



SC ESTATE BUILDER BERHAD
(Company No. 200401017162(655665-T))
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. Introduction and Purpose

1.1 The Board of Directors of SC Estate Builder Berhad ("SCBUILD/0109" or the "Company") is committed to maintaining high standards of integrity, accountability, transparency and ethical conduct across SCBUILD and its subsidiaries (collectively, the "Group").

1.2 This Whistleblowing Policy (the "Policy") provides a confidential and protected avenue for directors, employees and stakeholders to raise genuine concerns about suspected improper conduct without fear of retaliation, victimisation, harassment or intimidation.

1.3 All concerns raised under this Policy will be assessed objectively and handled in a timely, fair and confidential manner, subject to applicable legal and regulatory requirements.

2. Scope of the Policy

2.1 This Policy applies to all directors, officers and employees of the Group, whether permanent, contract, temporary, seconded or part-time, and to external parties who deal with the Group, including shareholders, consultants, contractors, vendors, customers, business partners and members of the public.

2.2 This Policy covers suspected improper conduct, whether committed or about to be committed, including but not limited to:

- Fraud, theft, embezzlement, falsification or misappropriation of assets;
- Corruption, bribery, facilitation payments, extortion, blackmail or kickbacks;
- Money laundering, terrorism financing, sanctions breaches or other financial crime;
- Criminal offences or breach of applicable laws, regulations or listing requirements;
- Breach of the Group's Code of Ethics and Conduct, policies, procedures or delegated authority limits;
- Abuse of power, intimidation, harassment, discrimination, bullying or victimisation;
- Conflict of interest, related party impropriety or failure to disclose personal interest;
- Insider trading, market abuse or unauthorised disclosure of confidential information;
- Misuse, unauthorised use, destruction or concealment of Group property, records, data or systems;
- Health, safety, environmental or human rights risks or violations;
- Gross negligence, serious misconduct, professional malpractice or miscarriage of justice;
- Deliberate concealment, destruction of evidence or cover-up of any of the above.

2.3 The list above is not exhaustive. Any act or omission which, if proven, may constitute misconduct, a disciplinary offence or a breach of law may be reported under this Policy.

2.4 This Policy is not intended to replace normal channels for personal employment grievances, operational complaints or customer service matters unless the grievance involves improper conduct, retaliation, a serious breach of policy, or a conflict involving

the normal reporting channel.

3. Good Faith Reporting

3.1 A whistleblower should make a disclosure in good faith and with a reasonable belief that the information disclosed is substantially true, even if the concern is not ultimately substantiated.

3.2 A whistleblower is encouraged to provide sufficient information to enable an effective assessment, including the names of persons involved, dates, locations, description of the concern, relevant documents, witnesses and any supporting evidence.

3.3 A whistleblower is not expected to prove the allegation before making a disclosure. However, disclosures that are knowingly false, malicious, frivolous, vexatious or made for personal gain may result in disciplinary action and/or legal action, where appropriate.

4. Protection of Whistleblowers

4.1 SCBUILD/0109 will take reasonable steps to protect the identity and confidentiality of a whistleblower and any person assisting an investigation, to the extent reasonably practicable and permitted by law.

4.2 SCBUILD/0109 prohibits retaliation against a whistleblower who makes a disclosure in good faith. Prohibited retaliation includes dismissal, demotion, suspension, disciplinary action, harassment, intimidation, discrimination, adverse work allocation, threats, blacklisting or any other detrimental action.

4.3 Protection will continue even if the investigation later determines that the whistleblower was mistaken, provided the disclosure was made in good faith and without malicious intent.

4.4 Any person who retaliates against, threatens or victimises a whistleblower or witness may be subject to disciplinary action, including dismissal, and/or other action permitted by law.

4.5 The whistleblower remains responsible for his or her own conduct. This Policy does not grant immunity from disciplinary action, civil liability or criminal prosecution for the whistleblower's own wrongdoing.

4.6 SCBUILD/0109 may revoke protection if the whistleblower participated in the improper conduct, wilfully made a false disclosure, acted maliciously, made a frivolous or vexatious disclosure, or made the disclosure substantially to avoid dismissal or disciplinary action.

5. Confidentiality, Data Privacy and Record Keeping

5.1 All disclosures, identities, investigation records and related communications will be handled on a need-to-know basis. Confidentiality may be limited where disclosure is required by law, regulation, court order, regulatory authority, external auditor or for the proper conduct of an investigation.

5.2 Personal data collected under this Policy will be processed, retained and protected in accordance with applicable personal data protection laws and SCBUILD/0109's internal record retention practices.

5.3 Records of disclosures, assessments, investigations, findings and outcomes shall be kept securely by the designated policy owner or authorised personnel for an appropriate retention period.

6. Anonymous Disclosures

6.1 Whistleblowers are encouraged to identify themselves to enable follow-up questions, effective investigation and protection against retaliation.

6.2 Anonymous disclosures may be considered at SCBUILD/0109's discretion, taking into account the seriousness of the issue, credibility of the information, availability of supporting evidence and ability to investigate without the whistleblower's identity.

6.3 A whistleblower who chooses to remain anonymous should provide sufficient details and, where possible, a confidential method of contact for follow-up.

7. Reporting Channels

7.1 Disclosures should be made to the appropriate designated channel below. Where the concern involves a designated person, or where there is an actual or perceived conflict of interest, the whistleblower should report to another designated channel, preferably the Chairperson of the Audit Committee or the Board.

Type of concern	Designated recipient	Contact details
Financial reporting, accounting, audit, fraud, bribery, corruption, unethical or illegal conduct	Chairperson of the Audit Committee: Ms. Josipinna Binti Pudun	josie.jp@scestatebuilder.com.my
Shareholder or stakeholder concerns, or matters involving senior management		
Employment-related concerns involving improper conduct, retaliation or serious policy breach	Chairman and Managing Director / Chief Executive Officer: Mr. Loh Boon Ginn	al@scestatebuilder.com.my

Via Email: whistleblowing@scestatebuilder.com.my

- Emails will be directed to The Chairperson of Audit Committee, Ms Josipinna Binti Pudun

Via Mail: SC Estate Builder Berhad
C-09-03, block C, Level 9, Capital 3, Oasis Square,
No.2, Jalan PJU1A/7, Ara Damansara,
Petaling Jaya, 47301, Selangor
Malaysia

7.2 Each disclosure should, where available, include:

- the whistleblower's name and contact details, unless reporting anonymously;
- the person(s) or department(s) involved;
- the nature of the suspected improper conduct;
- dates, times, locations and sequence of events;
- names of witnesses or persons who may have relevant information;
- supporting documents, photographs, correspondence, transaction details or other evidence; and
- any immediate risk to people, assets, records, operations, regulators or the public.

7.3 Disclosures should not be made to persons who are implicated in the concern or who may have an actual or perceived conflict of interest.

8. Assessment and Investigation Process

8.1 Upon receipt, the designated recipient will record the disclosure and conduct a preliminary assessment to determine whether the matter falls within this Policy, whether immediate action is required, and whether an investigation should be initiated.

8.2 Depending on the nature and severity of the concern, the investigation may be conducted by the Audit Committee, management, internal audit, legal advisers, external investigators, human resources or other persons authorised by the Board or Audit Committee.

8.3 Investigations will be conducted fairly, independently and without unnecessary delay. The subject of the complaint may be informed of the allegations and given an opportunity to respond, where appropriate and where doing so will not compromise the investigation or applicable legal requirements.

8.4 Employees and relevant parties are expected to cooperate with investigations. Obstruction, destruction of evidence, interference with witnesses or deliberate provision of false information may result in disciplinary action.

8.5 Where appropriate, SCBUILD/0109 may refer a matter to external regulatory, enforcement or professional bodies, and may cooperate with such authorities.

9. Outcome and Remedial Action

9.1 If a disclosure is substantiated, SCBUILD/0109 will take appropriate remedial action proportionate to the seriousness of the matter. This may include disciplinary action, process improvements, control enhancements, recovery of losses, reporting to regulators or law enforcement, legal action or other corrective measures.

9.2 The whistleblower may be informed that the matter has been received or concluded, where appropriate. Detailed investigation findings, disciplinary outcomes and personal data of other individuals may not be disclosed to preserve confidentiality and legal rights.

10. Responsibilities

10.1 The Board has overall responsibility for this Policy and for ensuring that appropriate whistleblowing channels and protections are maintained.

10.2 The Audit Committee oversees concerns relating to financial reporting, internal controls, audit, fraud, corruption and other matters within its remit, and may report significant matters to the Board.

10.3 Management is responsible for implementing this Policy, communicating it to employees and relevant stakeholders, maintaining records, supporting investigations and implementing remedial actions.

10.4 All directors, employees and relevant stakeholders are responsible for acting with integrity, reporting genuine concerns and cooperating with investigations.

11. Training and Communication

11.1 SCBUILD/0109 should communicate this Policy to employees and make it accessible to relevant stakeholders. Awareness, onboarding and periodic reminders should include reporting channels, confidentiality protections and the prohibition against retaliation.

12. Review of Policy

This Policy shall be reviewed periodically, and in any event when there are material changes to applicable laws, regulations, governance codes, listing requirements, organisational structure or reporting channels.