

Whistle-blowing Policy

MSM International Limited (MSM) is committed to the highest possible standards of openness and accountability with regards to behaviour at work, quality service to the public and in its working practices. Employees and vendors are expected to conduct themselves with integrity, impartiality and honesty. MSM encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

This page serves as a guideline for the MSM's stakeholders to report a Whistle-blowing complaint to the management of MSM for action.

Types of concerns

This policy applies to all stakeholders (employees, partners, contractors, suppliers, government parties, trade & union, professional organizations, associated companies) related to the organization. Types of concerns include:

- conduct which is an offence or a breach of law;
- failure to comply with a legal obligations;
- disclosures related to miscarriages of justice;
- health and safety risks, including risk to the public as well as other employees;
- damage to the environment;
- the unauthorized use of public funds;
- possible fraud and corruption;
- sexual, physical or other abuse of clients/customers;
- other unethical conduct;
- commercial crime;
- breach of MSM's policies
- acts or omissions which are deemed to be against the interest of MSM, laws, regulations or public policies

Confidentiality

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. Your role as the whistleblower could become apparent to third parties during the course of an investigation. In such circumstances, we will make efforts to inform you that your identity is likely to be disclosed and that all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure.

Acting in good faith

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. MSM expects all parties to act in good faith and have reasonable grounds when reporting a Whistle-blowing complaint. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

Whistle-blowing channel

The channel will be directly to a firm of independent professionals who will report directly to members of the Audit and Risk Committee.

Any report can be submitted confidentially via email to whistleblowing@msmmgroup.com

The following information must be available:

- Background of the individual initiating the allegation
- Date(s), details and reasons why the individual is concerned about the conduct

For further information, please visit whistleblowing@msmmgroup.com

Where relevant, the individual may be requested to submit evidences and documents. Any meetings arranged will be conducted discreetly and if necessary, off-site or out of the office premises.

MSM reserves the right to amend the policy and procedure as necessary to meet any change in requirements.