

WHISTLEBLOWING POLICY

1. Policy Statement

Magna Prima Berhad Group (“MPB Group”) is committed to achieving and maintaining high standard of work ethics in the conduct of business.

Magna Prima Berhad (“MPB”) encourages its employees to raise genuine concerns about possible improprieties in matters of financial reporting, compliance, suspected violations and to disclose any improper conduct or other malpractices within MPB Group (i.e. whistleblowing) in an appropriate way.

2. Purpose/Objective of Whistleblowing

The objective of this policy is to provide an avenue for all employees of MPB Group and all agents, vendors, contractors, suppliers, consultants and customers of MPB Group and members of the public to raise concerns about any improper conduct within MPB Group without fear of retaliation and to offer protection for such persons (including the employees of MPB Group) who report such allegations.

This policy is designed to provide a transparent and confidential process for dealing with concerns. The employee’s concerns about any improper conduct should be reported to his or her superior. If for any reason the employee finds it difficult to report his or her concerns to a superior, the employee may report the concerns through the whistleblowing channels. This whistleblowing policy provides for the disclosure of information concerning improper conduct within MPB Group through internal channel.

3. Scope/Types of Improper Conduct

Improper conduct, unethical behavior, malpractices, illegal acts or criminal offence shall include, but not limited to the following:

1. Fraud; misappropriation of MPB Group’s funds or assets;
2. Bribery or corruption or blackmail;
3. Criminal breach of trust; Abuse of power and position;
4. Improprieties and irregularities in accounting and financial reporting;
5. Misuse of confidential information of MPB Group;
6. Conflict of interest within the meaning of MPB Group’s conflict of interest policy;
7. Theft or embezzlement of MPB Group’s fund or assets;
8. Misuse of MPB Group’s properties;
9. Non-compliance with MPB Group’s procedure or breach of internal control;
10. Danger to health and safety of any employee of MPB Group or any other individual;
11. Damage to the environment;
12. Sexual harassment; and
13. An accomplice to or deliberate concealment of any or a combination of the above matters or other acts of wrongdoing.

4. Protection to Whistleblower

a) Anonymity

This policy allows the whistleblower to either identify himself/herself, or if the whistleblower wishes, to remain anonymous when reporting suspected improper conduct.

b) Confidentiality

The whistleblower shall be accorded with protection of anonymity or confidentiality of identity, unless otherwise required by law. All reports or disclosures or such other details shall be kept confidential.

c) Assurance against reprisal or retaliation, and immunity from disciplinary action

This policy provides assurance that the whistleblower, if an employee of MPB Group, shall be protected against reprisals or retaliation, and immunity from disciplinary action from

the whistleblower's immediate superior or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- the disclosure is not made with malicious intent or ill will;
- the disclosure is not frivolous or vexatious; and
- the report is not made for personal gain or agenda.

5. Whistleblowing Channels

Any employee or member of the public who has knowledge or is aware that any improper conduct has been, is being, or is likely to be committed within MPB Group is encouraged to direct the concern to the following reporting channel:

- Email to disclosure@magnaprima.com.my

