



STAR MEDIA GROUP
WHISTLEBLOWER POLICY
Approved by the Board of Directors on 23-03-2011
Amended in February 2018

1) INTRODUCTION

As a listed company, the Star Media Group and its employees are committed to high standard of ethical and legal business conduct. The Company is also committed to present accurate and factual financial information to guide the Board of Directors of the Company, its shareholders, financial markets and other stakeholders in making informed decisions.

For these reasons, the Board and the Management of Star Media Group (“The Company”) must maintain a workplace that practices good corporate governance and upholds integrity in all its operational activities and business dealings. To achieve this objective, the Company therefore encourages its Board members, employees and stakeholders to report inappropriate behavior or misconduct relating to fraud, corrupt practices and/or abuses involving the Group’s resources.

2) SCOPE OF WHISTLEBLOWER POLICY

The primary purpose of this policy is to govern the reporting and handling of wrongdoing at Star Media Group and its subsidiaries. This policy does not replace the Company’s existing policy for handling employee grievances or similar complaints, which will continue to be administered by the Group People Departments of Star Media Group and its subsidiaries.

3) WRONGDOING

Wrongdoing shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety, violation of Company’s policies, taking or giving kickbacks, bribes, favours, privileges, criminal offence and blackmailing.

4) REPORTING IN GOOD FAITH

The Company expects all parties to act in good faith and have reasonable grounds when making a report. If allegations are made with malicious intent, the Company will take appropriate action against the parties concerned including legal action, where applicable.

5) PROTECTION FROM RETALIATION AND REPRISAL

The Company views retaliation or reprisal against the whistleblower seriously. The Company provides assurance to the whistleblower that he/she would be protected from retaliation or reprisal from his/her reporting superior, manager or department head.

The Company assures that no disciplinary action can be taken against the whistleblower on condition that the information provided is accurate, factual and there is no element of malicious intent.

6) CONFIDENTIALITY

The Company recognises that anonymity to whistleblowers who willingly come forward to report a suspicion of misconduct is key to encouraging such reporting. However, to prevent false and malicious reporting, poison letters and abuse of the reporting channel, all whistleblowers must identify themselves and provide contact information in their report to facilitate further investigation. Whistle blowing investigation will only be initiated with complete contact information received. The Company reserves its right to investigate into any anonymous disclosure.

This is to enable verification of each report and to obtain further information, if required. It is also to facilitate any further investigations by auditors or the authorities where the identity of the informer is required by law. Contact information is needed to facilitate the communication of results of investigation to the whistleblower.

All reports and information provided to the Company are treated in strict confidence.

Information will only be disclosed on need-to-know basis to facilitate investigation.

The employee's identity will not be revealed unless it is required by law.

7) REPORTING WRONGDOING

a) The whistleblower should promptly report the suspected or instances of wrongdoing to the Internal Audit Manager.

b) If there is a need to contact someone other than the Internal Audit Manager, the whistleblower may address the report directly to the Audit Committee Chairman of the Board.

c) The report must be in writing, submit via post or email, to ensure that there is a clear understanding about the issues raised.

The report should be sealed in an envelop if sent via post with “Private and Confidential” indicated and addressed to:

Head of Internal Audit Department

Star Media Group

Menara Star

15, Jalan 16/11 Section 16

46350 Petaling Jaya

Selangor Darul Ehsan

Malaysia

Email: internalaudit@thestar.com.my

auditchairman@thestar.com.my

(note: the internal audit email stated above is only accessible by the Head of Internal Audit)

- d) The Audit Committee Chairman or the Internal Audit Manager who receives the report must promptly act to investigate and resolve the issue.
- e) The whistleblower shall be informed on the outcome of the investigation.
- f) All investigations shall be tabled to the Audit Committee of the Board that has the authority to ensure effective implementation of the whistleblower policy. The Audit Committee shall update the Board of Directors on reports that require their attention and approval.

8) WHISTLEBLOWER PROTECTION ACT 2010

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.

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Star Media Group
(10894-D)

Report of Wrongdoing

A. Details of suspect

1. Name of person alleged: _____

2. Designation of person alleged: _____

3. Name of the department or subsidiary: _____

4. Please describe the alleged wrongdoing:

5. Incident date: _____
6. Incident time: _____
7. Location of incident: _____
8. Please attach any evidence or document, if any that will support your claim.
9. Please provide the information of any other parties that are involved:

B. Witness details

Please provide the contact details of the witnesses to the alleged incident of wrongdoing.

Witness #1

Name: _____

Phone: _____

Email: _____

Witness #2

Name: _____

Phone: _____

Email: _____

C. Act in Good Faith

Your act of reporting the wrongdoing committed by the alleged person signified that you have read the Company's Whistleblower Policy and you are making the report in good faith.

D. Contact of Whistleblower

Please provide the following details so that members of the Whistleblower Working Committee could contact you for more information, should the need arises, to facilitate the investigation.

Name: _____

Phone: _____

Email: _____

Address: _____

E. Declaration:

I declare that the Report is made by me without malicious intent, not carelessly but is made after due and careful inquiry.

Signature

Date

- For Whistleblower Working Committee Use -

Code number: _____

Date of receipt: _____

Acknowledgement sent on: _____

Investigation commencement date: _____

Investigation done by: _____

Investigation completion date: _____

Investigation status: _____