

# WHISTLEBLOWING AND ANTI-FRAUD POLICY

## FREQUENTLY ASKED QUESTIONS

### 1. What is the Whistleblowing Policy?

The whistleblow policy is designed for employees and stakeholders of MRL to report on suspicious activity in good faith without having the fear of retaliation or any adverse consequences. It is a safe and accessible procedure, whereby concerns can be raised in a confidential manner knowing that management will investigate those concerns.

### 2. Who is a "whistleblower"?

A whistleblower is a person who exposes or discloses unknown information or activity that is deemed illegal, unethical, or in violation of law within a private or public organization.

### 3. Who can report on the suspicious activity?

Any MRL employees, interns, contractors, suppliers, business partners and the general public can make the report.

### 4. Why MRL developed this policy?

MRL expects the highest integrity and ethics from all its employees and stakeholders in the conduct of its business affairs. The policy enables all stakeholders to raise concerns or any possible misconduct or fraud which provides opportunities for investigation.

### 5. Who is covered under this Whistleblowing Policy?

All employees, consultants, vendors, contractors, funders, business partners or any other parties with a business relationship with MRL.

### 6. What are the "suspicious activities" that I can report?

You may report on act of corruption to include collusion with vendors or authorities, criminal offence, illegal activity, miscarriage of justice, health & safety of any individual or environment has been endangered or damaged, unethical conducts since its undermines core ethical values, a gross waste of resources, *fraud* and an attempt to cover up any of the action above.

### 7. What is fraud?

Fraud includes, but is not limited to:

- Forgery or alteration of documents
- Misappropriation of property
- Deliberately altering or reporting incorrect financial or personal information
- Seeking or accepting gifts from vendors, consultants or contractors doing business with the company
- Unauthorized use of the Company property, equipment, materials or records for personal advantage or gain

- Authorizing or receiving payment for goods or services not received or performed
- Authorizing or receiving payment for time not worked
- Any claim for reimbursement of expenses that are not incurred for the benefit of the Company
- Fabrication of falsification of data or other dishonest practices
- Bribery and
- Identity theft

### 8. What cannot be reported?

The policy does not cover the employees' grievances, false and malicious concerns, defaming concerns or concerns without any basis or insufficient evidence.

### 9. How do I make the report?

Reporting channel:

 Online Whistleblowing **e-form** on the MRL website at <https://www.mrl.com.my>

 Email to [whistle@mrl.com.my](mailto:whistle@mrl.com.my).

 Malaysia Rail Link Sdn Bhd  
Level 15, Menara 1 Dutamas,  
Solaris Dutamas, No. 1, Jalan  
Dutamas 1, 50480 Kuala Lumpur

 Directly report to the Malaysian Anti-Corruption Agency (MACC) website at <https://www.sprm.gov.my/>

### 10. Will my whistle-blower report be kept confidential?

Yes, your information will be kept confidential within the limitations of law and the legitimate needs to know as long as you act in good faith and have reasonable grounds on your claims. Your information will be known to the officer investigating the matter. If the case goes to authorities, there might be requirements to disclose your information to assist in the investigation.



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### 11. Can I make anonymous report?

Concerns expressed anonymously will not be investigated, unless if the report considered to be serious and alarming in nature. It is important to identify yourself to allow for follow-up questions and investigation. By providing your name and contact details, it would enable us to provide you with an update on the status of your reports.

### 12. Will I be protected from any consequences?

Management will ensure that employees who raise concerns using this procedure are protected from reprisals or victimisation by other employees. Any employee who takes such retaliatory action will be subject to disciplinary action. Reporting under this policy, however, in no way immunised or shields a whistle blower against his or her own misconduct which includes wilfully making allegation in this report that is false or with bad intent.

### 13. What information should I provide when I make my disclosure?

When making a report, the following information must be supplied:

- Reporter's detail (name, contact number and/or email address)
- Suspect's detail (name, designation, contact number and/or email address)
- Witness information (if any) such as name, contact number and email address
- Type of misconduct
- Description of offences (time, location and date it was committed)
- Documentation or evidence (if available)

We encourage you to provide as much details as possible of the alleged wrong doing to expedite the investigations.

### 14. Since there are several channels to make a report, how do I choose which one to use?

MRL provides several channels for the reports to ease the reporting including the e-form that is uploaded in the website. All reports will be directly handled by the governance officer. All reports will be collated and consolidated for appropriate actions.

### 15. What if I don't feel comfortable making a report to anyone because I feel there are conflicts of interest?

Because of potential conflicts of interest for example the claim is made against the Governance Dept, a report should be filed to the Chief Executive Officer (CEO) who will then consult Chairman of the Board of Risk, Audit

and Governance Committee (BRAGC) where appropriate. If the report is concerning the CEO, the report may be made directly to the Chairman of BRAGC or any member of the Board.

### 16. What happens after I file my report?

Your report will be received and reviewed by the Governance dept. If it meets the requirements and is covered in the policy, the reports will be consolidated to CEO who will then consult the Board. If necessary, a Committee will be appointed by BRAGC to investigate the reports. Committee will investigate and prepare a report with recommendations to BRAGC on the final decisions. The status of the report will be updated to the reporter.

### 17. Is there any chance that my report might not be investigated?

The report might not be investigated if it does not meet the criteria under this policy such as report on employees' grievances, false and malicious concerns or concerns without any basis or insufficient evidence. The report might not be investigated if the report is made anonymously.

### 18. How can I help with the investigation?

You can provide as much factual information and evidence as possible in order to allow the investigation to proceed. However, evidence must be acquired legally without breaking any laws.

You should be prepared to be interviewed and provide all the information you know about the allegations.

### 19. Will I be informed of the outcome of my report?

The whistleblower will be informed on the status of the investigation. However, any action taken against the person being reported to as a consequence of the investigation may be confidential, in which case, it cannot be disclosed.

### 20. Can I discuss the matter with friends and colleagues?

To protect your identity and the confidentiality of the investigation, it is advisable not to discuss the matter with friends and colleagues. If you self-disclose your identity, the Company no longer will be obligated to maintain your anonymity.