



Mudajaya Group Berhad
(Company No. 605539-H)

WHISTLEBLOWING Policy and Procedure

Information contained in this procedure is the sole copyright of Mudajaya Group Berhad. No part of it may be circulated, quoted, or reproduced for external publication or distribution without the prior written approval from Mudajaya Group Berhad

| | | |
|---|------------|-----------|
| 1 | New issue | |
| 2 | Revision 1 | 27-2-2020 |
| | | |
| | | |
| | | |



Mudajaya Group Berhad
(Company No. 605539-H)

1. Purpose

The purpose of this policy and procedure is to facilitate any Reporting Party ("RP") to raise concerns through whistleblowing about any suspected wrongdoing, bribery or corruption, including but are not limited to the following:

- fraud;
- misappropriation of assets;
- sexual harassment;
- criminal breach of trust;
- illicit and corrupt practices;
- questionable or improper accounting;
- misuse of confidential information;
- health and safety risks;
- acts or omissions which are deemed to be against the interest of the Company, laws, regulations or public policies;
- miscarriages of justice;
- breach of Group policies; or
- the deliberate concealment of any of the above or other acts of misconduct, wrongdoing, corruption, fraud, waste and/or abuse.

2. Scope

This procedure covers Mudajaya Group Berhad and its subsidiaries, associates (collectively known as "MDJ") and third parties for the reporting or disclosure about any actual or perceived wrongdoing, bribery or corruption in good faith, belief, and without malicious intent that a breach or violation as aforesaid may have occurred or may be about to occur, one will be accorded the protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that one is mistaken.

3. Abbreviation

| | | |
|-----|-----|--|
| 3.1 | MDJ | Mudajaya Group Berhad and its subsidiaries |
| 3.2 | RP | Reporting Party |



Mudajaya Group Berhad
(Company No. 605539-H)

4. Policy and Protection

4.1 Anonymity

It is the policy of MDJ to allow the RP to either identify themselves or if they prefer, to remain anonymous when reporting suspected and/or known instances of wrongdoings.

4.2 Assurance against Reprisal and/or Retaliation

Where the RP has chosen to reveal his/her identity, it is the policy of MDJ to provide assurance that the RP would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division.

In addition, MDJ provides assurance that no disciplinary action can be taken against the RP as long as he/she does not provide false information in the report "purposely, knowingly or recklessly" i.e. the report is basically malicious in nature.

4.3 Confidentiality

MDJ shall treat all reports or disclosures as sensitive and will only reveal information on a "need to know" basis or if required by law, court or authority.

The identity and particulars of the RP shall also be kept private and confidential unless the RP chooses to reveal his/her identity.

Where the RP has chosen to reveal his/her identity when making such a report, written permission from the RP would be obtained before the information is released.

4.4 Immunity

All costs in relation to any legal liabilities or proceedings (whether criminal or civil) that may be brought against the RP shall be borne by MDJ, and the selection of the lawyer defending the legal action shall be made by the Company.

4.5 Protection

The RP shall also be protected against:

- a) action causing injury, loss or damage;
- b) intimidation or harassment;
- c) interference with the lawful employment or livelihood of the RP, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the RP's employment, career, profession, trade or business or the taking of disciplinary action;
- d) a threat to take any of the actions referred to in paragraphs (a) to (c) above.

Where necessary, any person related or associated with the RP (e.g., immediate family members) shall be accorded with similar protection mentioned here in paragraph (4.5).



Mudajaya Group Berhad
(Company No. 605539-H)

5. Procedure

- 5.1. If a RP suspects that wrongdoing, bribery or corruption has occurred, the RP is encouraged to report to the Chairman of MDJ, or alternatively to the Integrity Unit of MDJ. This can be done in writing, by telephone, fax or email as follow:

| | | |
|---------------|---|---|
| Email address | : | whistleblowing@mudajaya.com ; OR IntegrityUnit@mudajaya.com |
| Phone | : | 603-7806 7899 |
| Fax | : | 603-7806 7901 |
| Address | : | Level PH2, Menara Mudajaya, No. 12A, Jalan PJU 7/3, Mutiara Damansara, 47810 Petaling Jaya, Selangor Darul Ehsan |

The RP is encouraged to make use the "Report of Wrongdoings" form provided in **Appendix A**.

- 5.2. The Independent Non-Executive Chairman/Director shall consider each disclosure and pursue it to the extent that the information received allows and based on the evidence that is available.
- 5.3. Once the disclosure is received from the RP, the Independent Non-Executive Chairman/Director will instruct Integrity Unit to initiate preliminary investigations to establish whether the disclosure has merit and can be substantiated.
- 5.4. The Independent Non-Executive Chairman/Director will review the disclosure and determine if there is enough evidence to confirm the disclosure.
- 5.5. With this information, the Independent Non-Executive Chairman/Director will do his best to draw an unbiased conclusion from facts given to him by the RP, or any other information gathered during the course of investigation.
- 5.6. Appropriate course of actions will be recommended to the Board of Directors for deliberation and decision. Advice of third-party consultants, legal counsel or regulatory bodies may be obtained, where appropriate.
- 5.7. If the case necessitates further action on the part of the Human Resources (HR) Department, a copy of a summary report will be provided to HR.
- 5.8. The Integrity Unit shall prepare a summary report and present it to the Company's Audit Committee and Board of Directors on a quarterly basis. The report shall maintain confidentiality to protect the RP's identity.
- 5.9. The Integrity Unit shall maintain a record of the complaints and track their receipt, investigation and resolution.



REPORT OF WRONGDOINGS

| | | |
|-----------|-------------------------------------|--|
| 1. | Date and Time of Report | |
| 2. | Details of Alleged Person | |
| a | Name of person alleged: | |
| b | Company of person alleged: | |
| 3. | Details of Incident | |
| a | Incident date and time: | |
| b | Location of incident: | |
| c | Details of allegation: | |
| 4. | Details of Reporting Party * | |
| a | Name: | |
| b | Contact number: | |
| c | Email address: | |
| d | Company: | |

* You may choose to remain anonymous or provide details as per item 4.