



**AEON CO. (M) BHD. (126926-H)**

**WHISTLEBLOWING  
POLICY AND MANUAL**

## **1. Overview**

AEON CO. (M) BHD (AEON) is committed to the highest standard of integrity, openness and accountability in the conduct of its business and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, AEON provides avenue for all employees of AEON and members of the public to disclose any improper conduct within AEON.

## **2. Definition**

The word whistleblowing in the context of this Whistleblowing Policy and Manual refers to a situation where internal parties such as employees of AEON, or external parties including members of public raise concerns at the earliest opportunity and in an appropriate way, of any attempted, suspected or actual wrongful activities or malpractices within AEON.

The person who initiates or raises concerns of wrongful activities or any malpractices is referred to as a “whistleblower”.

## **3. Objective**

This Policy and Manual is intended to outline the mechanism that has been put in place to enable employees of AEON and members of the public to raise concerns on any wrongful activities or malpractices, receive feedback on the actions taken and assurance that they will be protected from possible reprisals or victimization.

## **4. Scope**

This Policy and Manual is designed to facilitate whistleblowers to disclose any improper conduct (misconduct or criminal offence) through a designated channel. Such improper conduct includes the following: -

- i. Failure to comply with legal or regulatory obligations;
- ii. Corruption, bribery or fraud;
- iii. Money laundering;
- iv. Insider trading;

- v. Abuse of power;
- vi. Conflict of interest;
- vii. Theft or embezzlement; and
- viii. Misuse of AEON's funds or property.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under AEON's Code of Conduct and Business Ethics (CoBE) or any criminal offence under any relevant legislations in force.

All whistleblowing reports have to be made in good faith with reasonable belief that the information is true and not frivolously/maliciously and not for personal gain; otherwise, the necessary corrective action may be initiated against the whistleblower.

## **5. Protection & Confidentiality**

The identity of the whistleblower and the information reported will be kept in a secure information management system. AEON shall treat the report confidentially so as to protect the identity of the whistleblower and of others involved or referenced in the whistleblowing report on a "need-to-know" basis to facilitate the investigation.

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows will also be protected against any retaliation, adverse and detrimental actions to the extent reasonably practicable, for disclosing any attempted, suspected or actual improper conduct committed within AEON, or by persons acting for AEON, 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.

Protection may still be given by AEON at its discretion to a whistleblower who has participated in the improper conduct, wrongdoings, corruption or fraud.

AEON views any harassments or retaliations in any form or manner by any person against a genuine whistleblower seriously and will treat such acts as major misconduct which if proven may lead to serious disciplinary action including the possibility of dismissal.

Suppliers / Vendors / Tenants / Contractors of AEON and members of the public who become a whistleblower will also be protected by AEON as to his/ her/ its identity in the same manner as provided in this Policy.

The information reported, identity, and personal information of the whistleblower, and persons involved or referenced in the report, including the alleged wrongdoer, may be revealed to persons who are involved in the investigation to assist with their investigation. Such information will also be revealed if required under any other processes or proceedings (i.e. if the evidence is required in court) on a “need to know basis”. However, the identity of the whistleblower will not be disclosed without his/ her/ its prior consent.

**6. Procedures**

The Whistleblowing Procedures outline AEON’s commitment to have a channel in which AEON employees, suppliers, vendors, contractors and members of the public are able to report instances of unethical, unlawful or undesirable conduct of business within AEON.

AEON has established a Whistleblower Committee to carry out investigation(s) pertaining to reports or enquiries of improper conducts within AEON, in which the process flow for whistleblowing procedure is appended under Appendix A herein.

