



WHISTLEBLOWING Policy and Procedure

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1	New issue	
2	Revision 1	27-2-2020
3	Revision 2	29-8-2022
4	Revision 3	30-5-2025



Mudajaya Group Berhad

[Registration No. 200301003119 (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, bribery, forgery, theft or embezzlement;
- Criminal breach of trust;
- Misappropriation of Group's assets;
- Questionable or improper accounting;
- Abuse of power;
- Conflict of interest;
- Misuse of confidential information;
- Any act that poses danger to health and safety or causes damage to the environment;
- Sexual harassment;
- Acts or omissions which are deemed to be against the interest of the Company, laws, regulations or public policies;
- Breach of Group's 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
3.3	EC	Executive Chairman
3.4	ARMSC	Audit, Risk Management and Sustainability Committee
3.5	HRD	Human Resources Department



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



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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 Audit, Risk Management and Sustainability Committee ("ARMSC"), or alternatively to the Integrity Unit of MDJ. This can be done in writing, by telephone or email as follow:

Email address	:	whistleblowing@mudajaya.com ; OR IntegrityUnit@mudajaya.com
Phone	:	603-7806 7899
Address	:	Level PH1, Menara Mudajaya, No. 12A, Jalan PJU 7/3, Mutiara Damansara, 47810 Petaling Jaya, Selangor Darul Ehsan

RP is encouraged to raise concerns via Whistleblowing Form (MDJ/ABMS/WP/05 FM01).

- 5.2. The Chairman of ARMSC/Executive Chairman ("EC") 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 Chairman of ARMSC/EC will instruct Integrity Unit to initiate preliminary investigations to establish whether the disclosure has merit and can be substantiated.
- 5.4. The Chairman of ARMSC/EC will review the disclosure and determine if there is enough evidence to confirm the disclosure.
- 5.5. With this information, the Chairman of ARMSC/EC 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 action will be recommended to the Board of Directors for deliberation and decision. Advice from 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 Department ("HRD"), a copy of a summary report will be provided to HRD.
- 5.8. The Integrity Unit shall prepare a summary report and present it to the ARMSC and Board of Directors on a quarterly basis. The report should 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.

6. Form

Title	Ref. No.
Whistleblowing Form	MDJ/ABMS/WP/05/FM 01



WHISTLEBLOWING FORM

MDJ/ABMS/WP/05/FM 01

A Details of Alleged Person														
a	Name													
b	Designation													
c	Company/Department/Project (Where applicable)													
B Details of Allegation (You may use additional sheets if necessary)														
a	Date and Time													
b	Location													
c	Description of misconduct/ improper activity													
C Supporting Information (Please attach supporting evidence to substantiate your disclosure, if any to facilitate investigation)														
1	Witness Information	<table border="1"><thead><tr><th>Witness (1)</th><th>Witness (2)</th></tr></thead><tbody><tr><td>a Name</td><td></td></tr><tr><td>b Designation</td><td></td></tr><tr><td>c Company/Department/Project (Where applicable)</td><td></td></tr><tr><td>d Contact No.</td><td></td></tr><tr><td>e Email</td><td></td></tr></tbody></table>	Witness (1)	Witness (2)	a Name		b Designation		c Company/Department/Project (Where applicable)		d Contact No.		e Email	
Witness (1)	Witness (2)													
a Name														
b Designation														
c Company/Department/Project (Where applicable)														
d Contact No.														
e Email														
2	Other supporting documents (if any)													
D Details of Reporting Party/Whistleblower (You are encouraged to provide your contact details to enable us to contact you for further clarification if required and notify you on the outcome of the investigation subject to legal constraints)														
a	Name													
b	Designation													
c	Company/Department/Project (Where applicable)													
d	Contact No.													
e	Email													
f	Relationship with Mudajaya Group (If not employee)													
E Declaration														
<p>I hereby declare that all information provided herein are made voluntarily and are true to the best of my knowledge without malicious intent. I hereby agree that the information provided herein to be used and processed for investigation purpose and further agree that the information provided herein may be forwarded to another department/authority/enforcement agency for the purpose of investigation.</p> <p>By submitting this Form, I hereby agree that Mudajaya Group Berhad may collect, obtain, store and process my personal data that I provide in this Form.</p> <p>_____</p> <p>Name : _____</p> <p>Date : _____</p>														