NTPM HOLDINGS BERHAD
199601012313 (384662-U)
启顺控股有限公司

No. 886, Jalan Bandar Baru,
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NTPM HOLDINGS BERHAD is committed to establish and implement the following policy to the whole organization;

RETALIATION PREVENTION POLICY

1. PURPOSE

The purpose of this policy is to establish a workplace environment where employees can raise concerns, report misconduct, participate in investigations, and exercise their employment rights without fear of retaliation, intimidation, harassment, or unfair treatment.

The Company is committed to protecting employees who raise genuine and honest concerns and ensuring that all reports are handled fairly, objectively, impartially, and confidentially to the extent reasonably practicable.

The Company adopts a zero-tolerance approach towards retaliation, whether committed by its employees, management, supervisors, contractors, suppliers, customers, business partners, or other third parties.

2. SCOPE

This policy applies to all individuals working for or representing the Company, including:

- Permanent and contract employees.
- Probationary and temporary employees.
- Management and supervisory personnel.
- Interns and trainees.
- Directors and other relevant representatives, where applicable.

The policy also applies to retaliation carried out directly or indirectly by employees, supervisors, managers, or other persons acting on behalf of the Company.

This policy also extends, where applicable, to former employees, job applicants, and other individuals who have raised concerns or participated in investigations relating to the Company's business activities.

The policy further covers third parties who interact with or conduct business with the Company, including:

- Contractors and subcontractors.
- Suppliers and vendors.
- Customers and clients.
- Business partners and service providers.
- Consultants, agents, and other external representatives.

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The Company prohibits retaliation against employees by any third party arising from the employee's reporting of concerns, participation in investigations, or exercise of employment rights.

Employees, managers, supervisors, and other individuals acting on behalf of the Company are also prohibited from retaliating against any third party for raising genuine concerns or cooperating with investigations involving the Company.

The Company shall take reasonable and appropriate steps to address retaliatory conduct by third parties, subject to its contractual rights and applicable laws.

3. DEFINITION OF RETALIATION

Retaliation refers to any adverse action, threat, intimidation, harassment, victimisation, coercion, or unfair treatment against an individual because the individual has:

- Reported suspected misconduct, unethical behaviour, or policy violations.
- Raised concerns relating to workplace harassment, discrimination, or bullying.
- Reported suspected fraud, corruption, or other improper activities.
- Participated in an internal investigation or disciplinary inquiry as a witness.
- Provided information or evidence during an investigation.
- Exercised any rights protected under applicable employment laws.

Examples of retaliation include, but are not limited to:

- Unjustified dismissal or termination.
- Unfair demotion or reduction in salary or benefits.
- Unjustified negative performance evaluations.
- Unfair denial of promotion or career opportunities.
- Threats, intimidation, bullying, or harassment.
- Unreasonable changes to job responsibilities or working arrangements.
- Deliberate exclusion from work-related activities or information.
- Any other action intended to punish or disadvantage an individual for raising a genuine concern.

Retaliation may be committed by individuals within or outside the Company, including employees, management, contractors, suppliers, customers, business partners, or other third parties.

4. COMPANY'S NON-RETALIATION COMMITMENT

The Company strictly prohibits retaliation against any employee who raises a concern or participates in a protected activity in good faith.

No employee shall be subjected to adverse treatment for making a genuine complaint, reporting suspected misconduct, or cooperating with an investigation.
The Company shall ensure that:

1. All complaints are treated seriously and objectively.
2. Employees are encouraged to report concerns without fear of punishment.

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3. Confidentiality is maintained to the extent reasonably practicable.
4. Investigations are conducted fairly and without bias.
5. Appropriate corrective or disciplinary action is taken where retaliation is established.
6. Appropriate measures are taken to address retaliatory conduct by contractors, suppliers, customers, business partners, and other third parties.
7. Designated independent investigating authority or Board representative, where applicable

5. REPORTING PROCEDURE

Employees who believe they have experienced retaliation or witnessed retaliation against another individual should report the matter through any of the following channels:

- Immediate Supervisor or Department Head.
- Human Resources Department.
- Head of Human Resources.
- Senior Management.
- Whistleblowing reporting channel, where applicable.

Where the complaint involves the employee's immediate supervisor or HR representative, Head of Human Resources, or any member of senior management, the employee may report directly to a higher level of management, an independent investigating authority, designated Board representative, or the whistleblowing reporting channel.

Employees may also report retaliation committed by external parties, including contractors, suppliers, customers, business partners, or other third parties.

Where retaliation involves a third party, Human Resources shall coordinate with the relevant Department Head, Procurement Department, Customer Relations, or other appropriate department to assess the complaint and determine suitable protective and corrective measures.

Reports should include relevant details, such as the nature of the incident, date, persons involved, and any supporting evidence, where available.

External Reporting and Statutory Protection

Nothing in this policy shall restrict, prevent or discourage any employee from reporting suspected improper conduct, unlawful activities or other wrongdoing directly to the relevant external enforcement agencies or regulatory authorities, including the Malaysian Anti-Corruption Commission (MACC) and the Royal Malaysia Police (PDRM).

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Employees who make disclosures to the relevant enforcement agencies may be entitled to statutory protection under the Whistleblower Protection Act 2010 (Act 711), as amended, subject to the applicable requirements and conditions of the Act.

The Company shall not retaliate against, intimidate, threaten, discriminate against or subject any employee to adverse treatment solely because the employee has made a lawful disclosure to an external enforcement agency or exercised any rights protected under applicable laws.

The Company shall respect and uphold the rights of employees to seek assistance or protection from relevant authorities in accordance with applicable laws.

6. INVESTIGATION AND HANDLING OF COMPLAINTS

Upon receiving a retaliation complaint, Human Resources or the designated investigating party shall:

1. Acknowledge receipt of the complaint.
2. Conduct an initial assessment to determine the nature and seriousness of the allegations.
3. Take reasonable measures to prevent further retaliation while the investigation is ongoing.
4. Conduct an impartial investigation by interviewing relevant parties and reviewing available evidence.
5. Maintain appropriate confidentiality throughout the investigation.
6. Document investigation findings and recommendations.
7. Submit the findings to the appropriate management authority for review and decision.
8. Monitor the situation where necessary to identify any subsequent retaliatory conduct.

The Company shall endeavour to acknowledge complaints within five (5) working days upon receipt.

Under normal circumstances, the investigation shall be completed within thirty (30) working days from the date of commencement of the investigation. Where an extension is necessary due to the complexity of the case, the availability of relevant information or other reasonable circumstances, the Company shall document the reasons for the extension and notify the relevant parties of the delay and the expected timeframe for completion, where appropriate.

The Company shall endeavour to ensure that all investigations are completed within a reasonable timeframe, taking into consideration the complexity and seriousness of the allegations.

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Where an investigation cannot be completed within the expected timeframe, the relevant parties shall be informed of the delay and the revised expected completion timeframe, where appropriate.

Where the complaint involves HR personnel, senior management, or any individual with a potential conflict of interest, an independent investigator or other appropriate authority shall be appointed to ensure impartiality.

No individual shall be involved in receiving, investigating, reviewing or deciding on a retaliation complaint where that individual has an actual, potential or perceived conflict of interest.

Where retaliation involves an external party, the investigation may require coordination with the relevant internal department, contract owner, Procurement Department, or other appropriate authority.

Upon completion of the investigation, the complainant shall be informed that the matter has been concluded and whether appropriate action has been taken, subject to confidentiality requirements and applicable laws.

All investigations shall be conducted objectively, fairly, and without any actual or perceived conflict of interest.

7. PROTECTION OF EMPLOYEES

The Company shall take reasonable steps to protect employees who report concerns in good faith.

Such protection may include:

- Monitoring potential retaliatory conduct.
- Providing alternative reporting arrangements.
- Reviewing employment decisions that may appear retaliatory.
- Taking appropriate steps to prevent intimidation or harassment.
- Ensuring employees are not unfairly disadvantaged for participating in investigations.
- Providing alternative work arrangements or communication channels where necessary.

The protection under this policy applies even if the complaint is ultimately not substantiated, provided it was made honestly and in good faith.

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8. FALSE OR MALICIOUS REPORTING

The Company recognises that employees must be able to raise concerns without fear.

However, knowingly making false allegations, deliberately providing misleading information, or making complaints in bad faith with the intention of harming another individual may result in disciplinary action.

A complaint that cannot be substantiated does not, by itself, constitute a false or malicious complaint.

9. DISCIPLINARY ACTION

Any employee found to have engaged in retaliation may be subject to appropriate disciplinary action in accordance with the Company's established Major and Minor Misconduct classifications, internal procedures, and applicable employment laws.

Retaliation shall be treated as major misconduct depending on the nature, severity, circumstances, and impact of the conduct.

Depending on the seriousness of the misconduct, disciplinary action may include:

- Verbal or written warning.
- Final written warning.
- Suspension, where legally permissible.
- Demotion or other appropriate disciplinary measures, where legally permissible.
- Termination of employment, subject to due process and applicable law.

The Company shall determine the appropriate disciplinary action based on the seriousness of the misconduct and the findings of the investigation.

Managers and supervisors who knowingly permit, encourage, or participate in retaliatory conduct may also be subject to disciplinary action.
All disciplinary actions shall be administered fairly and consistently, taking into consideration the Company's established misconduct classifications and applicable legal requirements.

