

## **WHISTLEBLOWING POLICY**

### **INTRODUCTION**

MIECO is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

In line with good corporate governance practices, all employees of Miecoco Chipboard Berhad (“MIECO”) and its subsidiaries (“MIECO Group”) are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate manner.

### **OBJECTIVES**

This Policy is designed to: -

- provide an avenue for all employees of MIECO and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations; and
- provide a transparent and confidential process for dealing with concerns.

This Policy not only covers possible improprieties in matters of financial reporting, but also:

- abuse of power including sexual harassment;
- breach of MIECO’s Code of Conduct for Business Partners by its business partners;
- conflict of interest;
- criminal offences by MIECO’s employees and directors including bribery, blackmail, corruption, embezzlement, fraud and theft;
- endangerment of an individual’s health and safety;
- gross mismanagement within MIECO;
- non-compliance with a legal or regulatory obligations or with company procedures;
- assisting a person to commit any of the above instances of improper conduct or improprieties; and
- any other matter which relates to MIECO’s operations or business.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under MIECO' Code of Conduct (the "Code") or any criminal offence under relevant legislations in force.

## **PRINCIPLES**

The principles underpinning the Policy are as follows: -

- all concerns will be treated fairly and properly;
- MIECO will not tolerate harassment or victimisation of anyone raising a genuine concern;
- any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- MIECO will ensure that any individual raising a concern is aware of who is handling the matter;
- MIECO will ensure no one will be at risk of suffering some form of reprisal, as a result of raising a genuine concern in the interest of MIECO. However, if an individual makes malicious or vexatious allegations, disciplinary action may be taken against that individual.

## **GRIEVANCE PROCEDURE**

If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee concerned should report this to the Head of Department/HR Division/Executive Director.

Whistleblowers are advised to make their disclosures in writing and to provide sufficient details which include the following: -

- (a) the type or description of improper conduct;
- (b) the name of individuals who have committed or are involved in the improper conduct;  
and
- (c) the 'how', 'what', and 'where' in relation to the improper conduct including supporting documents or evidence, if any.

If for any reason the employee believes that this is not possible or appropriate or no action has been taken at the levels mentioned above, then the employee concern should report the concern to the Group Managing Director ("GMD") of MIECO. The complaint should be in a sealed envelope with an indicative label such as "*To be opened by the Group Managing Director*".

If these channels have been followed and employees still have concerns, or if for any reason the employee feels the matter is so serious that it cannot be discussed with any of the above, then the employee should report the concern by mail in a sealed envelope with

an indicative label such as “*To be opened by the Audit Committee Chairman*” to the Audit Committee Chairman of MIECO as follows:

***Mark “Strictly Confidential”  
Audit Committee Chairman of MIECO  
No. 1, Block C, Jalan Indah 2/6,  
Taman Indah, Batu 11,  
43200 Cheras, Selangor.***

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

Employee’s identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can proceed.

## **INVESTIGATING PROCEDURE ON CONCERNS RAISED BY EMPLOYEE**

MIECO may follow these steps: -

- to obtain full details and clarifications of the complaint;
- to decide on timeframe in which to acknowledge receipt of report and respond to the whistleblower;
- to conduct preliminary enquiries to decide whether a full investigation is necessary.

If an investigation is necessary, depending on the nature of the misconduct, an investigation may include internal reviews, reviews by the external auditors or lawyers or some other external body.

Employee’s identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can proceed.

## **Exclusion from Protection**

Potential whistleblowers are also reminded that there may be instances wherein their protection would be revoked or excluded. The whistleblower protection does not extend to the following disclosures and will be revoked by MIECO pursuant to section 11 of the Whistleblower Protection Act 2010: -

- where the disclosures of improper conduct which are: -
  - frivolous or vexatious;
  - known to the whistleblower to be false or untrue; or
  - made solely or substantially to avoid dismissal or other disciplinary action;
- where the whistleblower has participated in the improper conduct so disclosed; or
- where the whistleblower commits an offence under the Whistleblower Protection Act 2010.

Any person who makes a disclosure of improper conduct to MIECO, knowing or believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

### **Anonymous Whistleblower**

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the MD or the Audit Committee Chairman in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

### **Protection to Whistleblower**

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within MIECO, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

### **Applicability of the Policy**

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of MIECO and its subsidiaries. This policy also applies to members of the public, where relevant.

### **Notification**

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

### **DELEGATION**

The MD and the Audit Committee Chairman may delegate the responsibility for implementing the day-to-day running of this whistle blowing procedure to any officer of the Company. Such officer(s) has the authority to investigate. The officer reports on a day-to-day and a case-by-case basis to the MD and the Audit Committee Chairman, as appropriate.

MIECO reserve the right to amend the Policy from time to time.

- *End of Policy* -

**Revised on 21 May 2020.**

**CONFIDENTIAL**

**FORM FOR REPORTING IMPROPRIETIES/MISCONDUCT/NON-COMPLIANCE**

<b>A. Particulars of whistleblower</b>	
1.	Name:
2.	NRIC No./Passport No./Employee No.:
3.	Address:
4.	Contact No. Handphone: Telephone No.:
5.	Email address:
6.	Designation/occupation:
7.	Preferred method of communication: <input type="checkbox"/> Email <input type="checkbox"/> Hand-phone <input type="checkbox"/> Normal Mail
<b>B. Information of MIECO Employee(s) involved in improprieties</b>	
Individual 1	
1.	Name of MIECO employee:
2.	Designation of said employee:
Individual 2	
1.	Name of MIECO employee:
2.	Designation of said employee:
<b>C. Details of Improprieties</b>	
Date: Time: Place:	Brief description of improprieties: (*please submit supporting documents if available)
Have you lodged a complaint on this to another person/department/authority before?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please indicate to whom:
<b>D. Declaration</b>	
1.	I declare that all information provided in this form is true, correct and complete to the best of my knowledge, information and belief.
2.	I hereby agree that the information provided herein is to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department/authority/enforcement agency for purposes of investigation.
Name: Date:	Signature:
<b>For Office Use Only:</b>	
Record No.:	Person receiving this report:
	Date: