WENTEL ENGINEERING HOLDINGS BERHAD

and its subsidiaries

[The “Group”]

POLICY TITLE
M016 **Whistleblowing Policy**

Revision No.	01
Effective Date	29 May 2026

Revision Change History

Rev. No.	Effective Date	Affected Page (s)	Changes Made	Prepared by
00	28/12/2023	All	New Release	Corporate Div.
01	29/05/2026	All	Revised whole policy	Corporate Div.

Reviewed By		**Approved By**	
Name	Yap Yew Wei	Name	Freddy Wong
Position	Group Financial Controller	Position	Executive Director
Date	29 May 2026	Date	29 May 2026

Contents

1. INTRODUCTION

Wentel Engineering Holdings Berhad ("WEHB" or "the Company") and its subsidiary(ies) ("the Group") are firmly committed to upholding the highest standards of integrity, transparency, and corporate governance in all aspects of our operations. This commitment is foundational to the long-term success and stakeholder trust.

In support of these principles, the Group has established this Whistleblowing Policy to provide a secure, confidential, and structured mechanism for employees, business partners, and members of the public to report any suspected misconduct or unethical behavior. This policy reflects the Group's dedication to fostering a responsible and accountable workplace, where concerns can be raised without fear of retaliation and with assurance of fair treatment.

2. OBJECTIVE

The intended objectives of this policy are to:

a. Promote a culture of openness, trust, and ethical conduct throughout the Group.

b. Provide clear and accessible channels for stakeholders to report genuine concerns regarding misconduct, violations of laws, or breaches of internal policies.

c. Safeguard whistleblowers by ensuring confidentiality and protection against retaliation when reports are made in good faith.

d. Enable timely detection and resolution of issues that may compromise the Group's integrity, reputation, or operational effectiveness.

3. SCOPE OF THE POLICY

This Policy applies to the entire Group, including all future subsidiaries which are acquired / incorporated by the Group as defined in the Companies Act 2016 of Malaysia.

It is intended for use by:

- Directors and employees at all levels;
- Shareholders;
- Third parties such as customers, suppliers, contractors, agents, consultants, outsources personnel, distributors, advisers, and government/public bodies

Concerns may include, but are not limited to:

a. Fraud or Dishonesty;
b. Breach of Policies, Procedures and applicable laws and regulations;
c. Bribery or Corruption or blackmail;
d. Abuse of Power or Authority;
e. Conflict of Interest;
f. Insider Trading;
g. Criminal breach of trust;
h. Sexual Harassment or other forms of harassment;
i. Criminal Offences;
j. Misuse or unauthorised disclosure of confidential information; and/or
k. Concealment of any, or a combination, of the above.

This Policy does not apply to grievances concerning employee's terms of employment or other aspects of concerns or complaints within the scope of the Staff/Employment Policy.

4. DEFINITIONS

"Confidential Information" shall include without limitation to the following:

a) information about the identity, occupation, residential address, work address, whereabouts of or any other personal information a Whistleblower and a person against whom a Whistleblower has made a disclosure of Improper Conduct;

b) information disclosed by a Whistleblower; and

c) information that, if disclosed, may cause detriment to any person.

"Detrimental Action" shall include without limitation to the following:

a) action causing injury, loss and/or damage, physically, emotionally or otherwise;

b) intimidation and/or harassment;

c) interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or the taking of disciplinary action; and

d) the threat to take any of the actions referred to above.

"Improper Conduct" means any conduct which if proved, constitutes a disciplinary offence or a criminal offence;

"**Malicious Reporting**" means an inaccurate or misleading report that is made recklessly, or knowingly or deliberately for the purpose of gaining undue advantage or causing harm to a person or entity;

"Whistleblower or Whistleblower(s)" means any person who makes a disclosure of improper conduct to the Company;

"Whistleblowing" is a way by which any one can report or disclose improper conduct, unethical or unlawful behaviour that has been done or is being done in the Company. Whistleblowing is a way to alert the Company that stakeholders are being wrongfully harmed or they are at the risk of harm.

