

MEGA FIRST CORPORATION BERHAD
Registration No. 1996601000210 (6682-V)
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY AND PROCEDURE

DEFINITIONS

Definition	Meaning
ABAC Policy	: Anti-Bribery and Corruption Policy
AC	: Audit Committee of the Company
Board	: The Board of Directors of the Company
COC	: Code of Conduct
Director	: Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors
Employees	: All individuals directly contracted to the Group on an employment basis, including permanent and contractual employees excluding Directors
Group	: The Company and its subsidiaries, collectively
MFCB or the Company	: MEGA FIRST CORPORATION BERHAD (Registration No. 1996601000210 (6682-V))
Subsidiary(ies)	: A entity in which the Company controls the composition of the board of directors, controls more than half of the voting power or holds more than half of the issued share capital excluding preference shares

OBJECTIVE

The Board of 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 AC any concerns related to matters covered by the Company's COC, ABAC policy, legal issues and accounting or audit matters.

The whistle-blowing policy allows the management to take appropriate preventive and corrective actions inside the Group without the negative effects that come with public disclosure, such as loss of Group image or reputation, financial distress and loss of investor confidence. Through this program, employees and other interested parties are encouraged to discreetly disclose concerns about illegal, unethical or improper business conduct within the

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Group. In this manner, the employees and other interested parties can help the Group 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 all directors and employees of the Group and interested parties 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.

A person or entity making a protected disclosure is commonly referred to as a "Whistle-blower". Whistle-blowers provide initial information related to a reasonable belief that a Misconduct has occurred.

Whistle-blowers 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.

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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 Executive Directors of 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 COC, ABAC policy, 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

or

Email to:

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

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REPORTING

The reporting flow is as follows:

