

WHISTLEBLOWING POLICY

INTRODUCTION

MSB Global Group Berhad (“**MSB Global**” or “**the Company**”) and its subsidiaries (“**the Group**”) are committed to upholding values and highest standard of work ethics for all directors, managers and employees in line with good corporate governance and business integrity practices.

The Group believe that employees are our most important asset and encourage everyone to speak up if they observe any behaviour that doesn't align with the Group's values. This policy outlines the steps that employees can take to report concerns and ensures that all reports will be taken seriously and investigated thoroughly.

SCOPE

This policy applies to all employees of the Group, contractors, vendors, and other stakeholders who do business with MSB Global Group. The following shall constitute “Reportable Misconduct” under this Policy but not limited to the followings:

- i. Fraud and misappropriation of funds or assets;
- ii. Misconduct such as bribery, corruption or blackmail;
- iii. Violation of the Company's code of conduct, procedures or policies;
- iv. Improper or unethical conduct or behaviour;
- v. Conflict of interest;
- vi. Insider trading;
- vii. Theft or embezzlement of fund or assets;
- viii. Abuse of power or position;
- ix. Breach of confidentiality;
- x. Criminal breach of trust;
- xi. Failure to comply with any legal obligations or breach of internal control;
- xii. Danger to health and safety of any employee of the Company or any other individual; and
- xiii. Sexual harassment.

REPORTING CHANNEL

Any suspected or actual violation of this policy must be reported through the designated reporting channel to the Chairperson of the ARMC via email at whistleblowing@msbglobal.com.my.

ANONYMOUS WHISTLEBLOWER

This policy strongly encourages whistleblowers to put their name to any disclosures they make. However, whistleblowers may remain anonymous, if they choose to do so. Anonymous whistleblowers are encouraged to provide an email address or other contact information to facilitate proper investigation.

WHISTLEBLOWING POLICY – Cont’d

Confidentiality

We understand the importance of confidentiality in the whistle-blowing process and will protect the identity of the whistle-blower to the extent possible and will not be disclosed without his/her prior consent. There may be circumstances during the course of an investigation where it is necessary to disclose the identity of the whistleblower. If such circumstances exist, the whistleblower will be informed in advance, and consent will be sought prior to any disclosure.

The Company assures that all reports will be treated in the strictest of confidence and will be promptly investigated.

Investigation

Once we receive a report, we will promptly investigate it in a thorough and impartial manner. An independent and experienced investigator will be appointed to assess the seriousness of the matter and in their discretion decide whether the case shall

- (a) be closed;
- (b) proceed to a full investigation;
- (c) refer to the matter to the relevant authorities; or
- (d) determine any other course of action that deems fit having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation.

Upon completion of the investigation, the investigator shall submit their full report together with appropriate course of action / recommendation to the ARMC for their deliberation.

Actions mandated shall be carried out accordingly and steps to prevent similar situation arise will be implemented if possible.

The investigator will keep the whistle-blower informed of the status of the investigation, to the extent possible.

ASSURANCE AGAINST RETALIATION AND IMMUNITY FROM DISCIPLINARY ACTION

This Policy provides assurance that the whistle-blower, if an employee of the Company, shall be protected against retaliation and immunity from disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment. However, whistle-blowers making a report in bad faith or based on unfounded allegations or containing trivial and malicious claims maybe subjected to disciplinary actions by the Company.

Any person found to have retaliated against a whistle-blower shall face disciplinary action, up to and including termination of employment. Employees are encouraged to report any instances of retaliation they experience or witness.

WHISTLEBLOWING POLICY – Cont’d

Communication

We will communicate about this whistle-blowing policy through various channels, including our employee handbook, company intranet, and training sessions. We will provide regular training to employees to ensure they understand the policy and feel comfortable making a disclosure.

REVIEW OF THE POLICY

This Policy will be reviewed regularly to ensure its effectiveness and consistency with the governing legislation, the Board’s objectives, responsibilities and standards of corporate governance and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

This Policy has adopted by the Board on 19 July 2024 and is available on the Company’s corporate website.

END.

[Remaining of this page is left blank intentionally]