The report, or any enquiries relating to attempted, suspected or actual improper conduct or weaknesses in AEON’s processes and procedures can be made by filling up the Form of Improper Conduct appended under Appendix B for submission via writing (mail), electronic mail (e-mail) to: -

Name	Mr. Lee Choon Lam
E-mail	<a href="mailto:whistleblow@aeonretail.com.my">whistleblow@aeonretail.com.my</a>
Mail	AEON CO. (M) BHD 3 <sup>rd</sup> Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia Attention : Mr. Lee Choon Lam Mark : <b>Strictly Private &amp; Confidential</b>

If there is a need to contact someone other than Mr. Lee Choon Lam, the report may be addressed to the Chairman of the Audit and Risk Management Committee (“ARMC”) and/or Deputy Managing Director/Chief Governance Officer of AEON: -

Name	Mr. Hisham Bin Zainal Mokthar, Chairman of the ARMC
E-mail	<a href="mailto:ARMCChair@aeonretail.com.my">ARMCChair@aeonretail.com.my</a>
Mail	AEON CO. (M) BHD 3 <sup>rd</sup> Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia Attention : Mr. Hisham Bin Zainal Mokthar HamidMark : <b>Strictly Private &amp; Confidential</b>

Name	Mr. Tsugutoshi Seko, Deputy Managing Director/ Chief Governanance Officer of AEON
E-mail	<a href="mailto:seko.tsugutoshi@aeonretail.com.my">seko.tsugutoshi@aeonretail.com.my</a>
Mail	AEON CO. (M) BHD. 3 <sup>rd</sup> Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia  Attention : Mr. Tsugutoshi Seko Mark : <b>Strictly Private &amp; Confidential</b>

The whistleblower should try to provide specific information regarding the type of activity or conduct with as much detail as possible. The whistleblower should also disclose the identity of the person(s) suspected as being involved, how the misconduct happened, when it occurred, and who was affected.

The whistleblower should not be discouraged from making a report due to insufficient evidence to support their report.

Although anonymous reporting will be considered by AEON, a whistleblower is encouraged to disclose his/her identity so that AEON is able to protect him/her pursuant to this Policy.

## **7. Reporting**

All reports received will be analysed by the ARMC to decide on the next appropriate course of action.

In consequence of the investigation, the outcome will be tabled in summary at the ARMC meetings held quarterly. The Chairman of the ARMC shall then report to the Board of Directors (“Board”) on reports and findings that require the Board’s attention and approval.

## **8. Whistleblower Protection Act 2010**

While we encourage you to use our whistleblowing channel, you have an alternative avenue to make a report to an enforcement agency under the Whistleblower Protection Act 2010 (“WPA”). Further information on the WPA can be obtained from the Malaysian Anti-Corruption Commission (“MACC”) website: <https://www.sprm.gov.my/index.php/en/prevention/prevention-strategy/197-perundangan-anti-rasuah/1061-whistleblower-protection-act-2010-act-711>