5. WHISTLEBLOWING REQUIREMENTS

The reports should be submitted together with the following information:-

a. Details of the whistleblower (strongly encouraged, even though whistle blower may choose to remain anonymous);
b. Type of activity/conduct;
c. The reason for the concerns;
d. Details of suspected personnel involved;
e. Details of the incident (including date, time and location of incident); and
f. Any supporting/documentary of all factual evidence

The Improper Conduct Report Form is attached in **Appendix 1**.

A disclosure of Improper Conduct may still be made, subject to Section 6.2, although the person who makes the disclosure is not able to identify a particular person to which the disclosure relates.

When there is more than one disclosure made at a time, the disclosures may be prioritised according to the nature or gravity of the alleged Improper Conduct or reported risks and the magnitude of the repercussions.

6. ACTING IN GOOD FAITH

A fundamental requirement for protection under this Policy is that the Whistleblower(s) who is making the disclosure must be acting in Good Faith.

6.1 Definition and Expectation

- Good Faith Requirement: The Group expects all parties to have a reasonable belief that the information and any allegations contained within the disclosure are substantially true and not made for trivial reasons or personal gain. Good faith does not require the Whistleblower to have conclusive proof, but rather a genuine and honest suspicion based on available information.

- Motivation: The motivation for reporting must be to protect the Group's assets, reputation, or stakeholders, or to stop unlawful or unethical practices, and not for personal dispute resolution, financial reward, or malicious intent.

6.2 Handling of Anonymous Reports

- Policy on Anonymity: While the Group encourages Whistleblower(s) to identify themselves to facilitate effective communication and investigation, it acknowledges that concerns may be raised anonymously. Anonymous disclosures will not automatically be disregarded.

- Group's Right to Investigate: The Group reserves the right to investigate any anonymous disclosure if the allegations are sufficiently detailed, credible, and supported by circumstantial evidence, and relate to serious reportable misconduct that poses a significant risk to the organization or its stakeholders. However, the lack of identifying information may limit the scope and effectiveness of the investigation.

- Protection Limitations: Whistleblower(s) who choose to remain anonymous must recognize that, without their identity being known, the Group may be unable to provide the full protections outlined in this Policy, such as offering direct feedback or shielding them from potential retaliation.

6.3 Consequences of Malicious Reporting

- Retaliation Policy: Conversely, this Policy explicitly prohibits the making of reports that are knowingly false, malicious, frivolous, or vexatious.

- Appropriate Action: If an investigation concludes that the allegations were made maliciously, frivolously, or fraudulently (i.e., the Whistleblower(s) knew the information was untrue or distorted the facts for personal or other illicit purposes), the Whistleblower(s) will not be afforded protection under this Policy.

- Disciplinary Measures: Parties responsible for making malicious allegations may be subject to appropriate disciplinary action, up to and including termination of employment, and may further be subject to legal action by the Group or the subject of the false report, where applicable.

7. CONFIDENTIALITY

The Group is committed to protecting the confidentiality of the Whistleblower(s) to the extent possible and permitted by law.

- The identity of the Whistleblower(s) will be kept confidential unless the Whistleblower consents to its disclosure, disclosure is required by law, or disclosure is necessary for effective investigation (in which case the Whistleblower will be informed prior to disclosure).

- All information received will be handled sensitively and kept strictly confidential.

- The investigation will be conducted with discretion to protect the reputation of all involved parties.

8. PROTECTION

The Group is committed to creating a safe and supportive environment for Whistleblower(s) to report concerns without fear of retaliation. Protection under this policy is a fundamental assurance provided to individuals who act in good faith and in accordance with the procedures outlined herein.

This protection includes safeguards against:

- **Dismissal or Demotion:** The Whistleblower(s) shall not be terminated, suspended, downgraded, or denied promotion as a result of making a report.

- **Harassment or Intimidation:** The Whistleblower(s) shall not be subjected to verbal abuse, threats, bullying, or any form of psychological pressure intended to silence or punish them.

- **Any form of retaliation or adverse treatment:** This includes but is not limited to exclusion from work-related activities, denial of benefits, negative performance reviews, or any action that may affect the Whistleblower's employment, career, or professional standing.

The Group will investigate any alleged retaliation promptly. If retaliation is confirmed, the responsible party may face disciplinary action, up to and including termination or legal proceedings.

The protection against Detrimental Action is extended to any person related to or associated with the Whistleblower(s).

The identity and personal information of the Whistleblower(s) as well as the person implicated in the disclosure may be revealed to persons involved in investigations or any other required processes so far as is necessary to assist investigations and/or as required for a due inquiry process to be made. A Whistleblower may also be required to appear as a witness for the Company in the due inquiry process.

A Whistleblower is obliged to lodge a complaint to the Company of any Detrimental Action committed against the Whistleblower(s) or any person related to or associated with the Whistleblower, by any personnel of the Company. The Detrimental Action Complaint Form is attached in **Appendix 2**.

A Whistleblower or any person associated with him/her who fears or has suffered Detrimental Action may request to the Company in writing, for relocation of his/her place of employment. The Company shall, as far as is practicable, make arrangements for the relocation if there is a danger or likelihood of Detrimental Action and the only practical means of removing or substantially removing the danger of the effect of Detrimental Action is by way of relocation.

Protection remains valid regardless of the investigation outcome, provided the report was made sincerely and without malicious intent. However, protection may be revoked if the Whistleblower(s) is found to have acted in bad faith or participated in the misconduct.

9. REVOCATION OF POLICY

The protection stated above shall be revoked by the Group if:

i. The Whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
ii. The Whistleblower made his/her disclosure without good faith;
iii. The disclosure was frivolous or vexatious; or
iv. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the Whistleblower himself/herself.

10. ACTION

All complaints and disclosures received under this Policy shall be handled in accordance with the Whistleblowing Procedures set out in **Appendix 3**.

The Whistleblowing Committee (as defined in Clause 11 below) who receives a complaint shall ensure that the complaint is properly recorded, assessed, investigated, and resolved, as applicable.

Each report shall be reviewed to determine whether further investigation is required. Investigations shall be conducted promptly, with assistance from relevant internal or independent parties where necessary, in accordance with **Appendix 3**.

Upon completion of the investigation, the findings and recommended actions shall be referred to the Audit and Risk Management Committee (“ARMC”) or the Board for decision, as appropriate. Any decision taken shall be implemented without undue delay, and preventive measures may be introduced where necessary.

The ARMC shall subsequently update the Board of Directors on the status and outcome of the matter.

11. THE WHISTLEBLOWING COMMITTEE

The Whistleblowing Committee (the "Committee") oversees the administration and effectiveness of this Policy.

11.1 Composition and Authority

a. Appointment: The Committee is appointed by the Board of Directors.

b. Membership: The Committee comprises the Chief Executive Officer (CEO), Executive Director (ED), Group Financial Controller, and Manager of Human Resources and Administration.

c. Oversight: The Committee is accountable to the Audit and Risk Management Committee (ARMC).

d. Powers: The Committee is empowered to initiate, direct, oversee, and resource investigations, and to recommend corrective action.

11.2 Operational Procedures

a. Chairperson & Quorum: Members shall appoint a Chairperson. A quorum for transacting business is set at two (2) members.

b. Written Resolutions: The Committee may approve and recommend matters via a Written Report (Circular Resolution), signed by a majority of members, in lieu of a formal meeting.

c. Attendance: Other officers (e.g., Legal Counsel) may be invited to attend meetings where their expertise is necessary, but they shall have no voting rights.

11.3 Handling Conflict of Interest

a. **Conflicted Members:** Any member of the Committee who is the subject of a disclosure, or who has a conflict of interest, must immediately recuse themselves from all discussions and decisions related to that specific report.

b. **Report Against Committee Member:** If a disclosure is directed to the **ARMC Chairperson** against a Committee member: The ARMC Chairperson assumes direct oversight. The ARMC Chairperson may utilise non-conflicted Committee members and/or engage independent external parties to facilitate a fair investigation.

11.4 Confidential Report Receipt

Any sealed physical envelope containing a confidential report must be opened by at least two (2) non-conflicted members of the Committee to ensure transparency in the initial handling of the Whistleblower's confidential report.

12. TIMELINE

This Policy is intended to ensure that all disclosures made by Whistleblower(s) are acknowledged, assessed, and investigated in a timely manner.

The process and indicative timelines for acknowledging the receipt of a whistleblowing report, conducting preliminary assessments, and providing follow-up communications are set out in **Appendix 4: Timeline for acknowledging the report and escalation protocols**.

Investigations arising from a disclosure shall be concluded as soon as practicable, and in any event shall not exceed sixty (60) days from the date the disclosure was made.

Notwithstanding the above, where an investigation cannot reasonably be completed within sixty (60) days, the ARMC Chairperson may approve an extension, provided that the total investigation period shall not exceed one hundred and twenty (120) days from the date the disclosure was made.

13. REVERTING TO COMPLAINANT

The Whistleblower(s) will be informed on the progress and status of the investigation, however the Group reserves the right not to inform the Whistleblower(s) of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owed to someone else.

14. WHISTLEBLOWING CHANNEL

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Any disclosure of Improper Conduct must be made to the relevant "*designated person*" through the communication channels as set out in the table below:

i. All Employees (excluding Senior Management)

- **Immediate superior; or the ARMC Chairman if reporting to Management is not appropriate.**

ii. Members of the Board of Directors, Senior Management, or Shareholders

- **Chairman of the Board**

iii. Third parties such as customers, suppliers, contractors, agents, consultants, outsources personnel, distributors, advisers, and government/public bodies.

- **Committee**

iv. Disclosure can be made to ANY of the following reporting channels, in a strictly confidential manner, with the 'Improper Conduct Report Form" via:

- By Mail - Sealed letter clearly marked ***"Strictly Confidential."*** and *addressed to:*

  Wentel Engineering Holdings Berhad
  No. 11, Jalan Gagah,
  Kawasan Perindustrian Larkin,
  80350 Johor Bahru, Johor,
  Attention: "***Designated Person***"

- By Email : whistleblowing@wenteleng.com

v. All reports will be handled with strict confidentiality, and whistleblowers will be protected from retaliation in accordance with applicable laws and company policy.

15. REVIEW OF THE POLICY

This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation, the Board's objectives, responsibilities and standards of corporate governance and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

16. REFERRAL TO ENFORCEMENT AGENCY

The Group may refer any disclosure of wrongdoing and findings of the investigations under this Policy to enforcement agency.

Notwithstanding all of the above, employees or members of the public may disclose wrongdoing directly to enforcement agency as provided by law.

17. BOARD APPROVAL

This Policy (Version No. 01) was reviewed and approved by the Board of Directors of the Company on 29 May 2026.

Appendix 1

FORM FOR REPORTING OF IMPROPER CONDUCT

CONFIDENTIAL

A.	**PERSONAL PARTICULARS OF WHISTLEBLOWER**						
1.	Name:						
2.	NRIC / Passport No.:						
3.	Correspondence Address:						
4.	Telephone No. (Home): (Office): (Mobile):						
5.	Email Address:						
6.	Designation / Occupation:						
7.	Preferred Method of Communication:		Mail		E-mail		Telephone/SMS

B.	**INFORMATION OF PERSON BEING REPORTED WHO WAS INVOLVED IN IMPROPER CONDUCT**
	Individual 1
1.	Name of person being reported:
	Designation / Position of the person reported:
	How do you know the person being reported?
	Individual 2
2.	Name of person being reported:
	Designation / Position of the person reported:
	How do you know the person being reported?
	Individual 3
3.	Name of person being reported:
	Designation / Position of the person reported:
	How do you know the person being reported?

Appendix 1

FORM FOR REPORTING OF IMPROPER CONDUCT

CONFIDENTIAL

C.	**DETAILS OF IMPROPER CONDUCT**				
	Date:				
	Time:				
	Place:				
	Details of Improper Conduct:. ** Please submit supporting documents if available.* ** Please attach additional sheets if necessary.*				
	Have you lodged a complaint on this matter to another person / department / authority before?	YES		NO	
		(Cross "X" where applicable)			
	If YES, please indicate the person/ department/ authority that the report was lodged: *(Cross "X" where applicable)*				
	(i) Police	☐	** Please attach a copy of the report made.*		
	(ii) Malaysian Anti-Corruption Commission	☐	** Please attach a copy of the report made.*		
	(iii) Securities Commission	☐	** Please attach a copy of the report made.*		
	(iv) Securities Commission	☐	** Please attach a copy of the report made.*		
	(v) Others	☐	*Name of organisation:* ________________________ ** Please attach a copy of the report made.*		
	Date report was made:				
	Status of report made:				

Appendix 1

FORM FOR REPORTING OF IMPROPER CONDUCT

CONFIDENTIAL

D.	**DECLARATION**
☐	I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.
☐	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.
Signature:	
Name:	
Date:	

For Office Use Only:
Record No.:
Officer receiving this report:
Date:

Appendix 2

COMPLAINT OF DETRIMENTAL ACTION FORM

CONFIDENTIAL

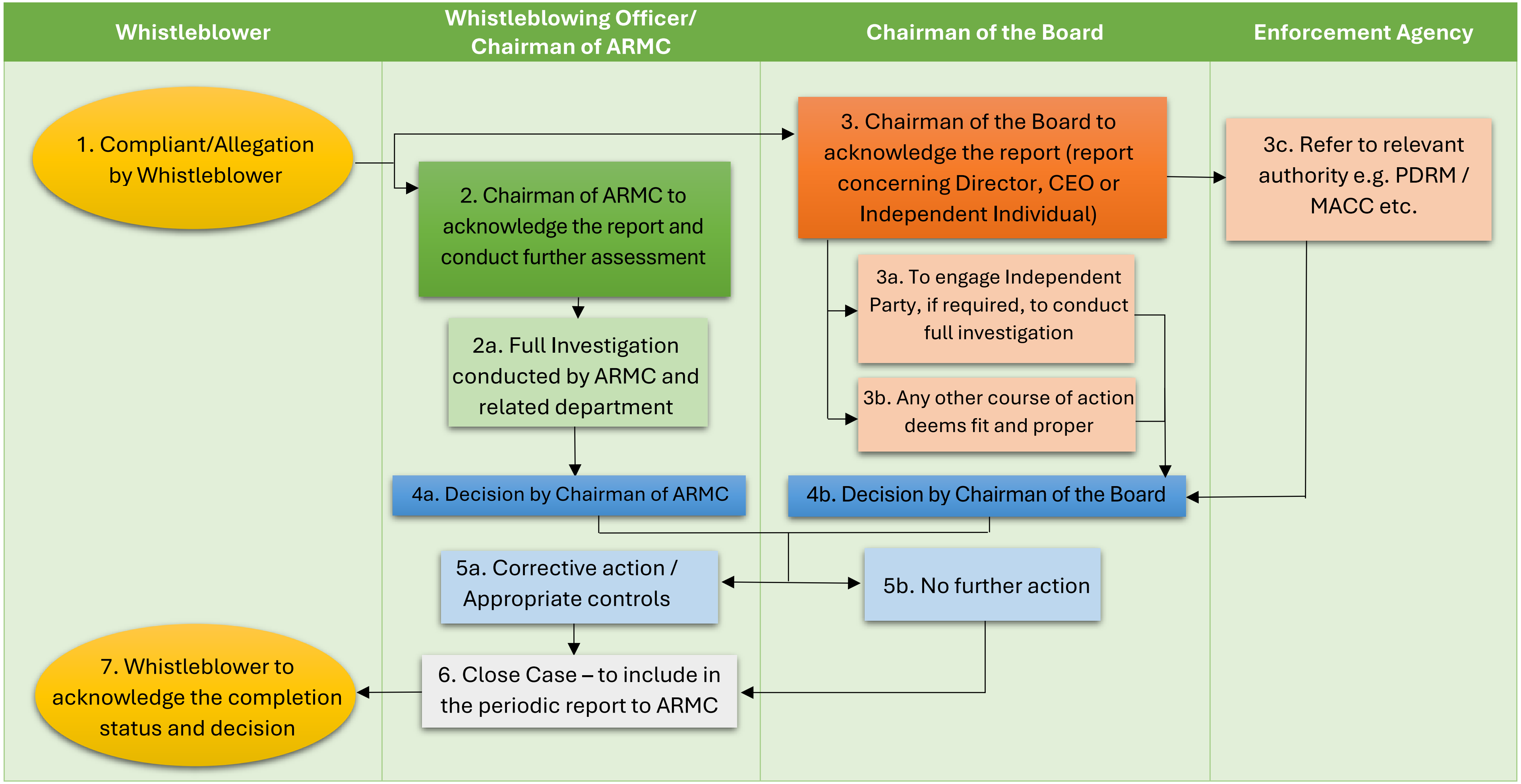
REFERENCE NO.:

