

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 Reporting

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’s 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.





SURIA KLCC SDN BHD

WHISTLEBLOWING PROCEDURES

“SURIA KLCC” means Suria KLCC Sdn. Bhd. Any SURIA KLCC employee, director, business associates (contractors, service providers, tenants) or members of the public who has knowledge or awareness of any improper conduct under SURIA KLCC’s Anti-Bribery & Corruption Manual (ABC Manual), Code of Conduct and Business Ethics (CoBE) and any criminal offence under relevant Laws, Court Order or Regulatory body committed or about to be committed within SURIA KLCC are encouraged to make disclosure by following the procedures as stated in this document.

Reporting Channels

Disclosure can be made to ANY of the following reporting channels, in strict confidential manner:

-  Email to whistleblowing@suriaklcc.com.my;
-  Online submission through website;
-  In writing to Suria KLCC Sdn. Bhd., Integrity & Compliance Department, Level 13 Menara Darussalam, 12, Jalan Pinang, 50450, Kuala Lumpur.
-  In person to respective Head of Department, Head of Human Resource or Head of Integrity & Compliance;

Disclosure of Identity

In order to facilitate SURIA KLCC’s investigation of the Disclosure, the Whistleblower is encouraged to disclose his/her identity which will be kept Private & Confidential.

A Whistleblower may also choose to remain anonymous.

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

Scope of Reporting

Improper conduct by any employee or director of SURIA KLCC 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’s Procedures, ABC Manual, 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 procedure will not supersede:-

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

The Whistleblower is responsible to ensure that the concerns disclosed is genuine, made in good faith and free from any malicious intent.

If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

Content of the Disclosure

It is encouraged that any disclosure made herein contain the following information:

- Details of the person(s) involved.
- Details of the allegation;
 - Nature of the allegation.
 - Where and when the alleged misconduct/wrongdoing took place.
- Other relevant information; and supporting evidence (if available).

Protection Accorded to the Whistleblower

A Whistleblower shall be protected from unfair treatment, retaliation or victimization 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.

A Whistleblower’s identity shall always be kept private and confidential unless otherwise required by relevant Laws, Court Order or Regulatory body.

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 made with malicious intent; or
- the disclosure is frivolous or vexatious.

Notification on the Outcome of the Disclosure

The Whistleblower will be notified on the outcome of his/her disclosure.

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