



MENANG CORPORATION (M) BERHAD

Registration No.: 196401000240 (5383-K)

WHISTLEBLOWING POLICY & PROCEDURES

1) POLICY STATEMENT

MENANG CORPORATION (M) BERHAD (the “Company”) and its subsidiaries (the “Group”) are committed to the highest standard of integrity and accountability in the conduct of its business and operations in the most ethical, responsible and transparent manner.

2) OBJECTIVES

The Company would like to provide an opportunity and proper channel for employees and other stakeholders to raise genuine concerns in relation to breach of a legal obligation, improper conduct or dangers to health and safety at the earliest opportunity without fear of being subject to discriminatory treatment. This avenue is for legitimate concerns to be objectively investigated and addressed within the Company prior to seeking resolution outside the Company.

This Policy is to reinforce the Group’s commitment to its policies, value, attitude and development of a culture of openness, accountability and integrity within the Group.

3) SCOPE

The Policy applies to the Company and the Group, all employees (whether permanent, contract, part-time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, external agencies or any parties with a business relationship with the Company.

Stakeholders are encouraged to report genuine concerns of improper conduct, breach in a legal obligation, dangers to health and safety and the concealment of any of these in the workplace.

4) IMPROPER CONDUCT

The following are types of concerns that shall constitute “Improper Conduct” under this Policy and should be reported:

- Criminal offences, unlawful acts, fraud, bribery, blackmail and/or corruption;
- Conduct or activity which breaches any law or regulatory obligation;
- Breach of the Company’s policies, practices, procedures or other rules of conduct including misuse of Company’s funds or assets
- Improprieties in matters of financial reporting;
- An act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- Disclosure of Company’s information without proper authorization;

- Abuse of power by an officer of the Company
- Commission of acts which intimidate, harass and/or victimize any member of the Board of Directors, Management or employee of the Company;
- Concealment of any of the above

NOTE: The above list is not exhaustive and includes any act or omission, which if proven, will constitute a criminal offence under relevant legislations.

5) CHANNELS OF COMMUNICATION

- Disclosure of information should initially and promptly be made by the Whistleblower to one or more of the Whistleblowing Committee Members, namely:
 - Y.A.M. Raja Shahrudin Rashid (*Group Executive Chairman*)
 - Mr. Chiam Tau Meng (*Senior Independent Non-Executive Director*)
 - Mr. Leou Thiam Lai (*Independent Non-Executive Director*)
- Reports under this Policy may be made through e-mail (wbcreport@menangcorporation.com) or by mail (using the 'Whistleblower Report' attached per *Appendix 1*) addressed to the Whistleblowing Committee or to ANY of the above persons at the following:

Mailing Address: **MENANG CORPORATION (M) BERHAD**
 #Box 2, 142-A Jalan Ampang,
 8th Storey, South Block, Wisma Golden Eagle Realty,
 50450 Kuala Lumpur.

- An anonymous disclosure will not be entertained. However, the Company has discretion to investigate such disclosures.

6) REQUIRED EVIDENCE

- The Whistleblower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved, when it occurred and who was affected.
- The Whistleblower must have first-hand knowledge or information of the facts, that is, information obtained from third party or "hearsay" will not be entertained. All reports should be made in good faith, any of the following should not be reported:
 - False or malicious allegations;
 - Defamatory allegations;
 - Concerns without any basis or with insufficient evidence.
- However, the Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.

7) CONFIDENTIALITY & PROTECTION

- A Whistleblower must identify himself / herself when submitting a report/disclosure. Upon making the disclosure in good faith:

- The Whistleblower will be protected from any reprisal within the Company or its subsidiaries as a direct consequence of the disclosure. This would include disciplinary measures, demotion, suspension or termination of employment or services;
 - Individuals who have reported a wrongdoing or who have facilitated with the investigations will be protected from any form of retaliation including harassment and victimization;
 - Identity shall be protected and remain confidential unless otherwise required by the law or for purposes of any proceedings by or against the Company
 - The identity and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in the investigations or any other process.
- b) Protection under 7(a) above will be accorded by the Company only when the Whistleblower satisfies all the following conditions:
- The disclosure is done in good faith;
 - The Whistleblower is aware that the information and any allegations disclosed are true;
 - The disclosure made is not for personal gain or interest.
- c) The Whistleblower will be protected under the Whistleblower Protection Act 2010 (“the Act”) if he / she makes a disclosure in good faith to an enforcement agency per the Act. If a Whistleblower reasonably believes that he / she is being subjected to reprisal, including harassment and victimization as a consequence of Whistleblowing, he / she may consult or report to the enforcement agency.
- d) The Company views making allegations which prove to be malicious, malafide or knowingly false shall be considered as a serious misconduct and shall warrant appropriate disciplinary action by the Company.
- e) The Company reserves the right to re-route all concerns / complaints submitted which are not related to the above-mentioned concerns (e.g. employee and industrial relations related issues or human resources related issue) to the respective channel within the Company for further action.

