



DIGITAL INTELLIGENCE

WHISTLEBLOWING POLICY

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1. Introduction

- 1.1 MSD Digital Intelligence Sdn Bhd (MSDDI) is committed to maintaining the highest standards of fairness, honesty, openness, decency, integrity and respect in all of its operations. We encourage employees, contractors and other stakeholders to report any concerns regarding unethical, illegal, or improper conduct that may be occurring within the company.
- 1.2 This policy is designed to provide clear guidance on how to report such concerns and ensure that whistleblowers are protected from retaliation.

2. Purpose

The purpose of this Whistleblowing Policy is to:

- 2.1 Enable employees and stakeholders to report concerns about unethical, illegal, or improper conduct.
- 2.2 Encourage an open and transparent environment where all individuals feel safe and supported in reporting their concerns.
- 2.3 Protect whistleblowers from retaliation or adverse action for reporting concerns in good faith.

3. Whistleblowing Measures

- 3.1 MSD encourages openness and transparency in its commitment to the highest standard of integrity and accountability.
- 3.2 MSD encourages the reporting of integrity-related issues and concerns which includes, but is not limited to, the following:
 - 3.2.1 Allegations of fraud, corruption, unethical behaviour or misconduct
 - 3.2.2 Concerns regarding questionable business practices and or plans
 - 3.2.3 Warning about particulars risk areas going unchecked

3.2.4 Non-Compliance observed with regard to company policy or the law

3.2.5 Discrimination, harassment, or bullying

4. Definition of whistleblower

4.1 This policy provides an avenue for all employees of MSD including Directors, Shareholders, Customers, Consultants, Vendors, Contractors, agencies or any parties (individually or collectively to be known as “whistleblower(s)”) with a business relationship with the MSD to disclose any unethical conduct or malpractice in accordance with the procedures as provided under this SOP

4.2 MSD shall take all necessary measures to ensure that the identity and personal information of the whistleblower shall be protected at all times and be kept, confidential to the extent reasonably practicable unless otherwise required by the law, or for the purpose of any proceedings by the company.

5. Reporting Channel for Whistleblowing

5.1 Whistleblowers are encouraged to report in good faith or to raise a concern about any attempted, suspected and/or actual bribery or corrupt practices that violates any law, policy, guideline or SOP at the earliest possible stage using the reporting channel as stated below:

Designated Whistleblower Helpline: If for any reason you do not feel comfortable reporting the issue to your supervisor, you may contact the designated Whistleblower Officer or use the company’s anonymous whistleblower hotline. Contact details are as follows:

- a. Whistleblower Hotline: Integrity Officer appointed by MSD DI (to be announced by HR) ; or
- b. Anonymous Email: suara@msd.net.my

5.2 Protection will be accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

5.3 Any anonymous disclosure will be entertained provided that the information / evidences received are sufficient and not frivolous.

6. Protection of Whistleblowers

6.1 MSDDI is committed to ensuring that individuals who report concerns in good faith are protected from retaliation, including:

- a) Disciplinary action
- b) Harassment
- c) Discrimination
- d) Unfair treatment

6.2 Any individual who retaliates against a whistleblower for reporting a concern in good faith will be subject to disciplinary action, up to and including termination of employment.

7. Confidentiality

All reports made under this policy will be treated with the utmost confidentiality. MSDDI will make every effort to protect the identity of the whistleblower and ensure that information is only shared on a need-to-know basis. However, in some cases, confidentiality may not be possible due to legal or regulatory requirements.

8. Investigation and Follow-up

Once a report is made, the company will conduct a prompt, thorough, and impartial investigation. All reports will be investigated in accordance with applicable laws, company policies, and best practices. Whistleblowers will be kept informed of the progress and outcome of the investigation, as appropriate.

9. False Allegations

While we encourage reporting of genuine concerns, individuals who knowingly make false or malicious claims may be subject to disciplinary action. However, anyone who reports concerns in good faith, even if their concerns are not substantiated, will not be penalised.

10. Conclusion

- 10.1 MSDDI values transparency and integrity and encourages a workplace culture where individuals feel comfortable raising concerns about unethical behavior. We are committed to maintaining a safe and ethical work environment and will take appropriate action to address any misconduct or unethical practices.
- 10.2 If you have any questions regarding this policy or need further guidance, please contact HR accordingly.
- 10.3 The Company reserves the right to amend this policy from time to time and shall notify all employees when such amendment has been made and has been approved by the Management.