

**MMIS BERHAD**  
**WHISTLEBLOWING POLICY**



**MMIS BERHAD**  
**(Formerly known as MMIS Sdn Bhd)**  
**201901006068 (1315395-W)**

**MULTI MOULD INDUSTRIES SDN BHD**  
**199601009594 (381942-V)**

PT 14495, Persiaran Batu Gajah Perdana 4,  
Kawasan Perindustrian Batu Gajah Perdana,  
31000 Batu Gajah, Perak Darul Ridzuan, Malaysia

## **POLICY STATEMENT**

MMIS Berhad (“MMIS” or “Company”) are committed to achieving sustainable performance and delivering value to our customers and shareholders without compromising our ethical standards, behavioral expectation and trusted reputation.

As such, we operate in a manner reflecting MMIS’s core values, adhering to the best practice in corporate governance and in accordance with all applicable laws, regulations and other policies applicable to MMIS and its subsidiary (“MMIS Group”).

Our Code of Conduct (“CoC”) states the standards of responsibility and obligations and promotes fair dealing, integrity and ethical conduct amongst the Group’s directors and employees. This Whistleblowing Policy on Whistleblower is designed to support the Group’s CoC and facilitates employees’ and other stakeholders’ concerns about possible improprieties and transparently spelt out procedures on managing disclosures of improper conduct without compromising the confidentiality of the person(s) involved.

This policy is intended to encourage and assist Whistleblowers to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. The Company will handle the report with care and will treat the Whistleblower’s concerns fairly and properly.

## **KEY OBJECTIVES**

The key objectives of the Whistleblowing Policy are as follows:-

- (i) Facilitates alert or disclosures of a bona fide complaint or report/raising of a genuine concern or allegation by any director, officer or employee of MMIS Group to an independent member of the management upon discovery of possible improper conduct;
- (ii) Facilitates the performance by any vendors, partners, associates or any individual of their assignment or conduct of business for or on behalf of MMIS Group;
- (iii) Provides protection to the individuals who have made the allegation or reported the misconduct.

## **SCOPE OF POLICY**

This Policy applies to all employees of MMIS and its subsidiary. This Policy also applies to members of the public, where relevant. All Employees, Directors, Shareholders, Consultants, Vendors, Outsider Agencies or any parties with a business relationship with the Company or its subsidiaries are encouraged to disclose any Improper Conduct that may adversely impact the Company and the Group.

This Policy is designated to facilitate employees and other stakeholders to disclose any improper conducts through internal channel. Such Improper Conducts include but not limited to the following:

- (i) Criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;

- (ii) Failure to comply with legal or regulatory obligations;
- (iii) Misuse of the Company's funds or assets;
- (iv) An act of conflict of interest with suppliers, vendors or customer;
- (v) Act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- (vi) Abuse of power by an officer of the Company; and
- (vii) Concealment of any of the above.

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 the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

## REPORTING PROCEDURES

- (i) If any employee believes reasonably and in good faith that Improper Conduct exists in the workplace, the employee should raise this concern with their immediate superior. However, if for any reason, it is believed that this is not possible or inappropriate, then the employee may report the concerns to either:
  - Group Managing Director ("GMD") of MMIS; or
  - Executive Director ("ED") of MMIS.
- (ii) If a Whistleblower wish to report or make a disclosure of an improper conduct, he/she is encouraged to report, using the Whistleblowing Form under **Appendix I**.
- (iii) The report can also be lodged in writing so as to ensure a clear understanding of the issues raised via postal mail and/or email addressed to the following party:

<p><b>Mailing:</b> PT 14495, Persiaran Batu Gajah Perdana 4, Kawasan Perindustrian Batu Gajah Perdana, 31000 Batu Gajah, Perak, Malaysia.</p> <p><b>Attention:</b> Managing Director</p> <p><b>Email:</b> cs_loh@mmis.com</p>	<p><b>Mailing:</b> PT 14495, Persiaran Batu Gajah Perdana 4, Kawasan Perindustrian Batu Gajah Perdana, 31000 Batu Gajah, Perak, Malaysia.</p> <p><b>Attention:</b> Head of Corporate Finance</p> <p><b>Email:</b> jeffreychin@mmis.com</p>
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- (iv) Any anonymous disclosure will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization. However, MMIS reserves the right to investigate into any anonymous disclosure.

