

# Whistleblowing Policy

<p><b>INTRODUCTION</b></p>	<p>Companies all over the world recognise that employees, from time to time, have concerns about what is happening at work, but are afraid to report those concerns. Reports are not limited to fraud, theft or corruption, but about possible misconduct, cover a much wider range of bad practices, including behaviour that is not in line with the Company's values. Such bad practice can be happening, likely to happen or even have happened. The Policy sets forth the conditions and procedures for investigations of allegations of corruption, fraud and misconduct. It is issued consistent with the Company's adoption of Code of Ethics Guideline and Fraud policy.</p>
<p><b>OBJECTIVE</b></p>	<p>The Company is committed to maintaining the highest possible standards of ethical, moral and legal conduct within the Company. In line with this commitment and in order to enhance good governance and transparency, the main objective of the Policy is to:</p> <ul style="list-style-type: none"> <li>▪ To provide avenues for employees to raise concerns and define a way to handle these concerns.</li> <li>▪ To enable Management to be informed at an early stage about acts of misconduct.</li> <li>▪ To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.</li> <li>▪ To help develop a culture of openness, accountability and integrity. Atrium REIT assures that all reports will be treated strictly confidentially and promptly investigated and that reports can be made anonymously, if desired. Employees and others are encouraged to use guidance provided by this policy for reporting all allegations of suspected misconduct or improper activities.</li> </ul>
<p><b>COVERAGE AND SCOPE</b></p>	<p>In line with the Code of Ethics and Fraud policy, all employees are required to disclose acts of Fraud, Corruption or any Misconduct relating to the work of the Company that come to their attention. Similarly, in line with the Company's Good Governance policy, the Company expects its business associates and stakeholders to disclose acts of Fraud, Corruption or Misconduct generally including such acts that involve Company's employees. The typical disclosures thus expected of staff and concerned third parties include, without limitation, the following:</p> <ul style="list-style-type: none"> <li>▪ Unlawful acts;</li> <li>▪ Failures to comply with statutory obligations;</li> <li>▪ Fraud, which means any act or omission, including a misrepresentation, which misleads, or attempts to mislead, a party in order to obtain, directly or indirectly, a financial or other benefit or to avoid an obligation;</li> <li>▪ Corruption, which means the offering, giving, receiving, or soliciting or anything of value to influence, directly or indirectly, the decision-making or action of another party;</li> <li>▪ Bribery, which means the offer or acceptance of anything of value in exchange for influence on authority, public affairs and employee;</li> <li>▪ Misconduct, which means the intentional or negligent failure to</li> </ul>

	<p>observe the Company’s rules and Code of Ethics;</p> <ul style="list-style-type: none"> <li>▪ Coercive practices, which mean impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of that party to influence the actions of that party; and</li> <li>▪ Collusive practices, which mean any arrangement between two or more parties designed to achieve an unlawful or unethical purpose, including influencing the actions of another party.</li> </ul> <p>Whistleblowing and complaints shall be considered when made in the reasonable belief that what is being reported is true. Allegations and concerns expressed anonymously shall be considered at the discretion of the Company. In the exercise of such discretion, the factors to be considered by the Company shall include, without limitation, the seriousness of the allegation, its credibility, and the extent to which the allegation can be confirmed and/or corroborated by attributable sources.</p>
<b>DEFINITIONS</b>	<p><b>a) Whistleblower:</b> A person or entity making a protected disclosure about improper or illegal activities is commonly referred to as a Whistleblower. Whistleblowers may be Atrium REIT employees, vendors, contractors, customers or general public. The Whistleblower’s role is as a reporting party. They are not, investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.</p> <p><b>b) Good Faith:</b> Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.</p> <p><b>c) Employees</b> Refers to all member of the Board of Directors, Senior Management, Permanent and Contract Staff including temporary and seconded employees working under the control and supervision of the Company.</p>
<b>PROTECTION</b>	<p>The identity and personal information of the Whistleblower will be protected, secured and kept confidential, unless agreed by Whistleblower or required by law.</p> <p>Whistleblower will be protected from any form of reprisal including but not limiting to the following:</p> <ul style="list-style-type: none"> <li>a) Action causing injury, loss or damage;</li> <li>b) Mental and physical torture;</li> <li>c) Intimidation/harassment;</li> <li>d) Discrimination, discharge, abandon, suspension, demotion;</li> <li>e) Termination, victimisation of consequence on relation to her/his employment, career, profession, trade or business or the taking of disciplinary action due to his/her disclosure; or</li> <li>f) Any threat to take any of the action referring to items (a) to (e) above.</li> </ul>
<b>PROCEDURE</b>	<p><b>a) General Guidance</b> This policy presumes that employees will act in good faith and will not</p>

make false accusations when reporting of misconduct by the Company's employees. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination.

**b) Reporting Allegations of Misconduct or Improper Activities**

- 1) Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, the Company's customers, shareholders, employees, investors or the public at large.
- 2) Acts of misconduct may be disclosed in writing, telephonically or in person. However, all reports are encouraged to be made in writing, so as to assure a clear understanding of the issues raised.
- 3) Individuals are recommended to self-identify, though it is not a requirement of this policy.
- 4) All reports should be sent directly to any of the Senior Management personnel or the Chief Executive Officer.
- 5) If for any reason, it is believed that this is not possible or appropriate to report to the persons as specified in item (4) above, then the report should be made directly to:

Chairman of Audit and Risk Management Committee  
Email: [boon.huat.chng@my.tricorglobal.com](mailto:boon.huat.chng@my.tricorglobal.com)

- 6) In case of reports sent through e-mail, it is recommended to mark the subject as 'Atrium REIT Whistleblower' for ease of identification.
- 7) Although the Whistleblower is not expected to prove the truth of an allegation, he / she needs to demonstrate to the person contacted that there are sufficient grounds for concern. The report must provide full details (where applicable) of the following:
  - a) Details of the Complainant
  - b) Type of improper activity/conduct
  - c) Details of suspected personnel involved
  - d) Information on incident (Date, Time and Place of incident)
  - e) Any document, information or physical evidences relating to the complaint.

**c) Investigating Alleged Misconduct or Improper Activities**

- 1) The Senior Management personnel or Chief Executive Officer who receives a report shall acknowledge receipt of the reported violation or suspected violation within five(5) business days.
- 2) The Senior Management ("Management") shall meet to discuss about the action / investigation on any reports received from the Whistleblowers. The Management shall not include any person(s) implicated in the complaint to be involved in any discussion meetings or investigations.
- 3) The Management have the responsibility to conduct its own investigations and if necessary, other relevant parties may also be invited to assist in the investigations.
- 4) The Management will ensure that the investigations are carried out using appropriate channels, resources and expertise.
- 5) Some concerns may be resolved by agreed action without the need for an investigation. Concerns about allegations which fall within the

	<p>scope of specific procedures of Atrium REIT will be referred for consideration under those procedures.</p> <p>6) The Management reserves the right to make any decision based on the findings.</p> <p>7) If the Whistleblower report is made to the Audit Committee (“AC”) Chairman, the AC Chairman in consultation with other AC members, shall decide whether the allegation has merit and could be substantiated.</p> <p>8) If an investigation is to be carried out, the AC Chairman may appoint the internal auditor of the Company or an independent party to carry out the investigation.</p> <p>9) Upon completion of the investigation as mentioned in item (8) above, the AC shall review the investigation report and if there is an action to be taken, the AC shall refer the investigation report to the Board of Directors of the Company for appropriate action to be taken.</p> <p>10) The Whistleblower will be informed of the outcome of the investigation.</p>
<p><b>ROLES AND RESPONSIBILITIES</b></p>	<p><b>Whistleblowers</b> Whistleblowers should act in good faith and should not make false accusations when reporting of any misconduct by the Company’s employees. The Whistleblower shall give his /her full cooperation during the course of the investigation, if required.</p> <p><b>Suspects</b> Suspects have a duty to cooperate with investigators. The identity of the suspects shall remain confidential.</p> <p><b>Investigators</b> All investigators derive the authority to handle all matters seriously, confidentially and promptly. All investigators shall be independent and unbiased both in fact and appearance.</p> <p><b>Investigation Participants</b> Employees who are interviewed or asked to provide information have a duty to fully cooperate with the investigators. All parties involved in the investigations should refrain from discussing or disclosing matters concerning the investigations.</p> <p><b>Confidentiality</b> All information, documents, records and reports relating to the investigation of the Whistleblower report shall be kept securely by the Management or the Audit Committee as the case may be, to ensure its confidentiality.</p>