

## KEY STANDARD OPERATING PROCEDURE

Division : Human Capital  
 Standard : Whistle Blowing  
 Policy

Business Unit :  
 Standard Ref :

Issue Date :

Issue Type:  New

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### 1.0 Whistle Blowing - Policy

- 1.01 The policy aims to provide a structured mechanism for staff and others to raise or report concerns about ongoing or suspected wrongful activities or wrongdoings to provide reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith.
- 1.02 For the purpose of this policy, the wrongful activities or wrongdoings refers to any potential violations or concern relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violation or concern relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of AlloyMTD Group.
- 1.03 The Board of Directors (BOD) of AlloyMTD has stewardship responsibility to communicate the requirements of this policy and to guide the organization in dealing with concerns arising from wrongful activities or wrongdoings.
- 1.04 The Policy of the Board of Directors (BOD) is:
- a) To encourage active and moral obligation to report wrongdoings.**
    - All staff and others are required to report any ongoing or suspected wrongful activities or wrongdoings at the earliest possible stage through the proper channel of reporting so that immediate action can be taken.
  - b) To use internal disclosure to report wrongdoings.**
    - As far as reasonable, internal disclosure is encouraged and used to avoid public crisis.
  - c) To protect the whistleblower.**
    - Where the disclosure is made in good faith, the whistleblower will be protected against victimization or other adverse treatment.
  - d) To ensure appropriate and fair disciplinary actions.**
    - All actions taken against the alleged wrongdoers would be fair and without prejudice.
  - e) To require that an effective whistle blowing guideline be established and maintained by AlloyMTD - Whistle blowing guideline must be sufficient to:**
    - Establish a formal and robust whistle blowing guideline, including hotline accessibility
    - Prohibit legal sanctions for retaliatory action taken against the whistleblower;
    - Establish timely, feedback, response and remedial and/or corrective action;
    - Ensure that this policy is properly communicated to all staff;
    - Establish procedures to maintain records confidentiality and retention; and
    - Embed integrity, transparency and accountability within the business.

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<b>2.0</b>	<p><b>Whistle Blowing Guidelines - Definition</b></p> <p>2.01 The word whistle blowing in the context of this Whistleblowing Guidelines new projects ("Guideline") refers to a situation where a person (internal or external) raising or reporting concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing within MTD Capital Bhd, MTD ACPI Engineering Berhad, MTD InfraPerdana Bhd and Metacorp Berhad and, other subsidiaries and related associates companies (here-in-after collectively referred as "AlloyMTD Group").</p> <p>2.02 The person who <u>ises</u> or reporting concerns of wrongful activities or wrongdoings within AlloyMTD Group is referred as "whistleblower".</p> <p>2.03 For the purpose of this Guideline, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of AlloyMTD Group.</p>
<b>3.0</b>	<p><b>Objective</b></p> <p>3.01 To provide an avenue and a structured mechanism for a person to raise or report concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing within AlloyMTD Group and, to protect the values of integrity, transparency and accountability in where AlloyMTD conducts its business and affairs.</p>
<b>4.0</b>	<p><b>Principles</b></p> <p>The Whistleblowing Policy is based on several key principles such as following:</p> <p>4.01 To establish a formal and written Guideline to provide a transparent method of addressing issues relating to whistleblower, such as answering standard questions, providing information and offering explanations.</p> <p>4.02 To apply as an early warning system to alert AlloyMTD Management to take the necessary remedial and/or corrective actions before a problem became a serious crisis.</p>

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	<p>4.03 To encourage and enable staff and others to be able to report irregularities in good faith within AlloyMTD prior to seeking resolution outside AlloyMTD and without having to fear that their action may have adverse consequences.</p> <p>4.04 To provide timely feedback and response.</p> <p>4.05 To verify the report incidents in the appropriate manner and, if the reports are confirmed, all necessary steps to identify appropriate remedies will be taken promptly.</p>
<b>5.0</b>	<p><b>Access Procedure for Occupants and Visitors</b></p> <p>5.01 Suppliers or vendors with bulky items are required to make prior arrangements for entry to the premises and in the case of the lifts they are use only the service lift or passenger lift.</p> <p>5.02 To ensure effective implementation of this Guideline. This will enhance AlloyMTD Group's accountability in preserving its integrity and will be able to stand up to public scrutiny. This in turn enhances and builds credibility of our stakeholders.</p>
<b>6.0</b>	<p><b>Application</b></p> <p>6.01 This Guideline is intended to complement the existing internal controls system and channels of communication and reporting lines within AlloyMTD Group.</p> <p>6.02 The Whistleblowing Policy and Guideline applies to all staff and others who want to report any wrongful activities or wrongdoings in good faith. The policy aims to provide an avenue to raise concerns and receive feedback on any action taken.</p> <p>6.03 This policy is intended to cover concerns which fall outside the scope of other AlloyMTD existing procedures which already are included in or covered by other Policies e.g. retaliation, discrimination and victimization.</p> <p>6.04 This Guideline will not apply to personal grievances. Such complaints will be dealt by AlloyMTD's Human Capital Division ("HCD") under the existing AlloyMTD Human Capital Division Manual on grievance, discipline and misconduct.</p>

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<b>7.0</b>	<p><b>Administration</b></p> <p>7.01 The Board of Directors shall exercise the oversight function over the administration of the policy and endorsed the policy.</p> <p>7.02 The administration of the policy, guideline and hotline is to be carried out by the Senior Vice President (SVP), Head and Human Capital Division.</p> <p>7.03 The Senior Vice President (SVP), Head and Human Capital Division, with the agreement of the President &amp; CEO/Deputy President &amp; COO, shall propose to the Board of Directors any necessary policy amendments for endorsement.</p> <p>7.04 The Senior Vice President (SVP), Head and Human Capital Division shall propose to the President &amp; CEO any necessary amendments to the Guideline for adoption.</p>
<b>8.0</b>	<p><b>Circulation and Annual Review</b></p> <p>8.01 The Whistleblowing Policy is made available to public via the AlloyMTD's public website.</p> <p>8.02 As for internal circulation within AlloyMTD Group, the Whistleblowing Policy and Guideline is made available via the AlloyMTD's intranet. Once the Whistleblowing Policy and Guideline is available at AlloyMTD Intranet, it is deemed to be considered that all staff of AlloyMTD Group are aware, has read and understand the content of AlloyMTD Whistleblowing Policy and Guideline.</p> <p>8.03 The Guideline will be reviewed on annual basis by the Senior Vice President (SVP), Head of Human Capital Division to ensure that the Guideline is in accordance with AlloyMTD Group's business environment and the relevant standards, act and law.</p> <p>8.04 The amendments will be updated in AlloyMTD's public website and intranet accordingly.</p>

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<b>9.0</b>	<p><b>Who Can Whistleblow</b></p> <p>9.01 Once the Whistleblowing Policy and Guideline are fully implemented, any of the following people can make a disclosure:</p> <ul style="list-style-type: none"> <li>• AlloyMTD Group staff including, staff on contract terms, temporary or short-term staff and staff on secondment;</li> <li>• Board members i.e. Board of Directors, Board Audit Committee, Board Nomination Committee and Board Remuneration Committee;</li> <li>• Ex-staff;</li> <li>• Financiers;</li> <li>• Shareholders; and</li> <li>• People performing services and supplying materials / products (here-in-after collectively referred as “service providers”) for AlloyMTD Group which includes contractors, suppliers, advisors, consultants, internal and external auditors.</li> </ul> <p>9.02 No staff or Board of Directors may use their position to prevent an individual to report any ongoing and suspected wrongful activities or wrongdoing.</p>
<b>10.0</b>	<p><b>What To Whistleblow</b></p> <p>10.01 A qualified disclosure may be made if it relates to one or more of the following wrongful activities or wrongdoings by any staff or service providers in the conduct of AlloyMTD Group's business or affairs that is being, has been, or is likely to be, committed:</p> <ul style="list-style-type: none"> <li>• Failure to comply with legal obligations;</li> <li>• Criminal offence;</li> <li>• Criminal breach of trust;</li> <li>• Corruption;</li> <li>• Unofficial payoffs;</li> <li>• Fraud;</li> </ul>

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- Collusion and money laundering;
- Improperly discriminatory;
- Misuse or abuse of AlloyMTD Group's funds or assets or assets misappropriation;
- Gross mismanagement within AlloyMTD Group;
- Gross negligent;
- Serious financial irregularity or financial fraudulent within AlloyMTD Group;
- Breach of AlloyMTD Group's Standard Operating Procedures;
- Breach of AlloyMTD Group's Financial Authority Limit;
- Repeated ill treatment of a client/customer/supplier despite a complaint being made;
- Activities, which otherwise amount to serious improper conduct, including AlloyMTD's Code Of Business Conduct And Ethics or Conflict Of Interest Code;
- Actions which endanger the health or safety of staff or the public and the environment;
- Actions which endanger National and public interest;
- Illegal or unlawful conduct or failure to comply with the provisions of the Government Laws and Regulations where the wrongdoer, knowingly, disregards or does not comply with such provisions;
- Sexual harassment;
- Knowingly directing or advising a person to commit any of the above wrongdoings; and
- Any action which is intended to conceal any of the above.

10.02 The above list is not exhaustive and there will be instances where whistleblower (s) would need to exercise judgement.

10.03 A whistleblower will not be expected to prove the truth of an allegation but he or she should be able to demonstrate that there are sufficient grounds to have a reasonable belief that something is wrong.

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	<p>10.04 If an individual is unsure whether a particular act or omission constitutes a wrongful activity or wrongdoing under Whistleblowing Policy and Guideline, he or she is encouraged to seek advice or guidance from the Senior Vice President, Head of Human Capital Division and where necessary, contact the Whistleblowing Hotline for more clarification.</p>
<b>11.0</b>	<p><b>When To Whistleblower</b></p> <p>11.01 A whistleblower should <b>immediately</b> come forward with any information that he or she, in good faith, reasonably believes discloses a wrongful activity or wrongdoing is likely to happen, is being committed or has been committed.</p> <p>11.02 However, he or she is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If he or she knows as a matter of fact that there are serious risks that a wrongful activity or wrongdoing is going to take place, such bona fide concerns should be raised immediately i.e. the whistleblower is able to show the reasons for concern.</p>
<b>12.0</b>	<p><b>Education Process</b></p> <p>12.01 Training and awareness on whistleblowing key processes and updates will be communicated via continuous training and awareness programs and, via AlloyMTD intranet.</p>
<b>13.0</b>	<p><b>Confidentiality</b></p> <p>13.01 The Whistleblowing Policy and Guideline is intended to safeguard the safety of the whistleblower's identity, and therefore undertakes to treat all Whistleblowing reports as confidential.</p> <p>13.02 All reports of violation or suspected violation will be kept as confidential to the extent possible, consistent with the need to conduct adequate investigation, unless otherwise required by law. Every effort will be made to protect the whistleblower's identity.</p>

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	<p>13.03 The Guideline provides assurances that the reporting mechanism for Whistleblowing is set up in a structured and systematic manner to safeguard the information and the identity of the whistleblower. By setting up the necessary system to safeguard the confidentiality, the interests of the whistleblower are protected from possible harm through retribution by those who stand to benefit the reported misconduct.</p> <p>13.04 The perception and the reality of safety of the information and the whistleblower identify are crucial to provide courage and confidence for individuals to speak up or report any sensitive issues that they believe in good faith that could have negative repercussion to AlloyMTD Group.</p> <p>13.05 Approaches for confidential advice to outside parties, such as lawyers, unions or other external safe channels are acceptable, but that the Whistleblowing Policy and Guideline Document is designed to prevent any unnecessary public disclosure of concerns.</p>
<b>14.0</b>	<p><b>Whistleblower Protection</b></p> <p>14.01 Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to this Guideline, the whistleblower's identity will be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against AlloyMTD Group.</p> <p>14.02 However, AlloyMTD will honor the request of the whistleblower if he or she request to maintain his or her identify confidential.</p> <p>14.03 If situation arises where the report launched by the whistleblower cannot be preceded without revealing the identity of the whistleblower, the Senior Vice President, Head, Human Capital Division will discuss with the whistleblower to determine the best available options taking into consideration the request of the whistleblower and to safeguard the interest of AlloyMTD Group.</p> <p>14.02 Where a whistleblower makes a report under this policy in good faith, reasonably believed to be true; the whistleblower will be protected from harassment or victimization within AlloyMTD Group, dismissal, disciplinary procedures or any other form of retaliatory action should the disclosure turn out to be inaccurate or false. Retaliation includes harassment and adverse employment consequence.</p> <p>14.03 AlloyMTD will not tolerate punishment or unfair treatment when concerns are raised in good faith. A whistleblower who reports a contravention or a concern will be given protection and shall in no way be put at a disadvantage as a result of his or her report.</p>

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	<p>14.04 Any staff who shows the act of retaliation against the whistleblower who has reported a violation in good faith will be subjected to Disciplinary Action by AlloyMTD in accordance with the AlloyMTD Human Capital Division Manual which includes termination of employment.</p>
<b>15.0</b>	<p><b>Safeguard Against Abuse Policy</b></p> <p>15.01 Reporting under this policy, however, would not immunize or shield a whistleblowing against action following from his/her intentional misconduct, which includes wilfully making allegations through the whistleblowing mechanism that the whistleblower knows to be false or makes with the intent to misinform or tarnish the reputation or others or due to personal gain.</p> <p>15.02 Where a whistleblower makes a report <u>not</u> in good faith or reasonably believed not to be true, the whistleblower will not be protected and will be subjected to Disciplinary Action by AlloyMTD in accordance with the AlloyMTD Human Capital Division Manual.</p> <p>15.03 Malicious rising of unfounded allegations is a disciplinary offence and will be subjected to Disciplinary Action by AlloyMTD in accordance with the AlloyMTD Human Capital Division Manual.</p>
<b>16.0</b>	<p><b>Reporting Process and Procedures</b></p> <p>16.01 Procedures for raising a complaint.</p> <ul style="list-style-type: none"> <li>• When an individual is of the opinion that a specific concerns falls within the scope of this Guideline and cannot be solved through AlloyMTD's existing internal written procedures / control systems, he/she can choose to make a report orally or in writing and submit it to Whistleblowing Hotline Consultant. If he/she decides to raise a matter orally, the respective staff will be requested to make a written statement subsequently. The example format of the report to be used by the whistleblower is provided in <b>Appendix A</b>.</li> <li>• In deciding whether or not the staff has acted reasonably, all circumstances will be taken into consideration but in particular;</li> <li>• The identity of the person to whom the disclosure is made;</li> <li>• The seriousness of the relevant "wrongful activity" or "wrongdoing" and the impact to AlloyMTD Group, e.g. reputation and financial;</li> </ul>

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- Whether the “wrongful activity” or “wrongdoing” is continuing or is likely to occur in the future;
- Whether the disclosure is made in breach of a duty of confidentiality owed by the employer to any other person;
- Any action the staff or other person might be reasonably be expected due to previous unfavorable disclosure; and
- Whether the complaints rose has taken into consideration the existing internal controls.
- The Whistleblowing Hotline is a confidential telephone service which offers staff and others the possibility to report concerns in confidence without any party in AlloyMTD knowing about the complaint initially. AlloyMTD has appointed Columbus Advisory Sdn.Bhd (“CASB”) to manage the hotline. CASB is completely independent organisation with impartial staff to handle these types of calls. (Refer to **Appendix B: Whistleblowing Hotline** for further details).
- When the whistleblower choose to put in writing in the event he or she feels the issues or concerns are sufficiently serious, the whistleblower can either email their complaint letter to Whistleblowing Hotline Consultant at [wb@columbus-global.com](mailto:wb@columbus-global.com) or mail the letter by marking “Private and Confidential” to the following address:

To: Whistleblowing Hotline Consultant,  
c/o: Columbus Advisory Sdn Bhd,  
1-23-7, Menara Bangkok Bank,  
Laman Sentral Berjaya  
No 105, Jalan Ampang  
50450 Kuala Lumpur.

- The envelope and email will be opened by the Whistleblowing Hotline Consultant and the whistleblower will be responded in accordance with the respond timing as included in **Appendix G**, to confirm receipt of the complaint letter. The respond letter will be sent to the address as specified by the whistleblower in the complaint letter or, his or her email.
- The whistleblower can also directly write to the Senior Vice President, Head of Human Capital Division at the following address when he/she has a reasonable belief that there is serious malpractice relating to any of the wrongful activities or wrongdoings specified in paragraph 26.1.8.1 and it will not adequately dealt with by reporting to the Whistleblowing Hotline Consultant;

Senior Vice President,  
Head, Human Capital Division,  
MTD Group of Companies  
1, Jalan Batu Caves,  
68100 Batu Caves, Selangor Darul Ehsan

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- The whistleblowing reporting structure is provided in **Appendix C**.
- The whistleblower is encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.
- The whistleblower is encouraged to disclose his or her particulars including, name, designation, current address and contact numbers to speed up the follow-up and investigation process.
- The whistleblower should inform the Whistleblowing Hotline Consultant of all details of his or her concerns as reasonably possible, including other details deemed to be useful to facilitate screening and action to be carried out under paragraph 26.2.4.2 and 26.2.4.3, if required.
- The whistleblower could refer to **Appendix A: Example Format of Report to Be Used by Whistleblower**, as a guideline prior to calling the whistleblowing hotline and, refer to **Appendix B: Whistleblowing Hotline** for further details.
- The whistleblower may be asked to provide further clarifications and information from time to time, for example, if an investigation is conducted.
- In respect of the whistleblower that reports a suspected violation in good faith and is not engaged in questionable conduct, AlloyMTD will attempt to keep its discussions and actions confidential to the greatest extent possible.
- However, there may be circumstances where the whistleblower may be needed as a witness. Should this be the case, the Senior Vice President, Head, Human Capital Division will discuss the matter with the whistleblower at the earliest opportunity as specified in paragraph 26.2.2.1. In addition, in the course of investigation, AlloyMTD may need to share information with others on a "need to know" basis.

**17.0 Screening**

- 17.01 The Whistleblowing Hotline Consultant will screen and assess the whistleblower's disclosure to determine whether it is related to a wrongful activities or wrongdoings specified in paragraph 26.1.8.1 or excluded from the scope of the Whistleblowing Policy and Guideline.
- 17.02 Initial enquiries will be made via telephone communication or emails with the whistleblower to decide on how to deal with any concerns raised and determine whether further interview is required, and the form that it should take. Some concerns may be resolved without the need of an interview process.

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17.03 If an interview is required, the Whistleblowing Hotline Consultant will meet with the whistleblower to obtain further information, clarification and documents which may be useful to support the alleged wrongdoings.

17.04 Upon completion of the initial enquiry and interview process, the complaints will be categorized into the following four (4) categories:

**Category A** : Extreme rated cases

**Category B** : High rated cases

**Category C** : Medium rated cases

**Category D** : Personal grievances cases

17.05 Upon completion of the screening process, the Whistleblowing Hotline Consultant will prepare a report for complaints under category A, B, C and D which will include general recommendations to the Senior Vice President, Head, Human Capital Division.

17.06 Following table shows the frequency of whistleblowing reporting to the Senior Vice President, Head of Human Capital Division:

Reporting	Contents
<b>Weekly verbal communication</b>	Category A rated cases
<b>Monthly report</b>	Category A and B rated cases
<b>Quarterly report</b>	Category A, B and C rated cases

17.07 In the event there is an urgent attention required due to the seriousness of the allegation i.e. for Category A type of complaints, the Senior Vice President, Head of Human Capital Division will be updated through verbal communication by the Whistleblowing Hotline Consultant to determine the appropriate action. The screening process will be completed on an urgent basis if the complaint on the alleged wrongful activities or wrongdoings is capable of causing irreparable harm to AlloyMTD Group's reputation or its financial position.

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	<p>17.08 For complaints which are specified under paragraph 26.1.4.3 and not specified under paragraph 26.1.8.1 i.e. Category D types of complaints, a separate report stating the nature of complaints, name, current address and contact numbers, the personnel alleged and additional information as required will be provided to the Senior Vice President, Head of Human Capital Division for follow-up.</p> <p>17.09 The individuals complaining under the Category D types of complaints will be advised by the Whistleblowing Hotline Consultant to refer their complaints to the Senior Vice President, Head of Human Capital Division.</p> <p>17.10 If the whistleblower's disclosure implicates the Senior Vice President, Head, Human Capital Division and the President &amp; CEO/Deputy President &amp; COO, the Whistleblowing Hotline Consultant will prepare a report which includes general recommendations for the Board Audit Committee ("BAC") / BOD consideration. (Refer to <b>Appendix C: Whistleblowing Reporting Structure</b> for further details)</p>
<b>18.0</b>	<p><b>Preliminary Action</b></p> <p>18.01 Following the recommendation of the Senior Vice President, Head, Human Capital Division and/or the Whistleblowing Hotline Consultant, the President &amp; CEO/Deputy President &amp; COO, will make decisions including but not limited to any of the following:</p> <ul style="list-style-type: none"> <li>• Rejection of the whistleblower's disclosure; or</li> <li>• Directing investigation by the Senior Vice President, Head, Human Capital Division , Whistleblowing Hotline Consultant or any other outside party; or</li> <li>• Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the AlloyMTD Human Capital Division Manual to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm; or</li> <li>• Referral to the police or any other appropriate enforcement authority; or</li> <li>• Referral to BAC / BOD for decision.</li> </ul> <p style="margin-left: 40px;">- All decisions made by the President &amp; CEO/Deputy President &amp; COO and reasons of action thereof shall be properly documented.</p>

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	<p>- If the case is referred to the BAC / BOD for decision, the BAC / BOD, together with the general recommendations made by the President &amp; CEO/Deputy President &amp; COO, will make decisions including but not limited to any of the following:</p> <ul style="list-style-type: none"> <li>• Directing investigation by the Senior Vice President, Head, Human Capital Division , Whistleblowing Hotline Consultant or any other outside party; or</li> <li>• Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the AlloyMTD Human Capital Division Manual to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm, or</li> <li>• Referral to the police or any other appropriate enforcement authority.</li> </ul> <p>18.02 All decisions made by the BAC / BOD and reasons of action thereof shall be minuted in the minutes of meetings of the BAC / BOD.</p> <p>18.03 Subject to legal constraints, the whistleblower will be notified of the status of his or her whistleblower's disclosure based on the preliminary action taken by the President &amp; CEO/Deputy President &amp; CoO and/or the BAC / BOD as far as reasonably practicable, in good time.</p> <p>18.04 The status will be updated by the Whistleblowing Hotline Consultant upon approval from the Senior Vice President, Head, Human Capital Division.</p> <p>18.05 The alleged wrongdoer will also be informed of the allegations and given an opportunity to answer the allegations at the upcoming investigation or appeal his/her case. The rights of person are specified under <b>Paragraph 26.2.5 – Rights of Person Implicated.</b></p>
<b>19.0</b>	<p><b>Investigation</b></p> <p>19.01 Following the recommendation of the Senior Vice President, Head, Human Capital Division and/or the Whistleblowing Hotline Consultant, the President &amp; CEO/Deputy President &amp; COO, will make decisions including but not limited to any of the following:</p> <p>19.02 The investigation would be carried out under the terms of strict confidentiality, by not informing the subject of the whistleblower's disclosure complaint until (or if) it becomes necessary to do so.</p>

