SPRITZER BHD

Registration No. 199301010611 (265348-V)
(Incorporated in Malaysia)

RISK MANAGEMENT POLICY

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1. Risk Management Vision

Our goal is to develop organisation-wide capabilities in risk management, ensuring a consistent, efficient, and effective approach to identifying, assessing, and mitigating risks to achieve corporate goals. We view risk management as an integral part of creating and safeguarding stakeholder value and a fundamental component of our corporate governance framework.

2. Scope

This policy applies to all employees, board members, and stakeholders involved in risk management activities of Spritzer Bhd and all subsidiaries ("Spritzer" or "the Group"). It covers all types of risks, including but not limited to operational, financial, strategic, compliance, cybersecurity, and ESG (environmental, social, govedrnance), including climate risks.

3. Risk Management Policy

3.1 Overall Policy

To achieve our corporate objectives, including fulfilling shareholder expectations, we acknowledge that pursuing growth and opportunities involves risk. Our policy is to employ a comprehensive risk management framework, integrating risk considerations into decision-making at all levels. This framework reflects our commitment to continuous risk assessment and agile responses to new challenges.

We recognise that effective risk management supports sustainable performance, enhances resilience, and is crucial to protecting our reputation.

This Policy shall be read in conjunction with the Group's Risk Management Framework, which sets out the supporting structure, processes, and tools for implementation.

3.2 Strategic and Planning Elements

Our core mission is to generate sustained, satisfactory performance through strategic business activities. The strategic planning process plays a critical role in risk identification and mitigation. This process, conducted annually across all business units, involves documenting and analysing risks and associated management strategies, which are then communicated to the Board.

Key Updates:

- **Dynamic Planning**: The strategic planning process is continuously informed by emerging risks and incorporates the latest insights into market and regulatory changes.
- **Integration with ESG Principles**: We align risk strategies with our Environmental, Social, and Governance ("ESG") principles, ensuring responsible and ethical operations across all areas.

3.3 Governance and Accountability

3.3.1 Board of Directors

Spritzer Bhd Board of Directors ("Board") oversees the risk management framework, including the consideration of this policy and the review of key risks on a continuous basis. The Board ensures that strategic objectives and risk management align with the overall corporate vision and stakeholder expectations.

3.3.2 Audit Committee

The Audit Committee ("AC") is responsible for reviewing the effectiveness of the Group's approach to risk management and advising the Board on necessary adjustments. The AC evaluates areas like cybersecurity, regulatory compliance, ESG practices, and financial risk.

3.3.3 Executive Committee

The Executive Committee ("EXCO") is responsible for implementing this policy, developing a risk profile, and ensuring that appropriate systems and procedures are in place. EXCO works with Risk Management Committees ("RMCs") to:

- Monitor performance against financial, operational, and ESG goals.
- Oversee implementation of cybersecurity protocols, including policies that ensure compliance with data privacy laws and prevention of data breaches.
- Identify and respond to changes in the economic, business, and regulatory environment.
- Monitor compliance with laws and regulations.

3.3.4 Group Risk Officer

The Group Risk Officer ("GRO") is responsible for leading the development of the risk management framework and internal controls, focusing on identifying, assessing, and managing risks across business units. The GRO works with the EXCO/RMC to maintain a cohesive approach to risk management.

3.3.5 Risk Management Committee

RMCs are set up within each subsidiary and consist of departmental heads and other senior executives of the respective subsidiaries. RMCs are responsible for identifying, assessing, and managing risks across the business units. RMCs collect, compile and report risks to GRO and EXCO to maintain a cohesive approach to risk management. Each RMC operates in accordance with a formal Terms of Reference ("TOR") that outlines its roles, responsibilities, and reporting structure. RMCs support the EXCO in implementing the risk management framework at the subsidiary level and promote awareness of risk policies among employees.

RMCs are also responsible for implementing the risk management framework and ensuring it aligns with business objectives, as well as promoting awareness and adherence to risk policies among employees.

3.3.6 Internal Audit

The Group engages independent internal auditors from external party to carry out the internal audit functions. The Internal Auditors ("IA") review compliance with internal controls, risk management practices, and this policy. The IA ensure that control processes are relevant, updated, and adhered to across the Group.

3.3.7 Company Secretaries

The Company Secretaries monitor legislative obligations across the organisation, ensuring prompt and effective compliance. They coordinate with various teams to address compliance concerns and oversee the development of Director training programs.

3.4 Risk Process Elements

The Group's risk management process is outlined in the Risk Management Framework, which provides the detailed steps and guidance for implementation.

3.5 Business Continuity Planning ("BCP")

Spritzer acknowledges the importance of Business Continuity Planning in managing operational disruptions. While a formal BCP framework is under development, departments are encouraged to identify critical functions and outline basic recovery steps. The Group is committed to gradually strengthening its continuity planning efforts.

3.6 Management of the Risk Management Framework

The Audit Committee evaluates the risk management framework annually, incorporating inputs from management, Internal Audit, and external experts as required. This review assesses:

- Accuracy of forecasting and adequacy of contingency plans.
- Efficiency in identifying and managing key risks.
- Emerging risks and unexpected incidents that impact the business.

Outcomes and recommendations are presented to the Board for review and approval.

3.7 Risk Culture and Employee Involvement

We believe that effective risk management is rooted in a culture that encourages all employees to participate. We promote an open environment where employees feel empowered to report risks, share concerns, and suggest improvements.

3.7.1 Whistleblowing

The Group has established a formal Whistleblowing Policy, available on its official website, to enable employees and stakeholders to confidentially report concerns about misconduct, policy breaches, or risk-related issues. Reports are independently investigated, and appropriate actions are taken in accordance with the policy.

3.7.2 Training Programs

The Group is committed to ensuring that employees are equipped with the knowledge and awareness necessary to manage risks effectively. Internal and external training programs shall be provided at least annually, covering key areas such as cybersecurity, data privacy, anti-corruption and bribery, ESG issues, and regulatory compliance.
Training content shall be tailored to the functional roles and risk exposure levels of different employee groups. Each business unit is responsible for identifying specific training needs, while the Human Resources Department, in collaboration with the Group Risk Officer, shall coordinate and ensure proper planning, delivery, and documentation of all risk-related training across the Group.

3.8 Policy Review and Continuous Improvement

This policy and its strategies will be reviewed annually by the Board to ensure ongoing relevance and alignment with corporate objectives. The policy will be updated to reflect significant industry, regulatory, or company changes and to incorporate lessons learned from previous risk events.

3.9 Communication

The Group promotes stakeholder engagement and transparency by ensuring timely communication of material risks, maintaining open channels for feedback and providing regular disclosures through reports and public platforms to build trust and support informed decision-making.
Spritzer upholds a strong commitment to risk management as an integral part of its corporate strategy. By fostering a proactive risk management culture, the Group enhances resilience, protects stakeholders, and ensures sustainable growth in an evolving business environment

This revised Risk Management Policy had been approved by the Board on 28 November 2025.