



Governance Documents

# Whistleblower Policy



## WHISTLEBLOWER POLICY

### POLICY STATEMENT

The Minority Shareholders Watch Group (MSWG) is committed to upholding the highest standards of integrity, transparency, and accountability in its operations. It aspires to conduct its affairs in an ethical, responsible and honest manner.

Recognising the abovementioned values, MSWG provides an avenue for all employees of MSWG and members of the public to disclose any improper conduct within MSWG.

### OBJECTIVE OF THE POLICY

This policy provides an avenue for all MSWG employees and members of the public to report any improper conduct and offers protection to employees who make such reports.

### SCOPE OF THE POLICY

This policy is designed to facilitate employees and members of the public in disclosing any improper conduct (including misconduct or a criminal offence) through an internal channel. Such misconduct or criminal offences include the following:

- Fraud
- Bribery
- Abuse of Power
- Conflict of Interest
- Theft or embezzlement
- Misuse of the Company's Property
- Non-Compliance with Procedure

The above list is not exhaustive and includes any act or omission, which, if proven, will constitute an act of misconduct under MSWG's Code of Conduct or any criminal offence under the law.

### APPLICABILITY OF THE POLICY

This policy applies to all employees of MSWG and to members of the public, where relevant.

#### Minority Shareholders Watch Group

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## **PROCEDURE IN MAKING A DISCLOSURE**

All disclosures related to MSWG staff are to be channelled to the CEO. All disclosures in relation to the CEO are to be channelled to the Chairman.

## **PROTECTION FOR WHISTLEBLOWER**

A whistleblower will be accorded protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within MSWG, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

## **ANONYMOUS WHISTLEBLOWER**

Any employee or member of the public who wishes to report improper conduct should disclose their identity to the Company so that the Company may provide the necessary protection to the whistleblower and facilitate further investigations.

Anonymous disclosures are not prohibited. However, the Company reserves its right to investigate any anonymous disclosure.

## **NOTIFICATION**

Upon completion of the whistleblowing process and procedures, the whistleblower will be notified of the outcome of the disclosure.

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