



MPHB CAPITAL BERHAD & GROUP OF COMPANIES (1010253-W)

WHISTLE BLOWING POLICY

1. Introduction

- 1.1 As a responsible corporation, MPHB Capital Berhad Group is committed to conduct our business activities with integrity, transparency and with the highest ethical standards.
- 1.2 This Whistle Blowing Policy aims to establish a transparent and secured communication channel for employees and stakeholders of the Company/ Group to raise their genuine concerns about possible improprieties in matters of financial reporting, unethical behavior, non-compliance with regulatory requirements and other malpractices at the earliest opportunity in the manner as set out herein. Each report shall be treated strictly confidential and promptly investigated.

2. Scope

- 2.1 This policy applies to all employees of MPHB Capital Berhad Group and stakeholders including contractors, suppliers, consultants, agents, customers or any parties with business relationship with the Company/ Group.

3. Improper Conduct

- 3.1 The following is a non-exhaustive list of examples of wrongdoing or improper conduct which shall be reported under this Policy:
 - Fraud;
 - Corruption, bribery and blackmail;
 - Criminal offences;
 - Failure to comply with regulatory requirements;
 - Unethical behavior, malpractices or illegal acts;
 - Abuse of power;
 - Conflict of interest;
 - Criminal breach of trust;
 - Misuse and/or misappropriation of the Company's fund or assets;
 - Impropriety (including financial and operational) within the Company/ Group;
 - Miscarriage of justice;
 - Harassment, abuses and intimidation;
 - Endangerment of an individual's health and safety; and
 - Concealment of any or a combination of the above.



4. Principles

4.1 The principles underpinning the policy are as follows:

- Any employee who makes a report regarding any irregularity or malpractice shall be able to do so without jeopardizing his/her position in the Company/ Group.
- The Company/ Group will ensure that any individual raising a concern is aware who is handling the matter. All concerns raised will be addressed promptly, fairly and properly.
- The whistleblower's information will be kept confidential by the Company/ Group. The consent of the whistleblower will be sought should there be a need to disclose his/her identity for investigation purposes.
- The Company/ Group will not tolerate any harassment or victimization against the whistleblower and will take appropriate action to protect the whistleblower, to the extent reasonably practicable, provided that the disclosure is made in good faith.
- The Company/ Group will ensure that no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company/ Group, however, does not extend this assurance to someone who maliciously raises a matter he/she knows is untrue.
- Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven, may lead to dismissal/ termination.

5. Reporting Procedures

5.1 Reporting procedures for employees:

- 5.1.1 Any concern should be raised to the immediate superior. However, if for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to either the **Executive Director** or the **Chief Executive Officer** in person or by sending her a mail.
- 5.1.2 If these channels have been followed and employees still have concerns, or if employees feel that the matter is so serious that it cannot be discussed with any of the abovementioned persons, they should contact the **Audit Committee Chairman** in person or by sending him a mail to:

Audit Committee Chairman
MPHB Capital Berhad
39th Floor, Menara Multi-Purpose
Capital Square
No. 8, Jalan Munshi Abdullah
50100 Kuala Lumpur.

Or e-mail to whistleblowing@mphbcap.com.my.

- 5.1.3 Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.



5.1.4 Employee shall not make any form of external or internal publicity concerning any irregularity or malpractice he/she intends to report or has reported. All reportings of concerns, irregularities or malpractices shall be confined with the Company/ Group and the procedures herein must be strictly followed.

5.2 Reporting procedure for other whistleblower other than employees:

5.2.1 Disclosure of improper conduct may be made in writing to:

Audit Committee Chairman
MPHB Capital Berhad
39th Floor, Menara Multi-Purpose
Capital Square
No. 8, Jalan Munshi Abdullah
50100 Kuala Lumpur.

Or e-mail to whistleblowing@mphbcap.com.my.

5.2.2 All disclosure made should be submitted together with the following information:

- Particulars of complaint (Name, Contact No. and email);
- Type of improper conduct;
- Name of personnel involved;
- Details of the allegation (including location, date and time of incidence);
- Particulars of witness, if any;
- Any supporting evidence and/or documents; and
- Any other relevant information.

5.3 The whistleblower is responsible to ensure that the disclosure is made in good faith with reasonable belief that the information and any allegation in it are true, and the report is not made for personal gain.

5.4 If the subsequent investigation reveals that the disclosure was made with malicious intent, appropriate action can be taken against the whistleblower.

6. Action

6.1 All reports will be investigated promptly by the person receiving the report. Assistance from other resources within the Group such as Group Internal Audit, Group Human Resources and Group Legal Department may be obtained, if required. The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.

6.2 Upon completion of the investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. The decision taken by the Audit Committee will be implemented immediately.