



WHISTLEBLOWING POLICY

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Revised Effective from 7 August 2025

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1. INTRODUCTION

Sentral REIT Management Sdn Bhd (“**SRM**”), the management company of Sentral REIT (“**SENTRAL**”) undertakes that its operations shall be conducted in a fair, transparent and responsible manner, in compliance with all applicable laws and regulations. SRM also upholds the highest standards of professionalism, honesty, integrity and ethics in all aspects of its business and operations.

In line with this commitment, SRM promotes a culture of openness and accountability. Individuals who become aware of potential malpractice or misconduct are encouraged to report such matters, in good faith, without fear of reprisal.

This Whistleblowing Policy (“Policy”) provides a framework for responsible and secure reporting of concerns regarding irregularities within SRM’s operations. The whistleblowing mechanism is intended to serve as an early warning system to avert financial or reputational risks to SRM.

The key provisions of this Policy are aligned with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, MACC (Amendment) Act 2018 and all other applicable laws and regulations in Malaysia.

This Policy shall be read together with the Code of Business Ethics of SRM, the Employee Handbook of MRCB and other relevant statutory or regulatory reporting procedures.

2. DEFINITIONS

2.1 The capitalized terms in this Policy shall have the following meanings:-

ARC	Audit & Risk Committee of SRM.
Board	Board of Directors of the SRM.
CEO	Chief Executive Officer of SRM.
Chairman	Chairman of the Board of Directors of SRM.
Complaint	A disclosure of Improper Conduct made by a Whistleblower.
Employees of SRM	Employees of SRM (either contract or permanent) and shall include the employees of MRCB (or any of its subsidiaries) seconded to SRM and members of the Board.
Enforcement Agencies	Any unit or body set up or established by the government of Malaysia having investigative and/or enforcement powers.
Improper Conduct	Any unethical behaviour, malpractice, illegal act or any other wrongful or improper conduct within SRM which if proven, constitutes a disciplinary offence or a criminal offence. This includes but not limited to the following;

- i) Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
- ii) Forgery or alteration of any document or account belonging to SRM and / or SENTRAL;
- iii) Forgery or alteration of a cheque, bank draft, or any other financial document;
- iv) Misappropriation of company's funds, securities, supplies, or other assets;
- v) Impropriety in the handling or reporting of money or financial transactions;
- vi) Profiteering as a result of insider knowledge of the activities of SRM and / or SENTRAL;
- vii) Conduct which is an offence or a breach of law;
- viii) Financial malpractice;
- ix) Abuse of power and position for personal gain;
- x) Any act that poses danger to health and safety;
- xi) Any act that causes damage to environment; and
- xii) Concealment of any of the above.

The list of Improper Conduct under this section is not exhaustive and shall include any other act or omission, which if proven, will constitute an act of misconduct pursuant to the Code of Business Ethics of SRM and/or a criminal offence under the relevant law in force.

MRCB

Malaysian Resources Corporation Berhad.

Recipients

means the Chairman and/or the CEO, as appropriate, being the persons within SRM designated to be the recipients of the Complaint made by a Whistleblower.

Whistleblower

An individual, who may or may not be an Employee, who makes a Complaint on a confidential basis under this Policy or to the Enforcement Agencies.

Whistleblowing

The deliberate and voluntary disclosure of information that one reasonably believes to be evidence of a contravention of any laws or regulations or organisation's policies committed by the Employees.

- 2.2 For purposes of clarity, defined terms in this Policy denoting the singular shall include the plural and vice versa.

3. OBJECTIVES

- 3.1 The main objectives of this Policy are to:

- (i) Support SRM's Code of Business Ethics and related policies and procedures, reinforcing SRM's values of integrity and accountability;
- (ii) Provide Employees and stakeholders with a safe channel to raise genuine concerns regarding alleged, suspected, or known illegal activities or Improper Conduct within SRM;

- (ii) Guide Employees and stakeholders on how to report instances of Improper Conduct to the appropriate party within SRM;
- (iii) Clarify the protection afforded to Whistleblowers under this Policy; and
- (iv) Establish procedures for the effective and timely handling of Complaints.

4. SCOPE

4.1 This Policy applies to any Improper Conduct involving the Employees that affects other Employees, consultants, vendors, contractors, outside agencies or employees of such agencies, and/or any other parties who have a business relationship with SRM and / or SENTRAL.

