



MALAYSIAN GENOMICS RESOURCE CENTRE BERHAD WHISTLEBLOWING POLICY (“Policy”)

1. Introduction

Malaysian Genomics Resource Centre Berhad and its subsidiaries (“the Group”) are committed to good business ethics and integrity as set out in its Code of Conduct and Ethics.

In recognising the above values, the Group provides an avenue for all the employees of the Group and external stakeholders to raise their concerns or disclose any improper conduct at the earliest opportunity, and in an appropriate manner.

2. Objectives

The objectives of this Policy are to:

- Encourage the reporting of genuine concerns regarding misconduct;
- Provide a transparent and confidential process for reporting;
- Ensure that whistleblowers are protected from retaliation; and
- Facilitate proper investigation and resolution of reported matters.

3. Scope

This Policy applies to:

- All employees of MGRC and its subsidiaries; and
- Any external parties, including contractors, vendors, consultants, and business associates.

4. Definitions of Improper Conduct

This Policy covers any actual or suspected improper conduct, including but not limited to:

- Fraud, corruption, bribery, or blackmail
- Abuse of authority or conflict of interest
- Breach of laws, regulations, or Company policies
- Financial irregularities or mismanagement
- Misuse of Company property or information
- Insider trading
- Harassment, including sexual harassment
- Any act that may adversely affect the Group’s reputation, operations or governance

5. Reporting Channels

Reports may be made to the following channels

Name : Mr. Lim Kok Kiong
Position : Audit and Risk Management Committee Chairman
Email : whistleblower@mgrc.com.my

If the concern involves the Audit and Risk Management Committee Chairman, or if the whistleblower is not comfortable reporting to the designated person, the report may be made directly to any member of the Board of Directors.

6. Procedures for Reporting

Whistleblowers are encouraged to submit their concerns using the Whistleblower Report Form as attached in Appendix 1 of this Policy. Completed forms may be submitted via email to the Audit and Risk Management Committee Chairman as stated in Section 5 of this Policy. The use of the form helps to ensure that sufficient and relevant information is provided to facilitate a proper assessment and investigation.

Whistleblowers should provide sufficient details of the concern, including the nature of the allegation, relevant parties involved, date, location and supporting evidence (where available). Incomplete reports may limit the ability of the Group to conduct a thorough investigation.

Reports may be submitted on a named or anonymous basis. While anonymous reports are accepted, the Group encourages disclosure of identity to facilitate effective investigation and follow-up.

Alternatively, concerns may be submitted via email or in writing to the designated reporting channel, provided that sufficient details are included.

7. Investigation Process

Upon receipt of a report:

- An acknowledgement will be provided within a reasonable timeframe (where contact details are available).
- A preliminary assessment will be conducted to determine the appropriate course of action.
- An independent and objective investigation will be carried out, if necessary.
- Updates may be provided to the whistleblower, where appropriate.
- Appropriate corrective, disciplinary, or legal actions will be taken based on the findings.

8. Protection of Whistleblower

The Group strictly prohibits retaliation against any whistleblower who reports a concern in good faith.

Protection applies regardless of whether the allegation is substantiated, provided that the report was made without malicious intent.

Any employee found to have engaged in retaliation shall be subject to disciplinary action.

9. Confidentiality

The identity of the whistleblower and all information provided shall be treated as confidential information under the Whistleblower Protection Act 2010. Such information shall not be disclosed to any person other than those authorised to investigate the matter, except where disclosure is required by law or court order. Any unauthorised disclosure may constitute an offence under the Act.

10. False or Malicious Reports

Any individual who knowingly makes a false or malicious report may be subject to disciplinary action.

11. Record Keeping

All whistleblowing reports, investigation records, and related documents shall be retained for a minimum of seven (7) years following the conclusion of the investigation, or as otherwise required by applicable laws. Access to these records shall be restricted to authorised personnel only.

12. Review of Policy

This Policy shall be reviewed periodically by the Board to ensure its effectiveness and relevance.

Appendix 1

WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy

REPORTER'S CONTACT INFORMATION (This section may be left blank if the reporter wishes to remain anonymous)	
NAME *	
DESIGNATION	
DEPARTMENT/AGENCY	
CONTACT NUMBER	
E-MAIL ADDRESS *	
SUSPECT'S INFORMATION	
NAME *	
DESIGNATION	
DEPARTMENT/AGENCY *	
CONTACT NUMBER	
E-MAIL ADDRESS	
WITNESSES' INFORMATION (if any)	
NAME	
DESIGNATION	
DEPARTMENT/AGENCY	
CONTACT NUMBER	
E-MAIL ADDRESS	
COMPLAINT: <i>Briefly describe the misconduct / improper activity 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>	
1. What misconduct / improper activity occurred?*	
2. Who committed the misconduct / improper activity?*	
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 us?

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which may assist us in the investigation?

8. Any other comments?

Declaration

I hereby declare that the information provided is true and accurate to the best of my knowledge and is made in good faith.

Date:

Signature: