



Version 6.0 (08 May 2025)



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1. INTRODUCTION

In line with good corporate governance practices, the Board of Directors of Sunway Berhad and its subsidiaries (hereafter referred to as “the Group”) and Management are committed to upholding the highest standards of business conduct and ethical behaviour. Integrity, Humility and Excellence are our corporate core values. This Whistleblowing Policy (“Policy”) provides a safe and confidential channel for employees, contractors, suppliers, and other stakeholders (hereafter referred to as ‘associates’) to report concerns regarding misconduct or unethical practices within the Group.

By fostering an open environment, we encourage whistleblowing in good faith and ensure that reports are dealt with fairly, promptly, and without fear of retaliation.

2. PURPOSE OF THE POLICY

The purpose of this policy is to outline the procedures for reporting any misconduct or malpractice, including but not limited to fraud, bribery, corruption, and other unethical conduct that undermines the Group’s Code of Conduct and Business Ethics (CCBE). We aim to ensure that all reports are treated seriously and acted upon swiftly, with respect to confidentiality and protection of the whistleblower.

3. SCOPE

This policy applies to all directors, employees and associates of the Group.

4. TYPES OF REPORTABLE CONCERNS

Individuals can report any concerns or suspicions regarding the following:

- (a) **Fraud or financial misconduct** (Any action deliberately designed to cause loss to the Group or to obtain any unauthorized benefit, whether directly or indirectly)
- (b) **Bribery or corruption** (including improper gifts, favours, or benefits)
- (c) **Violation of laws or regulations** (e.g., health and safety, environmental standards, or labour laws)
- (d) **Breaches of Group policies** (e.g., the Code of Conduct & Business Ethics, Gifts, Entertainment and Hospitality)
- (e) **Discrimination, harassment or abuse**
- (f) **Misuse of Group resources or information**
- (g) **Unsafe working conditions**
- (h) **Conflict of interest**

- (i) **Intellectual Property (IP) Theft** (e.g. unauthorized use of company IP or proprietary information, such as patents, trademarks, and trade secrets.)

We believe in addressing workplace concerns openly and efficiently. Therefore, employees are generally encouraged to first report any issues or potential violations through the appropriate formal reporting channels, allowing for direct communication and resolution. However, we recognize that in certain circumstances, an employee may fear reprisal or prefer to remain anonymous, particularly when reporting serious unethical conduct. In such cases, this whistleblowing channel is available to provide a safe and confidential means of reporting.

5. REPORTING CHANNELS

The Group provides the following channels for reporting concerns:

- (i) **Whistleblowing Hotline: +603 5639 8025**
- (ii) **Email: whistleblowing@sunway.com.my**

Calls and emails to these channels will be directed to:

- The Chairman of Audit Committee, Datuk Tong Poh Keow
- Head of Internal Audit Department, Mr Yee Meng Haw

Direct Contact:

Contact person	Contact details
Datuk Tong Poh Keow (Chairman of Audit Committee)	Level 16, Menara Sunway Jalan Lagoon Timur Bandar Sunway 47500 Subang Jaya, Selangor Darul Ehsan E-mail: tong.poh.keow@gmail.com
Mr Yee Meng Haw (Head of Group Internal Audit Department – GIAD)	Level 4.2, Menara Sunway, Jalan Lagoon Timur Bandar Sunway 47500 Subang Jaya Selangor Darul Ehsan Office Phone: +603 5639 8311 E-mail: yeemh@sunway.com.my

- (iv) **Mail:** Sunway Group Internal Audit Department
Level 4.2, Menara Sunway
Jalan Lagoon Timur
Bandar Sunway
47500 Subang Jaya
Selangor

Individuals are encouraged to make use of the “**Whistleblowing Report Form**” provided in the **Appendix** of this document.

Reports may be made anonymously, though individuals are encouraged to provide contact details to enable the independent investigation team to obtain further information required for investigation or clarification. We aim to handle all reports confidentially and with utmost sensitivity.

6. WHISTLEBLOWER PROTECTION

We are committed to protect whistleblowers from :-

- **Reprisal and/or Retaliation:** There will be no adverse action, such as termination, demotion, or harassment, taken against any individual who reports concerns in good faith.
- **Confidentiality:** The identity of whistleblowers will be kept confidential unless the whistleblower consents otherwise or unless disclosure is required by law.
- **Non-retribution:** The Group will not tolerate any form of retaliation or discrimination against whistleblowers.

Retaliation against any whistleblower will result in disciplinary action, including possible termination.

The Group reserves the right to revoke the whistleblower protection accorded under this Policy if the whistleblower has, or is found to have:

- (a) made a whistleblowing report not in good faith and/or made with malicious intent, ulterior motive or for personal gain;
- (b) participated in the reported misconduct or complaint;
- (c) made a disclosure not in accordance with the requirements of this Policy, including any disclosures that are deliberately false, dishonest, mischievous, malicious, frivolous or vexatious; or
- (d) made the report solely or substantially to avoid dismissal or any other disciplinary action.

7. RESPONSIBILITIES

The Chairman of the Audit Committee and the Head of Group Internal Audit Department (GIAD) shall be responsible for the administration and compliance with this policy.

- **Group Internal Audit Department (GIAD):** GIAD is an independent internal audit function in the Group and reports to the Sunway Berhad Audit Committee (AC). As an independent internal audit function, GIAD is assigned to manage the whistleblowing channel and responsible for receiving, investigating and managing whistleblowing reports. GIAD will investigate each report independently and confidentially. GIAD ensures that reports are acted upon in a timely and fair manner.
- **Management:** All management staff are responsible for fostering an environment that supports the policy and encourages the reporting of concerns. Management will act promptly to address any concerns raised by employees or other stakeholders.
- **Employees and Stakeholders:** Every individual covered by this policy has a responsibility to report any concerns they believe to be true and that may indicate unethical or illegal conduct.

8. INVESTIGATION PROCEDURES

Upon receipt of a report:

- **Acknowledge Receipt:** The whistleblower will be acknowledged within 3 working days (If non anonymous)
- **Initial Assessment:** GIAD will assess the complaint report within 14 working days to establish whether the claim has merit or can be substantiated and if an investigation is warranted.
- **Investigation:** If the report is substantiated, a detailed investigation will be carried out within 14 working days from the conclusion of the initial assessment. The whistleblower may be asked to provide further details or evidence. GIAD will complete the detailed investigation within 60 working days or such other time deemed necessary.
- **Outcome:** The findings of the investigation will be discussed with the Group's Management, Group Risk and Compliance (GRC) function and/or Group Human Resources (GHR). Where necessary, action will be taken to address the issue, including disciplinary measures, legal actions, or reporting to the relevant regulatory bodies or authorities.
- **Quarterly Reports:** On a quarterly basis, the Head of GIAD shall prepare a summary report of the whistleblowing cases received and investigated and present it to the Audit Committee for notation.

9. REPORTING TO AUTHORITIES

If a whistleblowing report involves violations of any law or regulation, the reporting shall be done by GRC or any other authorised person. The Group will cooperate fully with the relevant authorities, including the Royal Malaysia Police (PDRM), Malaysian Anti-Corruption Commission (MACC), Securities Commission Malaysia (SC), or any other relevant authorities in the event of any investigations arising from such reporting.

10. RECORD KEEPING

All reports, investigations, and actions taken will be documented and securely stored for a minimum of 7 years, or a duration deemed necessary. Access to these records will be restricted to authorized personnel only.

11. COMMUNICATION AND AWARENESS

The Group will communicate this policy to all employees and stakeholders regularly. This policy is available on Sunway Berhad's website. Additionally, periodic training on ethical conduct, anti-corruption, and reporting channels will be provided.

12. POLICY REVIEW

This policy will be reviewed regularly, at least once in 3 years to ensure its effectiveness and compliance with applicable laws, regulations, and standards. Any amendments or updates to the policy will be communicated to employees and stakeholders.

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APPENDIX : WHISTLEBLOWING REPORT FORM**Whistleblowing Report Form**

Please fill out this form to report any concerns. All information provided will be kept confidential, and you may choose to remain anonymous.

1. Your Name (Optional): _____

2. Your Contact Information (Optional):

○ Phone Number: _____

○ Email Address: _____

3. Nature of the Concern: (Please describe the issue in detail, including relevant dates, individuals involved, and any evidence you have in your possession.)

- _____
- _____
- _____
- _____

4. Witnesses: Please provide the contacts of the witnesses, if any, and/or the best way to get in touch with them.

- _____
- _____

5. Location of Incident (if applicable): _____

6. Have you previously reported this issue? (Yes / No)

7. If yes, to whom did you report it and what was the outcome?

- _____
- _____

8. Do you wish to remain anonymous? (Yes / No)

9. Other Comments or Information:

- _____
- _____

Please submit this form to the contact details described in the Reporting Channels above.

END OF POLICY