4.2 However, this Policy is not intended to cover the following:

- i) Customers' complaints about the products and services of SRM and/or SENTRAL;
- ii) Personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, and complaints of bullying or harassment; or
- iii) Disciplinary matters, other than that of fraud.

If an Employee is uncertain whether a particular act or omission constitutes an Improper Conduct under this Policy, the said Employee is encouraged to seek advice or guidance from the Chairman or the CEO.

4.3 Complaints may be submitted through the whistleblowing channel and procedures outlined in this Policy or directly to the Enforcement Agencies. Disclosures made to the Enforcement Agencies are governed by the Capital Markets Services Act 2007 or the Whistleblower Protection Act 2010, as applicable. This Policy only applies to disclosures made through the whistleblowing channel established by SRM as outlined in this Policy.

5. PROTECTION OF THE WHISTLEBLOWER

5.1 A Whistleblower will be accorded with protection on confidentiality of identity, to the extent reasonably practicable. Additionally, an Employee who internally whistleblows will also be protected against any adverse retaliation or detrimental actions (including risk of losing job) for lodging a Complaint on any genuine concerns of alleged, suspected, or known Improper Conduct within SRM, to the extent reasonably practicable, provided that:-

- i) the Complaint is made in good faith;
- ii) he/she reasonably believes that the information, and any allegations contained in it, are substantially true; and
- iii) he/she is not acting for personal gain.

5.2 In order for the Whistleblower to be accorded the necessary protection under this Policy, the Whistleblower would have to reveal his/her identity when making a Complaint. If the Whistleblower voluntarily discloses his/her identity, SRM is not obligated to keep it confidential.

- 5.3 The personal information of the Whistleblower will be protected under the provisions of the Personal Data Protection Act 2010 (as amended from time to time).
- 5.4 If a situation arises where the Whistleblower's identity is necessary to be disclosed, such as to stand as a witness in a court proceeding, wherever applicable and as appropriate, a prior consent shall be obtained from the Whistleblower.
- 5.5 The Whistleblower is encouraged to give all the necessary cooperation and assistance to the investigating party, in order for the investigating party to carry out the investigation properly.
- 5.6 All Complaints shall be duly investigated, regardless of the suspected wrongdoer's length of service, position/title, or relationship to SRM or SENTRAL.
- 5.7 Investigation findings will only be disclosed to those with a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct, and to protect SRM and SENTRAL from potential civil liability.
- 5.8 SRM does not tolerate any harassment, discrimination or victimisation (including informal pressures) and shall take appropriate action to protect those who raise a concern in good faith.
- 5.9 Any Employee who threatens retaliation against a person making a Complaint shall be subject to disciplinary actions, and procedures including termination of employment or services.
- 5.10 The making of false or malicious Complaints, or abuse of the whistleblowing mechanism are prohibited and should it be found that a person had acted in such a manner, the following actions may be considered:
- In respect of the Employees, a disciplinary action shall be taken against the said Employee(s);
 - In respect of the customers, suppliers, subcontractors or consultants, review of the continuing business relationship.
- 5.11 The protection accorded to the Whistleblower conferred under this section shall be revoked and appropriate action can be taken against the Whistleblower if it is found in the investigation that:
- The Whistleblower had participated in the Improper Conduct disclosed;
 - The Whistleblower wilfully made a material statement which the Whistleblower knew or believed to be false or untrue in the disclosure;
 - The disclosure was frivolous, malicious or vexatious; and/or
 - The disclosure was made solely or substantially with the motive to avoid dismissal or other disciplinary action.

Where the Whistleblower protection has been revoked, the Chairman or the CEO shall give a written notice to that effect to the Whistleblower.

6. MAKING A COMPLAINT

6.1 A Whistleblower may make a Complaint via e-mail to whistleblowing@sentralreit.com or in writing to all or either one of the Recipients, at SRM's registered address: Level 33A, Menara NU 2, No. 203, Jalan Tun Sambanthan, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia.

6.2 The Complaint shall include, but shall not be limited to:

- i) a description of the Improper Conduct and the individuals involved;
- ii) a background of the incident, including the relevant dates and location of occurrence;
- iii) how the Improper Conduct was discovered;
- iv) reason(s) for concern (e.g. it may result in loss of the assets/funds of SRM or SENTRAL); and
- v) particulars or production of documentary evidence and witnesses, if any.

The Whistleblower is also required to disclose his/her full name, NRIC No. and contact details such as telephone number or email address.

