

MAGNUM BERHAD
197501002449 (24217-M)

WHISTLE BLOWING POLICY AND PROCEDURES

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1. POLICY STATEMENT

Magnum Berhad and its subsidiaries ("**Group**") is committed to create value and contribute to society's progress and well-being through our business activities. As a responsible corporation, we are committed to conduct our business activities with integrity, transparency and with the highest ethical standards.

This Whistle Blowing Policy ("**Policy**") aims to establish a transparent and secured communications channel for Employees, Business Associates and members of the public to raise their legitimate and genuine concerns on any improper conduct within the Group. The procedures contained in this Policy enable the Group to take swift, fair and effective corrective actions that is transparent and impartial without compromising the confidentiality and the risk of reprisal of the Whistleblower.

This Policy does not replace the Group's Code of Conduct, Work Place Sexual Harassment and Grievance Policy or any other policies established by the Company.

This policy was approved by the Board on **28 May 2024**.

2. SCOPE

This Policy applies to all employees of Magnum Berhad Group and Business Associates including contractors, suppliers, consultants, agents, customers or any parties with business relationship with the Group. This Policy also applies to the members of the public who wish to disclose any improper conduct within the Group.

Any disclosure or report can be made if it relates to improper conduct. If such improper conduct is proved, it shall constitute a disciplinary offence or a criminal offence committed by any employee or director of the Group.

The following shall constitute "Improper Conduct" under this Policy but are not limited to: -

- Corruption, bribery, fraud and/or blackmail;
- Improprieties in matters of financial reporting;
- Failure to comply with legal and regulatory obligations;
- Abuse of power;
- Conflict of interest;
- Misuse of the Group's funds and assets;
- Criminal offences or unlawful acts;
- Violation or failure to comply with the Group's Anti-Bribery and Anti-Corruption Policy;
- Endangerment of an individual's health and safety; and
- Concealment of any or a combination of the above

The Policy does not however, cover the following in relation to:

- Concerns which are trivial or frivolous in nature;
- Concerns with no basis or insufficient evidence; and
- Concerns which are malicious.

3. REPORTING PROCEDURES

3.1 TO WHOM DISCLOSURE IS TO BE MADE

Any disclosure of Improper Conduct within the Group can be made by the Whistleblower in the following manner and to the designated person: -

- a) to the *Group Audit Committee Chairman* in writing via a letter in sealed envelope marked 'Confidential' and deposited at *Magnum Berhad, 35th Floor, Menara Multi-Purpose, Capital Square, No 8 Jalan Munshi Abdullah, 50100 Kuala Lumpur* or via email at whistleblow_gacc@magnum.my, or
- b) to the Anti-Bribery and Anti-Corruption Officer (ABAC Officer) in writing via a letter in sealed envelope marked 'Confidential' and deposited at *Magnum Berhad, 35th Floor, Menara Multi-Purpose, Capital Square, No 8 Jalan Munshi Abdullah, 50100 Kuala Lumpur* or via e-mail at whistleblowing@magnum.my.

If the Improper Conduct involves any of the Directors, the Whistleblower is to report the matter in writing or *via* email to the Group Audit Committee Chairman as in a) above.

3.2 DISCLOSURE OF INFORMATION TO BE MADE

In order for the Group to investigate the alleged Improper Conduct and to take the necessary corrective actions, the Whistleblower is encouraged to provide and submit the following information with sufficient details, to the extent that is possible: -

- Type of improper conduct;
- Name of personnel involved;
- Details and description of the allegation Improper Conduct (including location, date and time of its occurrence);
- Particulars of the Whistleblower (Name, Contact no. and email);
- Particulars of witnesses, if any;
- Supporting evidence and/or documentary, if any; and
- Other relevant supporting information, if any.

Alternatively, a disclosure may also be made by completing the Whistleblowing Form in Appendix A of this Policy.

The Whistleblower is responsible to ensure that the disclosure is made in good faith, free from malicious intent.

This Policy strictly prohibits frivolous, vexatious, mala-fide, bogus disclosure for personal gain or with personal agenda. This is also not a channel for taking up any personal grievances.

If the subsequent investigation reveals that the disclosure was made frivolously, in bad faith or with any malicious or ulterior intent, appropriate action can be taken against the whistleblower.

Whistleblower also has the right to report to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower

Protection Act 2010 such as Malaysian Anti-Corruption Commission (MACC), Royal Malaysia Police, etc.

4. DISCLOSURE ASSESSMENT AND INVESTIGATION

- 4.1 All disclosures of Improper Conduct made to the Group Audit Committee Chairman or the ABAC Officer will be assessed by the ABAC Officer to determine whether it is a concern related to Improper Conduct and/or excluded from the scope of this Policy.
- 4.2 If the disclosure is not related to the Improper Conduct within the scope of this Policy, it will be referred to the relevant department to handle the disclosure.
- 4.3 If the disclosure is related to the Improper Conduct within the scope of this Policy, the ABAC Officer shall, after the assessment, prepare a report to the Executive Director (ED) and make recommendation to either ignore or take further action on the disclosure.
- 4.4 If the Improper Conduct is related to any of the Directors, the Group Audit Committee Chairman may decide to appoint an external independent party (auditors or legal adviser) to assess the Improper Conduct. The external party shall prepare a report and recommend to the Group Audit Committee Chairman as the results of the assessment, to either ignore or take further action on the disclosure.
- 4.5 The ED or the Group Audit Committee Chairman in the case involving any of the Directors, shall make the final decision including but not limited to any of the following: -
 - a) Reject the disclosure(s) either in part or in total, if it is ultimately determined to fall outside the scope of this Policy;
 - b) Direct the matter or any part thereof to be handled under other internal disciplinary procedures;
 - c) Direct an investigation on the disclosure made and, on any persons, involved or implicated;
 - d) Suspend the person or persons implicated in the Improper Conduct from work pending investigation;
 - e) Appoint an Officer or any other persons to form a disciplinary committee to conduct an investigation on the disclosure; and/or
 - f) Obtain any other assistance from external independent or third parties (auditors or legal advice).
 - g) Refer the matter to the appropriate authorities such as the police and the Malaysian Anti-Corruption Commission.
- 4.6 It is the Group's intention that all disclosures made by the Whistleblowers will be reviewed, attended to and investigated upon as soon as is practicable and shall not exceed sixty (60) days from the date of receipt of the disclosure. The ED or Group Audit Committee Chairman may extend the timeline if further information and processes are required to complete the investigation.

- 4.7 All disclosures made by the Whistleblower will be treated fairly and objectively.
- 4.8 The Whistleblower and the person implicated are expected to give their full cooperation in the course of the investigation that will be conducted. They may be required to attend an interview to gather more information on the disclosure and must take all reasonable steps to attend the interview.
- 4.9 For the purpose of an inquiry, the implicated person will be informed of the charge against him/her in writing and he/she will be given an opportunity to answer the allegation as well as to appear before a disciplinary committee.
- 4.10 The Whistleblower will be accorded the privilege to be notified on the outcome of the disclosure within fourteen (14) days upon completion of the investigation and the action taken, if any.

5. WHISTLEBLOWER CONFIDENTIALITY AND PROTECTION

- 5.1 Subject to Clause 6 below, all disclosed information including the identity of the Whistleblower shall be treated with strict confidentiality to the extent reasonably practicable unless:
 - a) the Whistleblower expressly agrees otherwise, and provides his/her agreement in writing; or
 - b) otherwise required by law.
- 5.2 The Group is committed to provide the Whistleblower protections to the extent reasonably practicable, provided the disclosure is made in good faith and the protections underpinning the policy are as follows:
 - a) there will be no harassment or victimization of anyone raising a genuine concern; and
 - b) there will be no disciplinary actions, dismissal, demotion or reprisal against any individual as a result of raising a genuine concern even if the individual is mistaken.

6. EXCLUSION FROM PROTECTION

- 6.1 Protection accorded under this Policy will be revoked and action will be taken against the Whistleblower if:
 - a) the disclosure made by the Whistleblower is known to the Whistleblower or the Whistleblower has reasonable ground to believe it to be false or untrue and it is coupled with malicious ulterior or intent and/or bad faith; or
 - b) the disclosure made is frivolous or vexatious; or
 - c) the disclosure is made solely with a motive of avoiding dismissal or disciplinary action.
- 6.2 Protection accorded under this Policy may be revoked by the Board if it is discovered that the Whistleblower had participated in the Improper Conduct disclosed, depending on the nature and severity of the Improper Conduct. The

Board shall have sole, final and unequivocal discretion in determining the level of protection accorded to the Whistleblower.

7. ANONYMOUS REPORTING

Whistleblowers are encouraged to provide their full name and contact number to facilitate the Group to clarify or obtain further information for investigation into the Improper Conduct.

Any person who elects to remain anonymous is advised that sufficient details must be provided in the disclosure made and that no whistleblower protection will be accorded and the Group's ability and credibility to investigate disclosure made anonymously will be limited to the level of information provided in the disclosure received.

8. AMENDMENT OF POLICY

Magnum Berhad reserves the right to update or amend this policy from time to time, as and when necessary, to ensure that the Group has an up-to-date and effective Policy. Any amendment to the Policy, shall only be made with the Board's approval.

APPENDIX A

WHISTLEBLOWING FORM

A.	DISCLOSURE DETAILS	
1.	Name of Person(s) Involved	
2.	Designation	
3.	Department/Company	
B.	DETAILS OF IMPROPER CONDUCT	
1.	Type of Improper Conduct	
2.	Date of Occurrence	
3.	Time of Occurrence	
4.	Location of Occurrence	
5.	Details Description of Improper Conduct	
C.	SUPPORTING INFORMATION	
1.	Particulars of Witness(es)	Name : Contact No. : Email Address :
2.	Supporting Evidence/Documents Attached	<input type="checkbox"/> Yes <input type="checkbox"/> No

3.	Have you report the Improper Conduct to any other person or authority?	<input type="checkbox"/> Yes (If yes, please give the details of the report made e.g. the name of the person or authority and date of the reporting and attach a copy of the report made.) <input type="checkbox"/> No
4.	Any Other Relevant Supporting Information	<input type="checkbox"/> Please attach all other relevant supporting information, if any
D	PARTICULARS OF WHISTLEBLOWER	
1.	Full Name	
2.	Contact No.	
3.	Email Address	
4.	Relationship with Magnum Group	<input type="checkbox"/> Employee <input type="checkbox"/> Business Associate <input type="checkbox"/> Member of the Public

Note: Please submit the completed form in a sealed envelope marked "**Private and Confidential. To be opened by the Recipient only**" on the right-hand corner of the envelope and address to the following:

i) Anti-Bribery and Anti-Corruption Officer (ABAC Officer) and/or
 ii) Group Audit Committee Chairman
 Magnum Berhad
 35th Floor, Menara Multi-Purpose, Capital Square
 No. 8, Jalan Munshi Abdullah
 50100 Kuala Lumpur
 Wilayah Persekutuan

Or via email to the Anti-Bribery and Anti-Corruption Officer (ABAC Officer) at whistleblowing@magnum.my