

<b>MYCRON STEEL BERHAD</b>	
Document : Company Policy	Subject : <b>Whistleblowing Policy</b>
Revision Status : 2.0	No. of Pages : 7 (+3 Appendix)
Document Ref : GACPAFF-CP-04	Effective Date : 01 June 2024
Prepared by : Dept. of People & Culture	Approved by : Board of Directors

## 1.0 INTRODUCTION

- 1.1 Mycron Steel Berhad and its subsidiaries (“MSB” or “the Group”) are committed to the highest standards of openness and accountability. An important aspect of accountability and transparency is a mechanism to individuals to voice concerns of Wrongdoings in a responsible and effective manner.
- 1.2 The Group undertakes to act in accordance with all relevant Laws of Malaysia, if any, on disclosure of Wrongdoings in the workplace and to take steps to protect its employees from detrimental action if they raise concerns in good faith.
- 1.3 This policy is part of the **Group’s Anti-Corruption/Anti-Fraud Framework** and is supplemental to the Employee Handbook. It shall be read in conjunction with the Anti-Corruption Policy, Code of Conduct and Ethics, Anti-Fraud Policy, Conflict of Interest Policy, Internal Control Procedures, and any other relevant policies that are in existence or established in the future in accordance with regulatory requirements, good corporate governance, and best practices.

## 2.0 OBJECTIVE

- 2.1 To provide employees and third parties with proper internal procedures in disclosing cases of Wrongdoings.
- 2.2 To manage disclosures of Wrongdoings in an appropriate and timely manner.
- 2.3 To provide protection to Whistleblowers from detrimental action that may result from the disclosure of Wrongdoings.
- 2.4 To provide fair treatment to both the Whistleblower and the alleged wrongdoer when a disclosure of Wrongdoing is made.
- 2.5 To set out the processes to manage the overall system and implementation of the Whistleblowing Policy. The flow chart of the process is attached in **Appendix 1**.

## 3.0 AUTHORITY

- 3.1 The overall authority for this Policy sits with the Audit & Governance Committee (AGC).
- 3.2 The Anti-Corruption Managing Committee (ACMC) has a specific responsibility to facilitate the operation of this Policy and to ensure that employees and/or third parties feel able to raise concerns, without fear of reprisals, in accordance with the procedures set out below.

## 4.0 SCOPE

### 4.1 Disclosing parties

Any of the following persons (“**Whistleblower**”) can raise or disclose concerns about malpractice in the workplace:

- The Group’s employees, including employees on contract, temporary or short-term employees, and employees on secondment.
- The Group’s third-party service providers, independent contractors, vendors, suppliers, etc.
- Members of the public.

### 4.2 What to disclose

A report can be lodged if it relates to any conduct which if proved, constitutes a disciplinary offence or criminal offence by any employee or director within any Group of Company (“**Wrongdoing**”). They apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not. These concerns include, but are not exhaustive of:

- Taking or giving favors, kickbacks, bribes, and privileges.
- Financial malpractice, corruption, or fraud.
- Theft or embezzlement.
- Gross mismanagement.
- Serious financial irregularity or impropriety.
- Serious breach of MSB’s Code of Conduct & Ethics.
- Abuse of power by any director or officer of any Company under the Group
- Deficiencies in or non-compliance with MSB’s internal accounting controls.
- Breaches of legal obligations
- Dangers to Health and Safety or the environment.
- Criminal offences.
- Improper conduct or unethical behavior.
- The concealment of any of the above.

4.3 It should be emphasized that this Policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question strategy, financial or business decisions taken by the Group, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other matters related to human resource.

4.4 This Policy does not apply to grievances concerning an individual’s terms of employment or an employee performance matter and such matters shall be dealt with in accordance with the Group’s guidelines and policies. Should it be determined during the preliminary investigation that the matter disclosed does not fall within the scope of this Policy, such matters will be transferred and dealt with by the appropriate personnel of the relevant department for appropriate procedures and actions to be taken.

4.5 If an employee is unsure whether a particular act or omission constitutes a Wrongdoing under this Policy, the employee is encouraged to seek advice or guidance from the ACMC.

## 5.0 CONFIDENTIALITY

5.1 The Group will treat all such disclosures in a confidential and sensitive manner. Every effort will be made to keep the identity of the individual making the disclosure (“Whistleblower”) confidential.

