

MCE HOLDINGS BERHAD

Registration No. 201501033021 (1158341-K)
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

The board of directors (“Board”) and management of MCE HOLDINGS BERHAD (“the Company” or “MCE”) and its subsidiaries (collectively referred to as “the Group”) are committed to the highest standards of integrity, honesty and ethical behaviour in the conduct of its business and operations.

The Group’s Whistle Blowing Policy (‘WBP’) set out hereunder the protocols, procedures and protection for whistle blowers in support of the Group’s values and ethics.

Introduction

All employees are encouraged to raise genuine concerns about possible improprieties or violations in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This MCE is designed to:

- (a) Support the Group’s values and ethics set out in the Board’s Policy on Code of Business Conduct & Ethics;
- (b) Ensure employees have an avenue to raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- (c) Protect a whistle-blower from reprisal arising from making a disclosure; and
- (d) Provide a transparent and confidential process for dealing with concerns. This policy covers possible improprieties in matters of financial reporting, and amongst others, the following :
 - Fraud;
 - Corruption, bribery or blackmail;
 - Criminal offences;
 - Failure to comply with a legal or regulatory obligation;
 - Miscarriage of justice;
 - Spreading malicious rumours about the Group;
 - Unauthorized disclosure of the Group’s confidential information without prior approval;
 - Endangerment of an individual’s health and safety;
 - Discrimination & Harassment; and
 - Concealment of any, or a combination, of the above.

Principles

The principles underpinning this Policy are as follows:

- (a) internal procedures to facilitate necessary whistle-blowing, in a timely and responsible manner, are in place and made known to all employees of the Group;
- (b) all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- (c) the Group will not tolerate harassment or victimisation of anyone raising a genuine concern;
- (d) the identity and personal information of the whistle-blower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law, court or regulatory authority;
- (e) the whistleblower and the alleged wrongdoer will be treated fairly. The wrongdoer will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity

- to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);
- (f) personal information, including the identity, of the whistle-blower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis; and
 - (g) the Group will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Group, however, does not extend this assurance to someone who maliciously raises a matter which he knows is untrue.

Covered Concerns

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- (a) corruption, bribery and fraud;
- (b) criminal offence or any breach of the laws of Malaysia;
- (c) acceptance of gifts/ favour what would be deemed reasonable or such threshold fixed by Management;
- (d) misuse and/or misappropriation of the Group's funds or assets
- (e) impropriety (including financial and operational, etc.) within the Group;
- (f) gross mismanagement within the Group (including serious potential breach to the interest of society and environment);
- (g) breach of code of ethics of the Group, including discrimination and harassment, sexual, physical or other abuse of human rights; and
- (h) act or omission jeopardising the health and safety of the Group's employees or the public.

Acting In Good Faith

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain. Any anonymous whistle-blower will not be entertained.

Reporting Procedure

If any employee believes reasonably and in good faith that malpractices exist in the work place, the employee should report this immediately to the line manager. However, if for any reason the employee is reluctant to do so, then the employee should report the concerns to either:

1. Dr Goh Kar Chun, Group Managing Director (gohkc@multicode.com.my)
2. Goh Anne, Group Executive Director (anne@multicode.com.my)

Employees concerned about speaking to another member of staff can speak, in confidence, to an Executive Director. The employee will be provided counselling advice. These concerns will be reported to the Management without revealing the identity of the whistle-blower.

If these channels have been followed and if employees still have unresolved concerns or if employees feel the matter is grave in nature that it cannot be discussed with any of the appointed persons above, they should contact the Senior Independent Director at jane@fyg.com.my, being the director identified in the Group's annual report as one to whom concerns may be conveyed.

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can progress further.

Consequences of Wrongdoing or Wrongful Disclosure

If the Person (i.e. the whistle-blower) has, or is found to have:

- committed a wrongdoing;
- participated in the improper conduct, wrongdoing, corruption, fraud and/or abuse;
- taken serious risks which would likely cause a wrongdoing to be committed;
- involves frivolous and vexatious whistleblowing disclosures;
- wilfully or maliciously made the disclosure, knowing or believing the information was untrue or false;
- made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous, frivolous, vexatious or malicious complaints); or
- participated or assisted in any process pursuant to this policy otherwise than in good faith,

the corrective actions to be taken against that Person will be determined by the Executive Directors or, if so delegated by the Executive Directors, the Senior Management, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

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

Protection

The identity and personal information of the whistle-blower will be protected and kept confidential. The abovementioned identity and personal information will not be disclosed without the whistle-blower prior consent unless, required by law, court or regulatory authority. Further, in the event The whistle-blower will be protected from reprisals, as a consequence of his/her disclosure:

- a) action causing injury, loss or damage;
- b) intimidation, victimisation and harassment;
- c) interference with the whistle-blower's lawful employment or livelihood (including, discrimination, demotion, termination of employment, disciplinary actions); and
- d) any threats in relation to the above.

If a whistle-blower reasonably believes that he/she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he/she may consult or report to the Appointed Persons:

Ms Fong Jed See, Senior Independent Director (jane@fyg.com.my)

Revocation of Policy & Protection

The protection stated above shall be revoked by the Group if:

- a) The whistle-blower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- b) The whistle-blower made his/her disclosure without good faith;
- c) The disclosure was frivolous or vexatious; or
- d) The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistle-blower himself/herself.

This Policy was adopted on 1 November 2018.

This Policy was last reviewed on 26 September 2025 .