

MSTS ASIA WHISTLEBLOWER POLICY

INTRODUCTION

MSTS Asia has established a whistleblower programme, in order to enable employees, officers and directors in all MSTS Asia companies to report activities that may involve criminal conduct or other irregularities.

Our whistleblower policy is fundamental to MSTS Asia's professional integrity. In addition, it sustains the value that MSTS Asia places on employees, officers and directors to be honest. It provides a method of properly addressing good faith concerns that employees, officers and directors within MSTS Asia might have, while also offering whistle-blower's protection from harassment or disciplinary proceedings, and raising or reporting concerns of wrongful activities or wrongdoings as described under Anti-Bribery and Anti-Corruption Manual established by MSTS ASIA.

Employees, officers and directors are always free to report any suspect activities to their closest manager. If uncomfortable about raising the matter through MSTS Asia's normal reporting channels or with your human resources contact, you may want to seek assistance from this whistleblowing policy and make a report through email at codeofconduct@relyonnutec.com

It should be emphasised that whistleblowing is intended to assist individuals who believe they have discovered serious irregularities.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived serious irregularity. MSTS Asia considers such irregularities to include:

- Economic crime (including fraud, bribery, forgery);
- Violation of environmental rules and regulations;
- Violation of work safety;
- Violation of matters in relation to employees (such as sexual harassment and violence; and/or
- Violation of anti-trust rules and regulations
- Violation of anti-bribery, anti-corruption policies

Offences such as cooperative difficulties, incompetence, absence, and violation of guidelines for i.e. smoking/drinking, using e-mail/internet, shall not be reported. In these cases, the normal communication channels must be used instead, such as relevant line manager or local HR.

THE PROCESS

Reports can either be made online on the following web address: www.msts-my.org or by calling your local phone number as stated at www.msts-my.org or email to codeofconduct@relyonnutec.com, which received by Group General Council who will decide how to proceed. If the report is considered evidently unfounded it will be immediately deleted. Otherwise the next step can be a request of further information, a hearing, reporting to the police, employment consequences and/or notification of the relevant employee. In case there will be further investigation carried out it could involve MSTS Asia's Managing Director, Head of HR, Head of Finance or other senior management.

All data will be processed with a very high level of security and deleted when no longer needed for the purpose.

SCENARIOS

There will be no adverse consequences for anyone who reports a concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.

The following actions may be taken after investigation of the concern:

- disciplinary action (up to and including dismissal) against the wrongdoer dependant on the results of the investigation; or
- no action if the allegation proves unfounded; or
- disciplinary action (up to and including dismissal) against the whistleblower if the claim is found to be malicious or otherwise in bad faith.

The whistleblower will be kept informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally. A confidential record of the steps taken will be kept in accordance with the Personal Data Protection Act.

DATA PROTECTION

Reports made in whistleblowing will usually contain personal data. MSTS Asia are obligated to protect these personal data.

Personal data will be deleted, when no longer necessary in order to facilitate investigation or as evidence. This means that data will be deleted immediately, if incorrect information or apparently unfounded reports, or as soon as the case has been closed by the relevant authority. If the case leads to disciplinary sanctions against the wrong-doer or if it is otherwise necessary and objectively reasonable to keep the information, the information will be kept in the employee case file. The information will be kept up to 5 years after resignation.