

WHISTLE-BLOWING POLICY AND PROCEDURES**POLICY STATEMENT**

L&G 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. In recognising these values, L&G provides avenues for all directors, employees, and members of the public (“whistle-blower”) to disclose, in good faith, any improper conduct within the L&G Group of Companies.

To encourage disclosure without fear of reprisal, L&G Group will accord protection to the whistle-blower against any internal retaliation, harassment or discriminatory treatment. However, where it is found that the whistle-blower has made a report maliciously or for personal gain, disciplinary action (including legal action or dismissal) may be taken against the whistle-blower.

OBJECTIVE

The purpose of this Whistle-blowing Policy and Procedures (“Policy”) is to enable an avenue for whistle-blowers to disclose any improper conduct (including suspected or attempted) in accordance with the procedures as provided under this policy and to provide protection for directors, employees and members of the public who whistleblow such allegations. These procedures would facilitate the L&G Group to take necessary action to resolve such concerns effectively so as to mitigate any possible loss arising from such questionable issues or actions at the earliest opportunity.

SCOPE OF THE POLICY

Such instances of misconduct or wrongdoings (including suspected or attempted misconduct or wrongdoings) to be disclosed by the whistle-blower through the internal channel may comprise of the following:-

- Fraud;
- Corruption;
- Improprieties in matters of financial reporting;
- Unauthorised use of Company’s properties;
- Disclosure of confidential information without prior approval;
- Abuse of position;
- Endangerment of an individual’s health and safety;
- Any action which intimidates or coerce a Director or Management or employee of the L&G Group; or
- Concealment of any of the above or combination of the above.

In line with the Ministerial Guidelines on Adequate Procedures, L&G Group also encourage reporting of any inadequacies noted in the Group’s anti-bribery and corruption measures through this whistle-blowing channel.

WHISTLE-BLOWING POLICY AND PROCEDURES (CONT'D)

This Policy is not to invalidate any form of grievance procedures and/or disciplinary action process and procedures that the L&G Group may have put in place, but merely to provide whistle-blowing procedures relating to the abovementioned.

REPORTING PROCEDURES

Any concerns relating to misconduct, questionable issues or improper actions should be emailed to whistleblower@land-general.com by providing the following information:-

- Nature of misconduct, questionable issues or improper actions
- Name of person/persons involved
- Date, time and location
- The details of events taken place
- Other witness, if any
- Documentation or evidence available

Alternatively, such concerns which shall be classified as “Strictly Private and Confidential” may be directed in writing to the Senior Independent Director at the contact details stated below.

YBhg Dato’ Noorizah Binti Hj Abd Hamid

The Senior Independent Director

c/o Land & General Berhad

8trium, Level 21 Menara 1

Jalan Cempaka SD12/5

Bandar Sri Damansara

52200 Kuala Lumpur

Email: sid@land-general.com

Whistle-blower is encouraged to provide their details to allow the investigator to obtain clarification or additional information. Whistle-blower may choose to report anonymously, however, no whistle-blower protection will be accorded, and the Group’s ability to investigate and act on the concern raised will be limited to the extent of the contents in the report received.

CONFIDENTIALITY AND WHISTLE-BLOWER PROTECTION

A whistle-blower will be accorded with protection of confidentiality of identity, to the extent of reasonably practicable, including adherence to applicable laws and regulations. In addition, a director or an employee who whistle-blows internally will also be protected against any adverse and detrimental actions against him/her, provided such disclosure is made in good faith and without malice. The information provided shall be kept strictly confidential and the L&G Group will not tolerate any harassment or victimisation and will take appropriate action to protect the whistle-blower when he/she raises the concern in good faith. The L&G Group

WHISTLE-BLOWING POLICY AND PROCEDURES (CONT'D)

will not penalise any director or employee who raises such genuine concerns even though his/her concern was found mistaken after due enquiry.

WHISTLE-BLOWING MANAGEMENT PROCEDURES

The Audit Committee ("AC") has overall responsibility to oversee the implementation of this Policy. However, the administration of this Policy is delegated to the Group's Compliance Officer.

The Compliance Officer shall ensure all whistle-blowing disclosures received are documented. Additional information may be requested from the whistle-blower, if necessary. The Compliance Officer shall then compile the information received and forward it to respective personnel in-charge.

Bribery and Corruption-Related Disclosure

The Compliance Officer shall forward any bribery and corruption-related disclosure to the AC to decide on further action. The AC shall upon deliberation, appoint suitable and independent personnel to undertake the investigation.

The appointed investigator (internal or external) shall timely report the investigation result to the AC to decide on corrective action if any. Board of Directors, via the AC, shall be notified immediately of any major misconduct or concern discovered, especially matters relating to bribery and corruption.

Cases reported to the Senior Independent Director shall follow the same procedures. Alleged wrong-doer and person(s) who may be conflicted or may cover-up for the alleged wrong-doer shall be excluded from the discussion, investigation and decision-making processes.

All information, document, records and reports relating to the investigation of wrongdoing shall be maintained and kept securely to ensure confidentiality.

NOTIFICATION

Upon the completion of the whistle-blowing process and procedures, the whistle-blower will be accorded the privilege to be notified on the outcome of the investigation on the disclosure. In the event the investigation process took longer than three (3) months, whistle-blower shall be notified that the investigation is on-going to assure the whistle-blower that the Group are still looking into the concern raised.