



WHISTLEBLOWING POLICY AND PRODECURES

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Whistleblowing can be described as the action of raising a concern, in confidence, about an improper conduct occurring within, or associated with an organisation. The improper conduct may relate to fraud and corruption, breach of MDV's Code of Business Conduct, failure to comply with legal and statutory obligations, miscarriage of justice, abuse of power, discrimination, a criminal offence, endangering the health and safety, or concealment of any such matters.

The purpose of this Whistleblowing Policy and Procedures is to act as a guide to help employees to channel their concerns at the earliest opportunity, and in a responsible and effective manner, should they observe possible internal wrongdoing particularly unethical or illegal conduct.

Policy

- All concerns raised will be treated fairly and properly.
- Any whistleblower raising a concern will retain his/her anonymity unless he/she agrees otherwise. Nevertheless, there may be circumstances where MDV may need to divulge confidential information to external parties, subject to, obtaining the approval from appropriate authority (Appendix 1), and the dissemination of information is on a "need to know" basis.
- MDV will ensure that no whistleblower will be at risk of suffering any form of retribution as a result of raising a concern, provided that it was reported in good faith. The whistleblower will also be protected even if the concern raised proves to be incorrect or unsubstantiated.

Procedures

- All employees are encouraged to make a bona fide disclosure as soon as they have a reasonable suspicion of an improper conduct that have occurred, is occurring or will occur in the future.
- There are two ways of reporting or raising a concern;
 - Option 1
To fill the Whistleblowing Form (Appendix 2) and email it to whistle@mdv.com.my or mail it, address to the Chairman of Board Audit Committee or Head of Internal Audit. The whistleblower, if possible, should state his/her name in the form, as disclosure expressed anonymously is much less credible, but will nonetheless be considered.
 - Option 2
To contact directly the Chairman of Board Audit Committee or Head of Internal Audit.
- When raising the concern, the whistleblower;
 - must have first-hand knowledge of the information or facts of the improper conduct, and not obtained from a third party or hearsay
 - provide as much information as possible and keep the information relevant to the concern
 - provide any supporting documents or evidence, if possible.
- Internal Audit Department shall immediately acknowledge receipt once a report is lodged by the whistleblower.
- Subsequently, Internal Audit Department will review the disclosure and make a general recommendation to the appropriate authorised committee (Appendix 1). The committee will decide on further action to be taken.

- Internal Audit Department will inform the whistleblower in writing within 5 working days acknowledging that the form has been received, and whether an investigation will be conducted. If it is decided that an investigation is to be conducted, it should be conducted expeditiously as possible.

AUTHORISED COMMITTEES ON ACTIONS TO BE TAKEN

Improper Conduct By	Authorised Committee On Action To Be Taken On The Disclosure And Result of Investigation
MDV Chairman	MDV Board, which AC Chairman is mandatory.
Any member of the Board	MDV Board, which MDV Chairman and AC Chairman are mandatory. However, should the Board member be in a position of conflict, he/she must recuse him/herself.
MD/CEO	MDV Board, which MDV Chairman and AC Chairman are mandatory.
Any Senior Management or HOD	AC, which AC Chairman is mandatory, and CEO. MDV Chairman will be informed on the disclosure and action to be taken.
Other employees of MDV	CEO and Senior Management. The AC Chairman will be informed on the disclosure and action to be taken.



WHISTLEBLOWING FORM

Name of Employee	
Department	

Details of Concern:

Name of Individual(s) Involved	Position Title	Division/Department

Please describe the nature of your concern

[Please provide descriptions of your concern including precise information such as date(s) and time of event(s), meeting(s) or correspondence(s) that have taken place, reference to relevant documents or policies]

Note: To continue on a new sheet if there is insufficient space.

1. Do you have any evidence that you can provide to support the improper conduct or concern?

No

Yes, I will forward them in due course

Yes, the documents are attached with this form

Signature (Optional)/ Date

FOR INTERNAL USE

Date and Time Received	Received By