

POLICY

WHISTLEBLOWING POLICY & PROCEDURES

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0.0 INTRODUCTION

In line with good corporate governance practices, the Board of Directors of Sunway Construction Group Berhad (hereafter referred to as 'the Group' or 'SCG') and the Management are committed to upholding the highest standards of business conduct and ethical behaviour. Integrity, humility and excellence are core to our corporate values. This Whistleblowing Policy ("Policy") provides a safe and confidential channel for employees, contractors, suppliers, and other stakeholders (hereafter referred to as 'Associates') to report concerns regarding misconduct or unethical practices within SCG.

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By fostering an open environment, we encourage whistleblowing in good faith and ensure that reports are dealt with fairly, promptly, and without fear of retaliation.

1.0 PURPOSE OF THE POLICY

1.1 The purpose of this policy is to outline the procedures for reporting any misconduct or malpractice, including but not limited to fraud, bribery, corruption, and other unethical conduct that undermines the Group's Code of Conduct and Business Ethics (CCBE). We aim to ensure that all reports are treated seriously and acted upon swiftly, with respect to confidentiality and protection of the whistleblower.

2.0 SCOPE

2.1 This policy applies to all directors, employees and Associates of SCG.

3.0 TYPES OF REPORTABLE CONCERNs

3.1 Individuals can report any concerns or suspicions regarding the following:

- a) **Fraud or financial misconduct** (Any action deliberately designed to cause loss to SCG, or to obtain any unauthorized benefit, whether directly or indirectly)
- b) **Bribery or corruption** (including improper gifts, favours, or benefits)
- c) **Violation of laws or regulations** (e.g., health and safety, environmental standards, or labour laws)
- d) **Breaches of Group policies** (e.g., the Code of Conduct & Business Ethics, Gifts, Entertainment and Hospitality)
- e) **Discrimination, harassment or abuse**

- f) Misuse of Group resources or information
- g) Unsafe working conditions
- h) Conflict of interest

4.0 REPORTING CHANNELS

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- 4.1 SCG provides various channels for reporting concerns:
 - a) **Whistleblowing Hotline:** +603 5639 8033
 - b) **Email:** whistleblowing.SCG@sunway.com.my
 - c) **Direct Contact:** Head of Internal Audit – SCG or
The Chairman of Audit Committee – SCG
+603 5639 8301
 - d) **Mail** : Internal Audit Department
Level 4.2, Menara Sunway,
Jalan Lagoon Timur, Bandar Sunway,
47500 Selangor Darul Ehsan, Malaysia
- 4.2 Individuals are encouraged to make use of the “**Whistleblowing Report Form**” provided in the **Appendix** of this document.
- 4.3 Reports may be made anonymously, though it is encouraged to provide contact details to enable the independent investigation team to obtain further information, if required for investigation or clarification. We aim to handle all reports confidentially and with the utmost sensitivity.

5.0 WHISTLEBLOWER PROTECTION

- 5.1 At SCG, we are committed to protect whistleblowers. Whistleblowers will be protected from:
 - a) **Reprisal and/or Retaliation:** There will be no adverse action, such as termination, demotion, or harassment, taken against any individual who reports concerns in good faith.
 - b) **Confidentiality:** The identity of whistleblowers will be kept confidential unless the whistleblower consents otherwise or unless disclosure is required by law.
 - c) **Non-retaliation:** The Company will not tolerate any form of retaliation or discrimination against whistleblowers.
- 5.2 Retaliation against any whistleblower will result in disciplinary action, including possible termination.

5.3 SCG reserves the right to revoke the whistleblower protection accorded under this Policy if the whistleblower has, or is found to have:

- a) made a whistleblowing report not in good faith and/or made with malicious intent, ulterior motive or for personal gain;
- b) participated in the reported misconduct or complaint;
- c) made a disclosure not in accordance with the requirements of this Policy, including any disclosures that are deliberately false, dishonest, mischievous, malicious, frivolous or vexatious; or
- d) made the report solely or substantially to avoid dismissal or any other disciplinary action.

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6.0 RESPONSIBILITIES

6.1 The Chairman of the Audit Committee and the Head of Internal Audit Department (IAD) shall be responsible for the administration and compliance with this policy and procedures.

6.2 **Internal Audit Department (IAD):** IAD is an independent internal audit function in SCG and reports to SCG Audit Committee (AC). As an independent internal audit function in SCG, IAD is assigned to manage the whistleblowing channel and responsible for receiving, investigating and managing whistleblowing reports. IAD will investigate each report independently and confidentially. IAD ensures that reports are acted upon in a timely and fair manner.

6.3 **Management:** All management staff are responsible for fostering an environment that supports the policy and encourages the reporting of concerns. Management must also act promptly to address any concerns raised by employees or other stakeholders.

6.4 **Employees and Stakeholders:** Every individual covered by this policy has a responsibility to report any concerns they believe to be true and that may indicate unethical or illegal conduct.

7.0 INVESTIGATING PROCEDURES

7.1 Upon receipt of a report:

- **Acknowledge Receipt:** The whistleblower will be acknowledged within 3 working days (if non-anonymous).
- **Initial Assessment:** IAD will assess the complaint report within 14 working days to establish whether the claim has merit, can be substantiated and if an investigation is warranted.

- **Investigation:** If the report is substantiated, a detailed investigation will be carried out within 14 working days from the conclusion of the initial assessment. The whistleblower may be asked to provide further details or evidence. IAD will complete the detailed investigation within 60 working days or such other time deemed necessary.
- **Outcome:** The findings of the investigation will be discussed with SCG Top Management, SCG Compliance Function and/or SCG Human Resources, where necessary, action will be taken to address the issue, including disciplinary measures, legal actions, or reporting to relevant regulatory bodies or authorities.
- **Quarterly Reports:** On a quarterly basis, the Head of IAD shall prepare a summary report of the whistleblowing cases received and investigated and present it to the Audit Committee for notation. For cases assessed as significant or high-risk, the Head of IAD shall notify the Chairman of Audit Committee immediately upon assessment of the report.

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8.0 REPORTING TO AUTHORITIES

- 8.1 If a whistleblowing report involves violations of any law or regulation, the reporting shall be done by SCG Compliance function or any other authorised person. SCG will cooperate fully with the relevant authorities, including the police (PDRM), Malaysian Anti-Corruption Commission (MACC), Securities Commission Malaysia (SC), or any other relevant authorities in the event of any investigations arising from such reporting.

9.0 RECORD-KEEPING

- 9.1 All reports, investigations, and actions taken will be documented and securely stored for a minimum of 7 years, or a duration deemed necessary. Access to these records will be restricted to authorized personnel only.

10.0 COMMUNICATION AND AWARENESS

- 10.1 SCG will communicate this policy to all employees and stakeholders regularly. This policy is available on SCG's website. Additionally, periodic training on ethical conduct, anti-corruption, and reporting channels will be provided.

11.0 POLICY REVIEW

11.1 This policy will be reviewed regularly, at least once in 3 years to ensure its effectiveness and compliance with applicable laws, regulations, and standards. Any amendments or updates to the policy will be communicated to employees and stakeholders.

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- END OF DOCUMENT -

Appendix 1: Whistleblowing Report Form

Please fill out this form to report any concerns. All information provided will be kept confidential, and you may choose to remain anonymous.

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1. **Your Name (Optional):** _____
2. **Your Contact Information (Optional):**
 - Phone Number: _____
 - Email Address: _____
3. **Nature of the Concern:** (Please describe the issue in detail, including relevant dates, individuals involved, and any evidence you have.)
 - _____
 - _____
 - _____
 - _____
4. **Witnesses:** Please provide the contacts of the witnesses, if any, and/or the best way to get in touch with them.
 - _____
 - _____
5. **Location of Incident (if applicable):** _____
6. **Have you previously reported this issue?** Yes No
7. **If yes, to whom did you report it and what was the outcome?**
 - _____
 - _____
8. **Do you wish to remain anonymous?** Yes No
9. **Other Comments or Information:**
 - _____
 - _____

Please submit this form to the Whistleblowing Officer via the contact details above (clause 4).