

# **WHISTLEBLOWING POLICY**

**Version 2.2**

**Mesiniaga**

## TABLE OF CONTENTS

1. POLICY STATEMENT .....	1
2. OBJECTIVE OF THE POLICY .....	1
3. SCOPE OF REPORTING POLICY.....	1
4. CONTENT OF DISCLOSURE .....	1
5. ANONYMOUS WHISTLEBLOWER .....	2
6. ACTING IN GOOD FAITH .....	3
7. PROTECTION FROM RETALIATION & CONFIDENTIALITY .....	3
8. NOTIFICATION.....	3
9. WHISTLEBLOWING REPORTING CHANNELS .....	4
10. APPENDIX 1 – DEFINITIONS .....	5

## **WHISTLEBLOWING POLICY**

### **1. POLICY STATEMENT**

Mesiniaga Berhad's Whistleblowing Policy and Procedure ("**The Policy**") is to enable employees, who have knowledge or are aware of any improper conduct committed within Mesiniaga, to make disclosures appropriately. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

### **2. OBJECTIVE OF THE POLICY**

This Policy aims to provide an avenue for Mesiniaga's employees and members of the public to disclose any improper conduct that have been conducted or to be conducted by anyone appointed by Mesiniaga in accordance with the procedures as provided for under this Policy and to provide protection for Mesiniaga's employees and members of public who report such allegations.

### **3. SCOPE OF REPORTING POLICY**

This Policy provides a system that enables Mesiniaga's employees and members of the public acting in good faith to raise concerns and disclose actual and potential wrongdoings, misconducts and criminal offences ("**Wrongdoing**") in Mesiniaga. Such Wrongdoing includes and are NOT limited to the following:

- Corruption (bribery, fraud, conflict of interest);
- Abuse of power;
- Asset misappropriation (company assets, inventory, cash);
- Fraudulent statements (financial, non-financial);
- Breach of statutory regulations, acts and laws of Malaysia;
- Breach or non-compliance with Mesiniaga's Policies and Business Code of Conduct Guidelines; and
- Attempts to suppress or conceal any information relating to any to any of the above.

### **4. CONTENT OF DISCLOSURE**

In order for Mesiniaga to investigate the Wrongdoing reported, the Whistleblower is to provide the following particulars in report:

- Whistleblower's personal details (name, identification card number, email address, contact number);
- Details and description of the Wrongdoing, including its nature, the date, time and place of its occurrence as well as the identity of the alleged person(s) involved. A disclosure may be made even if the Whistleblower is not able to identify the person(s) involved;
- Particulars of witness (if any) to the Wrongdoing; and
- Available documentation or supporting evidence (if any).

The above details must be included when reporting via our Whistleblowing Reporting Channels. Additionally, the employee(s) of Mesiniaga can use the “Whistleblowing e- Form” which is available in the Employee E-handbook. The form should then be deposited into Mesiniaga’s HR Department enquiry box.

The Whistleblower may be asked to provide further clarification and information from time to time, during the course of investigation.

## **5. ANONYMOUS WHISTLEBLOWER**

Mesiniaga encourages whistleblowers to disclose their identities to provide the most effective investigation and support. Disclosures can be made anonymously, and we will investigate them. However, it's important to understand that anonymity may limit the scope of the investigation.

## **6. ACTING IN GOOD FAITH**

Mesiniaga expects all Whistleblowers to act in good faith and have reasonable grounds when reporting a Wrongdoing. If allegations are proven to be ill-intentioned, malicious and frivolous, employee(s) face disciplinary action in accordance with Mesiniaga’s Human Resource Disciplinary Policies, including termination of employment.

## **7. PROTECTION FROM RETALIATION & CONFIDENTIALITY**

Whistleblower Protection is provided under the **Whistleblowers Protection Act 2010 (Act 711)** stipulates that the identity of the Whistleblower will be protected and kept confidential. In addition, employee(s) who whistleblows internally will also be protected against any adverse and detrimental actions reasonably practicable provided that the disclosure is made in good faith. 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 Whistleblower protection is void in the event of:

- The Whistleblower participated in the Wrongdoing;
- The Whistleblower intentionally makes false statement;
- The disclosure was done in bad faith; and/or
- The disclosure is frivolous and vexatious.

## **8. NOTIFICATION**

Upon the completion of the whistleblowing process and procedures in accordance with Whistleblower Reporting Process as stipulated under **Appendix I** of this Policy, the Whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

## 9. WHISTLEBLOWING REPORTING CHANNELS

Whistleblowing Committee : [internalaudit@mesiniaga.com.my](mailto:internalaudit@mesiniaga.com.my)

**OR**

Audit Chairman : [audit.chairman@mesiniaga.com.my](mailto:audit.chairman@mesiniaga.com.my)

**OR**

Independent Board Member : [independentboardmember@mesiniaga.com.my](mailto:independentboardmember@mesiniaga.com.my)

Whistleblowing Hotline : +603-5635 5220 from Monday to Friday (9am to 5pm)

Correspondence : Mesiniaga Berhad,  
Menara Mesiniaga,  
11<sup>th</sup> Floor, No.1A, Jalan SS16/1  
47500 Subang Jaya, Selangor.

Attn : Whistleblowing Committee

Online Whistleblowing e-Form : *Applicable for employees only and available in the Employee e-Handbook*

APPENDIX 1

WHISTLE BLOWING (WB) POLICY & PROCEDURE

WHISTLEBLOWING (WB) PROCESS WORKFLOW

