



## WHISTLEBLOWING POLICY

SUMISAUJANA GROUP BERHAD  
COMPANY NO: 202101023259 (1423559-T)

12 FEBRUARY 2025

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## 1.0 INTRODUCTION

SumiSaujana Group Berhad (the “Company”) and its subsidiaries (“SumiSaujana” or the “Group”) are committed to ensuring that its business and operations are conducted in an ethical, moral, and legal manner. To uphold this commitment, the Group has implemented the Whistleblowing Policy and Procedure, which provides an avenue for individuals to report any illegal, unethical, or improper conduct, including fraud, bribery, corruption, or any other misconduct within the Group.

In line with the above commitment, this Whistleblowing Policy is established to encourage and to facilitate the disclosure of genuine and legitimate improper conduct within the Group at earliest opportunity, raised by: (a) employees of the Group; or (b) members of the public, including Group’s contractors, vendors, customers, individuals or entities doing business with the Group.

## 2.0 SCOPE

This policy applies to all employees, directors, and Business Associates of SumiSaujana. Business Associates include suppliers, contractors, sub-contractors, consultants, and any other parties with a business relationship with the Group.

## 3.0 DEFINITION OF WHISTLEBLOWING

Whistleblowing is defined as the disclosure of insider knowledge by an employee or other stakeholder of any attempted, suspected, or actual:

- Corruption;
- Bribery;
- Breach of applicable laws and regulations, including any illegal activities; and
- Bullying, harassment, or sexual harassment.

## 4.0 WHISTLEBLOWING REPORTING CHANNELS

The Group takes whistleblowing seriously, and your concerns matter to us. We would like to hear from you if any of your disclosures are related to improper practices occurring within the Group. Disclosures can be made through the following dedicated reporting channels:

- i. **Email:** [compliance@sumisaujanagroup.com](mailto:compliance@sumisaujanagroup.com) / [armcchairman@sumisaujanagroup.com](mailto:armcchairman@sumisaujanagroup.com)

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ii. **Post:**

Legal & Compliance department / Chairman of ARMC  
No. 57, Jalan TIAJ 2/1,  
Taman Industri Alam Jaya,  
42300 Puncak Alam, Selangor.

iii. **Phone:** Direct call to the Legal & Compliance department at +603 – 6038 8568

## 5.0 INFORMATION TO INCLUDE IN A WHISTLEBLOWING REPORT

Where possible, the whistleblower is encouraged to disclose the following information to assist the relevant parties in conducting the investigation:

- Date and time of contact.
- The name of the complainant and contact details.
- Nature of the allegation.
- Relevant supporting documents, if available.
- Alleged time or period of the conduct.
- Circumstances of the conduct.
- Location of the conduct.
- Names and details of organisational units and/or outside parties involved (name, description, and address), if known.
- Reason for providing the information.

## 6.0 INVESTIGATION AND REPORTING PROCESS

The process for investigating and reporting complaints of improper conduct will follow these steps:

- a) **Appointment of Investigation Team:** The ARMC will appoint an investigation team consisting of selected officers of the Group. This team will be responsible for thoroughly and impartially investigating the complaints received.

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- b) **Receipt and Reporting:** Once the Legal & Compliance Department or the Chairman of the ARMC receives a report, it will be tabled at the ARMC meeting on a quarterly basis or as and when required, if urgent matters arise.
- c) **Review of Findings:** Upon completion of the investigation, the ARMC will review the findings from the investigation team. Based on the results, the ARMC will recommend the appropriate course of action to the Board for approval.

The Group is committed to treating all complaints of improper conduct seriously, fairly, and expeditiously. Whistleblowers can expect updates on the progress of the investigation during its course and upon its completion within a reasonable timeline, unless the Group determines that such updates may hinder or interfere with the investigation process or the results.

## 7.0 WHISTLEBLOWER CONFIDENTIALITY

The Group is committed to ensuring that all disclosed information, including the identity of the whistleblower, will be treated with strict confidentiality. A whistleblower will not suffer any retaliation as a result of raising concerns and is protected under the Whistleblowers Protection Act 2020 (Act 711).

## 8.0 REVIEW

The ARMC will review and/or update this Policy at least once every three (3) years or when there are amendments to the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad (“AMLR”) or any other applicable laws and regulations. This is to ensure the Policy remains relevant, appropriate and consistent with the Group’s practices, AMLR, and other regulatory requirements. Any revisions recommended by the ARMC will be submitted to the Board for consideration and approval.

*This Policy was reviewed, approved and adopted by the Board on 12 February 2025.*