MMM Group Berhad
Registration No. 200801011849 (813137-V)

WHISTLEBLOWER POLICY

1. POLICY STATEMENT

MMM Group Berhad ("MMM" or "Company") and its subsidiaries ("Group") are committed to the highest standards of integrity, ethics, transparency and accountability. This Policy provides a safe, confidential and accessible mechanism for employees, directors, business partners, customers and other stakeholders to report actual or suspected misconduct without fear of retaliation.

The Chairman of the Audit and Risk Management Committee ("ARMC") shall be responsible for the effective implementation of this Policy supported by the Management.

2. OBJECTIVES

The following are the objectives of this Policy:

(a) Encourage prompt reporting of misconduct.

(b) Protect whistleblowers acting in good faith.

(c) Ensure disclosures are investigated fairly, independently and promptly.

(d) Promote compliance with applicable laws, the Whistleblower Protection Act 2010 and good corporate governance.

3. SCOPE OF REPORTABLE MISCONDUCT

Reportable matters include:

(a) Fraud, corruption, theft and misuse of the Group´s assets;
(b) Bribery, blackmail and miscarriage of justice;
(c) Abuse of authority;
(d) Conflict of interest without disclosure;
(e) Financial irregularities;
(f) Breaches of laws or company policies, harassment and discrimination;
(g) Data privacy breaches;
(h) Health and safety violations;
(i) Environmental breaches; and
(j) Concealment of any such misconduct

4. REPORTING CHANNELS

Disclosures may be made via:

(a) Email: whistleblowing@mmmgroup.com.my

(b) Sealed letter marked 'Private & Confidential – Whistleblowing Disclosure' addressed to the ARMC Chairman and send to the registered office.

(c) Any additional channel approved by the ARMC.

Anonymous reports will be considered where sufficient information is provided.

5. CONFIDENTIALITY

All reports and identities will be treated confidentially except where disclosure is required by law or for investigation purposes.

6. PROTECTION AGAINST RETALIATION

No person making a report honestly and in good faith shall suffer retaliation, harassment or discrimination. Protection may be withdrawn where a report is knowingly false, malicious or made in bad faith.

If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he or she should immediately report such perceived retaliation to the ARMC Chairman.

Retaliation constitutes misconduct and may result in disciplinary action.

7. INVESTIGATION PROCEDURE

1. Record the disclosure in a confidential register.
2. Acknowledge receipt where possible within seven working days.
3. Conduct a preliminary assessment.
4. Appoint an investigation team where appropriate, including Internal Audit or external advisers.
5. Persons implicated shall not participate in the investigation.
6. Findings shall be reported to the ARMC and, where appropriate, the Board.
7. Appropriate corrective or disciplinary action shall be implemented.
8. The whistleblower shall, where appropriate, be informed when the matter has concluded.

8. REMEDIAL ACTION

Appropriate disciplinary, legal and remedial actions shall be taken where misconduct is substantiated.

9. RECORD RETENTION

All disclosures, investigation reports and supporting documentation shall be retained for at least seven (7) years or longer where required by law.

10. AWARENESS AND COMMUNICATION

This Policy shall be communicated during employee onboarding and through periodic refresher training. Relevant employees, customers, vendors and business partners shall acknowledge both the Anti-Bribery and Corruption Policy and this Policy where applicable.

11. POLICY REVIEW

The ARMC shall review this Policy at least once every two (2) years or earlier when required by changes in legislation, regulation or business operations.