

MARCO HOLDINGS BERHAD

(196901000631) (8985-P)

(Incorporated in Malaysia)

WHISTLE BLOWING POLICY

Introduction

In line with the recommendation of the Malaysian Code on Corporate Governance 2017, it is the desire and aim of the Board of Directors of Marco Holdings Berhad Group (“Group”) to develop, promote and maintain a high standard of ethical values within the Group through a code of conduct which includes appropriate communication and feedback channels which facilitate whistle-blowing.

This Whistle Blowing Policy (“Policy”) aims to provide an avenue for Directors, employees and external parties to raise concerns about possible improprieties, unethical or illegal activities within the Group which they become aware of and to provide reassurance that they will be protected from reprisals or being victimised for whistle-blowing in good faith.

This Policy applies to all parties including the Group’s business associates and other stakeholders.

Procedures

- (1) Any party who have reliable information about possible misdeeds or improprieties involving any member of the Board of Directors or any employee or staff member within the Group have a duty to report them to the Senior Independent Director, Minhat Bin Mion. The complainant may submit the complaints addressed to the Senior Independent Director at fax no. 03-2775 8189 or by email to global@global-quality.com.my.
- (2) Every complaint shall be put in writing and shall be primarily lodged with the Senior Independent Director. The complainant should provide his/her name, as well as contact details so that he/she may be contacted for appropriate follow-up questions and investigations.
- (3) Upon receipt of each complaint, the Senior Independent Director shall inform the Audit Committee. The Audit Committee shall then direct how each complaint is to be investigated, taking into consideration the followings:
 - (a) seriousness of the issues raised;
 - (b) the credibility of the concern; and
 - (c) the likelihood of confirming the allegations from attributable sources.

- (4) In handling of each complaint, the Audit Committee may carry out the following action as it deems appropriate :
 - (a) conduct its own investigation or review;
 - (b) instruct the Internal Auditor to conduct further investigations or review;
 - (c) instruct the Management to take such remedial action as it deems appropriate;
 - (d) engage at the Group's expense, independent advisors to assist in the investigation; and/or
 - (e) take any other action as the Audit Committee may determine in the best interest of the Group.

- (5) Upon completion of the investigation, the Audit Committee shall report to the Board of Directors on the recommended disciplinary or remedial action, if any. Based on the findings, the matter will be reported to the relevant authorities if there is reason to believe that a crime has been committed.

Protection of Whistle Blower

- (1) Any party shall have unfettered right to file a complaint and shall not be restricted in the exercise of such right.

- (2) The Board of Directors does not condone any obstructive action being taken against any party who wishes to file a complaint; and may institute disciplinary action as it deems appropriate, against any employee or person found to have taken such obstructive action.

- (3) The Board of Directors does not condone any retaliatory action taken against any party who has filed, in good faith, a complaint alleging possible improprieties; and may institute disciplinary action as it deems appropriate, against any employee or person found to have taken such retaliatory action.

- (4) The identity of the complainant will be protected and kept confidential unless:
 - (a) the identity of the complainant, in the opinion of the Audit Committee, is material to any investigation;

 - (b) it is required by law, or by the order or directive of a court of law, regulatory body or such other body that has the jurisdiction and authority of the law to require such identity to be revealed;

- (c) the Audit Committee with the concurrence of the Board of Directors opined that it would be in the best interests of the Group to disclose the identity; and/or
- (d) it is determined unanimously by the Audit Committee that the complaint was frivolous, in bad faith, or in abuse of these policies and procedures and lodged with malicious or mischievous intent.

Consistency with Laws and Regulations

This document should be read in conjunction with the Group's Code of Conduct and Ethics, and all applicable laws, rules and regulations within Malaysia.