



WHISTLEBLOWING POLICY

MEASAT Global Berhad
MEASAT Teleport and Broadcast Centre, 63000, Cyberjaya.
Tel: + 60 (3) 8213 2188 / Fax: +60 (3) 8213 2233
Web: www.measat.com

Contents

1. Definition	1
2. Objectives	1
3. Access to the Whistleblowing Committee	2
4. Receiving a Complaint	2
5. Report of Detrimental Action	2
6. Whistleblower Confidentiality and Protection	3
7. Amendments to the Policy	4

1. Definitions

Companies: means MEASAT Global Berhad (“**MGB**”) and its subsidiaries; each being referred to as the **Company**.

Improper Conduct: means any conduct which if proved, constitutes a Disciplinary Offence or a criminal offence. Improper Conduct shall include but is not limited to the following:

- a. dishonest, fraudulent, corrupt or illegal actions, conducts or activities (including theft, illegal sales or use of drug, violence or threatened violence and criminal damage against the Companies’ property);
- b. misleading or deceptive conduct, including practices or representations which amount to improper or misleading accounting or financial reporting practices;
- c. actions, conducts or activities which are or may be in breach of any applicable law or the Companies’ rules and policies including without limitation the Companies’ Anti-Bribery and Corruption Policy;
- d. unethical or improper behaviour (this may represent a breach of the Company’s Code of Conduct and Ethics or otherwise unethical or improper behaviour generally); and
- e. wilful actions or omissions which (i) may give rise to health and safety risks, including risks to the public as well as other employees or stakeholders deliberately; (ii) is likely to cause financial or non-financial loss to the Companies; or (iii) is detrimental to the interests of the Companies.

Disciplinary Offence means any action or omission which constitute a breach of the Company’s Code of Conduct and Ethics or contract of employment, as the case may be.

Whistleblower: means directors, employees, contractors, contractors’ employees, clients, vendors, internal or external auditors, law enforcement/regulatory agencies, or other third parties who makes a disclosure or report of any actual or suspected Improper Conduct against or involving the Companies or their directors, employees, contractors and vendors.

Whistleblowing Committee: The Whistleblowing Committee shall comprise of at least four (4) members from the Companies, including the Compliance Officer and one director from any of the Companies.

Whistleblowing Committee Chairman: a member of the Whistleblowing Committee, who shall be designated as the Chairman of the Whistleblowing Committee as elected unanimously by the Whistleblowing Committee Members.

Compliance Officer: The Compliance Officer as designated by the Company.

Complaint: The reporting of any Improper Conduct to the Whistleblowing Committee.

2. Objective

2.1 The Companies relies on its stakeholders to help maintain and grow its culture of

honesty and ethical behaviour. It believes that whistleblowing is an important means of uncovering and discouraging unlawful acts, misconduct or other acts that may be detrimental to the Companies or their reputation or the reputation of their Board, employees or other stakeholders.

- 2.2 The Companies strongly encourage all concerned parties employees and or entity to make a report in the event there is an actual or suspected Improper Conduct involving the Companies' directors, employees or those acting for and on behalf of the Companies.

3. Access to the Whistleblowing Committee

- 3.1 A Complaint maybe made by email to wbc@measat.com or deliver a copy of the Complaint to the Whistleblowing Committee Chairman (or in the case which involves the Whistleblowing Committee Chairman, to the Chief Executive Officer of the Company) at Jalan Teknokrat 1/2, Cyberjaya, 63000 Cyberjaya, Selangor, marked 'Strictly Private and Confidential and to be opened by the Addressee only'.

4. Receiving a Complaint

- 4.1 A Complaint shall be made in writing. It must be factual, and not speculative and must contain as much specific information as possible to ensure proper investigation.
- 4.2 The Whistleblower need not prove the Improper Conduct but makes a Complaint in good faith with reasonable grounds for suspecting the Improper Conduct. Complaints received will be taken seriously and if a Whistleblower makes a false Complaint maliciously or recklessly, with an ulterior motive, or for personal gain, the Company reserves the right to take appropriate disciplinary action against that Whistleblower, including termination of service or employment.
- 4.3 The Whistleblowing Committee will investigate all Complaints and submit a report for each Complaint together with its recommendation / action taken to the Company's Board of Directors.
- 4.4 If it is determined that an Improper Conduct has occurred, the Company will be entitled to:
- a. in the case of a Disciplinary Offence, take the appropriate disciplinary action (including immediate dismissal, termination of employment or removal from position associated with the Companies); or
 - b. in the case of a criminal offence, take such steps as it deems appropriate (including but not limited to making a police report), against the person who has committed the relevant offence.

5. Report of Detrimental Action

- 5.1 The Companies recognise that Whistleblowers can be exposed to substantial risks while acting in good faith for the good of the Companies and encourage any Whistleblower who may have suffered any Detrimental Action in reprisal for making a Complaint under this Policy to also make a further complaint.
- 5.2 For the purposes of this Policy, “Detrimental Action” includes:
- (a) intimidation or harassment;
 - (b) interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the Whistleblower’s employment, career, profession; and
 - (c) a threat to take any of the actions referred to in paragraphs 5.2(a) and 5.2(b) of this Policy.
- 5.3 If any employee or third party commits a Detrimental Action against the Whistleblower, the Companies may take disciplinary action against the employee including termination of employment, or in the case of a third party termination of services.

6. Whistleblower Confidentiality and Protection

- 6.1 The Companies will treat all information received from a Whistleblower with utmost confidentiality. Particular care shall be taken to keep confidential the identity of a Whistleblower who requests anonymity. If a situation arises where it is not possible to resolve the matter without revealing the identity of the Whistleblower, the Whistleblower shall be informed and consulted before any further action is taken. Anonymity however can be excluded if the identity of the Whistleblower is legally required to be disclosed.
- 6.2 Similarly, the Whistleblower shall not comment on, disclose or discuss any information or allegations made in his/her/its Complaint with any third party.
- 6.3 While protection under the Whistleblower Protection Act 2010 (“WPA”) is not extended to disclosures made to a private organisation, the Companies’ policy accords similar protection as per the WPA to Whistleblowers who submit their Complaint in accordance with this Policy.
- 6.4 The Companies shall confer the following protections to a Whistleblower who has submitted a Complaint to the Whistleblowing Committee (“Whistleblower Protection”):
- a. protection of confidential information unless disclosure is required by law;
 - b. immunity from civil and disciplinary action by the Companies; and
 - c. protection against Detrimental Actions.
- 6.5 The Companies shall revoke the Whistleblower Protection if it is of the opinion, based

on the Whistleblowing Committee's investigation, that:

- a. the Whistleblower has participated in the Improper Conduct disclosed/reported;
- b. the Whistleblower wilfully made a false Complaint;
- c. the disclosure/report of the Improper Conduct is frivolous or vexatious;
- d. the disclosure/report of the Improper Conduct principally involves questioning the merits of the Companies' policy;
- e. the disclosure/report of the Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- f. the Whistleblower, in the course of making the disclosure/report or providing further information, fails to comply with paragraph 6.2 of this Policy.

6.6 Any revocation of the Whistleblower Protection shall be notified to the Whistleblower.

6.7 Any person or entity (including without limitation vendors/clients of the Companies and members of the public) who become a Whistleblower will be accorded protection under this Policy subject to paragraph 6.5 of this Policy.

7. Amendments to the Policy

7.1 The Companies reserve the right to make any changes to this Policy as it deems fit.