



**MEDIA CHINESE INTERNATIONAL LIMITED**  
**(the “Company”)**

**WHISTLE BLOWING POLICY**

*(adopted by the Board of Directors pursuant to the board resolutions dated 27 February 2020)*

**1. INTRODUCTION**

The Company is committed to the highest possible standards of integrity, openness, probity and accountability. In line with this commitment, the Company has set up a policy for any party who has concerns about any possible/suspected malpractices, wrongdoings, or improprieties concerning the Company and its subsidiaries (the “Group”) to come forward and voice their issues (the “Policy”).

**2. AUTHORITY**

Pursuant to the Code C.3.7 of Corporate Governance Code and Appendix 14 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited, the audit committee of the Company (“AC”) should review arrangements by which Employees may raise concerns, in confidence, about possible improprieties in financial reporting, internal control or other matters. AC should ensure that proper arrangements are in place for fair and independent investigation of these matters and for appropriate follow-up action.

Pursuant to the Malaysian Code on Corporate Governance, the board should formalise ethical standards through a code of conduct and ensure its compliance. The code of conduct should include appropriate communication and feedback channels which facilitate whistleblowing. The board should periodically review the code of conduct.

**3. SCOPE AND NATURE OF COMPLAINTS**

This Policy applies to Employees at all levels and divisions (including executive directors and non-executive directors) as well as any third party who is not Employee. Reportable incidents include but not limited to concerns regarding the Group’s malpractices, wrongdoings, or improprieties in financial reporting, accounting, auditing, internal controls, bribery or corruption, sexual harassment, breach of confidentiality, breach of the Group’s policies or failure to comply with legal or regulatory requirements.

**4. PROTECTION AND SUPPORT FOR COMPLAINANT**

Persons making appropriate complaints under the Policy (the “Complainant”) are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the concerns turn out to be unsubstantiated.

Persons who victimise or retaliate against any Complainant will be subject to appropriate action, including without limitation disciplinary actions or dismissal for Employees or legal actions for any party, where applicable.

## **5. RESPONSIBILITY FOR IMPLEMENTATION OF POLICY**

AC has an overall responsibility for overseeing, monitoring and reviewing the operation of this Policy and any recommendations for actions resulting from investigations into complaints. The AC can delegate the day-to-day responsibility for overseeing and implementing it to the Chairman of the Group Executive Committee (the “Group Exco Chairman”).

Management must ensure that all Employees feel able to raise concerns without fear of reprisals. All Employees may take steps to report any malpractices, wrongdoings or improprieties which they become aware. If any party has any questions about the contents or application of this Policy, please contact the Compliance Manager of the Group at the following emails:

- a) [compliance\\_abc@mediachinese.com](mailto:compliance_abc@mediachinese.com); or
- b) [compliance\\_abc@sinchew.com.my](mailto:compliance_abc@sinchew.com.my).

## **6. MISCONDUCT AND MALPRACTICE**

While the Company does not expect every Complainant to have absolute proof of the misconduct or improprieties of the matters reported, the report must show the reasons for the concerns. If any party makes a report in good faith then, even if it is not confirmed by an investigation, such concerns would be valued and appreciated.

## **7. FALSE REPORT**

If a report submitted by a Complainant is found maliciously false, with an ulterior motive, without reasonable grounds that the information in the report is accurate or reliable, or for personal gain, the Company reserves the right to take appropriate action against such Complainant, including without limitation disciplinary action or dismissal for Employees or legal action for any party, where applicable.

## **8. MAKING A REPORT**

A Complainant who has a legitimate complaint can raise his/her concerns in writing (in the standard report form attached to this Policy as Appendix I) to:

- a) the AC Chairman by email at [wbac@mediachinese.com](mailto:wbac@mediachinese.com) or by mail or by hand; or
- b) the Chairman of the Board, if complaint concerns AC Chairman, by email at [wboardchairman@mediachinese.com](mailto:wboardchairman@mediachinese.com) or by mail or by hand.

In the report, a Complainant should provide full details and, where possible, supporting evidence.

## **9. CONFIDENTIALITY**

The Company will make every effort to keep confidential of the identities of all Complainants. In order not to jeopardise the investigation, every Complainant should also keep confidential about the fact that he/she has filed a report, the nature of his/her concerns and the identity(ies) of those involved.

There may be circumstances in which, because of the nature of the investigation, it will be necessary to disclose a Complainant’s identity. If such circumstances exist, the Company will endeavour to inform such Complainant that his/her identity is likely to be disclosed. If it is necessary for such Complainant

to participate in an investigation, the fact that he/she made the original disclosure will, so far as is reasonably practicable, be kept confidential. However, it is also possible that his/her role as the Complainant could still become apparent to third parties during investigation.

Equally, should an investigation lead to a criminal prosecution, it may become necessary for a Complainant to provide evidence or be interviewed by the law enforcement authorities (the “Authorities”). In these circumstances, the Company will, once again, endeavour to discuss with such Complainant the implications for confidentiality.

The Complainant should, however, know that in some circumstances, the Company may have to refer the matter to the Authorities without prior notice or consultation with him/her.

## **10. ANONYMOUS REPORT**

The Company respects that the Complainant may wish to file the report in confidence. However, an anonymous allegation will be much more difficult for the Company to follow up as it is impossible to obtain further information from an anonymous Complainant and make a proper assessment.

The Company encourages the Complainant to come forward with his/her concerns.

## **11. INVESTIGATION PROCEDURES**

The AC Chairman and/or the Chairman of the Board will acknowledge receipt of the Complainant’s report within 5 working days from the date of receipt of the report:

- a) acknowledging the report has been received;
- b) advising whether or not the matter will be investigated;
- c) subject to legal constraint, giving an estimate of how long the investigation will take and provide a final outcome in due course.

The AC Chairman and/or the Chairman of the Board will evaluate every report received to decide if a full investigation is necessary and decide how the investigation should proceed.

The format and length of an investigation will vary depending upon the nature and particular circumstances of each complaint made.

The Complainant may be asked to provide more information during the course of investigation.

A final report, with recommendations for change (if appropriate), will be produced to AC. AC will review the final report and will make recommendations to the Board of Directors of the Company.

The Complainant will receive in writing the outcome of the investigation. Because of legal constraints, the Company will not be able to give the Complainant details of the action taken or a copy of the report.

## **12. MONITORING THE POLICY AND PROCEDURE**

The use and effectiveness of this Policy will be monitored and reviewed regularly by the AC. Any amendment to this Policy must be approved by the Board of Directors of the Company.

**APPENDIX I  
REPORT FORM  
STRICTLY CONFIDENTIAL**

The Company is committed to the highest possible standards of integrity, openness, probity and accountability. In line with this commitment, the Company has set up a policy for any party who has concerns about any possible/suspected malpractices, wrongdoings, or improprieties concerning the Group to come forward and voice their issues.

It is recognised that in most cases the person raising concerns will wish to be dealt with on a confidential basis. All reasonable efforts will therefore be made to avoid revealing the person's identity. Once this form is completed, this report becomes confidential.

Please read the Whistle Blowing Policy carefully before you fill in this Report Form.

To: AC Chairman (by email at [wbac@mediachinese.com](mailto:wbac@mediachinese.com), or 15th Floor, Block A, Ming Pao Industrial Centre, 18 Ka Yip Street, Chai Wan, Hong Kong) or  
Chairman of the Board (email: [wboardchairman@mediachinese.com](mailto:wboardchairman@mediachinese.com), or No. 78, Jalan Prof Diraja Ungku Aziz, 46200 Petaling Jaya, Selangor Darul Ehsan, Malaysia, or 15th Floor, Block A, Ming Pao Industrial Centre, 18 Ka Yip Street, Chai Wan, Hong Kong)

From: \_\_\_\_\_

Name:

Address:

Tel no.:

Email:

Date:

\_\_\_\_\_  
The names of those involved (if known):

Details of concerns:

Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence.