

SURIA KLCC SDN BHD

WHISTLEBLOWING

POLICY

Policy Statement

“SURIA KLCC” means Suria KLCC Sdn. Bhd. SURIA KLCC is committed to the highest standard of integrity, openness, and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the above-mentioned values, SURIA KLCC provides avenues for all employees and directors of SURIA KLCC, business associates (e.g. contractors, service providers, tenants) and members of the public to disclose any improper conduct within SURIA KLCC.

Objective of the Policy

This policy is to provide an avenue to SURIA KLCC’s employees, directors, business associates and members of the public to disclose improper conduct within SURIA KLCC and to provide fair treatment and protection when a disclosure of improper conduct is made.

Scope of the Policy

This policy is designed to facilitate SURIA KLCC employees, directors, business associates and members of the public to disclose any improper conduct within SURIA KLCC through internal channels. This includes but IS NOT limited to the following:

- i. Abuse of Power.
- ii. Conflict of Interest.
- iii. Fraud, theft or embezzlement.
- iv. Misuse of SURIA KLCC’s Property.
- v. Corruption or any form of Bribery.
- vi. Misappropriation of funds.
- vii. Misuse of confidential information.
- viii. Failure to comply with SURIA KLCC Procedures, Anti-Bribery and Corruption Manual (ABC Manual), Code of Conduct and Business Ethics (CoBE), Malaysian laws and regulatory requirements.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under SURIA KLCC’s Employee Handbook, and any criminal offence under relevant Laws, Court Order or Regulatory body.

This whistleblowing policy will not supersede:-

- a) Grievances policies and procedures; and
 - b) Sexual Harassment Policy;
- in the SURIA KLCC Employee Handbook.

Applicability of the Policy

This Policy applies to every SURIA KLCC:-

1. Director
2. Employee
3. Business associates
4. Members of the public who become a whistle blower.

Procedure in Making a Disclosure

All disclosures are to be disclosed via secure and confidential channels in accordance with the procedures as provided under this policy.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee, director, business associate or member of the public who whistle blows will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within SURIA KLCC, to the extent reasonably practicable, 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.

Anonymous Whistleblower

Any employee, director or member of the public who wishes to disclose any improper conduct within SURIA KLCC may remain anonymous.

SURIA KLCC will investigate anonymous disclosure. Further information and details from the anonymous whistleblower (if available) maybe needed in the course of the investigation.

Notification

When you disclosed a concern, you can expect that your disclosure will be treated seriously, fairly and promptly. You may expect updates during and upon the completion of our investigation, unless we take the view that the disclosure may impede investigation.

SURIA KLCC reserves the right to review and amend this policy from time to time, as and when necessary.