



A member of **UEM Group**

UEM EDGENTA BERHAD

(5067-M)

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

22 NOVEMBER 2019

1.0 POLICY STATEMENT

UEM Edgenta Berhad ("the Company") is committed to the highest standards of professionalism, honesty, integrity, accountability and ethical behaviour in the conduct of its business and operations. We aspire to conduct our affairs in an ethical, responsible and transparent manner.

With this in mind, the Whistleblowing Policy ("the Policy") has been formulated to enable employees of UEM Edgenta Berhad and members of the public to report instances of unethical behavior, improper conduct, actual or suspected fraud and/or abuse with the Company.

The implementation of the Policy is also in line with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, Capital Markets and Services Act 2007, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, Personal Data Protection Act 2010 and all applicable laws and regulations in Malaysia.

2.0 OBJECTIVES

This Policy is to provide an avenue for all employees of UEM Edgenta Berhad, third parties employed or engaged by UEM Edgenta Berhad, and members of the public to disclose any improper conduct or unethical behaviour, actual or suspected fraud and/or abuse in accordance with the procedures as provided for under this Policy, and to provide protection for those who report such allegations.

It aims to develop a culture of openness, accountability and total integrity. This is to reassure employees and directors that they would be fully protected from harassment or victimisation for whistleblowing in good faith.

This Policy is also to enable the Company to take prompt corrective action where necessary, in order to mitigate any potential financial or reputational damage.

3.0 SCOPE

This Whistleblowing Policy is applicable across UEM Edgenta Berhad and its group of companies. This policy is not to invalidate the Grievance Procedure and/or Disciplinary Action Process and Procedure but to provide alternative means for employees and members of the public to raise a concern outside the normal reporting channels.

This policy will not apply to personal grievances concerning an individual's term and conditions of employment, or other aspects of working relationship, complaints of bullying or harassment or disciplinary matters. Such complaints should be dealt under the existing Human Resource procedures in the Employee Handbook adopted by UEM Edgenta Berhad.

4.0 ELIGIBILITY

Members of the public, employees, directors, shareholders, consultants, vendors, contractors or any parties involved in a business relationship with UEM Edgenta Berhad are encouraged to disclose any wrongdoing that may adversely impact the Company. The Protected Disclosures may be in relation to matters concerning UEM Edgenta Berhad or any of its subsidiaries.

UEM Edgenta Berhad is committed to this Policy and assures that the Whistleblower will not suffer any form of retribution, victimisation or detriment.

If the Whistleblower could prove that they have been subject to redistribution, victimisation, or detriment because of using this policy, disciplinary action will be taken against the perpetrator.

5.0 PROCEDURE IN MAKING A DISCLOSURE

All disclosures are to be channeled in accordance with the Whistleblowing Procedures.

6.0 PROTECTION TO WHISTLEBLOWER

A Whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable.

An employee who whistleblows internally will also be protected to the extent reasonably practicable, against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within UEM Edgenta Berhad, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts and the rules and procedures involved.

The protection to the Whistleblower can be revoked under the following circumstances, among others:

- The Whistleblower participated in the improper conduct;
- The Whistleblower willfully discloses a false statement;
- The disclosure is frivolous or vexation;
- The disclosure is made with malicious intent;
- The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- The Whistleblower commits an offence in the course of making the disclosure or providing further information.

A Whistleblower may seek protection from any other enforcement agencies and any Federal or State Government departments or other persons as the enforcement agency deems appropriate.

7.0 DISQUALIFICATIONS

While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection can warrant disciplinary action.

Protection under this Policy will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by a Whistleblower knowingly. If the investigation later reveals that the Protected Disclosure was made with a malicious intention, appropriate action could be taken against the Whistleblower.

A report should be made in good faith as stipulated in 6.0 Protection to Whistleblower.

8.0 NOTIFICATION

The Whistleblower will be accorded the privilege to be notified on the outcome of the disclosure upon the completion of the whistleblowing process and procedures.

9.0 AMENDMENT

UEM Edgenta Berhad reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Whistleblowers unless the same is notified to the Whistleblowing Policy in writing.

This document shall be published on UEM Edgenta Berhad’s website for external parties and the public to be aware of the Policy and the available reporting channels to raise concerns with UEM Edgenta Berhad.

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APPENDIX 1 – EXAMPLES OF MALPRACTICES

As a guide, the types of malpractices covered under the Whistleblowing Policy include, but not limited to the following examples:

1. Theft, pilferage, misappropriation or attempt of the same of UEM Edgenta Berhad's money or property.
2. Fraud, dishonesty, cheating, falsification or attempt of the same in connection with UEM Edgenta Berhad's business, money or property.
3. Soliciting or accepting bribe or any illegal gratification.
4. Participating in unauthorised financial transactions.
5. Breach of fiduciary relationship.
6. Conflict of interest.
7. Spreading malicious rumours about UEM Edgenta Berhad.
8. Gross negligence and neglect of duty.
9. Unauthorised disclosure of UEM Edgenta Berhad's confidential information, including commercial or manufacturing secrets, calculations or designs.
10. Commission of any subversive act.
11. Commission of any act that brings disrepute, embarrassment or affects the legitimate interest of UEM Edgenta Berhad or ruins the image of UEM Edgenta Berhad.
12. Habitual breach of any of UEM Edgenta Berhad's order or any law applicable to the establishment of rules made thereunder.
13. Conduct which is likely to cause injury or endanger the life or safety of another person within UEM Edgenta Berhad's premise.
14. Misrepresentation of UEM Edgenta Berhad to others.
15. Breach of policies and UEM Edgenta Berhad Code of Conduct.
16. Abuse of position for personal gain or interest.
17. Assisting a person to commit any of the above instances of improper conduct.
18. Deliberate concealment of any of the above or other acts of wrongdoing/ misconduct.