

1. OBJECTIVE

The objective of the MBMR Group Whistleblowing Policy (“this Policy”) is to provide a set of guiding principles pertaining to whistleblowing.

As an extension to what is generally covered under the MBMR Group Policies, this Policy specifically, is aimed at providing an avenue for all employees and members of the public to disclose any improper conduct or criminal offence (“Improper Conduct”) in accordance with the procedures and/or processes issued as part of this Policy, or in addition to, and to provide protection for employees and members of the public who report such Improper Conduct.

2. SCOPE & APPLICABILITY

This Policy is designed to facilitate employees and members of the public to disclose, through internal channels, any Improper Conduct committed or about to be committed within the Group.

Improper Conduct includes the following:

- Any form of financial crime, including fraud;
- Bribery and corruption;
- Harassment, abuses and intimidation;
- Conflict of interest and/or potential abuse of power/position for personal gains;
- Disclosure of sensitive data or information to outsiders;
- Breach of legal obligations (including negligence, breach of contract or law)
- Regulatory breaches or non-compliance to regulatory requirements;
- Danger to health and safety or to the environment;
- Theft or embezzlement;
- Misuse or misappropriation of Company’s property and assets; and
- Non-compliance to the Group’s policies, procedures, processes, including any code of conduct.

The above list is not exhaustive and includes any acts or omissions, which if proven, will constitute an act of misconduct under the MBMR Code of Business Conduct & Ethics or a criminal offence under the relevant legislations in force. As such, this Policy is not to be read in isolation and reference, where necessary, is to be made to other documents that form the Policies.

3. DEFINITIONS & INTERPRETATIONS

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| “Document” or “Policy” | refers to this MBMR Whistleblowing Policy document; |
| “Improper Conduct” | refers to an improper conduct or criminal offence and shall include those items described in Section 2 above; |
| “MBMR” | refers to MBM Resources Berhad; |
| “MBMR Group” or “the Group” | refers collectively to MBMR and its Subsidiaries; |
| “MBMR Group RMC” | refers to the Group Risk Management and Compliance Department of the MBMR Group; |
| “Policies” | refers collectively to the MBMR Group Policies, to which this Policy is a part of or an extension thereto; |
| “Subsidiary/ies” | refers to a subsidiary or subsidiaries of MBMR, as may be applicable; |
| “Whistleblower” | refers to an employee or members of the public who discloses an Improper Conduct; |

4. PROTECTION TO WHISTLEBLOWER

A Whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable, unless disclosure is made with the prior consent of the Whistleblower (which should not be unreasonably withheld) and for the sole purpose of facilitating an investigation.

In addition, an employee who whistleblows internally and/or within the Group will also be protected against any adverse or detrimental actions or retaliation of any kind for disclosing any Improper Conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Any form of harassment, unfair treatment or retaliation against a genuine whistle blower, if proven, may lead to disciplinary action including dismissal. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts and the rules and procedures involved.

The protection to the Whistleblower may be revoked under the following circumstances, among others:

- the Whistleblower participated in the Improper Conduct;
- the Whistleblower wilfully discloses a false statement;
- the disclosure is made with malicious intent;
- the disclosure is made solely or substantially to avoid dismissal or other disciplinary action; or
- the disclosure is frivolous or vexatious.

5. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report an Improper Conduct is required to disclose his/her identity to ensure that a proper investigation can be carried out and that the Whistleblower is accorded the necessary protection. However, MBMR reserves the right to investigate into any anonymous disclosure.

6. PROCEDURE IN MAKING A DISCLOSURE

All disclosures are to be channelled in accordance with the Whistleblowing processes and procedures as follows:

Any whistleblowing complaints or reports can be channelled to whistleblowing@mbmr.com.my

OR

Whistleblowing complaints or reports may also be directed to the following reporting channels:

| Company | Alleged Improper Conduct Related to: | Reporting Channels | Contact Details |
|---------|--|---|--|
| MBMR | Employees | Group Chief Executive Officer (“CEO”) | CEO@mbmr.com.my |
| | CEO and Management Committee | Senior Independent Non-Executive Director | SID@mbmr.com.my |
| | Directors on the Board of MBMR other than the Senior Independent Non-Executive Director and Chairman | | |
| | Chairman of the Board of MBMR | | |
| | Senior Independent Non-Executive Director | Chairman of the Board of MBMR | chairman@mbmr.com.my |

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| Subsidiary | Employees including Head of Company | Group Chief Executive Officer (“CEO”) | CEO@mbmr.com.my |
| | Subsidiary’s Board of Directors other than Subsidiary’s Chairman of the Board | Subsidiary’s Chairman of the Board | - |
| | Subsidiary’s Chairman of the Board | MBMR’s Senior Independent Non-Executive Director | SID@mbmr.com.my |

7. DISQUALIFICATION

While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection may warrant disciplinary action. Protection accorded to Whistleblowers under this Document will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by a Whistleblower knowingly and/or in bad faith. Any investigation conducted that later reveals that the allegations of misconduct or criminal offence was made with a malicious intent will result in an appropriate action being taken against the Whistleblower.

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Last updated on 25th May 2023