



WHISTLEBLOWER POLICY

POLICY STATEMENT

The Whistleblower Policy of MMM Group Berhad (formerly known as Asia Media Group Berhad) (“MMM” or “Company”) and its subsidiaries (“Group”) provides avenue for all employees, business partners and other stakeholders to disclose any improper conduct or incident in relation to the Group, i.e. questionable accounting, internal accounting controls or auditing matters or potential violations of the law within the Group. The Group aspires to conduct its business in the highest standards of ethical, responsible and transparent manner as well as good Corporate Governance practices in the workplace.

The Chairman of the Audit Committee shall be responsible for the effective implementation of the policy supported by the Management.

OBJECTIVE OF THE POLICY

This policy is to provide an avenue for all employees, business partners and other stakeholders to disclose any improper conduct or incident in relation to the Group in accordance with the procedures to provide protection for employees and members of the public who report such allegations. The following are the purposes of this policy:

- To provide a possibility for employees, business partners and other stakeholders to raise serious and sensitive concerns;
- To provide proper internal reporting channel to make a disclosure to disclose any improper or unlawful conduct in accordance with the procedures under this policy;
- To ensure that such concerns are treated seriously and appropriately;
- To re-assure that any person raising a serious concern will be protected from detrimental action or unfair treatment for disclosing concerns in good faith;
- To help develop a culture of accountability and integrity within the Group; and
- To deter misconduct and promote standards of good corporate practices.

This Policy governs the disclosures, reporting and investigation of misconduct within the Group as well as the protection offered to the persons making those disclosures from detrimental action in accordance to Whistleblower Protection Act 2010. Such misconduct or criminal offences include the following:

- Fraud, corruption, theft and misuse of the Company’s properties/resources;
- Bribery, blackmail and miscarriage of justice;
- Abuse of power;
- Conflict of interest without disclosure;
- Sexual harassment;
- Inappropriate business practice; and
- Non Compliance with requirements and standards of a regulatory body.



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Registration No. 200801011849 (813137-V)

CONFIDENTIALITY

It is the Group's policy to treat all concerns and issues raised under this policy in a confidential manner. The identity of the complainant shall be kept confidential from any act of interference that may be detrimental to the whistleblower. The Group assures that all reports will be treated with strict confidentiality, and upon verification of genuine cases, prompt investigation will be carried out. 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.

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.

The Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else. The Group also reserves the right to amend this policy from time to time.

NO DISCRIMINATION OR RETALIATION

MMM will ensure that there will be no discriminatory or retaliatory action against any employee or third party who reports a concern to the Group in good faith based on his/her personal knowledge. If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he/she should immediately report such perceived retaliation to the Chairman of Audit Committee, a senior independent Non-Executive Director.

All such reports will also be investigated confidentially. Hence, the Group will not carry out or, to the fullest extent reasonably within its power, permit any retribution or retaliation of any kind against any individual for submitting any report in good faith.

PROCEDURES

1. Each complaint or concern will be received by the Chairman of Audit Committee, a senior independent Non-Executive Director.
2. The Chairman of Audit Committee shall:
 - I. record all reported complaints or concerns;
 - II. consider the seriousness and credibility of the complaint or concern raised ; and
 - III. proceed accordingly in determining the appropriate action. Some complaints or concerns may be resolved without requiring investigation.
3. The Chairman of Audit Committee may, in his/her sole discretion, consult with the Audit Committee (or a body appointed by the Audit Committee) and any senior members of the management. He or she may also engage external auditors, investigators and/or legal counsel to assist in the investigation and analysis of the results thereof.



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4. The conclusions of the investigation shall be submitted to the Audit Committee. The Audit Committee may decide on placing any investigation report before the Board of Directors depending on the gravity and magnitude of the violation.

REMEDIAL ACTION

In case an investigation shows any violation of this policy, appropriate remedial action will be taken.

RETENTION OF THE RECORDS

The Group shall retain a copy of all complaints or concerns, investigation reports and all relevant documentation thereof. The Audit Committee shall decide the period of retention of all these records, subject to limitations in applicable legislation.

Notes: Disclosure can be submitted to whistleblowing@mmmgrou.com.my.