8) PROCEDURES

- a) All reports / disclosures should be addressed to the Whistleblowing Committee (“WBC”) for further action.
- b) The WBC will acknowledge receipt within seven (7) calendar days and a ‘Whistleblowing Committee Report Form’ (per *Appendix 2*) will be filled.
- c) The WBC shall comprise of the following members of the Board of Directors:
- Senior Independent Non-Executive Director
 - Independent Non-Executive Director
- d) If any of the Committee Members is suspected of being involved in the improper conduct, he / she will automatically abstain from attending the meeting.
- e) The WBC shall have the authority to:
- Determine the legitimacy of the disclosure;
 - Direct further action (which may include suspension of the suspected individual until the outcome of the investigations); and
 - Determine who should conduct the investigation, that is, engage external expertise or from Management
- f) The assigned investigator tasked to investigate must take all reasonable steps to ensure the investigations regarding the disclosure are fair and unbiased and will keep detailed records of all

evidence gathered, interviews conducted and all records received which affect the outcome of the investigation.

- g) Upon the conclusion of the investigation, the assigned investigator will present the findings of the investigation to the Whistleblowing Committee who will then determine the next step of action.
- h) The Whistleblower, the Board of Directors and if necessary, External Authorities will be notified of the outcome of the investigation accordingly.

9) ROLES AND RESPONSIBILITIES

- a) Whistleblowers must act in good faith and not make false accusations when reporting.
- b) Suspects must cooperate during investigations (Whistleblower Protect Act 2010 shall apply and identity shall remain confidential).
- c) Whistleblowing Committee Members (“WBCM”)
 - Investigate the raised concerns promptly;
 - Maintain confidentiality;
 - Remain independent and non-bias.
- d) Investigation Participants
 - Fully cooperate in the investigation;
 - Be honest and open;
 - Maintain confidentiality and refrain from disclosing the matters;
 - Remain independent and non-bias.

10) REVIEW OF THIS POLICY

The Board of Directors reserves the right to amend this Policy at any time without notice. Any amendments shall only be enforced once it has been made known to the employees in writing or electronically.

THE BOARD OF DIRECTORS OF MENANG CORPORATION (M) BERHAD APPROVED THIS POLICY ON 24 FEBRUARY 2020.

WHISTLEBLOWING REPORTING PROCEDURE FLOWCHART

Raise the concern to any WBCM using one of the channels of communication

WBC will acknowledge receipt within seven (7) calendar days

Concerns will be meticulously evaluated to ascertain whether a full investigation is appropriate

Findings of the investigation will be submitted to WBC for instruction on next step of action

Concerns raised through this Procedure will be registered and tracked

Whistleblower will be notified of the outcome of the investigation

External authorities might be notified of the outcome of the investigation, i.e. SPRM, Police, etc.

On periodical basis, the Board of Directors will be informed of all whistleblowing concerns raised

Abbreviations:

WBC - Whistleblowing Committee

WBCM - Whistleblowing Committee Member

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WHISTLEBLOWER REPORT

INSTRUCTIONS: Please provide the following details for any suspected Misconduct and submit directly to the Whistleblowing Committee (WBC).

Please note that you may be called upon to assist in the investigation, if required.

<u>WHISTLEBLOWER'S INFORMATION</u>			
Name:			
Designation:			
Company & Department (where applicable):			
Contact No.:		Email Address:	
<u>SUSPECT'S INFORMATION</u>			
Name:			
Designation:			
Company & Department:			
Contact No.:		Email Address:	
<u>WITNESS(ES) INFORMATION (if any)</u>			
Name (1):			
Designation:			
Company & Department:			
Contact No.:		Email Address:	
Name (2):			
Designation:			
Company & Department:			
Contact No.:		Email Address:	

COMPLAINT:

Briefly describe the Misconduct and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.

1) What was the Misconduct that had occurred?

2) Who (Suspect) had committed the Misconduct?

3) When did it happen and when did you notice it?

4) Where did it happen?

5) Is there any evidence that you could provide?

6) Are there any other parties involved other than the suspect stated above?

7) Do you have any other details or information that would assist us in the investigation?

8) Any other comments?

Signature:

Date:

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WHISTLEBLOWING COMMITTEE REPORT FORM*- For Whistleblowing Committee Use ONLY -*

Complaint Reference No. :	Date Received:
Received By:	Acknowledgement Sent On:
Investigation Required (Yes/No)? (If no, please state the reason):	
Investigation To Be Done By:	
Investigation Results:	
Action Taken/Conclusion:	
Signed Off By:	Date: