

WHISTLE BLOWING POLICY

POLICY STATEMENT

The Board of Directors of **Mlabs Systems Berhad** (“**MLABS**”) and its subsidiaries are committed to creating the highest standard of work ethics, transparency, integrity and accountability in the conduct of its business dealing.

This Policy is part of the Company’s corporate governance and is accessible on the website of the Company and the Employee’s Handbook, which came into effect on 1 June 2020. This Policy may be reviewed and amended, at the Board of Director’s discretion from time to time, as and when necessary, to ensure its relevance and effectiveness in keeping with the Group’s changing business environment, administrative or operational needs and changes in legislations. Changes to the Policy, if any, shall only be made with the Board of Directors’ approval in writing.

In this Policy, “**Company**” means **MLABS** and its subsidiaries and “**Group Company**” means any company/ subsidiaries within the Group; “**Prescribed Officer**” means the person authorised to receive reports on Whistleblowing matters; “**Chairman**” means the Chairman of **MLABS**; “**Board of Directors**” means the board of directors of **MLABS**; “**Policy**” means this Whistleblowing policy.

OBJECTIVE

The Group Company maintaining a culture of openness and encouraging its employees to disclose and report any suspected misconduct via internal channel. This policy aims to provide a procedure or mechanism to support and facilitate:

- Report made from Whistleblower
- Investigation the incident, by setting up Investigation Team
- Protection to the Whistleblower

DEFINITION OF MISCONDUCT

- Unethical, disciplinary offence or violation of law and regulations
- Giving, solicitation or acceptance of favour, kickbacks, bribes and privileges
- Corruption, fraud, theft or embezzlement
- Acts that adversely affect the interests or values of shareholders and stakeholders
- Misuse of company assets
- Falsification of reports or documents
- Improper or undesirable personal behaviour or criminal action which seriously impacts the company’s business or reputation

- Sexual or other forms of harassment in the workplace
- Conflict of interest or statutory duties of the company
- Damages to the environment
- Attempts to cover any of the aforementioned

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 and Ethics or any criminal offence under relevant legislations in force.

PROTECTION TO WHISTLEBLOWER

As a statutory body entrusted with regulation, the Company is committed to provide the Whistleblower protection as stipulated in the Whistleblower Protection Act 2010. The following protection will be granted to the Whistleblower, who make disclosure of improper conduct to the Company based on reasonable belief that misconduct is likely to happen, is committed or has been committed:

- Protection of confidential information
- Immunity from civil and criminal action
- Protection against detrimental action
- Identity of Whistleblower shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against the Group Company.

Nevertheless, the Company shall revoke the Whistleblower protection, if it is of the opinion based on its investigation or in the course of its investigation that, the Whistleblower:

- Has participated in the improper conduct disclosed;
- Wilfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
- Made the disclosure of improper conduct is frivolous or vexatious;
- Made the disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body;
- Made the disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- In the course of making the disclosure or providing further information, commits an offence under the Whistleblowing Protection Act.

REPORTING PROCEDURE

Any concern should be reported to the following persons via the contact as set out below:

<i>Mlabs Systems Berhad's Audit Committee</i>	
<i>Attention To</i>	<i>Mr. Chuah Hoon Hong</i>
<i>Designation</i>	<i>Independent Non-Executive Director</i>
<i>Email Address</i>	<i>hh.chuah@chuahpartners.com</i>
<i>Contact Number</i>	<i>6012-9860018</i>

The Whistleblower is required to provide the following particulars in the report, as required in the attached Whistle Blowing Report:

- Particulars of Whistleblower i.e. Name, NRIC No., designation (if the Whistleblower is an employee of any Group Company) and contact particulars (email, telephone or mobile number and/or address)
- Details and description of the misconduct, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistleblower is not able to identify the identity of the person(s) involved
- Particulars of witnesses, if any
- Particulars or production of documentary evidence, if any

The personal details provided by the Whistleblower will be kept confidential. The Whistleblower may be asked to provide further clarification and information from time to time, during the course of investigation.

INVESTIGATION

When the Prescribe Officer receives any reported matters, shall assess if the misconduct falls within the scope of this Policy. The Prescribe Officer shall establish an investigation team to carry out investigation on the reported misconduct. Any person from the Group or external agent that deem appropriate could be appointed by the Prescribe Officer as part of the investigation team to carry out investigation. The responsibility of investigation team is to report the progress, result of investigation and provide recommendation to the Prescribe Officer. The Prescribe Officer shall report the investigation results/ findings to the Audit Committee for final decision and lastly, the Prescribe Officer shall inform the Board of Directors and the Whistleblower on the results of investigations and the final decisions

CONFIDENTIALITY AND ANONYMITY

All Whistle-blowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not frivolously or maliciously and not for personal gain; otherwise, disciplinary action may be taken against an employee Whistleblower.

Reasonable steps will be taken to maintain the confidentiality on the identity and any report made by the Whistleblower, unless:

- The Whistleblower expressly agrees otherwise, and provides his agreement in writing
- Otherwise required by law

The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties information regarding the misconduct or any part thereof, including the status or outcome of an investigation into it, except:

- To those who are authorised under this Policy;
- By lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law
- If required by law; and
- On a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

WHISTLE BLOWING REPORT

(A) CONTACT DETAILS		
Name		
NRIC No.		
Position		
Department		
Address		
Email Address		
Telephone No.	H/P:	Office:
(B) DISCLOSURE		
<ul style="list-style-type: none">▪ Details and description of the misconduct, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistleblower is not able to identify the identity of the person(s) involved.▪ Particulars of witnesses, if any;▪ Particulars or production of documentary evidence, if any.		
Event:		
Declaration: I have read and understand the Company's Whistle Blowing Policy. I hereby declare that all the information provided in this Form is true and accurate to my best knowledge.		
Signature:		
Name:		
Date:		