MAJESTIC GEN
NEXT GEN LIVING

WHISTLEBLOWING POLICY

TABLE OF CONTENT

Content		Page
1.	Policy Statement	1
2.	Objective	2
3.	Definition	3
4.	Scope	4
5.	Responsibility	5
6.	Reporting	6
7.	Protection	7
8.	Investigation	8
	Appendix – Whistleblower Reporting Form	9

1. POLICY STATEMENT

a. Majestic Gen Sdn. Bhd. ("**Majestic Gen**") conducts its business based on principles of fairness, honesty, openness, decency, integrity, and respect. Majestic Gen strives to foster and provide an environment where Whistleblowers can act appropriately without fear of reprisal or retaliation.

b. This Policy provides guidance for Whistleblowers who have knowledge of any Improper Conduct to come forward and report such information in good faith.

c. Procedures are also incorporated in this policy to provide protection for Whistleblowers from reprisal or retaliation.

2. OBJECTIVE

a. The main objectives of this Policy are:

i. to provide a confidential avenue for Whistleblowers to report any Improper Conduct and set out the procedures to deal with such reports;

ii. to enable Majestic Gen to be informed at an early stage about any Improper Conduct;

iii. to assure Whistleblowers that they will be protected from reprisal or retaliation as a consequence of reporting any Improper Conduct in good faith; and

iv. to develop a culture of openness, accountability and integrity

3. DEFINITION

1. "**Majestic Gen**" means Majestic Gen Sdn Bhd, its subsidiaries, joint venture companies and associated companies, and other Majestic Gen branded entities that adopt this, Policy.

2. "**Improper Conduct**" means any conduct which if proved, constitutes a disciplinary offence or a criminal offence, which shall include but not limited to the following:

a. fraud, corruption, bribery, theft, embezzlement or blackmail;

b. forgery or alteration of any document or accounts;

c. Impropriety in handling or reporting of money or financial transactions;

d. financial malpractices or irregularities;

e. profiteering as a result of insider knowledge;

f. impropriety in tender and procurement activities;

g. abuse of power and position for personal gain;

h. discrimination and sexual harassment;

i. failure to comply with applicable laws and regulations;

j. breach of Majestic Gen's Code of Conduct and Business Ethics and other applicable policies and procedures; and

k. concealment of any of the above.

3. "WBC" means the Whistleblowing Committee comprising:

a. Mr. Ta Wee Dher

b. Mr. Kee Ju Hun; and/or

c. Other members of the Board may be appointed from time to time.

4. "Whistleblower" means a person who has knowledge and makes a report of improper Conduct concerning any director, officer, employee of Majestic Gen of consultant, contractor, supplier or other parties having business relationship with Majestic Gen in accordance with this Policy. A Whistleblower is not an investigator.

4. SCOPE

1. This Policy is applicable to Majestic Gen.
2. This Policy applies to Majestic Gen's Board of Directors, senior management team and all employees. This Policy also governs consultants, contractors, suppliers and all other parties having a business relationship with Majestic Gen.
3. This Policy DOES NOT apply to or change Majestic Gen's policies and procedures regarding employees' grievances of complaints relating to their job performance, terms and condition of employment, which will continue to be administered and reviewed by Majestic Gen's People and Culture Department.

5. RESPONSIBILITY

1. Employees

All employees of Majestic Gen are required to acknowledge this Policy. This is to ensure that they have read and understood this Policy and are aware of Majestic Gen's commitment to a work environment free from retaliation for reporting Improper Conduct in good faith.

2. **Whistleblower**

   Whistleblowers must act in good faith and must not make false accusation in reporting Improper Conduct.

3. **Person against whom the report of Improper Conduct is made**

   The person against whom the report of Improper Conduct is made has to cooperate with the investigators fully.

4. **Investigators**

   Investigaroed shall conduct the investigations promptly and confidentially. They shall be independent, unbiased in fact and appearance, and maintain the confidentiality of the Whistleblowers' identity, unless the disclosure is required by law pursuant to an investigation.

5. **Party involved in investigation.**

   Any party (employees or otherwise) interviewed or asked to provide information must fully cooperate with the investigations.

