



HARTANAH KENYALANG GROUP OF COMPANIES

WHISTLEBLOWING POLICY

Table of Contents

1.	POLICY STATEMENT.....	2
2.	OBJECTIVE.....	2
3.	SCOPE	2
4.	PROCEDURES	3
5.	HANDLING OF WHISTLEBLOWING CASES.....	3
6.	PROTECTION TO WHISTLEBLOWER	4
7.	RESPONSIBILITY.....	4
8.	COMMUNICATION	4
9.	REVIEW OF POLICY.....	4

1. POLICY STATEMENT

The Group is committed to high standards of ethical, moral and legal business conduct.

In upholding of this commitment, the Whistleblowing Policy provides a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

2. OBJECTIVE

The objectives of this whistle blowing policy are as follows: -

- To provide an avenue for Whistle-blowers to raise concerns in good faith, confidently and professionally of any improprieties within Hartanah.
- To provide a transparent, clear and robust process and procedures for whistleblowing.
- To provide reassurance to Whistle-blowers that they will be protected from reprisals, retaliation, threats, intimidation, victimisation, discrimination or other unfair treatments as a result of their whistleblowing.
- To enable Management to be informed at an early stage, permitting expeditious and appropriate action.

3. SCOPE

The Whistleblowing Policy applies to the Group covering all Employees, Directors, Stakeholders and/or any other party with a business relationship with the Group.

Improprieties in the Group include, but not limited to the following:

- Fraud, bribery, corruption, blackmail;
- Criminal offences;
- Misuse of position, funds or assets of the Group or undisclosed conflicts of interest;
- Acceptance of gifts/favour beyond the threshold allowed by Hartanah;
- Intentional error or fraud/misrepresentations in company statements or records;
- Questionable accounting practices or disclosures;
- Unsafe work practices or conduct which jeopardises the health and safety of individual and damage to environment;
- Unlawful, unethical or improper conduct including sexual, physical or other abuse of human rights;
- Failure to comply with legal or regulatory obligation;
- Miscarriage of justice;
- Suppression or concealment of any information related to the above; and
- Any actions taken in reprisal against a Whistle-blower.

Note:

The Policy is intended to be used for serious and sensitive issues. Personal grievances or complaints on employment-related concerns should continue to be reported through the normal channels.

4. PROCEDURES

Whistle-blowers must reveal their identity in the Whistleblowing Report Form in order to facilitate investigation.

The Group reserves the right to investigate any anonymous complaints depending on the following:

- Seriousness of the issues raised;
- Credibility of the concern; and
- Likelihood of confirming the allegation from attributable sources

Written complaint must be made in writing using the Whistleblowing e-Form which can be accessed from the website at www.hartanahkenyalang.com.my and sent via any one of the following channels:

Email : whistleblow@hartanahgrp.com.my
[Access restricted to Independent Director only]

By Hand/

Post/Courier : Independent Director
c/o Company Secretary
Lot 7070 & 7071
Jalan Pending, Section 64
93450 Kuching, Sarawak
[Please mark "PRIVATE & CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY"].

5. HANDLING OF WHISTLEBLOWING CASES

Upon receipt of the report, the Independent Director will review the report within 14 working days.

The Independent Director may, at his discretion, direct the matter for investigation. The investigation team may comprise employees selected by the Independent Director who are independent of the matter and/or external parties (such as the external auditor, legal advisors, etc.).

Any action taken in response to a report would depend on the nature of concern.

The Group will treat all reports received, the process of investigation and the results of investigation in confidence.

Investigations shall be completed normally within 45 days of the report/complaint.

The Whistle-blower (if he/ she identifies himself/herself) will be notified upon completion of the investigation.

6. PROTECTION TO WHISTLEBLOWER

The Whistle-blower will be accorded with protection of strict confidentiality of identity unless otherwise required by law.

The Whistle-blower will be protected from any reprisals and adverse actions, including any form of harassment and victimisation as a consequence of his disclosure of any impropriety committed to or to be committed.

Provided that disclosures are made in good faith, such protection will be accorded to the Whistle-blower even if investigation later reveals that the allegation is unfounded, untrue or mistaken.

7. RESPONSIBILITY

The Independent Director shall be responsible to report on the whistleblowing cases to the Audit & Risk Committee and Board of Directors and provide updates on the investigation periodically.

The Board of Directors reserves the right to amend or modify this Whistleblowing Policy at any time.

The Group undertakes to communicate this Policy and any revision it made from time to time to all Employees, Directors and Stakeholders in the best manner it thinks fit.

8. COMMUNICATION

The Group undertakes to communicate this policy and any revision it made from time to time to all employees, directors and stakeholders in the best manner it thinks fit.

9. REVIEW OF POLICY

This policy shall be reviewed annually by the Nomination and Remuneration Committee to ensure its relevance and effectiveness. The Board reserves the right to amend or modify this whistle blowing policy at any time.