



M&A Securities Sdn Bhd (15017-H)

(A Wholly-Owned Subsidiary of Insas Berhad)

Policies and Procedures Whistleblowing

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1. Introduction

Objective

The objective of this P&P is to serve as a guidance to employees, remisiers, or any external party to report in good faith, serious concerns or any Improper Conduct and/or wrongdoing that could adversely impact the Company, its subsidiaries, holding company, clients, investors or the public at large without fear of being subject to Detrimental Action.

Definition

Whistleblower is one who informs the Company of Improper Conduct.

Whistleblowers are protected under the Whistleblower Protection Act 2010 as well as under Section 65 of the MACC Act 2009. Whistleblower Protection Act 2010 protects whistleblowers by ensuring information received is confidential, and offers immunity from civil and criminal action as well as protection against detrimental action.

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by management or employees.

2. Reportable Conduct

a. Employee Grievances

Whistleblowing is different from employee grievances, it does not affect the employee personally. Whistleblowing normally is to protect others from bullying and harassment.

b. Client Complaints

A client's complaint normally is made in regard to a problem with service or product. Example: complaint about frequent downtime of our online trading system, error in the client's portfolio, late crediting of receipts etc.

A designated complaint officer is appointed at each branch to handle such complaint. A complainant is required to file the complaint formally via email or letter and he/she is required to provide his/her name, contact information and description of the complaint in detail. Details are as per P&P Complaint.

c. Types of accepted reportable Improper Conducts (list is non-exhaustive):

1. Breach of any laws, regulations or rules that is applicable to M&A. Example, front running, insider dealing, conflict of interest, breach of anti-money laundering and anti-terrorism act;
2. Criminal act, fraud, theft and criminal breach of trust, misappropriation of fund;
3. Bullying and harassment including sexual harassment;
4. Corruption and bribery;
5. Unethical conduct and breach of M&A's Code of Conduct;
6. Unauthorized disclosure of M&A's confidential information, breach of PDPA and or falsification of documents;
7. Deliberately conceal any information of any Improper Conducts;
8. Any other action that would cause significant harm to M&A or any person(s)

3. Procedures

3.1 Reporting Procedures

The first point of contact for whistleblowers to alert M&A on the Improper Conduct is the Head of Compliance.

The contact details of HOC :

The Head of Compliance

6th Floor, M&A Building,

52A Jalan Sultan Idris Shah,

30000 Ipoh, Perak

Telephone No : 05-241 9800

Email : mazida@mna.com.my

Designated persons to receive the whistleblowing report:

Designation	Roles & Responsibilities
Head of Compliance (“HOC”)	Designated person to receive the whistleblowing report. Gather the full information and prepare a summary of the report and submit to Chairman of Audit Committee
Chairman of Audit Committee	Receive the whistleblowing report from HOC. Instructs Head of IA to conduct a preliminary investigation.
Head of Internal Audit	Conduct investigation, recommend correction actions
Audit Committee	Review findings, decide whether case to be referred to authorities or to conduct internal investigation
Board of Directors	Deliberate and decide the correction action and/or disciplinary action based on the report presented by Audit Committee

Lodging a report of Improper Conduct:

i. Reports by Employees

An employee is advised to report an Improper Conduct as soon as possible in writing using the Report of Improper Conduct Form as per Appendix I to the Board/Audit Committee/Head of Compliance.

ii. Reports by External Parties

Any external party intending to lodge a report of the Improper Conduct by an employee or Management may do so by sending the report to Head of Compliance. The email address/contact detail is published on our website and notice board.

Anonymous Reports

We do not encourage any form of anonymous report as the follow up to ascertain the facts or to obtain further information is challenging.

We do, on case to case basis open and investigation on anonymous report if the report is serious and there is likelihood of confirming the report from credible sources.

3.2 Investigation Procedures

HOC receives the report of Improper Conduct.

HOC acknowledges receipt of the report within 3 working days.

HOC assigns a case reference for communication and tracking purposes.

HOC gather the information based on the report received and forward the report to Chairman of AC.

Chairman of the AC receives the report from HOC and instruct the Head of IA to conduct a preliminary investigation.

Head of IA conducts a preliminary investigation. Consult the relevant subject matter expert without disclosing the whistleblower's identity.

Head of IA submit the preliminary findings to the Chairman of AC for a decision whether to close the case or proceed to a full investigation. If the Chairman of AC decides the case to be closed, the HOC to inform the Whistleblower of the decision.

The Chairman of AC has the discretion to instruct the case to be closed in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation. The Chairman of AC instructs the Head of IA to conduct a full investigation in the event the preliminary findings clearly indicate suspicious circumstances or refer the matter to the Audit committee to determine the next course of action.

In the event the preliminary finding indicates a possible criminal offence, the case could be transmitted, in strictest confidence, to external enforcement agencies as defined by the Whistleblower Protection Act 2010. The contact details of the relevant agencies are provided in Appendix II. The Whistleblower will be informed that the case has been referred to the authorities.

If full investigation is to be conducted, the Head of Internal Audit shall conduct the investigation in the most confidential manner. All employees shall give their full cooperation throughout the investigation. The alleged wrongdoer will be kept informed of the status of the disclosure and will be provided the opportunity to respond to all the allegations within 2 weeks.

The full report must be completed within one (1) month from the day the report is received. The full report will be tabled by the Head of Internal Audit to the Audit Committee for review. The Audit Committee to determine whether the allegation could be substantiated or not. If the allegation could be substantiated, the Audit Committee to identify and recommend corrective action or disciplinary action to be taken against the wrongdoer. The final report should be tabled to the Board for deliberation and decide on the corrective action to be taken and/or the disciplinary action to be taken (if any). The HOC to inform the Whistleblower that the investigation has been completed and action has been taken against the wrongdoer (if any).

The whistleblower may escalate any Improper Conduct to the regulator if:

- He/she is not satisfied with the outcome of the investigation;
- He/she has been treated unfairly or victimized;

The investigation process is summarized as below: refer to Investigation Process Flow

4. Confidentiality and Protection

Any report of Improper Conduct must be made in good faith and not for personal gain. Disciplinary action will be taken against the whistleblower if he/she is found to have made the disclosures in bad faith or he/she is found involved in the Improper Conduct.

The whistleblowers' identity must be protected in the strictest manner before, during and after the investigation.

The personal information and identity of the whistleblower and the alleged wrongdoer shall only be revealed on a "need-to-know" basis or as authorized by the whistleblower. In the event the disclosure of the identity of the whistleblower is essential where non-disclosure may result in the insufficient information to continue the investigation, M&A shall first notify the whistleblower.

All documents, files and record must not be shared to parties other than the members and committee set up to investigate the whistleblowing case unless otherwise ordered by the court of competent jurisdiction or by law.

Parties who are the subject of whistleblowing are refrained from accessing to the information related to the investigation.

5. Employee Training and Awareness

The whistleblowing P&P together with Anti-bribery and corruption P&P are drafted in simple and easily understand by all parties.

New staff will be trained on the P&P during the onboarding process. All staff are required to read and understand the P&P on annually basis as a refresher. The training provided includes how to report Improper Conduct, procedures to maintain confidentiality and procedures to prevent victimization.

Appendix I Whistleblowing Form

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M&A SECURITIES SDN BHD
(Company No. 13017-H)

WHISTLEBLOWING FORM

Part A: To Be Completed By Whistleblower

Name : _____
NRIC No: _____
Address : _____

Telephone : House : _____
 H/P : _____
 Email : _____
Occupation : _____

Part B: Details of report

Name of staff/Dealer's Representative involved: _____
Department: _____
Have you lodged a report on this matter to relevant party/authority?
 No
 Yes, reported to: _____
Date Report was made: _____
Status of the report: _____

Part C: For Office Use

RefNo.: _____ Date Received: _____

Received By: _____

Name of Whistleblower: _____

Name of employee and/or dealer's representative Involved: _____

Brief Description of the report: _____

Dates:

(i) First contact with Complainant: _____ (ii) File Close: _____

Status after one month:

Resolved

Pending

Actions:



Appendix II List of External Enforcement Agencies

1. Malaysian Anti-Corruption Commission (MACC) (www.sprm.gov.my)

Online Complaint Management System (CMS)

www.portaladuan.sprm.gov.my

MACC Hotline 1-800-88-6000

Walk-in : MACC Headquarters

No.2 Lebuw Wawasan

Presint 762250 Putrajaya

Telephone : 03-8870 0000

2. Bank Negara Malaysia (BNM) (www.bnm.gov.my)

Director of LINK via email : directorlink_wb@bnm.gov.my

BNM LINK (Walk-in Customer Service Centre)

Ground Floor, D Block

Jalan Dato' Onn

50480 Kuala Lumpur