- 5.2 In order not to jeopardize the investigation into the alleged malpractice, the Whistleblower will also be expected to keep the fact that he/she has raised a concern, the nature of the concern, and the identity of those involved confidential.
- 5.3 There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the identity of the Whistleblower. This may occur in connection with associated disciplinary or legal investigations or proceedings. If such circumstances exist, efforts will be made to inform the Whistleblower that his/her identity is likely to be disclosed.
- 5.4 If it is necessary for the Whistleblower to participate in an investigation, the fact that he/she made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect him/her from any victimization or detriment as a result of having made a disclosure. It is possible, however, that his/her role as the Whistleblower could still become apparent to third parties during the course of an investigation.
- 5.5 Similarly, should an investigation lead to a criminal prosecution, it may become necessary for the Whistleblower to provide evidence or be interviewed by law enforcement officers. In these circumstances, again, the implication for confidentiality will be discussed with the Whistleblower.
- 5.6 This Policy encourages Whistleblowers to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but may be considered at the discretion of MSB.
- 5.7 In exercising this discretion, the factors to be considered will include:
- the seriousness of the issues raised;
  - the credibility of the concern; and
  - the likelihood of confirming the allegation from attributable sources.

## 6.0 PROCEDURES FOR MAKING DISCLOSURE

- 6.1 Disclosure within the scope of this Whistleblowing Policy can be made through the following channels via email or letter as set out below:

Level of Disclosure	Designated Recipient	Appointed Officer
1	Disclosure against mid-level management and below Email: <a href="mailto:acmc@melewar-mig.com">acmc@melewar-mig.com</a>	Anti-Corruption Managing Committee Member of Anti-Corruption Managing Committee
2	Disclosure against senior management and above Email: <a href="mailto:agc@melewar-mig.com">agc@melewar-mig.com</a>	Audit & Governance Committee Appointed by the Designated Recipient (as the case may be)

- 6.2 As a guide, the information to be furnished by a Whistleblower is set out in the **Whistleblowing Form** (Refer to **Appendix 2**).
- 6.3 A Whistleblower can enhance the efficiency of investigating concerns by providing complete and accurate information in the report. Information which would be useful in assessing the whistleblower's concerns include:
- the details of Wrongdoing;
  - the date, time, and location of the Wrongdoing;
  - the identity and designation (if any) of the alleged wrongdoer(s);
  - particulars of witnesses or other parties involved, if any;
  - particulars or copies of documentary evidence, if any; and
  - any other details that are useful to facilitate screening and investigation.

## 7.0 PROTECTION

- 7.1 Upon making a disclosure in good faith, based on reasonable grounds, and in accordance with the procedure pursuant to this Policy:
- a) The Whistleblower shall be protected from **Detrimental Action** within the Group as a direct consequence of the Whistleblower's disclosure.  
**Detrimental Action** refers to: -
    - Action causing injury, loss, or damage;
    - Intimidation or harassment;
    - Interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination, adverse treatment in relation to person's employment, career, profession, trade or business, or the taking of disciplinary action; and
    - A threat to take any of the above actions.
  - b) The Whistleblower's identity shall be protected (i.e., kept confidential unless otherwise required by law for the purpose of any proceedings by or against the Group).
- 7.2 If the Whistleblower (being an employee), in good faith, reasonably believes he/she is being subjected to Detrimental Action from any person within the Group as a direct consequence of having made a disclosure under this Policy, he/she may lodge a complaint to the ACMC via The Detrimental Action Complaint Form (**Appendix 3**).
- 7.3 MSB does not permit Detrimental Action of any kind against the Whistleblower for complaints submitted hereunder that are made in good faith. Any such Detrimental Action shall be considered a serious breach of this Policy.
- 7.4 A Detrimental Action by any person against the Whistleblower may result in disciplinary action against that person, including issuance of formal warning or reprimand, suspension, or termination of employment or service with the Group.
- 7.5 MSB reserves the right to revoke the Whistleblower protection accorded under this policy if the Whistleblower has, or is found to have:
- a) participated in the Wrongdoing; and/or
  - b) made a disclosure not in accordance with the requirements of this Policy (i.e., false, dishonest, or malicious complaints).
- 7.6 MSB shall give written notice to the Whistleblower of the revocation of protection. In addition, MSB reserves the right to take such legal or other actions or disciplinary measures against the Whistleblower (if the Whistleblower is an employee), including issuance of formal warning or reprimand, suspension, or termination of employment or services with the Group.

