JLand Group is committed to the highest standards of integrity, transparency and accountability in the conduct of its business and operations. JLand Group **does not tolerate** Improper Conduct and provides a safe, confidential channel for any person to disclose wrongdoing in good faith.

## WHAT CAN BE REPORTED

The Policy defines Improper Conduct as unethical conduct which puts JLand Group's interest at risk and, if proven, constitutes a criminal or disciplinary offence.

## WHO CAN REPORT

A report may be made by anyone who has knowledge of, or genuinely and reasonably suspects, that a JLand Group director or employee has engaged, is engaging or is preparing to engage in Improper Conduct.

## ANONYMOUS REPORTS

Whistleblowers are encouraged to disclose their identity, though anonymous reporting is permitted. However, anonymous disclosures make it difficult to ascertain the facts and follow up for investigation purposes. JLand Group reserves the right to act and decide on any anonymous disclosure it receives—but no protection under this Policy will be provided for them.

### YOU ARE PROTECTED

Your identity is kept confidential as far as practicable. This protection applies when a disclosure is made honestly and in good faith.

JLand Group guarantees that no adverse or detrimental action can be taken by any person within JLand Group against the whistleblower who made the disclosure in good faith. Detrimental action includes:

a. Demotion, termination of employment or forced resignation;
b. Any action of harassment, intimidation or discrimination against the whistleblower;
c. A threat to take any of the actions above (a) and/or (b) against the whistleblower.

Protection can be revoked if a whistleblower making the disclosure is found to have:

a. Wilfully made the disclosure a material statement which the whistleblower knew or believed to be false or did not believe to be true;

b. Made a disclosure which is frivolous or vexatious;
c. Made a disclosure solely or substantially with the motive of avoiding dismissal or other disciplinary action;
d. Disclosed his/ her identity and the improper conduct disclosed to third party other than the Group Risk & Integrity Department, Investigation Officer and Whistleblowing Committee; or
e. Failed to comply with any provision stipulated in the policy.

Whistleblowers who require protections other than those specified in this Policy, may make a disclosure in good faith to the appropriate enforcement agency. Such disclosures shall be governed and protected by the Whistleblower Protection Act 2010.

## CONFIDENTIALITY

All reports and supporting information are treated as strictly confidential and handled appropriately in accordance with the applicable laws and JLand Group's internal policies.

### HOW TO REPORT

Email
**whistleblowing@jlandgroup.com.my**

**By Post (mark the envelope "Strictly Confidential")**

Chairman of BARC / Chairman of the Board
Group Governance, Risk and Integrity Department
Level 16, Menara KOMTAR,
80888 Ibrahim International Business District
Johor, Malaysia



We aspire to the highest standards of integrity in everything we do.
If you know of or suspect any Improper Conduct within JLand Group, please speak up — we are here to listen.