

# **MATRIX CONCEPTS HOLDING BERHAD**

(Company No : 414615-U)

## **Whistleblowing Policy**

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## 1. **Background**

Matrix Concepts Holdings Berhad (“MCHB” or “the Company”) is committed to promote and maintain high standards of integrity, transparency, accountability and ethical behaviour in the conduct of its business and operations.

This policy is designed to provide employees and stakeholders with proper internal reporting channels and guidance to disclose any improper conduct or wrongdoing within MCHB.

This policy has been adopted to promote alignment with the Whistleblower Protection Act 2010, Companies Act 2016 and Capital and Market Services Act 2007; and this policy should be read together with the Company's Code of Ethics and Conduct.

## 2. **Objective and Scope**

All employees and stakeholders may disclose to the designated person any wrongdoing or improper conduct (see Note 3 below) within MCHB that is taking place/ has taken place/ may take place in the future. No employee can use his or her position to prevent employees or stakeholders from exercising their rights or complying with their obligations as indicated in this Policy.

Only genuine concerns should be reported under whistleblowing procedures. The report should be made in good faith with a reasonable belief that the information and any allegations in it are substantially true and not be based on office gossip nor for the purposes of personal advantage or gain. Malicious and false allegations will be treated as a gross misconduct and if proven may lead to dismissal.

Any disciplinary action to be taken against MCHB’s employees after the conclusion of investigation of this nature shall be in accordance with the Company’s Disciplinary Policy. In the case of proven improper conduct or wrong doing involving stakeholders, the **Audit Committee will decide on the next course of action.**

Any employees who disclose improper conduct or wrongdoing in good faith and in compliance with the provisions of this Policy shall be protected against act of retaliation.

## 3. **Improper Conduct or Wrongdoing**

The following are the list of examples of improper conducts or wrongdoing under this Policy:-

- (i) conduct which constitute a criminal offence under the law, such as fraud, corruption, cheating, theft, criminal breach of trust, insider trading or intending to commit criminal offence;
- (ii) conduct which is in contravention of established written policies and guidelines including but not limited to breach of confidentiality, misuse of company property and assets, violations of the Company's code of conduct, code of ethnics, and procedures and/or any conduct which undermines the ethical values of the Company;
- (iii) any other conduct which may cause loss to the Company, or otherwise be detrimental to the interests of shareholders, clients and the public;
- (iv) failure to comply with the Company's contractual obligations or statutory obligations;

- (v) any actions which creates risk to the health and safety of any individuals;
- (vi) sexual harassment.

#### **4. Protection of the Whistleblower**

- (i) Any employee who discloses improper conduct or wrongdoing in good faith and in compliance with the provisions of this Policy, shall be protected against any act of detrimental action in reprisal. Such protection will continue notwithstanding that after investigation, it is shown that the whistleblower was mistaken as to the facts, rules or procedures of improper conduct or wrongdoing.
- (ii) MCHB reserves the right to take disciplinary action against those who:
  - (a) disclose any matter through the whistleblowing mechanism under this Policy knowing the matter was false; or
  - (b) make reports with the intention to deceive or misinform; or
  - (c) disclose any matter with malicious intent or vexations.
- (iii) The person who wishes to whistleblow any improper conduct or wrongdoing within MCHB Group, is required to disclose his or her name, NRIC number and contact telephone number. These identity details will be kept confidential to afford protection to the whistleblower. MCHB will not entertain any anonymous disclosure.
- (iv) MCHB will not disclose his or her identity to any third party without his or her consent except where disclosure is required by law or by legally binding requirements of any statutory authority. In such case, MCHB is required to notify the whistleblower before revealing their identities.

#### **5. Procedures of Reporting**

Any person who wishes to whistleblow is encouraged to make such disclosure in accordance with the procedures stated herein:-

##### **Channels**

- (a) A disclosure of improper conduct or wrongdoing may be made in writing (via such channels as a letter or electronic mail). The disclosure should contain the following information:-
  - . Details of the person(s) involved;
  - . Brief summary of the allegation;
  - . Date(s) and place(s) of the allegation; and
  - . Other relevant information.

(b) Disclosure can be made to the Senior Independent Director:-

**“Confidential - Senior Independent Director”**

Email: [rezalzain@hotmail.com](mailto:rezalzain@hotmail.com)

Address: 47 Jalan Keruing, Bukit Bandaraya, 59100 Kuala Lumpur

**To whom should disclosure be made?**

- (a) **Any improper conduct or wrongdoing shall be reported immediately to the Senior Independent Director of MCHB who will then perform a preliminary assessment on the seriousness of the matter disclosed; OR**
- (b) **If the matter involves the Senior Independent Director, whistleblower is required to report to Chairman of the Board;**

**with the course of action below.**

**6. Action**

Upon receiving the report, the Senior Independent Director shall assess the seriousness of the matter and assigned to relevant management personnel to investigate. The progress of investigation will be reported to the **Audit Committee**.

Upon completion of investigation, appropriate course of action will be recommended to **Audit Committee** for their deliberation. Decision taken will be implemented immediately and steps to prevent similar situation arise will be implemented if possible.

[The rest of this page has been intentionally left blank]

# WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company and submit directly to the Senior Independent Director. Please note that 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*

<b>REPORTER'S CONTACT INFORMATION</b>			
NAME			
NRIC			
DESIGNATION			
DEPARTMENT / OPERATION			
CONTACT NUMBERS			
E-MAIL ADDRESS			
<b>SUSPECT'S INFORMATION</b>			
NAME			
NRIC			
DESIGNATION			
DEPARTMENT / OPERATION			
CONTACT NUMBERS			
E-MAIL ADDRESS			
<b>WITNESS(ES) INFORMATION (IF ANY)</b>			
NAME		NAME	
NRIC		NRIC	
DESIGNATION		DESIGNATION	
DEPARTMENT		DEPARTMENT	
CONTACT NUMBERS		CONTACT NUMBERS	
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 and when did you notice it?
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 :

*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”.*

<b>FOR WHISTLEBLOWER COMMITTEE USE</b>		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 Senior Independent Director on :		
Signed Off by :		