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19.03 The whistleblower and the alleged wrongdoer are expected to give his or her full cooperation in any investigation or any other process carried out pursuant to this Guideline and/or the Disciplinary Action of the Human Capital Division Manual. The amount of contact between the whistleblower, the alleged wrongdoer and the investigating party will depend on the nature of the issue and the clarity of the information provided. Further information may be sought from or provided to whistleblower and the alleged wrongdoer.

19.04 The investigation will be carried out internally and/or by outside party and the directive of the investigation could be from the President & CEO/Deputy President & COO and/or the BAC / BOD.

19.05 As far as possible, all investigations will be completed within 30 working days. However, complex investigation that requires longer period will be notified to the President & CEO/Deputy President & COO and/or to the BAC / BOD by the Senior Vice President, Head of Human Capital Division.

19.06 In the event the whistleblower is implicated or discovered to be or have been involved in any wrongful activities or wrongdoing, he/she may also be investigated so as to complete the fact-finding process in accordance with this Guideline and/or the Disciplinary Action of AlloyMTD Human Capital Division Manual.

- If the alleged wrongdoer or any other implicated persons has/have, or is/are found to have: committed a wrongdoing; or
- taken serious risks which would likely cause a wrongdoing to be committed,
  - based on the investigation directed by the President & CEO/Deputy President & COO or the BAC / BOD, the action to be taken against that alleged wrongdoer or any other implicated persons will be subjected to Disciplinary Action by AlloyMTD in accordance with the AlloyMTD Human Capital Division Manual, which may include formal warning or reprimand, demotion, suspension or termination of employment or services with AlloyMTD Group.

19.07 In circumstances where immediate decision is required, the President & CEO/Deputy President & COO, with the recommendation of the Senior Vice President, Head, Human Capital Division, will make the decision on the appropriate measures to be taken, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The report will be presented subsequently to the BAC / BOD for approval and final decision.

19.08 In the event the implicated personnel is the President & CEO/Deputy President & COO or the Senior Vice President, Head, Human Capital Division, the BAC / BOD, based on the investigation report, will have the final decision on the appropriate measures to be taken including, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons.

## KEY STANDARD OPERATING PROCEDURE

<b>Division</b> : <b>Human Capital</b>	<b>Business Unit</b> :	
<b>Standard</b> : <b>Whistle Blowing Policy</b>	<b>Standard Ref</b> :	
Issue Date :	Issue Type: <input type="checkbox"/> New	<input type="checkbox"/> Revised Date:

	<p>19.09 All decisions made by the BAC / BOD and reasons of action thereof shall be minuted in the minutes of meetings of the BAC / BOD.</p>
<b>20.0</b>	<p><b>Reporting of Outcome</b></p> <p>20.01 Subject to any legal constraint, the whistleblower and, if applicable, the alleged wrongdoer will be notified in writing of the decision of the BAC / BOD with the recommendation from the President &amp; CEO, on whether any wrongful activities or wrongdoings specified under paragraph 26.1.8 have occurred or not and the alleged wrongdoer is guilty or not, in good time, and the basis thereof.</p> <p>20.02 The notification letter would be signed by the President &amp; CEO/Deputy President &amp; COO of AlloyMTD Group.</p> <p>20.03 If the whistleblower is unhappy / dissatisfied with the outcome of the investigation, the whistleblower may submit another detailed report explaining why this is the case and the whistleblower's concern will be investigated again if there is good reason to do so to the Whistleblowing Hotline Consultant.</p> <p>20.04 Based on the monthly and quarterly report from the Whistleblowing Hotline Consultant stating the number and nature of complaints received the results thereof, follow up action and the unresolved complaints to the Senior Vice President, Head, Human Capital Division, the Senior Vice President, Head, Human Capital Division will provide a report to the President &amp; CEO/Deputy President &amp; COO.</p> <p>20.05 Board Executive Summary Report will be provided to the BAC / BOD on a quarterly reporting basis.</p> <p>20.06 The procedures listed above in Paragraph 26.2.4 have been briefly summarised in a procedures flowchart for whistleblowing and provided in <b>Appendix D</b>: The reporting process and respond timing have been indicated in <b>Appendices C and G</b> respectively.</p>
<b>21.0</b>	<p><b>Rights of Persons Implicated</b></p> <p>21.01 AlloyMTD Group staff or other persons who are implicated of wrong doings/ alleged wrongdoers will be notified in good time of the allegation made against them provided that this notification does not impede the progress of the procedures for establishing the circumstances of the case.</p> <p>21.02 All alleged wrongdoers will be given the opportunity to put forward their comments during the investigation in keeping with the principle respect for the "right to have a fair hearing", as interpreted by the law.</p>

