

SEDC WHISTLEBLOWING POLICY

Policy Statement

SEDC is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, SEDC provides avenue for all employees of SEDC and members of the public to disclose any improper conduct within SEDC/involved SEDC Management and Staff.

Objective of the Policy

This policy is to provide an avenue for all employees of SEDC and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

Scope of the Policy

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i. Fraud
- ii. Bribery
- iii. Abuse of Power
- iv. Conflict of interest
- v. Theft or embezzlement
- vi. Misuse of Company's Property
- vii. Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which is proven, will constitute an act of misconduct under "Kod Budaya Kerja SEDC" or any criminal offence under relevant legislations in force.

Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of SEDC and its subsidiaries. This policy also applies to members of the public, where relevant.

Procedure in Making a Disclosure

All disclosures are to be channelled in accordance with the procedures as provided under this policy.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within SEDC, to the extent reasonably practicable, provided that the disclosure is made in good faith.

Anonymous Whistleblower

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose their identity to SEDC in order for the Corporation to accord necessary protection to him/her. However, the Corporation reserves its right to investigate into any anonymous disclosure.

Notification

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.