

# Anti-Bribery & Whistleblower Policy

Whistleblowing is defined as a deliberate, voluntary disclosure or reporting of an individual or an organisational malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated improper activities as stated here below within the Company's and that is within its ability to control.

In line with the Company's commitment to openness and accountability, the Company encourages and enables employees, who are often the first to realise that there is something seriously wrong within the organisation, to raise serious concerns within the organisation rather than overlooking a problem or 'blowing the whistle' outside. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organisation. Therefore, the Company encourages, in addition to its employees, contractors, suppliers, customers, stakeholders and others whom we deal with, who have concerns about any aspect of the organisation to come forward and voice those concerns.

Conduct considered reportable in this regard may include:-

- Non-compliance with Regulatory Requirements and Laws
- Unethical behaviour such as acting dishonestly and knowingly making false book entries and other records and engaging in questionable accounting practices and altering company records.
- Health and safety issues including risks to both employees and the public.
- Damage to the environment.
- Disclosure related to miscarriages of justice and discriminations
- Fraud, corruption, bribery and blackmail.
- Any criminal offence including drug peddling or use, violence or threatened violence and damage to company property.
- Theft of company or stakeholders' property or any items belonging to others.
- Abuse of Power/Authority or Company Properties
- Concealment of the commitment of any illegal activity, misdemeanour or any breach of company values which has the potential to cause harm.

A major consideration given to the implementation of this whistleblowing policy is the protection of the whistleblower who, by virtue of his or her involvement can, and is often, the target of retaliatory action by the perpetrators of unethical behaviour.

The Board of Directors hereby declare their support for the actions of the whistleblower performing his or her obligations of a stakeholder and responsible member of Minho (M) Bhd. In this regard, any member of the Board may be approached by the whistleblower to report any unethical behaviour he or she becomes aware of. Any retaliatory action against a whistleblower will not be tolerated. The identity and personal information of the whistleblower will be protected, secured and kept confidential, unless agreed by whistleblower or required by law.

## **REPORTING PROCEDURES**

The whistleblower shall make a confidential report of the improper activities in writing. The report must provide full details of the following:

- a) Details of the Complainant
- b) Type of improper activity/conduct
- c) Details of suspected personnel involved
- d) Information on incident (Date, Time and Place of incident)
- e) Any document, information or physical evidence relating to the complaint.

The report can be made to any of the independent directors of the Audit and Risk Committee (“ARC”) listed below:-

[faizal@minhobhd.com](mailto:faizal@minhobhd.com)

[limkimmeng@minhobhd.com](mailto:limkimmeng@minhobhd.com)

[jeannie@minhobhd.com](mailto:jeannie@minhobhd.com)

## **PROCESS OF INVESTIGATION**

1. If the whistleblower report is made to the any of the independent directors of the Company listed above, the Audit and Risk Committee shall decide whether an investigation should be carried out. If an investigation is to be carried out, the Company will carry out its own investigation and shall table the investigation report to the Audit and Risk Committee for review.
2. If an investigation is to be carried out, the ARC Chairman may appoint the internal auditor of the Company or an independent party to carry out the investigation. The whistleblower shall give his /her full cooperation during the course of the investigation, if required.

3. Upon completion of the investigation as mentioned above, the ARC shall review the investigation report and if there is an action to be taken, the ARC shall refer the investigation report to the Board of Directors of the Company for appropriate action to be taken.
4. The whistleblower will be informed of the outcome of the investigation.
5. All information, documents, records and reports relating to the investigation of the whistleblower report shall be kept securely by the Chairman of ARC to ensure its confidentiality.

### **REVIEW OF POLICY**

The Board of Directors can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and/or accommodate organizational changes within the Company or Group. However, the modification made shall be effective after the same is circulated to employees in writing or electronically. This Policy was adopted by the Board on 28 June 2022 and is made available on the Company's website, <https://www.minhomalaysia.com>.