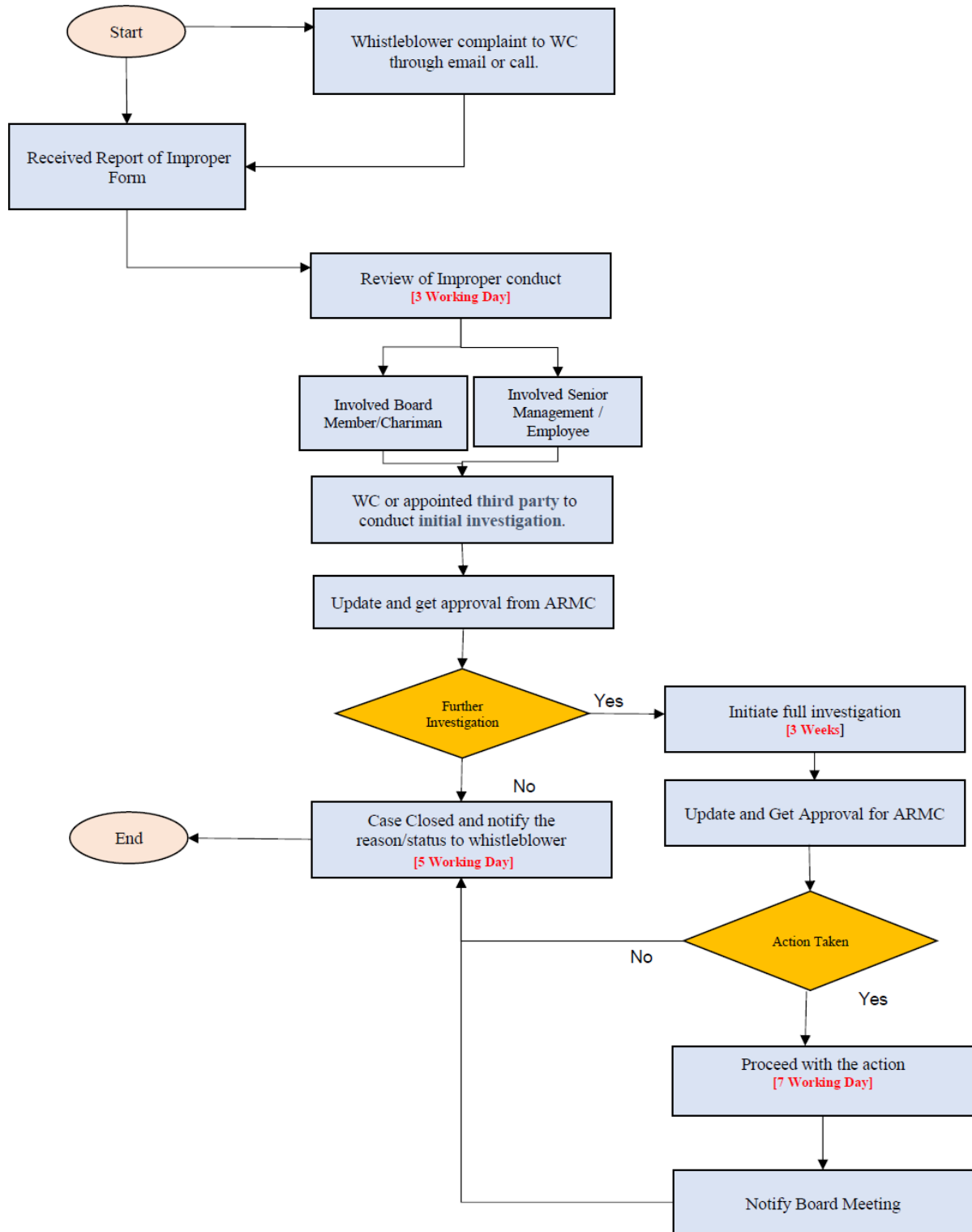
This Policy was approved and reviewed by the Board of Directors of AEON on the following dates:

Version	Date
1	28 <sup>th</sup> February 2018
2	20 <sup>th</sup> May 2020
3	22 <sup>nd</sup> Feb 2023

This policy shall be accessible at [www.aeongroupmalaysia.com](http://www.aeongroupmalaysia.com)

————— The End —————

Appendix A – Process Flow






## Details of Process Flow

- **Review of Complaint Improper Conduct:** Review the report/complaint and reject either the complaint falls outside the scope of this policy.
- **Anonymous Report:** The Company shall not be expected to follow-up on any anonymous reports. The Company may however consider investigating the allegations after considering the seriousness and credibility of the allegations and the impact of the allegations if confirmed.
- **Appointment of third party:** In the event the Whistleblower Committee is involved, the Chairman of ARMC or AEON's BOD may select other personnel or an independent third party to conduct the full investigation. i.e., improper conduct on CEO, appointment of external parties shall be approved by AC.
- **Initial investigation:**
  - Gathering of documents and information and get approval from ARMC Chairman.
  - Suspend the person implicated upon approved by AC Chairman.
  - The Whistleblower and witness identity shall be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the Company;
- **Full Investigation:**
  1. Examine the evidence from the initial Investigation.
  2. Conduct interview/Inquiry with any relevant person e.g. witness.
  3. If Investigating Officer is appointed from within the company, the Officer Designation and/or Grade shall be higher than the employee(s) implicated in the Improper Conduct.
  4. All interview and activities carried out during investigation shall recorded and reduced to writing and filed.
  5. Obtain any other assistance from third parties such as obtaining legal advice and etc.
  6. The Investigating Officer shall have free and unrestricted access to all company record which is related to the case.
  7. The Investigating Officer shall submit the recommendation action and the outcome from the full investigation. The recommendation or step that:
    - (i) prevent the improper conduct from continuing or re-occurring in future; and
    - (ii) any further action taken by company including the disciplinary proceeding or referring matter to the appropriate external authority.