6. REPORTING

1. A report of Improper Conduct must be made in writing using the Whistleblowing Reporting Form. All information in the form must be complete and accurate. The Whistleblower may require to provide additional information and documents, if deemed necessary by the WBC.
2. All reports of Improper Conduct must be emailed to taweedher@majesticgen.com.my ; or delivered by hand to Majestic Gen's registered office at Unit No. 3A-05-01 , Level 5, Corporate Tower 3A, Pavilion Damansara Heights, No. 3, Jalan Damanlela, 50490 Kuala Lumpur, Wilayah Persekutuan marked for the attention of "The Whistleblowing Committee". All reports will be directed to the WBC for review.

7. PROTECTION

1. Upon receipt of a report of Improper Conduct by the WBC, the Whistleblower will be conferred protection under this Policy provided that the report is made in good faith.

2. The protection provided in this Policy is available to the Whistleblower even if the report of Improper Conduct does not lead to a disciplinary action of the person against whom the report of Improper Conduct is made.

Protection of confidential information.

3. Any person who makes or receives a report of Improper Conduct or acquires information during the course of the investigation of such report shall maintain confidentiality of such information, including the identity of the Whistleblower.
4. In order to facilitate a smooth investigation process, the Whistleblower shall make all reasonable effort to maintain confidentiality of all confidential information, including the fact that a report has been made, the nature of the Improper Conduct and the identity of the person against whom the report of Improper Conduct is made.

Protection against detrimental action.

5. A Whistleblower will not be subject to any form of detrimental action such as intimidation, harassment, suspension, demotion, unfair dismissal, discrimination or threat of any such action for reporting Improper Conduct in good faith. Any Whistleblower suffering any detrimental action are advised to complaint with the WBC.

Revocation of protection.

6. The protection provided to Whistleblower under this policy will be revoked in the following circumstances:
    a. The Whistleblower has participated in the Improper Conduct that he/she is reporting about;
    b. The Whistleblower willfully made in the report of Improper Conduct a material statement which he/she knew or believed to be false or did not believe to be true;
    c. The report of Improper Conduct is frivolous, malicious or vexatious;
    d. The report of Improper Conduct is primarily involves questioning the merits of Majestic Gen's policies;
    e. The report of Improper Conduct is made with the intention to avoid dismissal or other disciplinary action; and
    f. The Whistleblower misuses or abuses the procedures under this Policy.

8. INVESTIGATION

1. Upon receipt of a report of Improper Conduct by the WBC, the Whistleblower will be conferred protection under this Policy provided that the report is made in good faith.
2. The WBC will review each report and based on the information received and evidence available, conduct a preliminary assessment to establish whether the report has any merit and can be substantiated.
3. If the report warrants an investigation, the WBC will open up an investigation into the matter using appropriate channels, resources and expertise and determine the appropriate action based on the findings and recommendation.

WHISTLEBLOWER REPORTING FORM

Please provide details for any suspected Improper Conduct and submit this form directly to the Whistleblowing Committee (WBC). Please note that you may be called upon to assist in the investigation if required.

Whistleblower's Contact Information			
Name			
Contact No.		Email Address	
Suspect's Information			
Name			
Functional Title			
Department			
Contact No.		Email Address	
Witness(es) Information (if any)			
Name (1)			
Department			
Contact No.		Email Address	
Name (2)			
Department			
Contact No.		Email Address	

Complaint: *Briefly describe the Improper Conduct and how you know about it. Specify what, who, when and how. If there is more than one allegation, number each allegation and use as many pages as needed.*
1. What was the Improper Conduct which had occurred?
2. Who had committed the Improper Conduct?
3. When did it happen and when did you notice it?

4. Where did it happen?	
5. Is there any evidence that you could provide?	
6. Are there any other parties involved other than the suspect stated above?	
7. Do you have any other details or information which would assist us in the investigation?	
8. Any other comments?	
Date:	Signature:
For Whistleblowing Committee use	**Complaint No.**
Received By:	Received on:
	Acknowledgement Sent on:
Investigation Required (Yes/No)? (If no, please state the reason)	

Investigation To Be Done By:
Investigation Result:
Action Taken/Conclusion:
Signed Off By: