



Whistleblowing POLICY

SUNRISE MCL LAND SDN BHD

Policy Statement

Sunrise MCL Land is committed to the highest standards of integrity, accountability and ethical behaviour in its business conduct and operations, consistent with our corporate values. In line with our commitment, we provide a mechanism for our employees and third parties employed or engaged to report wrongdoing or improper conduct within Sunrise MCL Land.

Policy Objective

This Policy makes clear that we take wrongdoing very seriously and that we are committed to identify, deal with, and rectify any improper conduct that can potentially harm the Company including its reputation. We want to embed a culture across the Company where wrongdoing is not tolerated and when reported, will be quickly and efficaciously addressed. We also commit to provide protection for those who make such disclosures.

Applicable Scope

This Policy covers, though it is not limited to, the following instances of improper conduct (i.e. misconduct or criminal offence):

- i. any form of financial crime, including fraud;
- ii. bribery and corruption;
- iii. abuse of power for personal gain;
- iv. conflict of Interest;
- v. theft or embezzlement;
- vi. misuse of Company's property and information;
- vii. non-compliance with the Company's policies and procedures; and
- viii. situations of regulatory breach or non-compliance.

This Policy does not apply to personal grievances concerning an individual's terms and conditions of employment, or any other aspects of working relationship with the Company.

Such matters shall be dealt with under Sunrise MCL Land's Human Resource Policies and Procedures.

Disclosure Procedure

All disclosures are to be channelled in accordance with the procedures outlined under this Policy. Disclosure should be factual and contain only specific information to enable proper assessment of the allegation made.

Disclosures can be made either through Development Committee.



Whistleblower Protection

A whistleblower will be accorded the necessary protection against any detrimental action or unfair treatment, provided that the disclosure is made in good faith. The identity of the whistleblower will be kept confidential to the fullest extent possible and as required under the applicable laws.

Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and/or the application of the relevant rules or procedures, or that the investigation later revealed that the allegation could not substantiated.

Anonymous Whistleblower

Anonymous disclosure of wrong doings and any improper conduct is not encouraged and Sunrise MCL Land recommends that the whistleblower disclose his/her identity to enable:

- i. further information gathering and/or clarification with regard to the disclosure made;
 - ii. accord the necessary protection to the whistleblower;
- and
- iii. notification of the outcome of the investigation on the disclosure where it relates to the disclosing party if deemed necessary.