- **Revocation of whistleblower Protection if:** The protection may be revoked if the Whistleblower misuses or abuses the Policy or has participated in the Improper Conduct, willful disclosure of false statements etc.
- **Timeline:** The process is expected to complete in 60 days from the date of complaint was received. Nevertheless, if the investigation is unable to completed within 60 days, the AC Chairman may extend the time for its completion but does not exceed the 120 days from the date complaint was received.
- **No Action:** No action will be taken against any employee or stakeholder who makes an allegation in good faith which is not confirmed by subsequent investigation.

**Appendix B – Form of Improper Conduct**

Whistleblowing Policy and Manual (Ver.2)

		<b>FORM OF IMPROPER CONDUCT</b>		Reference ID : <input style="width: 100px;" type="text"/>
<b>1. Details of Whistleblower</b>				
Name :	<input style="width: 150px;" type="text"/>	Staff ID/I.C No :	<input style="width: 150px;" type="text"/>	
Tel. No :	<input style="width: 150px;" type="text"/>	Email Address :	<input style="width: 150px;" type="text"/>	
Position :	<input style="width: 150px;" type="text"/>	Dept/Store/Mall/Company :	<input style="width: 150px;" type="text"/>	
<b>2. Details of Employee/Director Involved in Improper Conduct</b>				
Name :	<input style="width: 150px;" type="text"/>	Staff ID or I.C No :	<input style="width: 150px;" type="text"/>	
Tel. No :	<input style="width: 150px;" type="text"/>	Email Address :	<input style="width: 150px;" type="text"/>	
Position :	<input style="width: 150px;" type="text"/>	Dept/Store/Mall/Company :	<input style="width: 150px;" type="text"/>	
<b>3. Details of Witness Involved in Improper Conduct (if any)</b>				
Name :	<input style="width: 150px;" type="text"/>	Staff ID or I.C No :	<input style="width: 150px;" type="text"/>	
Tel. No :	<input style="width: 150px;" type="text"/>	Email Address :	<input style="width: 150px;" type="text"/>	
Position :	<input style="width: 150px;" type="text"/>	Dept/Store/Mall/Company :	<input style="width: 150px;" type="text"/>	
<b>4. Details of Improper Conduct (Briefly describe the misconduct / improper activity and how you know about it)</b>				
Date :	<input style="width: 150px;" type="text"/>	Time :	<input style="width: 150px;" type="text"/>	
Location (specific) :	<input style="width: 500px; height: 100px;" type="text"/>			
*Please attach supporting document(s) if available. If there is more than one allegation and space provided is insufficient, please number each allegation and use as many pages as necessary.				
<b>5. Have you previously made a Complaint of the Improper Conduct to any internal or external parties or the authorities?</b>				
YES	<input style="width: 40px;" type="checkbox"/>	NO	<input style="width: 40px;" type="checkbox"/>	
If Yes,				
(i) Name of person receiving the Complaint	<input style="width: 250px;" type="text"/>			
(ii) Date of Complaint made	<input style="width: 250px;" type="text"/>			
(iii) Status of the Complaint	<input style="width: 250px;" type="text"/>			
<b>6. Declaration</b> (Please note that complaint made anonymous may not be processed or investigated unless the concern/allegation made is of sufficiently serious nature as determined by the Whistleblower Committee)				
Name :	<input style="width: 150px;" type="text"/>	Signature		
Date :	<input style="width: 100px;" type="text"/>	Time :	<input style="width: 100px;" type="text"/>	
I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief. I hereby agree that the information provided herein to be used and processed for investigation purposes.				