

# MISC WHISTLEBLOWING POLICY

## 1. POLICY STATEMENT

MISC is committed to the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, MISC provides an avenue for all employees of MISC and members of the public to disclose any improper conduct within MISC.

## 2. POLICY INTENT

The Whistleblowing Policy is meant to provide an avenue for all employees of MISC and members of the public to disclose any improper conduct in accordance with the procedures as provided under this policy.

## 3. OBJECTIVE

This policy is to provide an avenue for all employees of MISC and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

## 4. SCOPE OF THE POLICY

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channels. Such misconduct or criminal offence includes the following:

- i. Fraud
- ii. Bribery
- iii. Abuse of Power
- iv. Conflict of Interest
- v. Theft or embezzlement
- vi. Misuse of Company's Property
- vii. Non Compliance to Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under MISC's Code of Conduct and Business Ethics (CoBE) or any criminal offence under relevant legislations at the material time.

This policy is not to invalidate the Grievance Procedure and / or the Disciplinary Action Process and Procedures but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed, against MISC.

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## 5. APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdictions, this policy applies to all employees of MISC and its subsidiaries. This policy also applies to members of the public, where relevant.

## 6. PROCEDURE IN MAKING A DISCLOSURE

All disclosures are to be channelled in accordance with the procedures as provided under the policy.

## 7. PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse or detrimental actions for disclosing any improper conduct committed or about to be committed within MISC, 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 whistleblower is genuinely mistaken as to the facts and the rules and procedures involved.

## 8. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosures will not be entertained. Any employee or members of the public who wishes to report any improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

## 9. NOTIFICATION

Upon completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified of the outcome of the disclosure.

*MISC reserves the right to amend this policy from time to time.*