



WHISTLE BLOWING POLICY AND GUIDELINE FOR MTD CAPITAL BHD

1.0 INTRODUCTION

- 1.1 This whistleblowing policy and guideline ("Manual") aim to provide a structured mechanism and platform for the employees of MTD Capital Bhd ("MTD Group" or "The Group") and its Subsidiaries and others to raise valid and legitimate concerns or report ongoing or suspected wrongful activities or wrongdoings involving the employees and the business conduct of the MTD Group while providing protection against retaliation and undue treatment.
- 1.2 For the purpose of this Manual, 'wrongful activities' or 'wrongdoings' refers to any action contradicting to any laws, rules, regulations, acts, ethics, integrity and business conduct, including without limitation, malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of MTD Group.
- 1.3 The Board of Directors of MTD Group ("BOD") has stewardship responsibility to communicate the requirements of this Manual and to guide the Group in dealing with concerns arising from wrongful activities or wrongdoings.
- 1.4 The policies of the BOD with respect to the wrongful activities or wrongdoings are as follow:
- a) **Advocacy of Reporting**
All employees and others are encouraged to report any ongoing or suspected wrongful activities or wrongdoings at the earliest possible stage through the proper channel of reporting so that immediate action can be taken.
 - b) **Promotion of Internal Disclosure**
As far as reasonable, internal disclosure is encouraged and used to avoid public crisis and to protect the Group's image.
 - c) **Protection of Whistleblower**
Where the disclosure is made in good faith, the whistleblower will be protected against victimization or other adverse treatment.
 - d) **Appropriate and Fair Actions**
All actions taken against the alleged wrongdoers would be fair and without prejudice.

In ensuring the effective implementation of the Manual, this Manual aims to:

- Establish a formal and robust whistleblowing guidelines, including hotline accessibility
- Prohibit legal sanctions for retaliatory action to be taken against the whistleblower;
- Establish timely feedback, response and remedial and/or corrective action;
- Ensure proper and effective dissemination of this Manual to all employees and others;
- Establish procedures to maintain records, confidentiality and retention; and
- Embed integrity, transparency and accountability within the business.



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2.0 WHISTLE BLOWING GUIDELINES

2.1 'Whistleblowing' in the context of this Manual refers to the act by a person (internal or external) raising or reporting concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing concerning MTD Group's business.

2.2 Correspondingly, the person raising or reporting concerns of wrongful activities or wrongdoings is then referred to as a "whistleblower".

3.0 OBJECTIVE

The objectives of this Manual are as follows:-

- (a) To provide an avenue and a structured mechanism and platform for reporting of a person to raise or report concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing within MTD Group's business.
- (b) To protect the values of integrity, transparency and accountability in where MTD Group conducts its business and affairs.

4.0 PRINCIPLES

The Manual is based on several key principles such as the following:

- a) To establish a formal and written Guideline to provide a transparent method of addressing issues relating to whistleblower, such as answering standard questions, providing information and offering explanations.
- b) To apply as an early warning system to alert the Management of MTD Group to take the necessary remedial and/or corrective actions before a problem becomes a serious crisis.
- c) To communicate to all employees and others on what the Manual are and the key processes.
- d) To encourage and enable employees and others to be able to report irregularities in good faith within MTD Group, prior to seeking resolution outside MTD Group, and without having to fear that their action may have adverse consequences.
- e) To provide timely feedback and response.
- f) To verify the reported incidents in the appropriate manner and, if the reports are confirmed, all necessary steps to identify the appropriate remedies will be taken promptly.
- g) To ensure effective implementation of this Manual. This will enhance MTD Group's accountability in preserving its integrity and will be able to stand up to public scrutiny. This in turn enhances and builds credibility of our stakeholders.



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5.0 APPLICATION

- 5.1 This Manual is intended to complement the existing internal controls system and, channels of communication and reporting lines within MTD Group.
- 5.2 This Manual applies to all employees and others who want to report any wrongful activities or wrongdoings in good faith.
- 5.3 This Manual is intended to cover concerns which fall outside the scope of the other MTD Group's existing procedures which already are included in or covered by other policies e.g. retaliation, discrimination and victimization.
- 5.4 This Manual will not apply to personal grievances. Such complaints will be dealt with by the Group Human Capital Division ("GHCD"), under the existing policies and procedures on grievance, discipline and misconduct.

