



Whistleblowing Policy

MSM MALAYSIA HOLDINGS BERHAD

This policy is implemented along with guidelines to facilitate the MSM community to disclose any form of corruption, fraud, improper conduct without fear of punishment or unfair treatment. At the same time, it protects the Whistleblower's identity from being victimization and harassment.

Any employee or member of the public who has knowledge or aware of any improper conduct (criminal offence or misconduct) committed or about to be committed within MSM Group is strongly encouraged to make disclosure, in order to protect the Group's interest and reputation.

IDENTITY OF WHISTLEBLOWER

Whistleblower has the obligation to enclose his/her name and contact details in order to be protected by the Policy. Nevertheless, anonymous allegation is acceptable, if the disclosure contains accurate and complete information.

CONTENT OF DISCLOSURE

Any disclosure made herein should contain the following information:

- **WHO** – details of the person(s) involved
- **WHAT** – the alleged misconduct / wrongdoing
- **WHEN** – when the alleged misconduct / wrongdoing took place
- **WHERE** – where is the alleged misconduct/wrongdoing took place
- **HOW** – Nature of allegation / details of allegation

REPORTING CHANNELS

Disclosure can be made to **ANY** of the following reporting channels, in strict and confidential manner:

- Letter
- E-Form (Visit MSM Website - <https://msmwhistleblowing-form.msmsugar.com/>)
- Email
- In Person
- Telephone Call

PROTECTION ACCORDED TO WHISTLEBLOWER

- a. This Policy shall provide protection to the whistleblower on:
 - The identity of the whistleblower;
 - The confidentiality of the information;
 - Detrimental Action as consequences of whistleblower's disclosure.

- b. Whistleblower protection shall be revoked if the whistleblower breaches the terms and condition under this Policy if it is of opinion, based on investigation or in the course of investigation that:
 - The whistleblower himself has participated in the improper conduct disclosed;
 - The whistleblower willfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
 - The disclosure of improper conduct is frivolous or vexatious;
 - The disclosure of improper conduct principally involves questioning the merits of company policy;
 - The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - The whistleblower, in the course of making the disclosure or providing further information, commits an offence under any of Company Policies or SOPs.

WHISTLEBLOWING COMMITTEE

WB committee comprises of the following members:

- MSM Head of Corporate Governance & Risk Management - Chairman
- MSM Head of Legal Affairs
- MSM Head of Group Human Resource
- MSM Head of HSES & Quality
- MSM Head of Treasury
- MSM Head of Corporate Strategy & Investor Relation
- MSM Head of Finance (Compliance)

DELIBERATION OF CASES

MSM Whistleblowing Committee (WBC) is responsible to handle and deliberate disclosure of improper conduct against Senior General Manager and below; through an orderly process, in fair and transparent manner; evaluate investigation outcome and determine the next course of action.

MSM WBC Chairman and/or MSM Whistleblowing Secretariat shall refer and discuss with Audit, Governance & Risk Committee (AGRC) on disclosure of improper conduct received against Vice President(s) and above, Members of the Board and Government Appointed Director(s) to determine the next course of action.

OBLIGATION

It is the responsibility of all employees to fully cooperate with the investigation.