

HL MANAGEMENT CO. SDN BHD
WHISTLEBLOWING POLICY

1. POLICY STATEMENT

HL Management Co Sdn Bhd (“**HLMC**”) and its parent company, Hong Leong Company (Malaysia) Berhad and its subsidiaries (but excluding public listed companies, Hong Leong Manufacturing Group Sdn Bhd, and their subsidiaries) (collectively, “**HL Group**”) are committed to good business ethics and integrity. All employees are encouraged to raise genuine concerns on improper conduct or wrongful act committed within HL Group at the earliest opportunity, and in an appropriate way. This is to promote good corporate governance practices within HL Group.

2. PARTIES THAT MAY RAISE CONCERNS

- Any employee of HL Group; and
- Any (legal or natural) person providing services to, or having a business relationship with any of HL Group.

3. TYPES OF CONCERNS THAT MAY BE RAISED

You should raise any concerns on any improper conduct or wrongful act that is committed within HL Group (“**Improper Conduct**”), including but not limited to:

- Any criminal offences, including fraud, corruption, bribery and blackmail
- Any failure to comply with legal or regulatory obligations
- Any improper conduct which would be a disciplinary offence
- Any serious breach of the Code of Ethics
- Any gross mismanagement of company affairs
- Any act or omission which jeopardises the health and safety of any employee of HL Group or any member of the public

Please note that any grievance of a personal nature should be raised through the HR grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.

4. WHO SHOULD YOU RAISE YOUR CONCERNS TO

Reports of any such concerns may be raised to the Managing Director of HLMC:

Managing Director
HL Management Co Sdn Bhd
Level 32, Menara Hong Leong
6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: hlmcwhistleblowing@hongleong.com

Please include your full name and contact details, as well as full details of your concern and any supporting documentation you consider relevant. Should you wish to do so, you may use our [Whistleblower Form](#) to provide the details required.

HLMC reserves the right not to investigate any alleged Improper Conduct which is raised anonymously.

Additionally, you also have the right to raise your concerns with the relevant regulators or law enforcement agencies.

5. ACTIONS WHICH MAY BE TAKEN AGAINST YOU

- (i) Subject to paragraph (ii) below and to the extent permitted by law, you will be protected from retaliation, adverse employment action or legal action and where feasible, from disclosure of your identity, provided your report is made in good faith (even if you are genuinely mistaken in the concerns you raise).
- (ii) Your protection may be revoked and appropriate action may be taken against you if:
 - a. You have participated in the Improper Conduct disclosed;
 - b. You made a material statement which you knew or believed to be false or did not believe to be true;
 - c. The disclosure of the Improper Conduct is frivolous or vexatious;
 - d. The disclosure of the Improper Conduct is made maliciously; or
 - e. The disclosure of the Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Please note that we may have to disclose your personal information to the board of directors and investigation team in order to follow up and, if appropriate, act on your complaint, and where required by law or regulatory authorities to release your personal information. Please take note that we may not be able to conduct the investigation or the investigation may be affected if you object to the disclosure of your personal information.

7. WILL YOU BE INVOLVED IN THE INVESTIGATION?

You will only be requested to assist when more information is needed during the investigation of the alleged Improper Conduct.

WHISTLEBLOWER FORM

You should raise any concern on any improper conduct or wrongful act that is committed within HL Group. Any grievance of a personal nature should be raised through the HR grievance procedures and not through this Whistleblower Form.

YOUR FULL NAME		
NAME OF YOUR EMPLOYER		
YOUR STAFF ID <i>(if an employee of HL Group)</i>		
YOUR DEPARTMENT		
YOUR POSITION / DESIGNATION		
YOUR CONTACT DETAILS	Address:	Telephone:
		Email:

DETAILS OF YOUR CONCERNS (please provide as much information as possible)
DESCRIPTION OF IMPROPER CONDUCT: (use the additional information sheet, if necessary)
WHERE DID THE IMPROPER CONDUCT OCCUR?
WHEN DID THE IMPROPER CONDUCT OCCUR?
NAME AND POSITION OF PERSON(S) INVOLVED:

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DETAILS OF ANY WITNESS(ES):

**DID YOU REPORT THE IMPROPER CONDUCT TO ANY AUTHORITIES? IF YES,
PLEASE GIVE DETAILS:**

SUPPORTING DOCUMENT(S) ATTACHED (Please tick)? Yes No

ADDITIONAL INFORMATION SHEET

ANY ADDITIONAL INFORMATION:

Provide any further details you think may be relevant, for example, whether you approached the person(s) concerned, any financial impact to HL Group, etc.