

## **WHISTLEBLOWER POLICY**

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### **1. PURPOSE**

This policy is intended for Minetech Resources Berhad (“**Minetech**” or “**the Company**”) and its subsidiary companies (“**the Group**”).

All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group and have a professional responsibility to disclose any known malpractices or wrongdoings (hereon referred to as “**Concerns**”). The policy adopted by the Group establishes a clear line of communication and reporting of Concerns for employees at all levels and provides alternative lines of communication depending on the person(s) who is/are the subject of such Concerns.

### **2. SAFEGUARDS**

A person or entity making a protected disclosure is commonly referred to as a “**Whistleblower**”. Whistleblowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistleblowers are protected against being dismissed or penalised by the Group, and the Company will consider mitigating circumstances if the Whistleblower himself/herself is involved in the activity that he/she reports.

In order for the Whistleblower to be protected under this policy, the Whistleblower may be anonymous. Nevertheless, the disclosure must at least have details of person(s) involved, nature of allegation, when and where the incidents took place as well as supporting evidence, if any.

A Whistleblower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

### **3. CONFIDENTIALITY**

Minetech will ensure the Whistleblower’s Concerns in a confidential and sensitive manner. The Group gives the assurance that it will not reveal any information of the Concerns to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistleblowing report, if ordered to do so by a court of law. The Group’s assurance of confidentiality can only be completely effective if the Whistleblower likewise maintains confidentiality.

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### **4. PROCEDURES**

#### **4.1 Process for disclosure**

##### **I) Impropriety**

This policy covers:

- improprieties or irregularities (including financial and operational);
- suspected fraud or criminal offences (including corruption, bribery or fraud);
- breach of confidentiality; miscarriage of justice;
- intentional misrepresentations, misstatements, omissions, directly or indirectly affecting financial statements or operation of the Group;
- endangerment of an individual's health and safety; and
- failure to comply with legal or regulatory requirements.

##### **II) Reporting procedures**

If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within the Group, the employee should report this immediately in writing, providing as much details as possible and specifying:

- (i) the background, date and history of the Concerns;
- (ii) suspected personnel(s) involved
- (iii) the reasons for the Concerns;
- (iv) details of witnesses and all factual corroborating evidence as is available;
- (v) whether the Whistleblower has any personal interest in the matter;
- (vi) whether action has already been taken by anyone.

Any improper activities disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

- Chairman of Audit and Risk Management Committee (“**ARMC**”)  
Address: D-G-5, Block D, Parklane Commercial Hub  
No. 21, Jalan SS7/26, Kelana Jaya  
47301 Petaling Jaya  
Selangor Darul Ehsan  
E-mail: [ruslan@mrbs.com.my](mailto:ruslan@mrbs.com.my)

Any employment-related Concerns can be reported to:

- Executive Directors (“**ED**”)  
Address: D-G-5, Block D, Parklane Commercial Hub  
No. 21, Jalan SS7/26, Kelana Jaya  
47301 Petaling Jaya  
Selangor Darul Ehsan  
E-mail: [mattchin@mrbs.com.my](mailto:mattchin@mrbs.com.my), [azlan@mrbs.com.my](mailto:azlan@mrbs.com.my)

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Disclosures shall be in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as *“To be opened by the Chairman of ARMC or ED only”*.

### **III) Handling of a reported allegation**

The action taken by the Group in response to a report of Concerns under this policy will depend on the nature of the Concerns. The Chairman of ARMC or ED shall receive information on each report of Concerns and follow-up information on actions taken.

#### **4.2 Investigator**

The Internal Auditor or Head of Human Resource, as the case maybe, shall be the named Investigator unless the Chairman of ARMC or ED assign/appoint another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of ARMC or ED.

#### **4.3 Inquiries**

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Concerns may be resolved without the need for investigation.

If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group’s Code of Ethics and Conduct, the results of the investigation shall be reported to the Chairman of ARMC or ED, as the case maybe, in accordance with the applicable procedures for company conduct and the administration of discipline.

Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

### **5. POLICY MATTERS**

This policy shall be published at the Minetech’s website and shall be displayed prominently at all the Group premises.

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### **6. MONITORING AND PERIODIC REVIEW OF POLICY**

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed annually to assess its effectiveness.

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*This Whistleblower Policy has been approved by the Board on 29 May 2023.*