Where a contractor, supplier, customer, business partner, or other third party is found to have engaged in retaliatory conduct against an employee, the Company shall take appropriate steps to address the matter.

Depending on the nature and severity of the conduct, such action may include:

- Issuing a formal warning or notification to the relevant third party.
- Requiring the third party to cease the retaliatory behaviour and undertake corrective action.
- Reviewing relevant contractual arrangements.

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- Restricting access to Company premises or employees, where appropriate.
- Suspending business dealings, where contractually and legally permissible.
- Terminating the relevant business relationship, subject to contractual obligations and applicable laws.
- Escalating the matter to relevant authorities, where necessary.

The Company shall take reasonable steps to ensure that employees are not penalised or disadvantaged as a result of reporting or participating in investigations involving third parties.

10. CONFIDENTIALITY, ANONYMOUS REPOTING AND RECORD MANAGEMENT

All retaliation complaints and investigation records shall be handled confidentially and shared only with individuals who have a legitimate business or investigative need to know.

The Company shall take reasonable steps to protect the identity of complainants, witnesses and other individuals involved in an investigation, subject to legal requirements and the need to conduct a fair investigation.

Anonymous Reporting

The Company accepts anonymous reports relating to suspected retaliation, misconduct or violations of this policy.

Individuals may submit reports without disclosing their identity through the Company's designated whistleblowing reporting channel or other approved reporting mechanisms.

Anonymous reports shall be assessed objectively based on the information and supporting evidence provided. The Company may initiate an investigation where the information received is sufficiently credible, specific or indicates a potential violation of this policy.

Where a report is submitted anonymously, the Company shall make reasonable efforts to assess the allegations and investigate the matter to the extent practicable, even where the identity of the reporting individual cannot be established.

However, anonymous reporting may limit the Company's ability to obtain further clarification, verify certain information, provide updates or implement specific protective measures for the reporting individual.

The Company shall not reject or disregard an anonymous report solely because the identity of the reporting individual is unknown.

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Confidentiality and Information Disclosure

Information obtained during an investigation shall not be disclosed or used for purposes unrelated to the investigation, except where disclosure is required or permitted by applicable laws or necessary for legitimate business purposes.

Record Management

All complaint records, investigation findings and related documents shall be maintained securely in accordance with the Company's document retention requirements, applicable data protection obligations and relevant regulatory requirements.

Retaliation complaints and investigation records shall be retained for a minimum period of six (6) years from the date of case closure to facilitate the Company's response to potential legal proceedings, regulatory inquiries or other legitimate business requirements.

Upon expiration of the retention period, such records shall be securely destroyed or permanently deleted in accordance with the Company's record disposal procedures and applicable data protection laws, including the Personal Data Protection Act 2010 (Act 709), as amended, unless further retention is required or permitted by applicable laws or regulatory requirements.

11. RESPONSIBILITIES

Party	Responsibilities
Board of Directors / Designated Board Representative	Provide appropriate oversight and ensure independent handling of complaints involving senior management or other individuals in positions of authority, where applicable.
Senior Management	Demonstrate commitment to a workplace free from retaliation and ensure appropriate resources and support are provided for policy implementation.
Human Resources	Receive complaints, coordinate investigations, recommend appropriate action, maintain records and monitor compliance with this policy.
Department Heads	Promote a workplace free from retaliation, address concerns appropriately and report suspected violations.
Managers and Supervisors	Treat employees fairly, avoid retaliatory conduct and ensure that employees are not discouraged from raising genuine concerns.
Employees	Comply with this policy, refrain from retaliatory conduct and report suspected retaliation.
Relevant Internal Departments	Support investigations and take appropriate corrective measures relating to third-party retaliation within their respective areas of responsibility.

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12. POLICY VIOLATIONS

Any violation of this policy will be reviewed and addressed in accordance with the Company's internal procedures, applicable employment laws, and relevant regulatory requirements.

The Company reserves the right to take appropriate corrective action to prevent further retaliation and protect affected employees.

Any employee, manager, or supervisor who knowingly fails to comply with this policy, obstructs an investigation, interferes with the reporting process, or attempts to discourage employees from raising genuine concerns may be subject to appropriate corrective or disciplinary action.

Where a third party is involved in retaliatory conduct, the Company may take appropriate contractual, commercial, operational, or legal measures, depending on the nature and seriousness of the conduct.

The Company shall ensure that all actions taken under this policy are fair, reasonable, proportionate, and consistent with applicable laws and contractual obligations.

13. POLICY REVIEW

The Company shall review this policy at least once every two (2) years, to ensure its continued effectiveness and compliance with applicable laws and regulatory requirements.

Any amendments shall be subject to management approval.

Lee Chong Choon
Chief Executive Officer
Date: 05 November 2026