A sample of the form to be used to make a Complaint is attached in Appendix A.

6.3 Although the Whistleblower is not expected to prove beyond reasonable doubt the truth of the disclosure, the Whistleblower will need to demonstrate that there are reasonable grounds for their concern and provide sufficient information for SRM to take appropriate steps.

6.4 The Whistleblower shall not attempt to personally conduct any investigations, interviews or interrogations related to the matter being disclosed.

6.5 If a Complaint made involves or creates a conflict of interest for a Recipient, that Recipient must recuse himself/herself or be immediately excluded from any further deliberation or involvement pertaining to the allegation.

7. PROCEDURES FOR INITIAL INVESTIGATION OF AN ALLEGED IMPROPER CONDUCT

7.1 Upon receiving a Complaint, the Recipients shall review and evaluate the disclosure by the Whistleblower and determine the next steps. These may include requesting further details, initiating an internal review, making a police report and/or referring to the Enforcement Agencies.

7.2 If an investigation is required, the Recipients shall appoint suitable and competent employee(s) ("Investigation Team") to assess the Complaint's validity and seriousness.

7.3 The Whistleblower will also be informed of the following:

- (i) Not to contact the suspected employee(s) in an effort to determine facts or demand restitution;
- (ii) Not to discuss the case, facts, suspicions or allegations with anyone except with the Investigation Team.

- 7.4 The Investigation Team shall conduct the initial investigation and shall then submit its findings and recommendation to the Recipients.
- 7.5 If the initial investigation indicates to the reasonable satisfaction of the Recipients that the Complaint has no basis or merit or outside the Policy's scope, the Recipients may dismiss it. The Whistleblower will be notified accordingly.

8. PROCEDURES FOR FULL INVESTIGATION OF AN ALLEGED IMPROPER CONDUCT

- 8.1 If the Complaint has merit, the Recipients will decide on the next course of action, depending on the severity of the Complaint alleged and rank of the Employees involved. The matter may be escalated to the Board and/or the ARC.
- 8.2 Depending on the case, the following may be carried out by the Recipients:
- i) Mobilize the Investigation Team and/or external investigator to conduct full inquiry or investigation;
 - ii) Refer the matter to the relevant Enforcement Agencies or the police; and/or
 - iii) Any other appropriate actions as it reasonably sees fit.
- 8.3 The Investigation Team together with the external investigator, if any, shall conduct a thorough investigation and report findings and recommendations to the Recipients.
- 8.4 If a decision of the ARC or the Board is needed, an ARC meeting or a Board meeting, as the case may be, shall be convened to deliberate on the matter. Based on the decision made upon completion of the full investigation, the required action shall be carried out promptly and accordingly.
- 8.5 A summary of the Complaints, outcomes and actions will be presented to the ARC during the quarterly ARC meeting when there are such cases. The ARC will then report to the Board.

9. COMMUNICATION

- 9.1 During the investigation, information must be restricted to those with a need to know. Confidentiality must be strictly observed.
- 9.2 Relevant disclosures will be made in compliance with regulatory or legal requirements.
- 9.3 This Policy (including any amendments or revisions from time to time) is published on SENTRAL's website.

10. REVIEW

The Policy shall be reviewed as and when necessary or at least once every three (3) years. All revision or amendments to the Policy shall be subject to approval from the ARC and the Board.

Appendix A
Sample Complaint Form

Name:		NRIC No.:	
Phone No.:		Email address:	
Employees No.: (for staff only)		Department / Company:	
Details of Allegation:			
<p>Person(s) Involved:</p> <p>Location:</p> <p>Date and Time:</p> <p>Incident/Details of Allegation:</p> <p>How Incident Was Detected:</p> <p>Evidence Available:</p> <p>Concern and/or Potential Impact of Allegation:</p>			
<p>Declaration:</p> <ol style="list-style-type: none"> 1. I hereby declare that the information provided herein is true and accurate to the best of my knowledge and belief and I have made this disclosure voluntarily. 2. I understand and agree that the information provided herein shall or may be used and processed by SRM or SENTRAL for investigation purposes. 3. I fully understand that in the event I have made this Complaint maliciously or in bad faith, the whistleblower protection under the Whistleblowing Policy will no longer be applicable to me and I may be subject to disciplinary actions or legal proceedings. <p>.....</p> <p>Name:</p> <p>Date:</p>			