

WHISTLE-BLOWING POLICY

PHEIM ASSET MANAGEMENT SDN BHD (PAMSB)

Company No. 269564-A

and

PHEIM ISLAMIC ASSET MANAGEMENT SDN BHD (PIAMSB)

Company No: 1237521-H

and

PHEIM UNIT TRUSTS BERHAD (PUTB)

Company No. 545919-A

Kuala Lumpur

August 2025

Division/Department	Risk and Compliance Management
Policy Title	Whistle-blowing Policy

INTRODUCTION

PHEIM (PAMSB, PIAMSB and PUTB) recognizes that as a PHEIM customer or staff, you may, from time to time, witness practices that seem suspicious with regard to malpractice or wrongdoing, within your service area. PHEIM is committed to develop a culture with highest possible standards of openness, probity as a contribution towards enhancing the quality and ensuring high standards of governance and accountability for PHEIM.

PHEIM takes a serious stance against any unlawful conduct, financial malpractice, any potential dangers to customers, suppliers, members of the public, or the environment, or what may be considered wastage or other avoidable losses committed by its employees.

WHO CAN RAISE CONCERNS?

- I. Any employee of PHEIM: or
- II. Any (legal or natural) person providing services to, or having a business relationship with PHEIM (e.g. vendors/service providers/customers)

WHAT TYPE OF CONCERNS SHOULD YOU RAISE?

You should raise any serious and genuine concern(s) about malpractice or wrongdoing that may adversely impact PHEIM, including but not limited to:

- Breach of legal obligation(s) and statutory requirement(s);
- Improper or unauthorized use of public or other funds;
- Any unlawful activity(ies), whether criminal or a breach of the civil law;
- Possible fraud(s) and corruption(s);
- Financial irregularity(ies) or malpractice(s);
- Insider trading(s), inducement, bribery and dishonesty;
- Possible breaches of Health and Safety Regulation(s);
- Miscarriage of justice (e.g. harassment, discrimination, victimization or abuse of power);
- Disclosing confidential information in respect of PHEIM activities;
- Other improper or unethical conduct;
- A deliberate concealing of information about the above;
- Deliberate wastage, theft or abuse of PHEIM's provisions/utilities; or
- Deliberate damage of PHEIM's asset(s)/property(ies).

The above list is not intended to be comprehensive or exhaustive. However, it illustrates the kind of issues that PHEIM would consider as malpractice(s) or wrongdoing(s) and could be raised under the whistle-blowing policy.

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WHO SHOULD YOU RAISE YOUR CONCERNS WITH?

All concerns under these procedures shall be reported to Compliance or Board of Directors as the case may be.

The policy requires you to raise the concern(s) in writing and put your name to your allegation, using a **Lodgement Form** (Appendix I) for the purpose of reporting your concern(s) or allegation(s).

PHEIM shall at its discretion decide whether or not to pursue investigation on any anonymous allegation and such decision shall be final.

CONFIDENTIALITY

PHEIM will protect the confidentiality of all concerns raised in good faith by you. PHEIM will do its best to protect your identity by not disclosing your name so long as it does not hinder the investigation process. However, the source of information covering the issue raised may be revealed as part of the evidence for the investigation process.

PHEIM will treat all disclosures in a confidential and sensitive manner.

UNTRUE ALLEGATIONS

If you make the disclosure or an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you.

If, however, it becomes apparent from the investigation that you had made the allegation maliciously, frivolously or for personal gain, appropriate action can be taken against you according to the law.

AM I BEING PROTECTED IF I RAISED THE CONCERN?

You will be protected from possible reprisals or victimization, harassment, discrimination if you have made a disclosure in good faith.

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Appendix I**LODGEMENT OF CONCERNS WITH REGARD TO
MALPRACTICE/WRONGDOING**

To : Compliance/Director

From :

Department :

Contact No :

Email :

Section A: (To be completed by person reporting)

1) Describe the nature of your concern:

2) Reason(s) for your concern; including any background information.

3) Describe the place and time of the event had taken place.

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4) Name of staff involved in the malpractices or wrongdoings:-

i) _____ ii) _____

iii) _____ iv) _____

5) Names of witness(es) that may support your concern:

i) _____ ii) _____

6) Documentary evidence to substantiate your report/event (if any)

Signature of Person Reporting

Name:

Date: