



## ASIA FILE CORPORATION BHD

Registration No. 199401027510 (313192-P)  
(Incorporated in Malaysia)

### WHISTLEBLOWING POLICY

#### Overview

Asia File Corporation Bhd and its subsidiaries (“the Group”) are committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business and affairs. In order to achieve the standards set therein, the Group therefore encourages all its employees and stakeholders (shareholders, customers and suppliers) to disclose any improper conduct in accordance with the procedures as provided for under this Policy and to provide protection for employees and stakeholders who report such allegations in good faith.

The Group has established internal procedures for handling employee and stakeholder concerns, to assist in addressing any shortcomings within its processes, and to facilitate good governance practices. Therefore, employees and stakeholders are encouraged to raise their genuine concerns about possible misappropriation at the earliest opportunity via the specific reporting channels. Through this program, it can help the Group to monitor and keep track of such illegal, unethical or improper business conduct within the Group which otherwise may not be easily detected through normal process or transaction.

This Policy is not to invalidate the existing Grievance Procedure and/or the disciplinary action procedures, but to provide more avenues for employees and stakeholders to disclose improper conduct committed or about to be committed and take appropriate action to resolve them effectively.

#### Reporting Procedures

Employees or stakeholders can make a whistleblowing complaint if they are aware of any misconduct/wrongdoings, including but not limited to:-

- Fraud, bribery or corruption
- Abuse of power
- Conflict of interest
- Theft or embezzlement
- Misuse of Group’s assets or properties
- Criminal offence
- Acts or omission endangering individual’s health or safety
- Violation of laws and regulations
- Violation of Group’s policies

To ensure clear and effective disclosure of misconduct/wrongdoings, the report shall at least contain the following information:-

- (a) Types of misconduct/wrongdoings
- (b) Name of person/persons involved
- (c) Time, location and dates of misconduct/wrongdoings

- (d) How the misconduct/wrongdoings were perpetrated
- (e) Other witness to the misconduct/wrongdoings, if any
- (f) Documentation or evidence available, if any

The disclosure should be made the soonest possible upon such information or documents are available. Delaying the disclosure will make it harder for the Group to address and resolve the concerns.

Disclosure can be made to **ANY** of the following reporting channels, in the strictest confidence:-

- (a) Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the "Top Management".

- Dedicated Whistleblowing email address:  
[whistleblower@asia-file.com](mailto:whistleblower@asia-file.com)
- Mailing address:  
(Mark "**Strictly Confidential, to be opened by the addressee only**")  
Asia File Corporation Bhd  
Plot 16, Kawasan Perindustrian Bayan Lepas,  
Phase 4, MK 12, Bayan Lepas, 11900 Penang

Addressing to **ANY** of the following Designated Officers:

Officer 1

|              |   |                                                                            |
|--------------|---|----------------------------------------------------------------------------|
| Attention to | : | Executive Chairman                                                         |
| Name         | : | Dato' Lim Soon Huat                                                        |
| Email        | : | <a href="mailto:michaelshlim@asia-file.com">michaelshlim@asia-file.com</a> |
| Phone No     | : | +60 4 646 7216                                                             |

Officer 2

|              |   |                                                              |
|--------------|---|--------------------------------------------------------------|
| Attention to | : | Chief Financial Officer                                      |
| Name         | : | Ms Karen Lim Swee Kheng                                      |
| Email        | : | <a href="mailto:sklim@asia-file.com">sklim@asia-file.com</a> |
| Phone No     | : | +60 4 642 6601                                               |

- (b) In the case where reporting to management is a concern, then the report should be made to the "Chairman of Audit Committee".

|                 |   |                                                                |
|-----------------|---|----------------------------------------------------------------|
| Attention to    | : | Chairman of Audit Committee                                    |
| Name            | : | Ms Chua Hooi Luan                                              |
| Email           | : | <a href="mailto:hooiluan33@gmail.com">hooiluan33@gmail.com</a> |
| Mailing address | : | Same as above                                                  |

The whistleblower may be asked to provide further clarifications and information from time to time if an investigation is conducted.

All reports received from whistleblowers will be taken seriously and addressed promptly, discreetly, thoroughly and professionally. Discussions and documentation in relation to the reports will be kept in strict confidence to the extent appropriate.

The recipient of the report, with the assistance of the Internal Auditor, personnel from Human Resource Department, or other relevant departments within the Group will be responsible to investigate and resolve the issues highlighted in the report. The appointed investigating officer(s) shall be free in their discretion to engage outside auditors, other experts or external resources deemed necessary to assist in the investigation of the allegation or complaint. The whistleblower will be informed of the status of his/her complaints as far as reasonably practicable.

The findings of the investigation and recommended course of action will be reported to the Board together with preventive steps to address any shortcomings of the internal control.

**Protection to whistle blower**

This policy provides assurance that the whistleblower, if is an employee of the Company, shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:-

- a) Only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- b) The disclosure is not made with malicious intent or ill will;
- c) The disclosure is not frivolous or vexatious; and
- d) The report is not made for personal gain or agenda.

The Group views any harassment or retaliations in any form or manner against genuine whistleblower seriously and will treat such actions as gross misconduct which if proven may lead to dismissal. However, if allegations from whistleblower are proven to be malicious or not made in good faith, parties responsible may be subject to appropriate action, including legal action, where applicable.

This Policy was updated by the Board on 24 September 2025.