6.0 ADMINISTRATION

- 6.1 The BOD, the Group Executive Deputy Chairman ("GEDC"), the Chief Operating Officer ("COO") and/or the Executive Director ("ED") shall exercise the oversight function over the administration and endorsement of this Manual for the Group's adoption.
- 6.2 The administration of this Manual and the Whistleblowing Hotline (as defined in paragraph below) shall be jointly carried out by the Head of the GHCD and the Head of the Group Internal Audit Department and any other person as may be further appointed by the BOD (collectively, the "Whistleblowing Hotline Team").
- 6.3 The Whistleblowing Hotline Team with the concurrence and agreement of the GEDC/COO/ED, shall propose to the BOD any necessary amendments of this Manual for endorsement for the Group's adoption.
- 6.4 The roles and responsibility of the persons relating to this Manual is provided in **Appendix E: Roles and Responsibilities.**

7.0 CIRCULATION AND ANNUAL REVIEW

- 7.1 This Manual shall be made available to the employees and the public via MTD Group's intranet and public website.
- 7.2 The employees of MTD Group are expected to be aware, have read and understood and to comply with the Group's internal policies and procedures in general and this Manual in particular.
- 7.3 This Manual shall be reviewed on annual basis by the Whistleblowing Hotline Team to ensure that this Manual is in accordance with MTD Group's business environment and the relevant standards, act and law.
- 7.4 The amendments will be updated in MTD Group's corporate website and intranet accordingly.



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8.0 WHO CAN WHISTLEBLOW

8.1 Once this Manual are fully implemented, any of the following persons can make a disclosure:

- a) Employees of the Group including employees on contract terms, temporary or short-term employees and employees on secondment;
- b) Members of the Board for the Group i.e. BOD, Board Audit Committee, Board Nomination and Remuneration Committee and Board EXCO;
- c) Ex-employees of the Group;
- d) Financiers;
- e) Shareholders;
- f) Advisors, consultants, vendors, contractors, sub-contractors, suppliers, distributors, agents, agencies, customers, joint venture partners and other third parties who perform work and/or provide services for or on behalf of MTD Group and any other persons associated with MTD Group ("**Third Parties**").

8.2 No persons above shall prevent an individual from reporting any ongoing and suspected wrongful activities or wrongdoings.

9.0 WHAT TO WHISTLEBLOW

9.1 A qualified disclosure (in the context of this Manual, "Whistleblowing Report") may be made if it relates to one or more of the following wrongful activities or wrongdoings by any employees or Third Parties in the conduct of MTD Group's business or affairs that is being, has been, or is likely to be committed:

- a. Failure to comply with legal and/or contractual obligations;
- b. Criminal offence;
- c. Criminal breach of trust;
- d. Corruption;
- e. Unofficial payoffs;
- f. Fraud;
- g. Collusion and money laundering;
- h. Improperly discriminatory;
- i. Misuse or abuse of MTD Group's funds or assets or assets misappropriation;



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- j. Gross mismanagement within MTD Group;
- k. Gross negligence;
- l. Serious financial irregularity or financial fraudulent within MTD Group;
- m. Breach of MTD Group's prevailing policies and operating procedures;
- n. Breach of MTD Group's Financial Authority Limit;
- o. Repeated ill treatment of any Third Parties despite a complaint being made;
- p. Activities, which would otherwise amount to serious improper conduct, including the Group's Code of Conduct or Conflict of Interest policy;
- q. Actions which endanger the health or safety of employees or the public and the environment;
- r. Actions which endanger national and public interests;
- s. Illegal or unlawful conduct or failure to comply with the provisions of any of the governmental laws and regulations where the wrongdoer, knowingly, disregards or does not comply with such provisions;
- t. Sexual harassment;
- u. Knowingly directing or advising a person to commit any of the above wrongdoings; and
- v. Any action which is intended to conceal any of the above.

