



MUAR BAN LEE GROUP BERHAD

[Company No. 200601033829 (753588-P)]
(Incorporated in Malaysia)

WHISTLEBLOWER FRAMEWORK AND POLICY

OVERVIEW

The Board of Directors (“the Board”) and Management of Muar Ban Lee Group Berhad (“MBL” or “the Company”) together with its subsidiaries (“the Group” or “MBL Group”) are committed to adhering to the best practice in corporate governance and observing the highest standards of integrity and behaviour in all activities conducted by MBL Group, including the interaction with its customers, suppliers, shareholders, employees and business partners, and within the community and environment in which the Group operates.

All employees of MBL Group play an important role in establishing, maintaining and enhancing the reputation, image and brand of the MBL and ensuring the observance to and compliance with the standards of integrity and behaviour that MBL Group is committed to. It is required that employees display the highest levels of professionalism in all aspects of their work and comply with this Whistleblower Framework and Policy (“WFP”) and all applicable laws, regulations and other policies applicable within MBL Group.

(A) POLICY STATEMENT

- (a) MBL Group committed to achieving and maintaining high standards with regards to behavior at work as set out in MBL Group’s Principles of Business.
- (b) In order to achieve the standards set in the MBL Group’s Principles of Business, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- (c) MBL views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- (d) This WFP is applicable to all companies within MBL.

(B) WHISTLE BLOWING

- (a) Whistle Blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- (b) Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the



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information and any allegation 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.

(C) PROCEDURES

- (a) Any concern should be raised with immediate superior.
- (b) If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Group Managing Director. Channel of reporting to Group MD is:

Name: Chua Heok Wee
Address: JR52, Lot 1818, Jalan Raja,
Kawasan Perindustrian Bukit Pasir,
84300 Muar, Johor
Telephone: 06-9859998
E-mail: HW.Chua@mbl.com

- (c) In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee is:

Name: Tan Soo Mooi
Address: JR52, Lot 1818, Jalan Raja,
Kawasan Perindustrian Bukit Pasir,
84300 Muar, Johor
Telephone: 06-9859998
E-mail: mbl@mbl.com

(D) ACTION

- (a) All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Internal Audit, Finance Department, Human Resource Department, etc.) and external resources (e.g. legal and other professional advisory, etc). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- (b) Reports received anonymously will be treated as confidential.
- (c) The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be



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maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.

- (d) Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- (e) Where possible, steps will also be implemented to prevent similar situation arising.

(E) FURTHER ACTION

- (a) If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:-

Name: Tan Soo Mooi
Address: JR52, Lot 1818, Jalan Raja,
Kawasan Perindustrian Bukit Pasir,
84300 Muar, Johor
Telephone: 06-9859998
E-mail: mbl@mbl.com

- (b) Chairman of Audit Committee will deliberate the report with his Committee members and decide on the appropriate course of action.

(F) OTHER

- (a) Publication of the WFP

This WFP will be available at all venues and places of employment in the MBL Group.

- (b) Continual Improvement

The appropriateness and effectiveness of the WFP will be continuously monitored and appropriate agreed improvements and reporting procedures will be adopted where necessary.

- (c) Amendments and Updates

- (i) The WFP may be updated from time to time. Affected Personnel will be required to comply with the WFP as updated.



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- (ii) Amendments to the WFP must be approved by the Board.
- (iii) All updates and amendments are to be communicated to Affected Personnel.
- (d) Questions about the WFP
 - (i) Questions about the WFP and its application by employees should be directed to their Manager or Human Resources.

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