1.	Name:				
2.	NRIC / Passport No.:				
3.	Correspondence Address:				
4.	Tel No.:	(H)		(O)	
		(H/P)			
5.	Designation / Occupation:				
6.	Preferred method of communication: ☐ Mail ☐ Email ☐ Telephone/SMS				
7.	Information and particulars of Detrimental Action:				
	(i) Name(s) of Person(s) committing the Detrimental Action:				
	(ii) Detrimental Action complained of: **Please submit supporting documents if available. *Please attach additional sheets if necessary.*				
	DECLARATION				
☐	I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.				
☐	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.				
Signature:					
Name:					
Date:					

For Office Use Only:
Record No.:
Officer receiving this report:
Date:

WHISTLEBLOWING PROCEDURES APPENDIX 3

Whistleblowing Process Flow and Procedures



WHISTLEBLOWING PROCEDURES (CONT'D) **APPENDIX 3**

No	Stage	Description	Role / Task	Remark
1	Compliant / Allegation by whistleblower (internal / external)	Sources of the report can be from employee and public by mail or email.	Chairman of the Board / Chairman of ARMC to determine whether it is reportable, non-reportable to MACC / other authorities.	
2	Chairman of ARMC to acknowledge the report and initiate the further assessment with relevant department.	No further assessment required if the whistleblower does not provide contact details, only to put the compliant in writing AND the compliant/report has no basis.	i. To register the report. ii. To get the detail of whistleblower such as name, email address and contact number. iii. To acknowledge the report in writing within 2 days. iv. To conduct fact finding of the case.	Criteria of **No Basis**: 1.There are no details and contact of whistleblower (name & contact no). 2. The Subject matter is not relevant or not related to Bursa. The subject matter is unfounded and considered as fictitious, frivolous, and vexatious.
2a	Investigation team to analyze and conduct preliminary assessment whether to proceed or close the case.	Assessment to be conducted based on the information and evidence that is available and obtained at this juncture to determine whether there is a cause of action to be taken.	To decide whether to proceed or not to proceed based on the assessment. Procedures: i. Interview the whistleblower. ii. To get the detail of the whistleblower such as name, email address and contact number. iii. Interview the alleged staff. iv. To record in writing / audio / video with consent obtained.	1. Seek for independent legal advice from *corporate legal* or external lawyer if required. 2. To KIV the case of insufficient evidence to proceed. 3. To close the case if the evidence is

No	Stage	Description	Role / Task	Remark
			Investigation team to prepare a report/memo to ARMC on the finding of the preliminary assessment and propose next course of action.	unavailable or insufficient. 4. To advise HR if suspension of suspected employee is necessary.
3	Chairman of the Board may request *Corporate Team/IA* to log and acknowledge the report within 2 days. (In case of the whistleblowing about wrongdoing of Board of Directors, CEO or Independent Individual)	*Corporate Team/IA* to conduct preliminary assessment and administrative process of the compliant discreetly with high integrity. Chairman of the Board to decide the next course of action. No further assessment required if the whistleblower does not provide contact details, only to put the compliant in writing AND the compliant/report has no basis (refer to 2a-remark).	i. To register the report. ii. To get the detail of whistleblower such as name, email address and contact number. iii. To acknowledge the report in writing within 2 days. iv. To conduct fact finding of the case. *Corporate Team/IA* may seek independent Legal Advice from relevant stakeholders, if required by the Chairman. *Corporate Team/IA* to provide preliminary assessment and report to ARMC, if required.	
3a	To engage Independent Party, if required, to conduct full investigation.	To engage independent party once there is a sufficient believe that the cause of action has been established, full investigation to be conducted to determine, fully and credibly, what happened with respect to a particular incident – whether suspected conduct did or did not take place; what the	Mandate to be given upfront by ARMC where the investigator shall have access to the other relevant witnesses and their documentations.	

