

**Sime Darby Property CapitaLand
(Melawati Mall) Sdn. Bhd.**

**Whistleblowing
Policy**

Contents

1	PURPOSE & SCOPE.....	3
2	APPLICATION	3
3	REPORTABLE INCIDENTS.....	3
4	REPORTING RESPONSIBILITY	4
5	CONFIDENTIALITY	4
6	ACTING IN GOOD FAITH.....	4
7	PROTECTION AFFORDED	5
8	REPORTING & COMMUNICATION CHANNELS	5
9	INVESTIGATION	6
10	POLICY REVIEW.....	6

1 PURPOSE & SCOPE

- 1.1 Sime Darby Property CapitaLand (Melawati Mall) Sdn. Bhd. (“SDPCMA”) is committed to maintaining high standard of integrity in its business conduct.
- 1.2 The objective of this policy is to:
- a) Support SDPCMA’s “zero tolerance” stance to fraud, bribery, corruption and other unethical behavior or conduct;
 - b) provide a trusted avenue for employees, vendors, customers and other stakeholders to report serious wrongdoing or concerns, particularly in relation to fraud, controls or ethics, without fear nor reprisals when reporting in good faith; and
 - c) ensure that arrangements are in place to facilitate independent investigation and for the appropriate follow up actions to be made post investigation of the alleged allegation.

2 APPLICATION

- 2.1 This Policy applies to SDPCMA and its employees, and any other persons or business organisations carrying out work for SDPCMA.

3 REPORTABLE INCIDENTS

- 3.1 For the purpose of this policy, reportable suspected and actual wrongdoings that is committed within SDPCMA or in connection with SDPCMA’s business include but are not limited to:
- (a) Fraud;
 - (b) Misappropriation of assets;
 - (c) misconduct relating to financial reporting, accounting or other financial matters;
 - (d) bribery or corruption;
 - (e) conflict of interest;
 - (f) Criminal breach of trust;
 - (g) Acts or omissions which are deemed to be against the interest of SDPCMA, laws, regulations or public policies
 - (h) blackmail;
 - (i) any criminal offence or failure to comply with legal or regulatory obligation;
 - (j) Breaches of SDPCMA’s policies or internal controls;
 - (k) endangerment of the health and safety of an individual; or

(l) concealment of any of the above.

- 3.2 For the purpose of clarity, this policy does not cover grievances, such as employment or service level matters, which should be channeled to the appropriate authority within SDPCMA, such as Human Resource Department or [customer service department].

4 REPORTING RESPONSIBILITY

- 4.1 It is the responsibility of all Directors, Employees, any other persons or business organisations carrying out work for SDPCMA to promptly report actual, potential or suspected Wrongdoings, i.e. when they possess a reasonable suspicion of Wrongdoing;
- 4.2 If there are any uncertainties as to whether a matter is within the scope of this policy, advice should be sought from the relevant channels set out in Clauses 8 below.
- 4.3 Directors, Employees or business organisations carrying out work for SDPCMA who knowingly conceal any acts of Wrongdoing by anyone, shall be construed as aiding and abetting in those acts of Wrongdoing (if proven), and shall be subject to disciplinary action (if applicable) or other forms of action by the SDPCMA, under this policy

5 CONFIDENTIALITY

- 5.1 To the fullest extent possible, reports of alleged Wrongdoing, and investigation pertaining thereto, shall be kept confidential in a manner that is consistent with the need to conduct an adequate investigation and in accordance with the applicable laws and regulations.
- 5.2 Disclosure of reports of alleged Wrongdoing to individuals not involved in the investigation will be viewed as a serious disciplinary offence, and may result in disciplinary action, up to and including dismissal.

6 ACTING IN GOOD FAITH

- 6.1 Anyone reporting a violation must act in good faith and have reasonable grounds for suspicion, at the time of making the report, that the information disclosed indicates a Wrongdoing.
- 6.2 The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offence, which may result in disciplinary action, up to and including dismissal (applicable to Employee) and other forms of action by SDPCMA any other persons or business organisations carrying out work for SDPCMA.

7 PROTECTION AFFORDED

- 7.1 Reports that was made in good faith shall be protected from all forms of retaliation, disadvantage, or discrimination at the workplace linked to or resulting from whistleblowing.
- 7.2 Individual who makes a report maliciously, recklessly, or knowing the report to be false will not be tolerated and will be subjected to amongst others, employment sanctions and/or termination of contracts.

8 REPORTING & COMMUNICATION CHANNELS

- 8.1 Employee or business organisations carrying out work for SDPCMA is encouraged to share their questions, concerns, suggestions, or complaints with someone within SDPCMA who may be in a position to address the area of concern.
- 8.2 If the concern is not addressed or if the Employee or business organisations carrying out work for SDPCMA is not satisfied with the response, the Employee or business organisation is encouraged to report his/her concern to the Chairman of the Board of Directors of SDPCMA (“Chairman”) or through any one of the secured whistleblowing channels as follows:

Email	Whistleblowing@melawatimall.com
Mail	Chairman of the Board of Directors of SDPCMA UP2-01, Centre Management Office, Melawati Mall, 355, Jalan Bandar Melawati Pusat Bandar Melawati 53100 Kuala Lumpur

- 8.3 The complainant’s report shall be specific as to the nature of the allegation(s) and should be supported by evidence, if possible.
- 8.4 Concerns expressed anonymously are difficult to act upon effectively; however, they may be considered, taking into account the severity and credibility of the issues raised and the likelihood of confirmation of the allegation from the attributable sources and information provided. Hence, the complainant is encouraged to provide their contact information so that clarifications could be sought during the course of investigation. If a complainant chooses to make such reports anonymously, he/she shall not be entitled to the investigation outcome of the case reported

9 INVESTIGATION

- 9.1 SDPCMA takes all reports of possible wrongdoing seriously and shall investigate the report.
- 9.2 The Chairman will handle all reported cases and ensure that concern raised are properly investigated and resolved by Management or such parties as appropriate. In Chairman's absence, one of the Directors will be appointed to take charge of the matter.
- 9.3 The Chairman will decide the manner which the concern is handled and investigated.
- 9.4 All concerns and/or allegations raised will be assessed to ensure that they are fairly and properly considered.
- 9.5 If any allegation of Wrongdoing is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to, and including termination of employment or dismissal, or termination of any contractual relationship (where relevant). Notwithstanding the foregoing, SDPCMA shall be entitled to take all legal actions and seek all remedies available in respect of the allegation, including reporting the matter to the appropriate authorities

10 POLICY REVIEW

- 10.1 The Policy shall be reviewed annually, where the Policy may be modified, to maintain compliance with applicable laws and regulations or accommodate organizational changes. This review will be carried out by the Board of Directors of SDPCMA, subjected to the approval of the shareholders of SDPCMA.