

WHISTLEBLOWING POLICY

KINABALU INTERNATIONAL HOTEL SDN. BHD.

1. OBJECTIVE

Whistleblowing Policy is aimed at achieving and maintaining high standards of conduct at work, openness and accountability.

Employees, stakeholders and including members of the public who have official dealings with KIH (hereinafter stated as members of the public) are encouraged to report genuine concerns about any misconduct without fear of reprisals should they act in good faith.

2. WHISTLEBLOWING POLICY

2.1 'Misconduct' means any unethical behaviour, malpractice, illegal act or failure to comply with KIH's policy and procedures, including but not limited to:-

- (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.

2.2 This policy applies to all KIH Board of Directors, Personnel and Business Associates who have official dealings with KIH.

Disclosure made under this policy shall be made subject to the procedures, terms and conditions stated in this policy.

2.3 Investigation

Any complaints reported through the channels provided will be investigated transparently and fairly based on the KIH Integrity Complaint Management Procedures.

2.4 Protection of the Whistleblower

KIH will take all reasonable steps to protect the whistleblower against any discrimination, retaliation or harassment. Party that retaliates against someone who has reported a wrongdoing in good faith may be subject to appropriate action, up to and including legal action, where applicable.

However, if the subsequent investigation reveals that the disclosure was made with malicious intent, appropriate action will be taken against the whistleblower.

2.5 Disclosure of Identity

Whistleblower is required to disclose his/her identity to enable KIH to obtain further details about the disclosure and for purpose of protection.

2.6 Anonymous Whistleblower

The Company through the GIC reserves its right to investigate into any anonymous disclosure.

2.7 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.

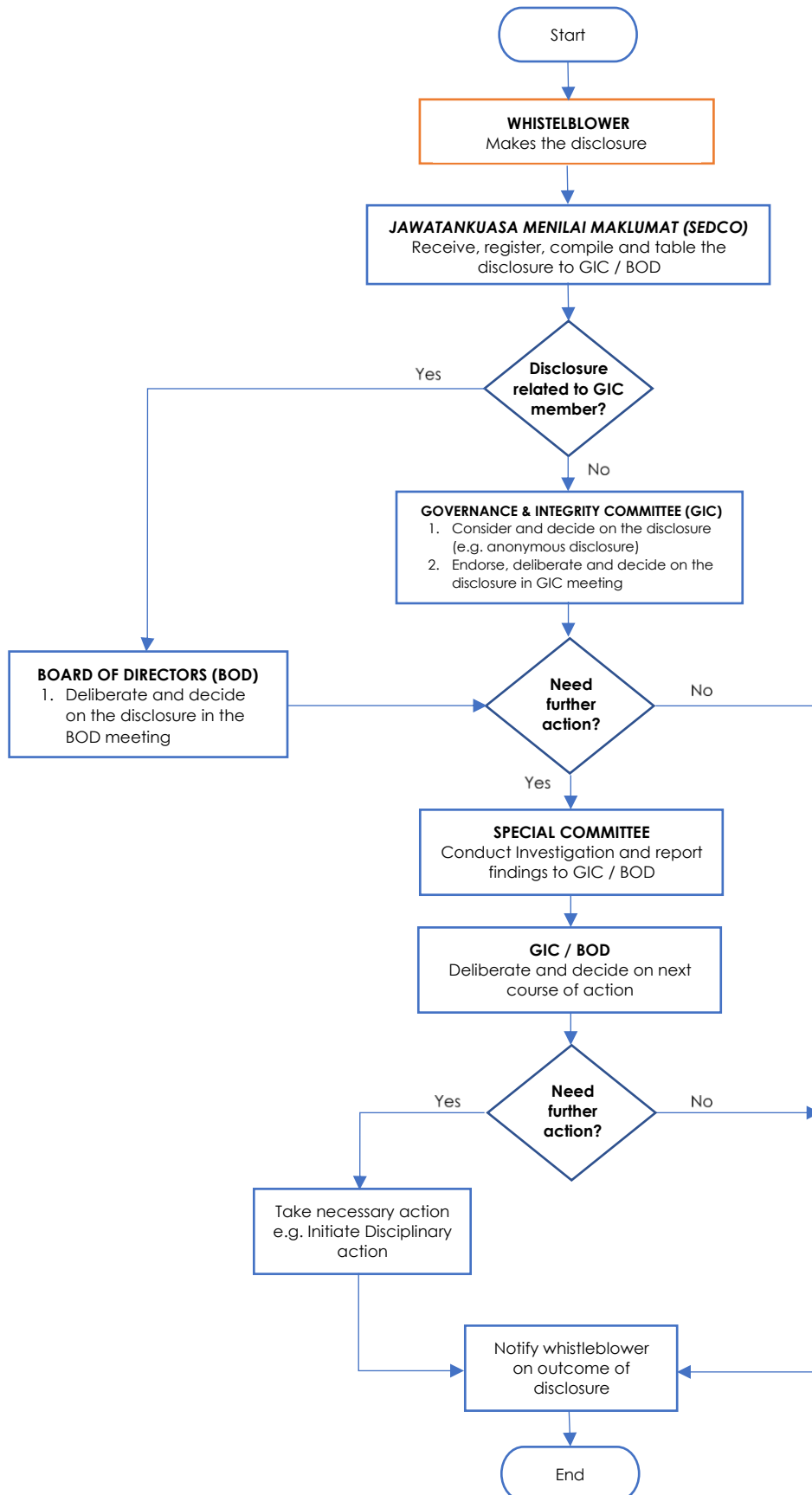
3.0 CHANNEL OF DISCLOSURE

All disclosures made under this policy shall be submitted to the **Head of Integrity Unit SEDCO (member of Jawatankuasa Menilai Maklumat SEDCO)** through the following methods:

- a. Meet with the Head of Integrity Unit SEDCO; or
- b. Call 088-266 777 ext: 266; or
- c. Email to **integrity@sedco.com.my**; or
- d. Channel the Complaint to the KIH Complaint Box - Integrity Misconduct by filling in the **Whistleblowing Report Form**; or
- e. Complaint Letter to the following address:

**Kinabalu International Hotel Sdn. Bhd.
c/o Head of Integrity Unit SEDCO
Level 8, Wisma SEDCO,
Lorong Plaza Wawasan, Off Coastal Highway,
88823, Kota Kinabalu, Sabah**

INTEGRITY COMPLAINT MANAGEMENT PROCEDURES





KINABALU INTERNATIONAL HOTEL SDN BHD WHISTLEBLOWING REPORT FORM

SECTION A (Details of Complainant / Whistleblower)

1. Name : _____
2. How to contact
- a. HP / WhatsApp No. : _____
- b. Email Address : _____
- c. Home/Office Address : _____
- _____

Note:

- a. Please fill in the above information to facilitate the investigation process.
- b. Complaints can also be submitted via e-mail integriti@sedco.com.my.

SECTION B (Details of Disclosure)

1. Details of person(s) alleged
- a. Name : _____
- b. Company/Department : _____

2. Whistleblower Type:
- Fraud
- Bribery
- Abuse of Power
- Conflict of Interest
- Theft or embezzlement
- Misuse of Company's Property
- Non-Compliance with Procedure
- Other (please specify):

3. How is the offence of corruption or violation (refer to number 2) committed?
(Please submit an attachment if the space is insufficient).

4. Date of incident :

5. Time of incident :

6. The place where it happened :

7. Names of people involved in the incident:

a. _____

b. _____

c. _____

(Please submit an attachment if the namespace is insufficient).

8. Names of witnesses who knew / saw the incident. (If any)

a. _____

b. _____

c. _____

(Please submit an attachment if the namespace is insufficient)

Section C (For use of Jawatankuasa Menilai Maklumat SEDCO)

1. Date received :

2. Time received :

3. Refer file no. :

4. Received by

Name : _____

Signature : _____

5. Notes :