



**MALTIMUR  
RESOURCES**

Connecting for Growth

**MALTIMUR  
Whistleblowing  
Policy**

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## REVISION RECORD

REV	REVISION DESCRIPTION	DATE
00	MALTIMUR Whistleblowing Policy	14 February 2024
01		
02		
03		
04		
05		

*MALTIMUR reserves the right to amend this Policy from time to time.*

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## **1. POLICY STATEMENT**

MALTIMUR RESOURCES SDN BHD (MALTIMUR) is committed to the highest standard of integrity, transparency, and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical and responsible manner.

Upholding the above-mentioned values, MALTIMUR provide guidance for all employees including the member of the public to disclose any suspected misconduct within MALTIMUR.

## **2. OBJECTIVE OF THE POLICY**

This policy is crafted to provide an avenue for all employees of MALTIMUR and the members of public who have concerns about improper conduct to come forward at the earliest opportunity so that concerns can be raised without fear of reprisal or retaliation and to provide protection for whistle-blowers who report such allegations.

## **3. SCOPE OF THE POLICY**

The policy is designed to facilitate employees and member of the public to report the misconduct or about to be committed to MALTIMUR. Misconduct, if proven may constitutes to a disciplinary action or criminal offence. Such misconduct or criminal offences include the following:

- Fraud, corruption, bribery, and blackmail;
- Abuse of Power;
- Conflict of Interest;
- Theft of embezzlement;
- Misuse of Company's funds or assets;
- Violation of laws and regulations;
- Any intentional act deliberately designed to cause loss to MALTIMUR;
- An act or omission which endangers the safety of employees or the public or the environment;
- Any threat of personal violence, harassment or misconduct towards 3<sup>rd</sup> parties and
- Concealment of any of the above

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under Maltimur Resources Code of Business Ethics (MR COBE) or any criminal offence under relevant legislation in force. This policy is not to invalidate the Grievances Procedure but to provide avenues for the employees and members of the public to raise their concerns. The given procedures as reflected in the MALTIMUR Handbook shall be operative based on the purpose and objective of their existence.

#### **4. APPLICABILITY OF THE POLICY**

Subject to the requirement of applicable jurisdiction, this policy applies to all Board Members, Directors, and employees of MALTIMUR. Joint venture companies in which MALTIMUR is not a controlling stakeholder and associate companies of MALTIMUR are encouraged to adopt this policy whilst our contractors, agents, outsourced workers, and business associates are required to always act consistently with applicable part of this policy when dealing with, acting on behalf, or in name of MALTIMUR. This policy also applies to members of the public, where relevant.

The Chief People and Sustainability Officer shall be the appointed Integrity Officer.

#### **5. PROCEDURE IN MAKING A DISCLOSURE**

All disclosure is to be reported with protection via secure and confidential channel called whistle-blowing line in accordance with the procedures as provided under this policy.

#### **6. PROTECTION TO WHISTLE-BLOWER**

MALTIMUR recognizes that anonymity to whistle-blowers who willingly come forward to report a suspicion of misconduct is key to encouraging such reporting. However, to prevent false and malicious reporting, poison letters and abuse of the reporting channel, all whistle-blowers must provide sufficient evidence (such as documents, images, footages, audio, email, text message, etc.) in their report to facilitate further investigation, failing which credible reasoning/argument must be presented to show that misconduct has taken place.

MALTIMUR assures that all reports will be promptly investigated and treated strictly confidentially save for disclosure on a “need to know” basis to facilitate investigations and/or to mete out the appropriate actions following such investigation. Incidents of retaliation against any individual reporting a violation or assisting in investigations will result in appropriate disciplinary action. The appointed Integrity officer and Whistleblowing committee will ensure that investigation is carried out using appropriate channels, resources, and expertise.

#### **8. MALTIMUR WHISTLE-BLOWING PROCEDURES**

Any employee or member of the public who wishes to report improper misconduct may remain anonymous and use the whistle blowing line together to submit their whistle blowing report.

##### **A. Lodging a report**

Employees and external parties are advised and urged to report a misconduct as soon as they discover the commission or intended commission of a misconduct or are instructed to participate in any misconduct by completing the Whistleblowing Reporting Form appended to this Policy as **Appendix 1** and send it to the whistleblowing line

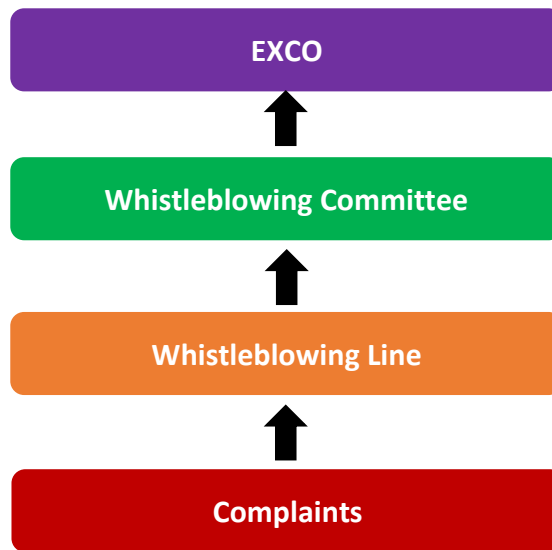
- email: [maltimurspeakup@gmail.com](mailto:maltimurspeakup@gmail.com);
- in person: The Appointed Integrity Officer.

### **Anonymous Reports**

- i. An employee is encouraged to submit a confidential report of misconduct in writing using the form appended to this Policy as Appendix 1. The report must provide full details of the misconduct and, where possible, supporting evidence
- ii. Anonymous reports are not encouraged as any follow up to ascertain the facts or to obtain further information for investigation purposes would be very difficult
- iii. Although the Company is not expected to address any anonymous allegations, the Company may, however, consider investigating an anonymous allegation after having considered the following:
  - a. the seriousness of the concern;
  - b. the credibility of the concern; and
  - c. the likelihood of confirming the concern from credible sources
- iv. The Company reserves its right to investigate into misconduct report at its sole discretion

### **B. Procedure for Handling Whistleblowing Reports**

- i. The Whistleblowing Line will be managed by an appointed person by the company as Integrity officer who shall review the complaints raised by the Whistle-blower and ensure that all relevant information is sufficient before convening a Whistleblowing Committee Meeting. Members of the committee consisting of 2 persons who shall be selected randomly from among the management group of the company who are not implicated by any of the complaints received.
- ii. The Whistleblowing Committee will assume the responsibility for the investigation and reporting of the misconduct with the support of the Integrity officer and Human Resources personnel, as and when required
- iii. All misconduct report received via the Whistleblowing Line, investigation findings and recommendation by the Whistleblowing Committee shall be reported to the EXCO.
- iv. The EXCO upon the recommendation by the Whistleblowing committee shall further deliberate on the investigation findings and decide on the appropriate action to be taken against the perpetrator of the alleged misconduct.
- v. In respect of misconduct report where an investigation is not conducted, a summary of such reports including the reasons for not investigating shall also be reported to EXCO further deliberation and action if required
- vi. All misconduct report is to be investigated and escalated within a reasonable time frame
- vii. The complaints and investigation process are set out in the flow chart below



### **C. Confidentiality**

- i. All misconduct report will be treated as confidential and sensitive and all reasonable efforts shall be made to maintain the confidentiality of the information the identity of the Whistle-blower.
- ii. The identity of the Whistle-blower shall be kept confidential and only made known at the Whistleblowing Committee level and EXCO.
- iii. However, if a situation arises where it will be necessary to disclose the identity of the Whistle-blower, the Whistleblowing Committee shall inform the Whistle-blower that his/her identity is likely to be disclosed and to obtain his/her consent and if the investigation can be further pursued.
- iv. Any person who obtains any confidential information during any investigation shall not disclose any confidential or any part thereof.
- v. Anonymity however cannot be respected if the identity of the Whistle-blower is required by law to be disclosed.

## APPENDIX



## WHISTLEBLOWER REPORTING FORM

Please provide the following details for any suspected Misconduct and submit directly to the Whistleblowing Committee via [maltimurspeakup@gmail.com](mailto:maltimurspeakup@gmail.com). Or hand over to the appointed Integrity officer. Please note that you may be called upon to assist in the investigation, if required.

Whistle-blower's Contact Information			
Name:			
Position:		Company:	
Contact Number:		Email Address:	
Information of MALTIMUR Employee(s) Involved in Misconduct			
Name (1):			
Designation / position			
Department & Company (where applicable):			

Complaint:	
<i>Briefly describe the Misconduct and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i>	
Date of the incident:	Time of the incident:
Location of the incident:	Evidence / Witness details (if any):
Incidents Details:	
<b>DECLARATION</b>	
I declare that all information provided in this Form is true, correct, and complete to the best of my knowledge.	
Signature:	Name:
	Date:

For Whistleblowing Committee Use Only	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 Results:	
Action Taken/Conclusion:	
Signed Off By:	

