

WHISTLEBLOWING POLICY AND PROCEDURES

1. SCOPE AND PURPOSE

At Mercury Securities Group Berhad (“**Company**”), we take pride in our reputation and our commitment to conduct our business in a professional, ethical and moral manners operating within the framework of relevant laws, regulations and guidelines.

In line with this commitment, we have put in place a **Whistleblowing Policy and Procedures** to provide an avenue for our directors, employees and third parties (such as vendors, contractors, consultants, agents and business partners of the Company and our subsidiaries) to disclose any improper conduct that may be illegal, unethical, corrupt or otherwise cause damage to the Company’s reputation.

2. WHAT IS IMPROPER CONDUCT

Conduct by the Company, its subsidiaries or any of its directors, employees and third parties will be considered to be improper when it does not meet the Company’s regulatory obligations or where it may otherwise be considered illegal, fraudulent, unethical, corrupt or inconsistent with the Company’s internal policies.

Examples of improper conduct include but are not limited to:

- Bribery and corrupt conduct;
- Fraud, theft, embezzlement or dishonest conduct;
- Breaches of policies and procedures (e.g. Code of Conduct);
- Breaches of applicable laws and regulations including any illegal activities;
- Insider trading and front-running;
- Conflict of interest;
- Substantial mismanagement of the Company’s resources or duties;
- Any form of harassment;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/ assets;
- Improper use or falsification of management and financial information;
- Conduct which may cause financial loss to the Company or bring it to severe public disrepute or ridicule or is otherwise detrimental to the Company’s interests; or
- Misuse of position or information.

Employee has a right to whistle blow any known or suspected incidences of improper conduct of the Company or any directors, employees and third parties. Reporting concerns can help the Company improve processes and solve problems quickly. Such individual is referred to as “**Whistleblower**”.

3. HOW TO MAKE A REPORT

We take whistleblowing seriously and your concern matters to us. We would like to hear from you if any of your disclosure is related to improper conduct or practices occurring within or related to Mercury Securities Group Berhad.

Any disclosure can be made to any of the following dedicated reporting channels:

- (i) **Complete the Whistleblowing Form and then send it to whistleblower@mersec.com.my;**
- (ii) For any reason, it is believed that this is not possible or appropriate to report to the channel as specified in (i) above, then the report should be made directly to:

Chairman of Audit and Risk Management Committee
Address: L-2-7, No. 2 Jalan Solaris, Solaris Mont' Kiara, 50480 Kuala Lumpur
Email: ARMC @mersec.com.my

or

- (iii) Report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010 such as Bank Negara Malaysia (BNM), Securities Commission Malaysia (SC), Malaysian Anti-Corruption Commission (MACC), Police etc.

4. PROTECTION OF WHISTLEBLOWER

- (a) The Company encourages the Whistleblower to disclose his/her identity to enable him/her to be accorded with the necessary protection and to facilitate investigation. Nevertheless, the Whistleblower may choose to remain anonymous, although in certain circumstances, it may limit the conduct of a comprehensive investigation due to insufficient information.
- (b) The Company will accord protection of confidentiality to the Whistleblower to the extent reasonably consistent with the need to conduct an adequate investigation.
- (c) The Company will take all reasonable steps to protect the Whistleblower against any harassment, retaliation, victimization and recrimination, corresponding to its internal policies and scope under its purview and supervision.

5. INVESTIGATION

- (a) The Head of Compliance or another designated officer authorised by the Audit and risk Management Committee (“**ARMC**”) shall conduct preliminary investigation into the allegations received from the Whistleblower. If the allegation warrants further investigation, the Compliance Officer or the designated officer shall then conduct further investigation to establish the veracity of the allegations.
- (b) Allegations received and the outcome of each investigation shall be tabled to the ARMC periodically for their notation and further decision. When the veracity of an allegation is extremely serious, the Head of Compliance shall inform the Chairman of the ARMC as soon as practicable to enable the Chairman to schedule an emergency meeting of the ARMC to discuss and decide on the course action to be taken including, amongst others, suspension of the suppliers, disciplinary action of the employee and reporting the matter to the relevant authorities if required.

6. WITHDRAWAL OF REPORT

The Whistleblower who wishes to withdraw his/her report is required to write to whistleblower@mersec.com.my, together with supporting reason(s) for the withdrawal. Notwithstanding such withdrawal, the Company reserves the right to proceed with the investigation on the matters arising from the report.



MERCURY SECURITIES GROUP BERHAD

WHISTLEBLOWER REPORTING FORM

Please provide the following details for any suspected Misconduct and submit directly to our Head of Compliance. Please note that you may be called upon to assist in the investigation, if required.

Whistleblower's Contact Information			
Name:			
Contact Number:		Email Address:	
Suspect's Information			
Name:			
Functional Title:			
Division & Department (where applicable):			
Contact Number:		Email Address:	
Witness(es) Information (if any)			
Name (1):			
Division & Department (where applicable):			
Contact Number:		Email Address:	
Name (2):			
Division & Department (where applicable):			
Contact Number:		Email Address:	

Complaint:

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.

1) What was the Misconduct which had occurred?

2) Who had committed the Misconduct?

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?

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

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

8) Any other comments

Date:

Signature:

For Audit & Risk Management Committee Use	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:	