## **CONFIDENTIALITY**

- (i) Reports of Improper Conduct or suspected Improper Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. This is important to provide protection for whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such suspected person(s) confidentially. It is to treat both the whistleblower and alleged wrongdoer fairly and to protect MMIS from potential civil liability.
- (ii) Protection under (i) above will be accorded by the Company only when the whistleblower satisfied all the following conditions:
  - The disclosure is done in good faith
  - The whistleblower is aware that the information and any allegations disclosed are true
  - The whistleblower has not communicated the disclosure to any party not related to the disclosure
  - The disclosure made is not for personal gain or interest
- (iii) Until the investigation is completed, employee(s) under investigation will be treated confidentially and fairly. On the completion of the investigation, the name of the alleged employee(s) may or may not be disclosed depending on the nature, extent and circumstances of the incident and is subject to the Board's decision on consultation with the Legal Counsel (where necessary).
- (iv) Except for cases that are reported to external authority (e.g. Malaysian Anti-Corruption Commission ("MACC"), Police), MMIS shall ensure the confidentiality and protection of whistleblower who report on incidents/ instances of misconduct in good faith.

## **INVESTIGATION**

- (i) The GMD/ED shall have the authority to appoint an Investigating Officer ("IO") to carry out the reports of improper conduct or suspected Improper Conduct. The IO, if appointed within MMIS must be an employee of a designation higher than the employee(s) implicated in the Improper Conduct.
- (ii) In instances where the improper conduct is more technical in nature or involves Board of Directors or Senior management, the Independent Non-Executive Chairman/ARMC Chairman may request the IO to be recruited from independent external party who possess the necessary technical knowhow or obtain outside legal or other professional, at the Company's expense to efficiently conduct the investigation.
- (iii) The IO shall have the full and unlimited/unrestricted access to all information and documents/resources which are required in the investigation of the Improper Conduct and all the employees within the Group is bound to extend their co-operation upon request by the IO.

- (iv) At the conclusion of the investigation, the IO will submit an investigation report of the findings to the GMD/ED or to the Independent Non-Executive Chairman/ Chairman of ARMC when the improper conduct is involving Board of Directors or Senior management.
- (v) The GMD/ED or the Independent Non-Executive Chairman/ Chairman of ARMC must maintain a record of reports and the outcome will be reported, as necessary, to the ARMC or the Board of Directors accordingly. The report has to be in a form which does not endanger employee's confidentiality.
- (vi) The whistleblower will be notified on the outcome of the disclosure after investigation.

#### **DECISION AND ACTIONS TAKEN ON INVESTIGATION OUTCOME**

- (i) Depending on the severity of the case, MMIS reserves the right to make any decision based on the findings and the recommended actions by the GMD, ED, ARMC and/or Board of Directors of MMIS.
- (ii) An investigation results in a recommendation to terminate the employee, the decision to terminate will be made in conjunction with Group Human Resources and, if necessary, the Legal Counsel.

#### **AMENDMENT**

MMIS reserves its right to amend or modify the Whistleblowing Policy in whole or in part, at any time without assigning any reason whatsoever, subject to the approval of the Board of Directors. However, no such amendment or modification will be binding on employees unless the same is circulated to employees in writing or electronically.

Date: 22 May 2020

**APPENDIX 1**

**WHISTLEBLOWING FORM**

**A. Details of Person Alleged**

1. Name of person alleged: \_\_\_\_\_

2. Designation of person alleged: \_\_\_\_\_

3. Name of Department or Subsidiary: \_\_\_\_\_

4. Please describe the alleged wrongdoing:

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\_\_\_\_\_

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5. Date and Time of Incident: \_\_\_\_\_

6. Location of Incident: \_\_\_\_\_

7. Please attach a separate narrative if necessary and provide any evidence or document that will support your claim.

8. Please provide information of any other parties that are involved and other information you may find relevant:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**B. Witness Details**

Please provide the contact details of the witnesses to the alleged incident.

**Witness #1**

Name: \_\_\_\_\_

Contact No: \_\_\_\_\_

Email: \_\_\_\_\_

**Witness #2**

Name: \_\_\_\_\_

Contact No: \_\_\_\_\_

Email: \_\_\_\_\_

**C. Act in Good Faith**

Your act of reporting the wrong doing committed by the alleged person signifies that you have read the Company's Whistleblowing Policy and you are making the report in good faith.

**D. Declaration: (include a whistleblower who wishes to remain anonymous)**

I declare that this Report is made by me without malicious intent and not carelessly but is made after due and careful consideration and/or inquiry.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Contact No: \_\_\_\_\_

Email: \_\_\_\_\_

Date Reported: \_\_\_\_\_

(If you decide to remain anonymous, please contact us within two (2) weeks of your report as we may need additional information concerning the alleged wrongdoing)