

## **MEGA FIRST CORPORATION BERHAD WHISTLE-BLOWING POLICY**

### **OBJECTIVE**

The Board of Directors of Mega First Corporation Berhad (“MFCB”) wishes to provide all directors, management staff and employees of MFCB and its subsidiaries with mechanisms for employees and other interested parties to confidentially bring to the attention of the Audit Committee (“AC”) any concerns related to matters covered by the Company’s Code of Conduct, legal issues and accounting or audit matters.

The whistle-blowing policy allows the management to take appropriate preventive and corrective actions inside the company without the negative effects that come with public disclosure, such as loss of company image or reputation, financial distress and loss of investor confidence. Through this program, employees are encouraged to discreetly disclose concerns about illegal, unethical or improper business conduct within the company. In this manner, the employees can help the company to monitor and keep track of such illegal, unethical or improper business conduct within the company which otherwise may not be easily detected through normal process or transaction.

### **SCOPE OF THE POLICY**

This policy is designed to facilitate employees to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i) fraud, including misrepresentation or falsifying of records;
- ii) misappropriation of assets;
- iii) criminal breach of trust;
- iv) illicit and corrupt practices;
- v) questionable or improper accounting;
- vi) misuse of confidential information;
- vii) misuse of position or seniority for personal gain;
- viii) breach of company policies;
- ix) sexual harassment;
- x) miscarriages of justice;
- xi) acts or omissions which are deemed to be against the interest of the company, law, regulations or public policies; or
- xii) the deliberate concealment of any of the above or other acts of misconduct, wrongdoing, corruption, fraud, waste and/or abuse.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under the Company's Code of Conduct or any criminal offence under relevant legislations in force. This policy is for the employees to raise the matters in an independent and unbiased manner.

Employees are not required to prove the cases but rather to provide sufficient information for the management to take appropriate steps.

## **PROTECTION TO WHISTLE-BLOWER**

A whistle-blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. Whistle-blower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within MFCB Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle-blower is mistaken as to the facts and the rules and procedures involved.

Any attempt to retaliate, victimize or intimidate against anyone (whistle-blower) making report in good faith is a serious violation of the Code and shall be dealt with serious disciplinary actions and procedures.

A whistle-blower may choose to remain anonymous. However, MFCB reserves its right to investigate into any anonymous disclosure.

The whistle-blower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his or her disclosure. If a whistle-blower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he or she may consult or report to the Chairman of Audit Committee.

## **ADMINISTRATION**

This Policy is administered by MFCB and its subsidiaries, and is overseen by the AC. Employees and other interested parties are able to report their concerns related to matters covered by the Company's Code of Conduct, legal issues and accounting or audit matters through any of the following channels:-

Letters to:

(Private & Confidential - Do Not Open If Not the Addressee)  
Chairman of Audit Committee, Mega First Corporation Berhad  
A-12-01, Level 12, Block A, PJ8  
No. 23 Jalan Barat, Seksyen 8, 46050 Petaling Jaya

Email to

Chairman of Audit Committee - *auditcom-chairman@mega-first.com*.

*This Whistle-Blowing Policy is adopted by the Board of Directors on 21 May 2014*