



If you suspect that someone, be it he/she is our director, senior management, manager or employee is behaving illegally or unethically, promptly raise ethics and compliance questions and please speak up and report the suspected unethical, illegal or suspicious behavior to any members of the Audit Committee. All members are welcomed to report any of the improper avenues and the Audit Committee will not tolerate with any members who fail to comply with this Code of Ethics and Conduct legally and ethically. Analysis and investigation will be carried out upon allegations raised and confidentiality of the whistle blower will be maintained, and appropriate reward shall be made when an allegation is proven to be true. Report or disclosure under this Policy can be made through email (malpaccorporate@gmail.com) or mail addressed to the Audit Committee to the following address:

Malpac Holdings Berhad
4th Floor Wisma Concorde,
No.2 Jalan Sultan Ismail,
50250 Kuala Lumpur.

List of Reportable Violations

- Corruption or bribery
- Breaching of legal obligation
- Misuse of company information
- Any dishonest or fraudulent act
- Negligence in carrying out work obligations
- Any act of conflict of interest with suppliers, vendors or contractors
- Forgery or alteration of any document or account belonging to the company
- Forgery or alteration of a cheque, bank draft or any other financial document
- Misappropriation or theft of funds, supplies or other assets
- Providing or accepting gifts or material value to/from customers, contractors, vendors or other persons
- Destruction, removal or inappropriate use of the Company's records, furniture, fixtures and equipment
- Falsifying payroll records or overtime claims
- Falsifying travel and entertainment expenses and/or utilizing company funds to pay for personal expenses
- Fictitious reporting or receipts, delivery orders, etc from suppliers or shipment to customers
- Misappropriation of Company-owned computer hardware, software, data, etc
- Acceptance of fictitious quotations from suppliers, vendors or contractors in favoring for a particular entity
- Inventory or asset theft

Response to Whistleblower

The Whistleblower will be protected under the Whistleblower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency as per the Act. If a Whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimization, as a consequence of whistleblowing, he may consult or report to the enforcement agency. Upon conclusion of the investigation, the Whistle-blower will be contacted by the Audit Committee with the token of appreciation and the investigation results will then be used to further enhance the risk management and internal control.