

Whistleblowing Policy

As part of the company's commitment to conducting its business activities ethically and professionally, IvyGreen Solutions has developed this policy to ensure accountability and to promote a culture within the Company which is consistent with the highest standards of integrity that the company values and expects from all employees.

The reporting mechanism is designed to:

- Enable confidential reporting of suspected or actual misconduct
- Ensure thorough investigation by the designated officer
- Provide protection from retaliation for individuals who report in good faith

Reporting Procedures

A. Who can report

Any of the following persons ("**Whistleblower**") can make a report to the Company of any suspected or actual wrongdoing:

- The Company's employees, including those on contract, temporary, short-term assignments, and secondment
- The Company's third-party service providers, contractors, vendors, and suppliers

B. Reportable misconduct

As soon as a whistleblower becomes aware and reasonably believes in good faith that improper conduct is being committed or has been committed, they are encouraged to report it through the proper channels as outlined in this policy.

Improper conduct or wrongdoing may include, but is not limited to: -

- i. Fraud
- ii. Bribery and corruption
- iii. Abuse of power or authority
- iv. Discrimination and harassment
- v. Violation of fair employment practices
- vi. Environmental violations
- vii. Financial misconduct (e.g., manipulation of financial reporting)
- viii. Conflicts of interest
- ix. Theft or embezzlement
- x. Misuse of company property, including data/information
- xi. Non-compliance with company procedures/code of conduct

If an employee is uncertain whether an act or omission qualifies as improper conduct under this policy, they are encouraged to seek guidance from their immediate supervisor or HR Department.



C. Where to report

All disclosures pursuant to this policy are to be made to:-

- i. Company director: keejin@ivygreensolutions.com
- ii. HR Department: vanessa.yap@ivygreensolutions.com

Whistleblowing reports can also be ESCALATED by any parties to the relevant regulators and law enforcement agencies, including:

Malaysian Anti-Corruption Commission

MACC Headquarters No. 2 Lebuhr Wawasan, Presint 7
62250 Putrajaya Malaysia
MACC hotline: 1-800-88-6000

All disclosure made pursuant to this policy should contain the following information:

- Details of the person(s) involved
- Details of the allegation
- Nature of the allegation
- Location and date / time the alleged misconduct took place
- Any supporting evidence (if available) and
- Other relevant information.

D. Protection and Confidentiality under this policy

Company permits whistleblowers to either disclose their identity or remain anonymous when reporting suspected or known misconduct. However, whistleblowers are encouraged to provide their personal details, as complete anonymity may, in certain cases, limit the effectiveness of the investigation due to insufficient information.

D-1 Confidentiality

The Company shall not disclose information about the whistleblower, their report, or any part of the investigation to third parties, except in the following circumstances

- To individuals authorized under this policy
- For the purpose of filing a report with enforcement agencies in accordance with the Whistleblower Protection Act 2010 ("WPA") or other relevant authorities
- If required by law
- On a strictly confidential basis to a qualified lawyer for the purpose of obtaining legal advice

D-2 Safeguarding the revealed identity of the whistleblower.

When a whistleblower chooses to disclose their identity, the Company is committed to taking all necessary measures to protect them from any reprisals, retaliation, or detrimental actions resulting from their disclosure. This includes protection against:

- Intimidation or harassment



- Any interference with lawful employment or livelihood, including discrimination, dismissal, demotion, suspension, disadvantage, termination, or any adverse treatment related to their employment, career, profession, trade, or business, as well as any disciplinary action

D-3 Revocation of protection

Company reserves the right to revoke protection and take appropriate disciplinary action, including termination of employment, against any employee if a whistleblowing report contains false or malicious allegations, such as when the whistleblower has participated in the improper conduct disclosed.

E. Investigation Process

E-1 The Designated Recipient, upon receiving the report, shall assess it as soon as reasonably practicable and take appropriate actions, which may include:

- i. Dismissing the report if deemed to be unfounded, frivolous, or vexatious
- ii. Referring the concerns, in whole or in part, for review under other internal procedures or the Company's existing disciplinary protocols as outlined in the Employee's Handbook, if applicable
- iii. Assigning an internal or external party to investigate the report
- iv. Temporarily suspending the alleged wrongdoer or any other implicated individual to facilitate the investigation or protect employees from potential threats or harm
- v. Seeking additional assistance, such as external auditors or legal counsel
- vi. Referring the matter to the police or any relevant enforcement authority

E-2 The Whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation, or any other process carried out pursuant to this policy.

E-3 The investigation shall be carried out with due regard to fair process. No adverse action will be taken against any party without first giving them opportunity to be heard.

E-4 The Whistleblower will be informed of the result of any investigation or action, or decision taken by the Company as soon as practicable.

F. Policy Review

This policy will be reviewed annually and may be amended at the discretion of the Company's Board of Directors, as necessary, to ensure its relevance and effectiveness in response to the Company's evolving business environment, administrative or operational needs, as well as changes in legislation.

This policy contributes to the following
Sustainable Development Goals