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	21.03 All alleged wrongdoers have the duty to attend and assist the investigation process.
<b>22.0</b>	<p><b>External Disclosure</b></p> <p>22.01 AlloyMTD Group staff or other persons who are implicated of wrong doings/ alleged wrongdoers will be notified in good time of the allegation made against them provided that this notification does not impede the progress of the procedures for establishing the circumstances of the case.</p> <p>22.02 If the procedures under the Whistleblowing Policy and Guideline have been exhausted, or the whistleblower is still not satisfied with the AlloyMTD's response and reasonably believes that the information disclosed, and any allegation contained in it, are substantially true, he or she is at liberty to take the matter further by raising it with the relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned. External disclosure may further be made in case of an important and urgent public interest or required by the law.</p> <p>22.03 Whilst the whistleblower(s) is able to report issues externally, the whistleblower must be aware that there is a difference between reporting internally through the Whistleblowing Hotline or to the Senior Vice President, Head of Human Capital Division of AlloyMTD, and externally. To report internally, the whistleblower must be suspicious that there is malpractice whereas to report externally, the whistleblower must have reasonable belief that malpractice has or is taking place and some evidence to support the report and, he or she believes that the framework will not adequately dealt with the matter. External disclosures must be made in good faith, in the belief that allegations are substantially true and there should be no motive for personal gain.</p> <p>22.04 The instrument of external reporting should in reasonable opinion of the whistleblower is in balance with the relevant matter and there should not be a less potentially damaging option available.</p> <p>22.05 The whistleblower should minimise the possible impact of his or her actions to AlloyMTD Group and to the people involved. The external party one considers disclosing information to, should be a party which will be able to effectively organise action against the alleged contravention.</p> <p>22.06 The staff who makes an external complaint in good faith to any the relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned after exhausting AlloyMTD Group existing internal procedure will be protected against victimisation or other adverse treatment.</p>

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<b>23.0</b>	<p><b>The Limits and The Retention of Records</b></p> <p>23.01 Time limits should be allocated for each stage of the procedure. If the time limits pass without any satisfactory action being taken, the concerns should be raised at the next level.</p> <p>23.02 The Human Capital Division will retain for a minimum period of <b>seven (7)</b> years all records relating to any whistleblower case(s) and its related investigation report, if any.</p> <p>23.03 All records will be maintained in good condition to protect evidence and avoid legal repercussions at dedicated place as allocated by the Human Capital Division.</p> <p>23.04 All records will be treated as confidential and only dedicated staff as assigned by the Senior Vice President, Head and Human Capital Division will have the accessibility of the records.</p>
<b>24.0</b>	<p><b>Privacy</b></p> <p>24.01 AlloyMTD is committed to protect the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws. Any personal data obtained through or as part of this Guideline, will only be used for the purposes explained in this Guideline and will only be provided to those who have a need to know these data for these purposes or to comply with the law or an important public interest.</p>