9.2 The above list is not exhaustive and shall include any other activities where the whistleblower, by exercising discretion and moral judgment, would be able to make such determination.

9.3 Whistleblower is not expected to be able to prove an allegation but should at least be able to demonstrate that there are sufficient grounds to have a reasonable belief or concern that a wrongful activity or wrongdoing is being, has been, or is likely to be committed.

If an individual is unsure whether any act or omission constitutes a wrongful activity or wrongdoing under this Manual, he/she is encouraged to seek advice or guidance from the Whistleblowing Hotline Team and where necessary, contact the Whistleblowing Hotline for more clarification.



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10.0 **WHEN TO WHISTLEBLOW**

- 10.1 Whistleblower should immediately come forward with any information that he/she, in good faith and reasonably believe that it is true, discloses a wrongful activity or wrongdoing that is likely to happen, is being committed or has been committed.
- 10.2 The Whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a Whistleblowing Report. If the Whistleblower knows as a matter of fact that there are serious risks, that a wrongful activity or wrongdoing is going to take place, such bona fide concerns should be raised and reported immediately when the Whistleblower is able to show the reasons for concern.

11.0 **EDUCATION PROCESS**

The GHCD shall provide adequate and continuous training and awareness programmes in respect of this Manual and updates will be communicated via such training and programmes and, via MTD Group's intranet.

12.0 **CONFIDENTIALITY**

- 12.1 This Manual is intended to safeguard the Whistleblower's identity, and therefore undertakes to treat all Whistleblowing Reports as confidential.
- 12.2 All Whistleblowing Reports will be kept as confidential to the extent possible, consistent with the need to conduct adequate investigation, unless otherwise required by law. Every effort will be made to protect the Whistleblower's identity.
- 12.3 This Manual provides assurances that the reporting mechanism for whistleblowing is set up in a structured and systematic manner to safeguard the information and the identity of the Whistleblower from possible harm through retribution by those who stand to benefit from the reported misconduct.
- 12.4 The confidentiality of the information and the Whistleblower's identity are crucial to provide courage and confidence for individuals to speak up or report any sensitive issues that they believe in good faith that could have negative repercussion to MTD Group.
- 12.5 Approaches for confidential advice to outside parties, such as lawyers, unions or other external safe channels are acceptable, but this Manual is designed to prevent any unnecessary public disclosure of concerns.



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13.0 WHISTLEBLOWER PROTECTION

- 13.1 Upon making a Whistleblowing Report in good faith, based on reasonable grounds and in accordance with the procedures pursuant to this Manual, the Whistleblower's identity will be kept confidential unless otherwise required by law or for purposes of any proceedings instituted by or against MTD Group.
- 13.2 In the event that the identity of the Whistleblower is required by any proceedings instituted by or against MTD Group, MTD Group will honour the request of the Whistleblower to maintain his or her identity confidential.
- 13.3 If situation arises where the investigation on the Whistleblowing Report cannot be preceded without revealing the identity of the whistleblower, the Whistleblower Hotline Team will discuss with the Whistleblower to determine the best available options taking into consideration the request and safety of the whistleblower and to safeguard the interest of MTD Group.
- 13.4 The whistleblower shall be protected from harassment or victimization within MTD Group, dismissal, disciplinary procedures or any other form of retaliatory action including adverse employment consequence should the disclosure turn out to be inaccurate or false
- 13.5 MTD Group does not exercise nor tolerate punishment or unfair treatment when concerns are raised in good faith. A Whistleblower who reports a contravention or a concern will be given protection and shall in no way be put at a disadvantage as a result of his or her report.
- 13.6 Any employees who show the act of retaliation against the Whistleblower shall be subjected to disciplinary action by MTD Group in accordance with the GHCD's Key Standard Operating Procedures ("GHCD's "Manual") which includes termination of employment.

14.0 SAFEGUARD AGAINST ABUSE POLICY

- 14.1 Reporting under this Manual, however, would not immunize or shield a Whistleblower against action following from intentional misconduct, which includes willfully making allegations through the whistleblowing mechanism that the Whistleblower knows to be false or makes with the intent to misinform or tarnish the reputation of others or due to personal gain.
- 14.2 Where a Whistleblower makes a Whistleblowing Report not in good faith or reasonably believed not to be true, the Whistleblower will not be protected and will be subjected to appropriate disciplinary action.
- 14.3 Malicious rising of unfounded allegations is an offence and will be subjected to an action according to the law or disciplinary action, whichever deemed fit.



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15.0 REPORTING PROCESS AND PROCEDURES

15.1 Procedures for making a Whistleblowing Report

15.1.1 When an individual is of the opinion that a specific concern falls within the scope of this Manual and cannot be solved through MTD Group's existing internal written procedures / control systems, a Whistleblowing Report can be submitted orally through the Whistleblowing Hotline as provided in **Appendix B: Whistleblowing Hotline** or in writing either by email at [wb hotline@mtdgroup.com.my](mailto:w hotline@mtdgroup.com.my) or by mail in an envelope sealed and marked 'Private & Confidential' to the Whistleblowing Hotline Team in the form as provided in **Appendix A: Form of Whistleblowing Report**. An oral report made through the Whistleblowing Hotline shall be followed with an official submission of the Whistleblowing Report to the Whistleblowing Hotline Team.

15.1.2 In deciding whether or not the employees have acted reasonably, all circumstances will be taken into consideration but in particular;

- The identity of the person to whom the disclosure is made;
- The seriousness of the relevant wrongful activity or wrongdoing and the impact to MTD Group, e.g. reputation and financial;
- Whether the wrongful activity or wrongdoing is continuing or is likely to occur in the future;
- Whether the disclosure is made in breach of a duty of confidentiality owed by the Whistleblower to any other person;
- Any action the employees or other person might reasonably be expected due to previous unfavorable disclosure; and
- Whether the complaints rose has taken into consideration the existing internal controls.

15.1.3 The Whistleblowing Hotline Team shall acknowledge receipt of the Whistleblowing Report by giving a confirmation to the Whistleblower in accordance with the timeline as provided in **Appendix G: Response Timing**.

15.1.4 The Whistleblower is required to put his particulars including name, designation, current address and contact details in the Whistleblowing Report as appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

The Whistleblowing Report shall include all details of his concerns as reasonably possible, including other details deemed to be useful to facilitate screening and action to be carried out by the Whistleblowing Hotline Team, if required.



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16.0 SCREENING

- 16.1 The Whistleblowing Hotline Team shall screen and assess the Whistleblowing Report to determine whether the reported or alleged wrongful activities or wrongdoings fall within the scope of this Manual.
- 16.2 Initial enquiries or interview will be made with the Whistleblower to decide on how to deal with the concerns raised in the Whistleblowing Report and to inquire further information, clarification and documents to substantiate the allegation.
- 16.3 Upon completion of the initial screening processes, the Whistleblowing Report shall be categorized into one of the following four (4) categories:
- 16.4 Category A : Extreme-rated cases
Category B : High-rated cases
Category C : Medium-rated cases
Category D : Personal grievances cases

A brief description of each of the above categories is provided in **Appendix F: Categories of Whistleblowing Report**.

- 16.5 Upon completion of the screening process and categorisation of the Whistleblowing Report, the Whistleblowing Hotline Team shall prepare a report which will include general recommendations to the BOD and the GEDC.
- 16.6 The following table shows the frequency of whistleblowing reporting to the BOD and the GEDC:

Reporting	Contents
Weekly verbal communication or ad-hoc reporting	Category A rated cases
Monthly report	Category A and B rated cases
Quarterly report	Category A, B and C rated cases

- 16.7 Depending on the severity and the seriousness of the allegation made in the Whistleblowing Report particularly ones which falls under Category A, the Whistleblowing Hotline Team may verbally communicate with the BOD and/or the GEDC on ad hoc basis to determine the appropriate action. The screening process will be completed on an urgent basis if the complaint on the alleged wrongful activities or wrongdoings is capable of causing irreparable harm to MTD Group's reputation or its financial position.

For the Whistleblowing Report which falls under Category D the Whistleblowing Hotline Team shall advise that such Whistleblowing Report shall not be dealt with in accordance with this Manual and that it will be referred to the Head of the GHCD for the appropriate action to be taken.

- 16.8 For Category D types of complaints, a separate report stating the nature of complaints, name, current address and contact numbers, the personnel alleged and additional information as required will be provided to the Head of GHCD for follow-up.



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16.9 If a Whistleblowing Report implicates the GEDC, the Whistleblowing Hotline Team shall prepare a report which includes general recommendations for the Board Audit Committee ("BAC")/BOD's consideration.

16.10 If a Whistleblowing Report implicates any of the members of the Whistleblowing Hotline Team, the other non-implicated members of the Whistleblowing Hotline Team shall prepare a report which includes general recommendations to the GHDC and BAC/BOD consideration.

16.11 If a Whistleblowing Report implicates the Whistleblowing Hotline Team, the GEDC, the COO or the ED, the Whistleblower may submit a Whistleblowing Report in writing directly to the BAC/BOD.

Refer to **Appendix C: Whistleblowing Reporting Structure** for further details.

17.0 PRELIMINARY ACTION

17.1 Following the recommendation of the Whistleblowing Hotline Team, the GEDC will make decisions including but not limited to any of the following:

- a. Rejection of the Whistleblowing Report; or
- b. Directing investigation by the Whistleblowing Hotline Team or any other outside party; or
- c. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the GHCD's Manual to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm; or
- d. Referral to the police or any other appropriate enforcement authority; or
- e. Referral to BAC/BOD for decision.

17.2 All decisions made by the GEDC and reasons of action thereof shall be properly documented.

17.3 If the case is referred to the BAC/BOD for decision, the BAC/BOD, together with the general recommendations made by the GEDC/COO/ED, will make decisions including but not limited to any of the following:

- a. Directing investigation by the Whistleblowing Hotline Team or any other outside party; or
- b. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the GHCD's Manual to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm; or
- c. Referral to the police or any other appropriate enforcement authority.

17.4 All decisions made by the BAC/BOD and reasons of action thereof shall be minuted in the minutes of meetings of the BAC/BOD.



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17.5 Upon the approval from the GEDC, the Whistleblowing Hotline Team shall notify the Whistleblower and the alleged wrongdoer of the status of the preliminary action taken by the GEDC/COO/ED and/or the BAC/BOD as soon as reasonably practicable.

18.0 INVESTIGATION

18.1 The investigation of a Whistleblowing Report shall be carried out in strict confidentiality without having the subject of the Whistleblowing Report becoming aware that an investigation is being conducted against him/her until it is necessary to do so.

18.2 The Whistleblower and the alleged wrongdoer are required to give full cooperation in the investigation or any other process carried out pursuant to this Manual. The amount of contact between the Whistleblower, the alleged wrongdoer and the investigating party will depend on the nature of the issue and the clarity of the information provided. Further information may be sought from or provided to the Whistleblower and the alleged wrongdoer.

18.3 The investigation shall, to the extent applicable to prevent any unnecessary public disclosure of concerns, be carried out internally or by an external counsel under the term of confidentiality and the directive of the investigation shall be from the GEDC/COO/ED and/or the BAC/BOD with the assistance of the Whistleblowing Hotline Team.

18.4 As far as possible, all investigations will be completed within 30 working days. However, complex investigation that requires longer period will be notified to the GEDC/COO/ED and/or to the BAC/BOD by the Whistleblowing Hotline Team.

18.5 In the event the Whistleblower is also implicated or discovered to be or has been involved in any wrongful activities or wrongdoing, he may also be investigated so as to complete the fact-finding process in accordance with this Manual.

18.6 If the alleged wrongdoer or any other implicated persons has, or is found to have:

- committed a wrongdoing; or
- taken serious risks which would likely cause a wrongdoing to be committed,

18.7 Based on the investigation directed by the GEDC/COO/ED or the BAC/BOD, the alleged wrongdoer or any other implicated persons shall be subjected to disciplinary action in accordance with the GHCD's Manual, which may include formal warning or reprimand, demotion, suspension or termination of employment or services with MTD Group.

18.8 In circumstances where immediate decision is required, the GEDC/COO/ED, with the recommendation of the Whistleblowing Hotline Team, will make the decision on the appropriate measures to be taken, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The report will be presented subsequently to the BAC/BOD for approval and final decision.

18.9 In the event the implicated personnel is the GEDC/COO/ED or the Head of the GHCD, the BAC /BOD, based on the investigation report, will have the final decision on the appropriate measures to be taken including, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons.

All decisions made by the BAC/BOD and reasons of action thereof shall be minuted in the minutes of meetings of the BAC/BOD.



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19.0 REPORTING OF OUTCOME

- 19.1 Subject to any legal constraint, the Whistleblower and, if applicable, the alleged wrongdoer will be notified in writing of the decision of the BAC/BOD with the recommendation from the GEDC, on whether any wrongful activities or wrongdoings have occurred or not and the alleged wrongdoer is guilty or not, as soon as reasonably practicable, and the basis thereof.
- 19.2 If the Whistleblower is dissatisfied with the outcome of the investigation, the Whistleblower may submit an appeal detailing the reason for such dissatisfaction and any other reason for the Whistleblower Hotline Team to consider to investigate the concern again
- 19.3 Whistleblowing Hotline Team will provide to the GEDC/COO/ED monthly and quarterly reports stating the number and nature of Whistleblowing Reports received, the results thereof, follow up action and the unresolved complaints.
- 19.4 A report shall also be provided to the BAC/BOD on a quarterly reporting basis.
- 19.5 The flowchart for the procedures concerning the whistleblowing is provided in **Appendix D: Reporting Process and Procedures Flowchart for Whistleblowing**.

20.0 RIGHTS OF PERSONS IMPLICATED

- 20.1 The alleged wrongdoer or other implicated persons shall be notified of the allegation made against them as soon as reasonably practicable provided that such notification does not impede the progress of the procedures for establishing the circumstances of the case.
- 20.2 All alleged wrongdoers shall be given the right to have a fair trial and opportunity to defend himself in person, as provided by the laws.
- 20.3 All alleged wrongdoers have the duty to attend and assist the investigation process.

21.0 EXTERNAL DISCLOSURE

- 21.1 If the procedures under the Manual have been exhausted, or the Whistleblower is still not satisfied with the MTD Group's response and reasonably believes that the information disclosed, and any allegation contained in it, are substantially true, he is at liberty to take the matter further by raising it with the relevant governmental, regulatory authorities and enforcement agencies. External disclosure may further be made in case of an important and urgent public interest or required by the law.
- 21.2 The whistleblower should minimize the possible impact of his actions to MTD Group and to the people involved. The external party one considers disclosing information to, should be a party which will be able to effectively organize action against the alleged contravention.
- 21.3 The employees who make an external complaint in good faith to any relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned after exhausting MTD Group existing internal procedures will be protected against victimization or other adverse treatment.



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22.0 THE LIMITS AND THE RETENTION OF RECORDS

- 22.1 Time limits should be allocated for each stage of the procedure. If the time limits pass without any satisfactory action being taken, the concerns should be raised at the next level.
- 22.2 The GHCD shall retain all records relating to any whistleblower case(s) and its related investigation report, for such period as required and stipulated under the relevant statute of limitation.
- 22.3 All records shall be maintained in good condition to protect evidence and avoid legal repercussions at a secured and dedicated place as allocated by the Whistleblowing Hotline Team.
- 22.4 All records will be treated as confidential and only dedicated employees as assigned by the Whistleblowing Hotline Team shall have access to the records.

23.0 PRIVACY

MTD Group is committed to protect the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws. Any personal data obtained through or as part of this Manual, will only be used for the purposes explained in this Manual and will only be provided to those who have a need to know these data for these purposes or to comply with the law or an important public interest.