## 8.0 SCREENING

- 8.1 The Appointed Officer will screen and assess the Whistleblower's disclosure to determine whether it constitutes a Wrongdoing or is excluded from the scope of this Policy. The Whistleblower may be required to provide additional information and clarifications should the need arise.
- 8.2 The Appointed Officer shall, within fourteen (14) working days from the date the disclosure was made, prepare a report ("Assessment Report") to the AGC Chairman informing the results of the assessment and recommend either to ignore the disclosure or to take further action. The AGC Chairman may extend the time for the completion of the Assessment Report.
- 8.3 In respect of the disclosures made in relation to Wrongdoing relating to the Appointed Officer or the Executive Director(s), the AGC may decide to appoint an external independent party to assess

whether it is related to a Wrongdoing and/or excluded from the scope of this Policy. The terms of appointment of the external party shall be approved by the AGC.

- 8.4 The AGC Chairman, shall have the authority to make final decisions including, but not limited to, any of the following:
- reject the disclosure(s), either in part or in total, if it falls outside the scope of this Policy;
  - direct the matter or any part thereof to be dealt with under other appropriate internal procedures, which includes disciplinary procedures;
  - direct an investigation into the disclosure(s) made and on any persons involved or implicated;
  - suspend the persons implicated in the Wrongdoing from work pending any further investigation and/or disciplinary procedures;
  - designate the Appointed Officer or any other persons from within or outside of the Group to conduct investigations or to take any other action pursuant to this Policy;
  - obtain any other assistance from third parties such as external auditors or obtaining legal advice whether from internal or external solicitors; and
  - refer the matter to an appropriate enforcement agency, which includes the police and the Malaysian Anti-Corruption Commission.

## 9.0 INVESTIGATION PROCEDURE

- 9.1 The full investigation process aims to achieve the following objectives:
- to gather relevant information in the most appropriate manner and to protect the information/document from sabotage/compromise;
  - to ensure that the proper procedures are carried out in the process of the investigation;
  - to arrive at a fair decision and recommendation on the next course of action.
- 9.2 In the event further investigation is necessary, the person appointed to investigate the Wrongdoing ("**Investigating Officer**") shall, as soon as possible, conduct an investigation into the matter.
- 9.3 The AGC shall have the authority to appoint an external party as the Investigating Officer to carry out investigations pertaining to the Wrongdoing within a reasonable set of terms of reference.
- 9.4 In instances where the Investigating Officer is appointed from within the Group, the Investigating Officer must be an employee of a Designation and/or Grade higher than the employee(s) implicated in the Wrongdoing.
- 9.5 The Investigating Officer may conduct interviews with any relevant witnesses and shall use his best endeavors to gather all data and materials relevant to the Wrongdoing disclosed. The Investigating Officer shall have absolute discretion to allow any assistance to the witness during the interview, subject to a request made by the witness.
- 9.6 All interviews and activities carried out in the course of the investigation shall be recorded, reduced to writing, and filed.
- 9.7 A specific room will be designated for the use of the Investigating Officer to carry out interviews, store documents, and for any other purpose deemed necessary during the investigation.
- 9.8 Whenever practicable, all interviews shall be conducted in the designated room and all documents relating to the investigation must not be removed from the room during the course of the investigation.
- 9.9 The Investigating Officer shall have free and unrestricted access to all records of MSB and shall have the authority to examine, obtain and/or make copies of all or any portion of the contents of documents, files, desks, cabinets, and other storage facilities of the MSB so far as it is necessary to assist in the investigation of the Wrongdoing.

## **10.0 INVESTIGATION REPORT (IR)**

- 10.1 At the conclusion of the investigation, the Investigating Officer will submit an Investigation Report (“IR”) of the findings to the AGC Chairman.
- 10.2 The IR will contain the following:
- a) the specific allegation(s) of the Wrongdoing;
  - b) all relevant information/evidence received and the grounds for accepting/rejecting them (copies of interview transcripts and any documents obtained during the course of the investigation shall accompany the IR); and
  - c) the conclusions made and the basis for them.
- 10.3 Whenever practicable, the Investigating Officer may include in the IR the following:
- a) the steps or recommendations that need to be taken by the Group to prevent the Wrongdoing from continuing or re-occurring in future; and,
  - b) any further action to be taken by the Group in respect of the Wrongdoing.
- 10.4 The IR shall be presented to the AGC. In the event that the AGC is satisfied that based on the findings and recommendations made in the IR, a Wrongdoing has been committed, the AGC Chairman will update the Board on the matter and also refer the matter to the Department of People & Culture (DPC) where appropriate to follow-up with disciplinary proceedings in accordance with the policies of the Group as well as to MSB’s legal counsel for further advice (if necessary).
- 10.5 The DPC shall inform the RSC of the status of disciplinary proceedings and any disciplinary action taken.

## **11.0 TIMEFRAME**

- 11.1 This Policy is intended to ensure that disclosures made by Whistleblowers are reviewed and actions are taken in a timely manner.
- 11.2 Investigations in respect of disclosures made are to be concluded as soon as is practicable but shall not exceed sixty (60) days from the date the disclosure was made.
- 11.3 Notwithstanding the above, where an investigation cannot be reasonably completed within sixty (60) days, the AGC Chairman may extend the time for its completion provided that the extension does not exceed one hundred and twenty days (120) days from the date the disclosure was made.
- 11.4 The Whistleblower shall be informed of the result of any investigation and/or any action taken by the Group in respect of the disclosure made within seven (7) working days from the date an investigation is completed and/or any action taken by the Group, subject to any extension of time that may be granted by the AGC Chairman.

## **12.0 SAFEKEEPING OF RECORDS**

- 12.1 All reports, its supporting evidence, findings of investigations and monitoring of corrective actions shall be centralized, logged, and monitored by the APMC under the supervision of AGC.
- 12.2 Disclosure of reports to individuals who are not involved in the investigation will be viewed as a serious disciplinary offence which may result in disciplinary action, including termination of employment or dismissal.
- 12.3 All records of disclosures made shall be managed in compliance with the provisions of the Personal Data Protection Act 2010 and other applicable laws.

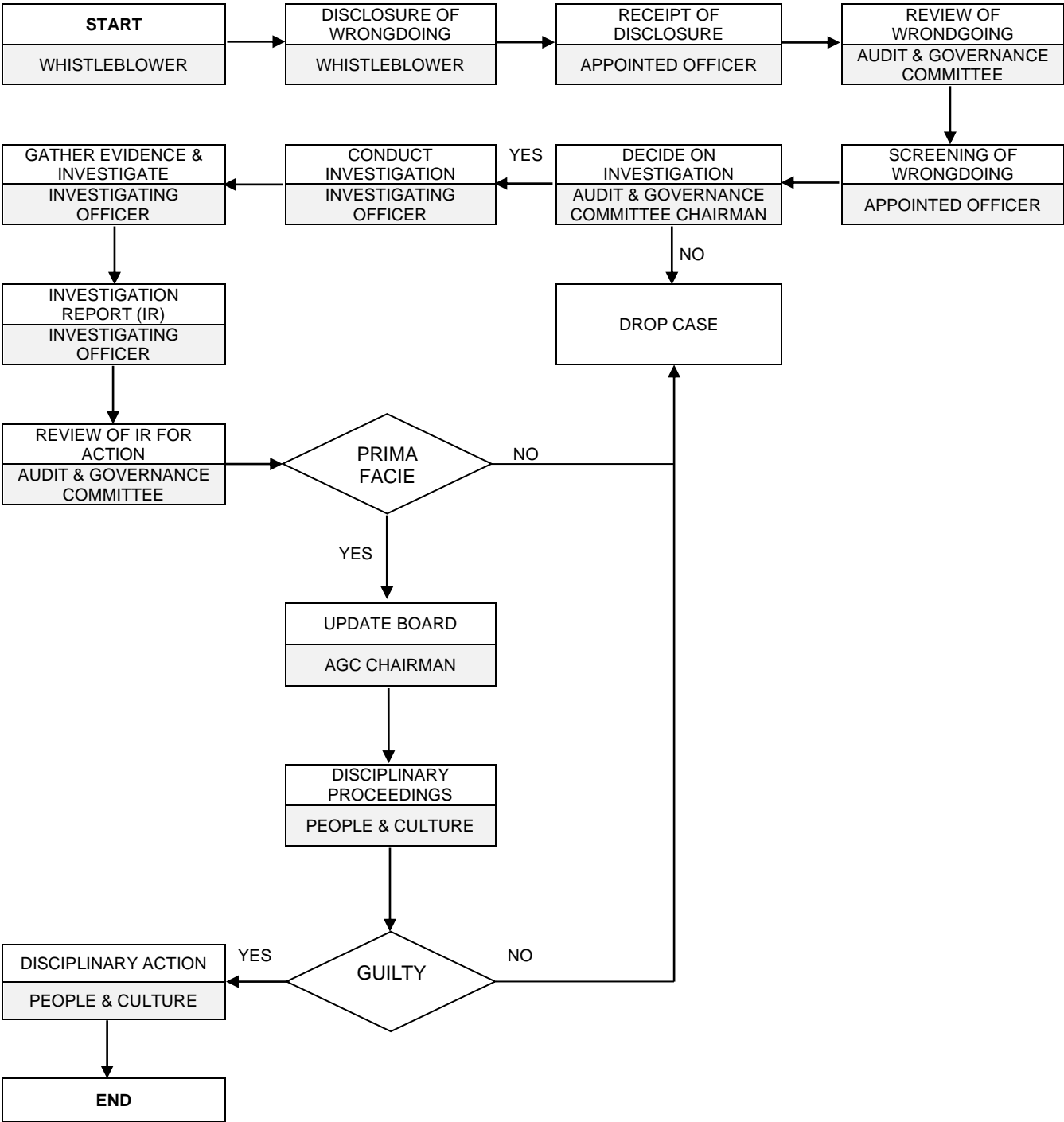
### **13.0 INCENTIVES**

- 13.1 Upon conclusion of the investigation into a particular allegation, the AGC may, at its discretion, approve certain incentives to be awarded to the Whistleblower.

### **14.0 CIRCULATION AND REVIEW**

- 14.1 This Policy will be circulated to all employees of the Group.
- 14.2 A copy of this Policy will be made available on the Group's website, HR Employee portal, and at various locations of the Group's premises.
- 14.3 This Policy will be reviewed regularly by the AGC. Any revisions or amendments to this policy will be communicated to all employees of the Group.

WHISTLEBLOWING PROCESS FLOW CHART







## MSB WHISTLEBLOWING FORM

<b>A. DISCLOSURE DETAILS</b>	
<b>1.</b>	<b>PARTY INVOLVED IN CONCERNED RAISED</b> (You may insert information on additional individual(s) in a separate sheet)
a.	Name of Party : _____
b.	Designation : _____
c.	Division / Company : _____
d.	How do you know this party? : _____
<b>2.</b>	<b>DETAILS OF CONCERN</b> (You may use additional sheets if necessary)
	( <input type="checkbox"/> ) Has happened ( <input type="checkbox"/> ) Suspect to happen
a.	Date / Time / Location : _____ (If the Wrongdoing has happened)
<b>3.</b>	<b>NATURE OF CONCERN</b>
a.	Description of Concern : _____
<b>4.</b>	<b>SUPPORTING INFORMATION TO ASSIST INVESTIGATIONS</b> (Please attach supporting evidence to substantiate your disclosure. You may use additional sheets for additional witnesses or supporting evidence if necessary.)
a.	Witness Name : _____ Department : _____
b.	Supporting Evidence : _____
<b>B. REPORTING TO OTHER PARTIES</b>	
	Have you raised your concern to any other person / department / authority? ( <input type="checkbox"/> ) Yes ( <input type="checkbox"/> ) No
	If yes, please state the person/department/authority the report was made/lodged and insert the date of the report. You may attach a copy of the report made.  _____
<b>C. PARTICULARS OF WHISTLEBLOWER</b>	
1.	Name : _____
2.	Designation / Occupation : _____
3.	Contact No. : _____
4.	Email Address : _____
5.	Relationship with Mycron Group : _____ (if not employee)
<b>D. DECLARATION</b>	
	I confirm that all the information given herein are made voluntarily and true to the best of my knowledge and I will be entitled to the Whistleblower protection from the company. I understand further that in the event I have made this disclosure maliciously or in bad faith, the Whistleblower protection accorded will no longer be applicable to me and I may be subjected to disciplinary or legal proceedings by the company (if an employee of the company).
	Name : _____
.....	Date : _____
Signature	



## DETRIMENTAL ACTION COMPLAINT FORM

1. COMPLAINANT'S DETAILS	
Name	:
IC No.	:
Mobile No.	:
Email Adress	:
Designation	:
2. INFORMATION AND DETAILS ON DETRIMENTAL ACTION	
Name(s) of Person(s) Committing the Detrimental Action	:
Detrimental Action Complained of	:
*Please attach supporting document(s) if available	
3. DECLARATION	
<p>a. I hereby declare that all information provided in this Form is true, correct, and complete to the best of my knowledge, Information, and belief.</p> <p>b. I hereby agree that the information provided herein to be used and processed for investigation purposes.</p>	
<p style="text-align: right;">Name : _____</p> <p style="text-align: right;">Date : _____</p> <p>..... Signature</p>	