



Policies & Procedures

Whistleblower Policy



UEM Group Berhad (UEM Group)'s Policy and Procedures outlines the rules of conduct and responsibility of UEM Group personnel and governs the Company's direction, activities and matters which may directly impact businesses, board members, employees, member of the public and the Company's programmes and services.

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1.0 POLICY STATEMENT

UEM Group is committed to the highest standards of professionalism, honesty, integrity, accountability and ethical behaviour in the conduct of its business and operations. We aspire to conduct our affairs in an ethical, responsible and transparent manner.

With this in mind, the Whistleblower Policy ("the Policy") has been formulated to enable employees within the UEM Group, vendors and members of the public to report instances of unethical behaviour, improper conduct, actual or suspected fraud and/or abuse within the UEM Group.

The implementation of the Policy is also in line with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, Capital Market and Services Act 2015, Personal Data Protection Act 2010 and all applicable laws and regulations in Malaysia.

2.0 OBJECTIVE

This Policy is to provide an avenue for all employees of the UEM Group, third parties employed or engaged by the UEM Group, employees of third parties employed or engaged by the UEM Group and members of the public to disclose any improper conduct or unethical behaviour, actual or suspected fraud and/or abuse in accordance with the procedures as provided for under this Policy and to provide protection for those who report such allegations.

This Policy aims to develop a culture of openness, accountability and total integrity.

It is to enable the Top Management to be informed at an early stage to take corrective action and mitigate any potential damages; financially or reputation of the UEM Group.

It aims to reassure employees and directors that they would be fully protected from harassment or victimization for whistle blowing in good faith.

3.0 SCOPE

This Whistleblower Policy applies to the UEM Group. This policy is not to invalidate the Grievance Procedure and/or Disciplinary Action Process and Procedure but to provide alternative means for employees and members of the public to raise a concern outside the normal reporting channels.

This policy will not apply to personal grievances concerning an individual's term and conditions of employment, or other aspects of working relationship, complaints of bullying or harassment or disciplinary matters. Such complaints should be dealt under the existing Human Resource procedures in the Code of Conduct adopted by the UEM Group.

4.0 COMMITTEE AND MEETINGS

The Whistleblower Committee shall be appointed by the Board of Directors from amongst their numbers, which fulfils the following requirements:

- a. The Committee must comprise at least three (3) directors; and
- b. The quorum for each meeting shall consist of at least two (2) members.

The members of the Committee shall elect a Chairman from among the Directors of the Board.

The Committee may from time to time and if deemed appropriate, consider and approve and/or recommend relevant matters via a Circular Resolution in writing, in lieu of formally convening a meeting. The Circular Resolution shall be as valid and effectual as if it has been passed by a meeting of the Committee duly convened.

Any other appropriate officers may be invited to attend where their presence is considered appropriate as determined by the Committee Chairman.

5.0 ELIGIBILITY

Members of the public, all employees, directors, shareholders, consultants, vendors, contractors or any parties involved in a business relationship with the UEM Group are encouraged to disclose any wrongdoing that may adversely impact the UEM Group. The Protected Disclosures may be in relation to matters concerning the UEM Group or any of its subsidiaries.

UEM Group is committed to this Policy and assures that the Whistleblower will not suffer any form of retribution, victimisation or detriment.

If the Whistleblower could prove that they have been subjected to retribution, victimisation, or detriment because of using this policy, disciplinary action will be taken against the perpetrator.

6.0 DISQUALIFICATIONS

While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection can warrant disciplinary action.

Protection under this Policy will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by a Whistleblower knowingly. If the investigation later reveals that the Protected Disclosure was made with a malicious intention, appropriate action could be taken against the Whistleblower.

A report should be made in good faith.

7.0 AMENDMENT

The UEM Group reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Whistleblowers unless the same is notified to the Whistleblowers in writing.

This document shall be published on the UEM Group's website for external parties and the public to be aware of the Policy and the available reporting channels to raise concerns with the UEM Group.

ATTACHMENT A

As a guide, the types of malpractices covered under the Whistleblower Policy include the following examples:

1. Theft, pilferage, misappropriation or attempt of the same of the UEM Group's money or property.
2. Fraud, dishonesty, cheating, falsification or attempt of the same in connection with the UEM Group's business, money or property.
3. Soliciting or accepting bribe or any illegal gratification.
4. Participating in unauthorised financial transactions.
5. Breach of fiduciary relationship.
6. Conflict of interest.
7. Spreading malicious rumours about the UEM Group.
8. Gross negligence and neglect of duty.
9. Unauthorised disclosure of the UEM Group's confidential information, including commercial or manufacturing secrets, calculations or designs.
10. Commission of any subversive act.
11. Commission of any act that brings disrepute, embarrassment or affects the legitimate interest of the UEM Group or ruins the image of the UEM Group.
12. Habitual breach of any the UEM Group's order or any law applicable to the establishment of rules made thereunder.
13. Conduct which is likely to cause injury or endanger the life or safety of another person within the UEM Group's premise.
14. Misrepresentation of the UEM Group to others.