No	Stage	Description	Role / Task	Remark
		circumstances were; who was involved; whether a violation of law or policy occurred. Chairman of the Board may direct *Corporate Team/IA* / Independent Party to conduct investigation and fact finding.		
3b	Any other course of action deems fit and proper.	Chairman of the Board may use its power and discretion to proceed the next course of action on cases to case basis depending on the facts and circumstances of the case.	Corporate Team/IA to take note and record the decision.	
3c	Refer to relevant authority e.g. PDRM / MACC etc.	In the event there is a believe that the case involves corruption, fraud, abuse of power and / or criminal, the case must be reported to the relevant authority.	All report to MACC must uses the format provided by MACC via the most convenient and suitable channel provided. Corporate Team/IA must be present together with the whistleblower when lodging the report to get the protection under Whistleblower Act.	
4a	Decision by Chairman of ARMC	Chairman of ARMC may give other directives or action to resolve the matter internally. Chairman of ARMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	To record the decision and inform the relevant parties accordingly.	
4b	Decision by Chairman of the Board	Chairman of the Board may give other directives to resolve the matter	To record the decision and inform the relevant parties accordingly.	

No	Stage	Description	Role / Task	Remark
		internally. Chairman of the Board may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.		
5a	Corrective Action / Appropriate Controls	Chairman of the Board may decide on the action to be taken against the Director, CEO or Independent Individual.	To record the decision and inform the relevant parties accordingly.	
		Chairman of ARMC may decide on the action to be taken against the staff based on the CAM and Group Disciplinary Policy.		
5b	No Further Action	Chairman of the Board / Chairman of ARMC may decide No Further Action if there is no basis to proceed further. Chairman of the Board / Chairman of ARMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	To record the decision and inform the relevant parties accordingly.	
6	Close Case	The case has been resolved, decided or disposed accordingly.	To specify the basis and to include in the periodic report to ARMC.	
7	Whistleblower acknowledges the completion status and decision	Upon completion of the case, whistleblower will be informed on the outcome accordingly. The acknowledgement must be in writing either via email or letter.	The decision must be informed in writing and *Corporate Team/IA* must keep the acknowledgement for record purpose.	

APPENDIX 4

TIMELINE FOR ACKNOWLEDGING THE REPORT & ESCALATION PROTOCOLS

Timeline for acknowledging the receipt of a whistleblowing report:

Stage	Action	Responsible Party	Timeframe	Notes
1	Report Received	Whistleblowing Channel	Immediate	Immediate logging of the report to prevent delays and ensure traceability.
2	Initial Acknowledgement	Whistleblowing Officer	1 business day	Confirms receipt, assigns a case reference, and assures confidentiality and non-retaliation.
3	Formal Acknowledgement	Whistleblowing Officer + Committee	5 business days	Provides whistleblower with next steps, investigation process, and expected timelines.
4	Preliminary Assessment Update	Whistleblowing Committee	14 business days	Communicates whether the report is accepted for investigation or requires additional details.
5	Follow-Up Communication	Whistleblowing Committee + ARMC Chairperson	21 business days	Ensures Board-level oversight for high-risk cases or those involving senior management.

Escalation Contacts Summary (Bottom-up Governance)

Escalation Level	Contact Role	Time Trigger
Level 1	Chairman of ARMC	No acknowledgement within 7 days; and No investigation initiated within 14 days
Level 2	Chairman of the Board	No progress or update within 30 days
Level 3	External Authority (Enforcement Agency)	Systemic failure or unresolved after escalation