

SC ESTATE BUILDER BERHAD
("SCBUILD" or "the Company")
(Company No. 655665-T)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY
(Adopted w.e.f. 25 March 2019)

1. Introduction

Practice 3.2 of the Malaysian Code on Corporate Governance ("**MCCG**") stipulates that the Board establishes, reviews and together with management implement policies and procedures on whistleblowing.

In addition, Guidance 3.2 of the MCCG stipulates that the Board should encourage employees to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any these in the workplace.

The Board should ensure that its Whistleblowing Policy ("**Policy**") sets out avenues where legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

2. Scope of the Policy

2.1 This Policy covers possible improper conduct such as:-

- (a) Fraud;
- (b) Corruption, bribery or blackmail;
- (c) Criminal offences;
- (d) Theft or embezzlement;
- (e) Abuse of power;
- (f) Conflict of interest;
- (g) Misuse of the SCBUILD Group's property;
- (h) Insider trading;
- (i) Money laundering;
- (j) Breach of legal obligation (including negligence, criminal activity, breach of contract and breach of law);
- (k) Miscarriage of justice;
- (l) Endangerment of an individual's health and safety or of the environment; and
- (m) Concealment or cover-up of any of the above.

2.2 The improper conduct above is not exhaustive and includes any other act or omission, which if proven, will constitute an act of misconduct under SCBUILD's *Code of Ethics and Conduct*, disciplinary offence under the relevant policies and procedures of SCBUILD or criminal offence under relevant legislations in force.

2.3 SCBUILD expects all parties to act in good faith with a reasonable belief that the information and allegations are substantially true.

2.4 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

2.5 All confidential reporting or disclosures by a whistleblower are to be directed to the designated person in accordance with the procedures under this Policy.

2.6 The Policy is not intended as a means for employees to pursue personal grievances which should be referred directly with their immediate superiors.

3. Protection to Whistleblower

- 3.1 SCBUILD will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.
- 3.2 Any employee of SCBUILD who whistleblows will also be protected against any adverse and detrimental actions in reprisal for disclosing any improper conduct committed or about to be committed within the SCBUILD Group, to the extent reasonably practicable, provided that the disclosure is made in good faith.
- 3.3 Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.
- 3.4 The whistleblower remains liable for his/ her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. SCBUILD does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.
- 3.5 SCBUILD may revoke the protection accorded to a whistleblower under the following circumstances, amongst others:-
- (a) the whistleblower participated in the improper conduct;
 - (b) the whistleblower wilfully discloses a false statement;
 - (c) the disclosure is made with malicious intent;
 - (d) the disclosure is frivolous or vexatious; or
 - (e) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

4. Anonymous Whistleblower

- 4.1 SCBUILD will not entertain any anonymous disclosure. The person who wishes to whistleblow any improper conduct within the SCBUILD Group is required to disclose his/her name, identity number and contact number. Nonetheless, these identity details will be kept confidential to accord protection to the whistleblower.
- 4.2 However, SCBUILD reserves its right to investigate into any anonymous disclosure.

5. Reporting procedures

- 5.1 All disclosures are to be channelled in accordance with the procedures provided herein.
- 5.2 Anyone with genuine concerns in relation to unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements may forward his/her report to the designated persons as provided below (where applicable):-

For matters relating to financial reporting, unethical or illegal conduct, one can report directly to the following designated Director:-

Audit Committee Chairman

Mr. Ooi Soo Kok at email address: skooi@porooi.com.my

For employment-related concerns, one can report directly to the following designated Director:-

Managing Director

Mr. Loh Boon Ginn at email address: alex.loh@scestatebuilder.com.my

For any concerns from the shareholders/stakeholders, one can email to the following designated Director:-

Independent Non-Executive Chairman

Datuk Cheng Lai Hock at email address: clhtax@gmail.com

5.3 As it is essential for SCBUILD to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much details and be as specific as possible. The disclosures should contain the following information:-

- (a) Details of the person(s) involved;
- (b) Details of the allegations such as nature, time and place;
- (c) Other relevant information; and
- (d) Any supporting evidence.

5.4 All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

5.5 At the appropriate time, the whistleblower making the disclosures may need to come forward as a witness.

6. Handling of Complaints

6.1 The Chairman of the Audit Committee may direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.

6.2 SCBUILD reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

6.3 If, at the conclusion of an investigation, SCBUILD determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

7. Review of the Policy

7.1 SCBUILD reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organisational changes within SCBUILD.

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