MN HOLDINGS BERHAD

Registration No. 202001038774 (1395095-M)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY AND PROCEDURES

1. POLICY STATEMENT

MN Holdings Berhad ("the Company") is committed to upholding values and highest standard of work ethics for all directors, managers and employees in line with good corporate governance and business integrity practices.

The Company has adopted whistle-blowing policy to provide an avenue for the employees of the Group and members of the public to raise genuine concerns of any wrongdoing or improper conduct involving the Group and its directors or employees.

2. OBJECTIVE

The objective of this policy is to encourage reporting of any suspected fraud, corruption, conduct or inappropriate behavior of the Company. The policy will provide an avenue for all employees of the Company and all agents, vendors, contractors, suppliers, consultants and customers of the Company and members of the Company to raise concerns about any improper conduct without fear of retaliation and to offer protection for the reporter who reports such allegations. This will strengthen the accountability and transparency in the business affairs of the Company.

3. TYPE OF IMPROPER CONDUCT

The following shall constitute "Reportable Misconduct" under whistle-blowing policy but not limited to the followings:

i. Fraudand misappropriation of funds or assets
ii. Misconduct such as bribery, corruption or blackmail
iii. Violation of the Company's code of conduct, procedures or policies
iv. Improper or unethical conduct or behavior
v. Conflict of interest
vi. Theft or embezzlement of fund or assets
vii. Abuse of power or position
viii. Breach of confidentiality
ix. Criminal breach of trust
x. Failure to comply with any legal obligations or breach of internal control
xi. Danger to health and safety of any employee of the Company or any other individual
xii. Sexual harassment

4. PROTECTION TO WHISTLEBLOWER

The Company is committed to ensuring confidentiality in respect of all matters raised under this policy and those who lodge a report in good faith.

a) Confidentiality

The confidentiality of identity of the whistle-blower will be ensured and protected, unless otherwise required by law. The Company assures that all reports will be treated in the strictest of confidence and will be promptly investigated.

b) Assurance against retaliation and immunity from disciplinary action

This policy provides assurance that the whistle-blower, if an employee of the Company, shall be protected against retaliation and immunity from disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment. However, whistle-blowers making a report in bad faith or based on unfounded allegations or containing trivial and malicious claims maybe subjected to disciplinary actions by the Company.

5. REPORTING PROCESS AND PROCEDURES

a) Any concern of improper conduct should be reported to the immediate supervisor. However, if it is not possible or appropriate to do so, the concern should then be reported to the Managing Director by providing and completing the information as required in the form annexed herewith as Appendix A and email to: -

Managing Director
Attention : Dato' Toh Eng Keat
Email : clementtoh@mnusantara.com.my

b) In cases where reporting to management is a concern, then the reports should be made to the Chairperson of the Audit Committee ("AC") by providing and completing the information as required in the form annexed herewith as Appendix A and email to: -

Chairperson of AC
Attention : Ms. Soh Eng Hooi
Email : enghooi@ehsoh.co

c) The whistle-blower is encouraged to disclose his/her particulars including, name, contact number and email address, as well as the supporting evidence (if any) to speed up the follow-up and investigation process.

d) Upon receipt of the concern, the Managing Director or the Chairperson of AC (depending on who is the recipient of the reporting) shall set up an investigating team to conduct investigation on the issue/concern raised. The progress of the investigation shall be reported to the Managing Director or the Chairperson of AC.

e) Upon completion of the investigation, the Investigators shall submit their full report together with appropriate course of action/recommendation to the Managing Director or the Chairperson of AC.

f) The findings of the investigation and recommendation shall be referred to the AC for their deliberation.

g) In cases where the findings disclose a possible criminal offence, the AC may seek consultation with external legal advisors, decide if the matter should be referred to the relevant authorities, such as the police or the Malaysia Anti-Corruption Commission for further action.

h) If the matter is closed, the Managing Director or the Chairperson of AC will inform the whistle-blower that the matter is closed. If the matter is to be referred to the authorities, subject to any legal requirements or prohibitions, the Managing Director or the Chairperson of AC will inform the whistle-blower that the matter has been referred to the authorities

i) If the whistle-blower is not satisfied with the way the concern/matter is dealt with, he/she can escalate the report to the Chairman of the Board via email as stated below. The Board of Directors will deliberate the matter reported and decide on the appropriate action.

Chairman of the Board
Attention : Dato' Seri Ir. Baharin Bin Din
Email : datoseri.baharin@mnholdings.com.my

6. REPORTING OF WHISTLE-BLOWING MATTERS

The Managing Director and/or the Chairperson of AC shall update/report to the AC on a quarterly basis in relation to the whistle-blowing matters.

7. AMENDMENT OF POLICY

This policy cannot be amended without approval from Board of Directors of the Company. It will be reviewed from time-to-time to ensure that it remains effective and meets best practice standards and the needs of the Company.

Revision Record Table

Date	Brief Description of Changes	Approval Date	Effective Date
30 May 2022	Adoption	30 May 2022	30 May 2022
22 October 2024	Review and refinement	24 October 2024	24 October 2024

Appendix A

WHISTLE BLOWING REPORT FORM

A. Nature of Misconduct

(Kindly describe the incident, specify date, time and venue, person(s) involved and enclosed supporting evidence).

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B. Contact

Name of Whistle-Blower :_____

Contact (for further details):
Tel No : _____
Email Address : _____
Date : _____