



Muda Holdings Berhad
(197101000036 [10427-A])

WHISTLEBLOWING POLICY AND PROCEDURES

FOR

MUDA GROUP

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SECTION 1 - POLICY

This policy addresses the commitment of Muda Holdings Berhad Group (“the Company or Muda”) to integrity and ethical behaviour by helping to foster and maintain an environment where employees can act appropriately, without fear of retaliation. To maintain these standards, Muda encourages its employees who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the company, to come forward and express these concerns without fear of punishment or unfair treatment.

Muda conducts business based on the principles of fairness, honesty, openness, decency, integrity and respect. It is Muda’s policy to support and encourage its employees to report and disclose improper or illegal activities, and to fully investigate such reports and disclosures. It is also Muda’s policy to address any complains that alleged acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, disclose, or investigate improper or illegal activities (“the Whistleblower”) and to protect those who come forward to report such activities. Muda ensures that all reports will be treated as strictly confidential and to promptly investigate and that reports can be made anonymously, if desired.

Muda’s internal control and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of controls cannot provide absolute safeguards against irregularities. Muda has the responsibility to investigate and report to appropriate parties, allegations of suspected improper activities and to take appropriate actions. Employees and others are encouraged to use guidelines provided by this policy for reporting all allegations of suspected misconduct and improper activities.

This policy is intended to act as a deterrent to fraud or other corruption or serious malpractices and is also intended to protect the Group’s business and reputation.

SECTION 2 - BACKGROUND

Employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal, dishonest, or improper, but may feel apprehensive about voicing their concerns. Muda does not believe that it is in anyone's interest for employees with knowledge of wrongdoing to remain silent.

Reports are not limited to fraud, theft, or corruption, but about possible misconduct, cover a much wider range of bad practices, including behaviour that is not in line with Muda's values. Such bad practices can be happening, likely to happen or even have happened. These procedures are designed to encourage employees to voice concerns internally and promptly so as to prevent or remedy acts of misconduct.

SECTION 3 - OBJECTIVES AND SCOPE

Section 3.1 : Objectives of this Policy

The intended objectives of this policy are:-

- To help develop a culture of openness, accountability and integrity.
- To provide avenues for employees to raise concerns and define a way to handle these concerns.
- To enable Management to be informed at an early stage about acts of misconduct.
- To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.

Section 3.2 : Scope of this Policy

This Policy governs the reporting and investigation of improper or illegal activities in Muda Group as well as the protection offered to the "Whistleblower". This Policy DOES NOT apply to or change the Group's policies and procedures for individual employee grievances or complaints relating to job performance, terms, and conditions of employment, which will continue to be administered and reviewed by Muda's Human Resource Department.

SECTION 4 - DEFINITIONS

a. Whistleblower

A person or entity making protected disclosure about improper or illegal activities is commonly referred to as a whistleblower. Whistleblower may be Muda employees, applicants for employment, vendors, contractors, customers, or the general public. The whistleblower's role is as a reporting party. They are not, investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

b. Good Faith

Good faith is evident when the report is made without malice or consideration for personal benefit and the employee has a reasonable basis to believe that the report is true; provided however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

c. Misconduct/Improper Activities

Examples of misconduct includes, but not limited to fraud, corruption, bribery or other malpractices which could lead to a financial loss to the Group; criminal offences, eg. theft, drug taking; breaches relating to accuracy or integrity of the Group's financial statements; failure to comply with laws and regulations and violation of Company policies or practices, endangerment to public health or safety and negligence of duty.

SECTION 5 - PROCEDURES

Section 5.1: General Guidance

This Policy presumes that employees will act in good faith and will not make false accusations when reporting misconduct by the Company's employees. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination. Muda will not tolerate spurious or inconsequential allegations.

Section 5.2: Reporting Allegations of Misconduct or Improper Activities

1. Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law and regulation that may adversely impact the Muda Group, the Muda Group's customers, shareholders, employees, investors or the public at large.
2. Acts of misconduct may be disclosed in writing, telephonically or in person. However, all reports are encouraged to be made in writing, so as to assure a clear understanding of the issues raised. The format provided in Appendix I may be used for reporting purposes.
3. Individuals are recommended to self-identify, though it is not a requirement of the policy.
4. All reports may be sent either directly to any of the members of the Whistleblowing Committee at:

	Name	Common Contact Address
Chairman	Mr Wong Choong Yee	c/o The Company Secretary Lot 7, Jalan 51A/241, 46100 Petaling Jaya, Selangor Darul Ehsan
Members	Dato' Hazli Bin Ibrahim	
	Dato' Tan Tian Meng	

OR via email at whistleblowing@muda.com.my.

5. In case of reports sent through emails, it is recommended to mark the subject as "Muda Whistleblower" for case identification.
6. Although the whistleblower is not expected to prove the truth of an allegation, he/she need to demonstrate to the person contacted that there are sufficient grounds for concern.

Section 5.3: Investigating Alleged Misconduct or Improper Activities

1. Whistleblowing Committee Member who receives a report will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 working days.
2. The Committee members shall meet to discuss about the action/investigation on the reports received from the whistleblower. The Committee may also exclude from its meetings any persons it deems appropriate, depending on the nature of the compliant.

3. The Committee Members have the responsibility to conduct investigations. In addition, other parties may also be involved in the investigations.
4. The Committee Members will ensure investigations are carried out using appropriate channels, resources and expertise.
5. Some concerns may be resolved by agreed action without the need for an investigation. Concerns about allegations which fall within the scope of specific procedures of the Muda Group will be referred for consideration under those procedures.
6. The Committee Members will report to the Committee Chairman on a periodic basis about the reports received and actions taken.
7. The Management reserves the right to make any decisions on the findings by the Committee.

SECTION 6: ROLES AND RESPONSIBILITIES

Whistleblowers:

Whistleblowers should act in good faith and should not make false accusations when reporting of misconduct by the Company's employees.

Suspects

Suspects have a duty to cooperate with investigators. The identity of the suspect shall remain confidential.

Investigators

All investigators should handle all matters seriously, confidentially, and promptly. All investigators shall be independent and unbiased both in fact and appearance.

Investigation Participants

Employees who are interviewed or asked to provide information have a duty to fully cooperate with the investigators. Participants should refrain from discussing or disclosing matters concerning the investigations.

Appendix I

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law and regulations that may adversely impact the Muda Group and submit directly to any of the Whistleblowing Committee members. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy and Procedure

REPORTER'S CONTACT INFORMATION (This section may be left blank if the reporter wants to be anonymous)			
NAME			
DESIGNATION			
DEPARTMENT			
CONTACT NO.			
E-MAIL ADDRESS			
SUSPECTS' INFORMATION			
NAME			
DESIGNATION			
DEPARTMENT			
CONTACT NO.			
E-MAIL ADDRESS			
WITNESS(ES) INFORMATION (if any)			
NAME		NAME	
DESIGNATION		DESIGNATION	
DEPARTMENT		DEPARTMENT	
CONTACT NO.		CONTACT NO.	
E-MAIL ADDRESS		E-MAIL ADDRESS	
ALLEGATION NO.		ALLEGATION NO.	

COMPLAINT : Briefly describe the misconduct/improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.

1. What misconduct/improper activity occurred?

2. Who committed the misconduct/improper activity?

3. When did it happen?

4. Where did it happen?

5. Is there any evidence that you could provide us? *

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which would assist us in the investigation?

8. Any other comments?

Date:

Signature (Optional)

Note* - You *SHOULD NOT* attempt to obtain evidence for which you do not have a right of access since whistleblowers are “reporting parties” and NOT “investigators”

For Whistleblowing Committee Use	Report No:
Received By:	Received On:
	Acknowledgement Sent On:
Investigation Required (Yes / No)? (If no, please state the reason)	
Investigation Done By:	
Investigation Results:	
Action Taken/Conclusion:	
Reported to Whistleblowing Committee Chairman on:	
Signed Off By:	Date: