



HEKTAR ASSET MANAGEMENT SDN BHD

WHISTLEBLOWING POLICY AS AT 1 JUNE 2020

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1.0 Introduction

- 1.1 Whistleblowing is a form of disclosure, involving the Reporting Person (refer to the definition section) to raise concerns on actual or suspected alleged wrongdoings concerning associated persons of Hektar Asset Management Sdn Bhd (“HAMSB” or the “Company”) and its related entities (collectively referred to as the “Group”). This Policy facilitates an open and transparent corporate culture within the organisation, thus, promoting candour, accountability and enabling the Group to respond nimbly to changes in the environment.
- 1.2 As prescribed under **Guidance 3.2 of the Malaysian Code on Corporate Governance**: “the board should ensure that its whistleblowing policies set out avenues whereby legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal”.
- 1.3 The Group is committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business and affairs. It expects alleged wrongdoings such as fraud, corruption, financial misappropriation, gross mismanagement and other possible improprieties to be reported in good faith and in confidence. This Whistleblowing Policy (“Policy”) provides:
- a set of procedures to enable the Reporting Person(s) to raise concerns in good faith, and to receive feedback from the Group on actions, if any, taken in respect of such concerns; and
 - (where Reporting Persons are employees) assurance that the employee(s) will be treated fairly, and to the extent possible, be protected from reprisals or victimisation for whistleblowing in good faith.
- 1.4 This Policy provides an alternative avenue for the Reporting Person(s) to raise concerns if the normal lines of communication are not available. Nothing in this Policy shall interfere with other established operational policies and processes of the Group.
- 1.5 This Policy should be read together with enumerations encapsulated in the relevant legislative and regulatory promulgations including but not limited to the following:
- i. Whistleblower Protection Act 2010;
 - ii. Malaysian Anti-Corruption Commission Act 2009; and
 - iii. Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Listing Requirements”) and other authoritative guidance such as the Malaysian Code on Corporate Governance.
- 1.6 Where there is a conflict between the contents of this Policy and the laws and regulatory promulgations, the relevant enumerations contained in the legislations and regulations shall prevail.
- 1.7 In this Policy, words importing one gender include the other gender and words importing the singular include the plural and vice versa, as the case may be.

2.0 Definition

- 2.1 Associated person – Associated person shall be ascribed with the same meaning as outlined in Section 17A(6) of the Malaysian Anti-Corruption Commission (Amendment) Act 2018. A person is associated to the Group if he is a director or employee of any entity within the Group or if he is a person who performs services for and or on behalf of the Group.
- 2.2 Appointed Officer – An individual within HAMSB who is appointed to lead the investigation of the case pursuant to the whistleblowing report received by the Designated Recipient.
- 2.3 Designated Recipient – An individual within HAMSB who is authorised to receive the whistleblowing report.

- 2.4 Enforcement agency – Enforcement agency shall be ascribed with the same meaning as outlined in Section 2 of the Whistleblower Protection Act 2010. Enforcement agency includes any ministry, department, agency or other body set up by the Federal Government, State Government or local government including a unit, section, division, department or agency of such ministry, department, agency or body, conferred with investigation and enforcement functions by any written law or having investigation and enforcement powers.
- 2.5 Governing Party – An individual or group of individuals within HAMSMB who is/are charged with the responsibility of reviewing and deciding on the outcome of the investigation pursuant to findings made by the Appointed Officer.
- 2.6 Key management personnel – The Executive Director and Chief Executive Officer of HAMSMB as well as persons directly reporting to the Executive Director and Chief Executive Officer of HAMSMB.
- 2.7 Minor misconduct – A summary misconduct which can result in disciplinary proceedings (other than dismissal and/or report to enforcement authorities) on the employee, if convicted. Reference can be made to the Group’s Code of Conduct and Ethics for examples on minor misconduct.
- 2.8 Reporting person – Any person or a group of persons who submits a whistleblowing report via the channels outlined in this Policy. They include those who are employed by any entity within the Group as well as those described in the “Who Can Disclose” paragraph set out in this Policy (i.e. external stakeholders).
- 2.9 Serious misconduct – A major misconduct which shall bring about disciplinary proceedings that can lead to an employee’s dismissal if convicted and/or reports being made to enforcement authorities. Reference can be made to the Group’s Code of Conduct and Ethics for examples on serious misconduct.
- 2.10 Whistleblowing – Disclosures made in good faith on any real or suspected misconduct within the Group. Such good faith reporting must not be made recklessly, maliciously, and/or for personal gain. Whistleblowing does not include matters that could be resolved via existing feedback mechanisms in the Group (e.g. operational issues and suggestions from customers).

3.0 Designated Recipient

3.1 In general, all disclosures pursuant to this Policy are to be made to the Designated Recipient for investigation by the Appointed Officer prior to reporting to the Governing Party, as designated below.

Level of disclosure	Designated Recipient	Appointed Officer	Governing Party
Serious misconduct – Disclosure against all levels of staff up to the rank of Manager	Executive Director and Chief Corporate Officer	Head of Group Human Resource Department	Audit Committee of HAMSMB
Minor misconduct – Disclosure against all levels of staff up to the rank of Manager	Head of Department	<i>As appointed by the Designated Recipient</i>	Head of Group Human Resource Department
Disclosure against a key management personnel, Executive Director or member of the Board	Chairman of the Audit Committee of HAMSMB	<i>As appointed by the Designated Recipient</i>	Audit Committee of HAMSMB

Refer to Paragraph 5.6(i) of this Policy should there be any conflict between the Reporting Person and Designated Recipient or if the alleged misconduct implicates the Designated Recipient.

4.0 Monitoring and Review of this Policy

- 4.1 The Group Human Resource Department shall maintain a register for all disclosures made pursuant to this Policy. All documents obtained pertaining to disclosures shall be considered “Confidential” and be stored securely as enumerated under **Section 9 of the Personal Data Protection Act 2010**. The disclosures shall be kept under the custody of the Group Human Resource Department for seven (7) years, or longer as may be decided by the Audit Committee of HAMSMB.
- 4.2 In adherence to **Section 10 of the Personal Data Protection Act 2010**, the disclosures shall not be kept longer than necessary. The Group Human Resource Department shall undertake reasonable steps to ensure the disclosures are destroyed or permanently deleted after the designated timeframe.
- 4.3 The Group Human Resource Department shall, on a quarterly basis, update the Audit Committee and/or Board on the number of disclosures received to date and nature of such disclosures, status of investigations, and other relevant updates.
- 4.4 This Policy shall be reviewed to reflect any changes in relevant laws and guidelines. Any proposed changes to this Policy shall be facilitated by the Group Human Resource Department and tabled to the Board for approval. As a minimum, this Policy shall be reviewed on a triennial basis.
- 4.5 The Group Human Resource Department shall monitor the implementation and understanding of this Policy.
- 4.6 The Group shall communicate its Whistleblowing Policy to its Directors, employees and other stakeholders.
- 4.7 On a periodic basis, the internal auditors shall review and stress test the whistleblowing reporting channels to ensure they are functioning adequately and as intended.

5.0 Reporting procedures

- 5.1 It is in the enlightened interest of the Group to promote an open and a positive environment for the employees or other stakeholders, to raise concerns or report on any possible improprieties in financial reporting or other business matters, without fear of retaliatory action. This Policy is intended to complement the standard channels of communication and reporting lines within the Group.
- 5.2 An employee who intends to raise a concern may consult or raise their concerns to their respective Head of Departments. However, if the concerns of the Reporting Person(s) remain unresolved, this Policy provides an avenue for such Reporting Person(s) to make formal disclosures for escalation through the relevant channels.

5.3 Who can disclose:

Any of the following Reporting Person(s) can make a disclosure:

- The Group’s Directors or employees, including employees on permanent, contract, temporary, assignment, or secondment basis; and
- Stakeholders of the Group who are natural persons, not being incorporated or unincorporated bodies i.e. third parties, suppliers, tenants, unit holders, etc.

A Reporting Person who has whistleblown is referred to as “whistleblower” in this Policy.

5.4 What to disclose:

A disclosure on improper conduct may be made if the Reporting Person has reasonable grounds to believe that the alleged wrongdoer has engaged, or is prepared to engage in an improper conduct, as prohibited by the Group or applicable laws and regulations.

Examples of improper conduct are outlined below in a non-exhaustive manner:

- Criminal offences such as fraud, corruption, forgery, insider trading, abetting or intention to commit any criminal offence;
- Acceptance, involvement or solicitation of a bribe, or a favour in exchange for direct or indirect personal benefits;
- Acceptance, involvement, or solicitation of corruption or fraud;
- Serious breaches of the Code of Ethics and Conduct, in particular failure to disclose a conflict of interest;
- Any irregularity or non-compliance with laws/ regulations, and/ or internal controls;
- Endangering the health or safety of an individual, the public or the environment;
- Dishonesty and unethical behaviour, or violence at the workplace;
- Theft or misuse of the Group's resources or assets;
- Attempt to conceal information relating to improper conduct;
- Knowingly directing or advising a person to commit any of the above alleged wrongdoings; and
- Any other matters that may adversely affect the interests of the Group, its assets and its reputation.

An alleged wrongdoing may occur in the course of the Group's business or affairs or at any workplace, i.e. any related workplace to the Group's business or affairs, for example, on the Group's premises, at an event organised by the Group, or during a conference attended by the Group's employees in the course of their work.

If a Reporting Person is unsure whether a particular act or omission constitutes an alleged wrongdoing under this Policy, the Reporting Person is encouraged to seek advice or guidance from the their respective immediate superior, Group Human Resource Department or the Chairman of the Audit Committee.

5.5 **When to disclose:**

A whistleblower shall come forward with any information or document(s) that they, in good faith, reasonably believes in and discloses an alleged wrongdoing, which is likely to happen, is being committed or has been committed.

The whistleblower needs to demonstrate that he has reasonable grounds for the concerns. However, the whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt, or even be able to identify a particular person to which the disclosure relates, when making a disclosure.

If the whistleblower knows as a matter of fact that there are reasonable grounds of suspicion that an alleged wrongdoing is going to take place, such genuine concerns shall be raised at an early stage.

Examples of reasonable grounds of suspicion are outlined below in a non-exhaustive manner:

- Unnecessary use of intermediaries in contracts or purchases;
- Mode of payment used is outside the course of normal business practice;
- Lengthy, unexplained delay between the announcement of project award and signing of the contract;
- Selectively extending or repeatedly excluding tender invitations to a select group of vendors;
- Vague contract specifications that are followed by variation orders; or

- Selected employees are treated differently as a result of their race, age, gender, descent, national or ethnic region.

5.6 How to proceed:

Generally, all disclosures pursuant to this Policy are to be made to the Designated Recipient via the circumstances specified below:

- (a) Disclosures are best raised in writing through a Whistleblowing Form and submitted via electronic mail ("email") to whistleblowing@hektarreit.com with the subject of the email clearly specifying the Designated Recipient for secured internal routing. The Reporting Person may also choose to submit a hardcopy Whistleblowing Form in person, by way of a sealed envelope, to the Designated Recipient. Refer to **Appendix I** of this Policy for the Whistleblowing Form.
- (b) If it is not convenient to disclose in writing, the Reporting Person may leave a telephone message at **016-9552543** and **016-2502265**, which is routed to the Executive Director and Chief Corporate Officer as well as the Chairman of the Audit Committee respectively. However, the Designated Recipient, shall as soon as it is practicable, reduce it into writing.

The Procedure Flowchart is set out in **Appendix II**.

- (c) Where a disclosure concerning one or more matters set out in **Paragraph 5.4** is received through channels other than the reporting channels above, it will be forwarded to the Designated Recipient for review, in accordance to **Paragraph 3.1** of this Policy.
- (d) A disclosure shall include at least the following particulars:
 - i. if the whistleblower is an employee of the Group, their name, designation, current address, contact numbers and relationship or interest, if any, in connection with the concerns raised;
 - ii. if the whistleblower is not an employee of the Group, their name, name of employer and designation, current address, contact numbers and relationship or interest, if any, in connection with the concerns raised;
 - iii. bases or reasons for their concerns, including granular details of the alleged wrongdoing. For instance, such details would include the nature, the date, time, and place of its occurrence and the identity of the alleged wrongdoer;
 - iv. particulars of witnesses, if any; and
 - v. particulars or the production of documentary evidence, if any.
- (e) The Group may need to contact the whistleblower for further details in order to proceed with any investigation or other appropriate action.
- (f) Any evidence obtained from the whistleblower shall be documented and kept confidential within the Group.
- (g) In cases of anonymous disclosures, whereby information provided is comprehensive and/or deemed sufficient to warrant an investigation, the Group may decide to proceed with an investigation depending on the nature and severity of the allegations in the disclosure.
- (h) Where the alleged wrongdoer is not an employee of the Group, the Designated Recipient shall make an official report to the authorities, after consultation with the Governing Party.
- (i) The whistleblower may report the same disclosure to another Designated Recipient (which may be for different level of disclosure) if:
 - the status of the disclosure is not communicated to the whistleblower within two (2) weeks;
 - the alleged wrongdoing involves a Designated Recipient; or

- (i) The whistleblower may report the same disclosure to another Designated Recipient (which may be for different level of disclosure) if:
 - the status of the disclosure is not communicated to the whistleblower within two (2) weeks;
 - the alleged wrongdoing involves a Designated Recipient; or
 - where the alleged wrongdoing does not involve the Designated Recipient but the whistleblower, in good faith, reasonably believes that the Designated Recipient may be personally conflicted (for instance, the Designated Recipient is an ally of the alleged wrongdoer).
- (j) As soon as it is reasonably practicable and legally permissible, the Group will, as it considers appropriate, write to the whistleblower who has reported the matter in good faith:
 - acknowledging that the concern has been received;
 - requesting for further information from the whistleblower;
 - informing the whistleblower whether further investigations will take place, and if not, the reason for not proceeding further; and/or
 - advising the status or outcome of any investigation.

6.0 Assessment and investigation

- 6.1 The Designated Recipient shall assess the disclosure prior to escalation to the Appointed Officer who in turn shall lead the investigation and provide an opinion if the alleged wrongdoing was indeed committed. The Appointed Officer shall report to the Governing Party, based on his assessment, the outcome of the investigation and recommendations for further steps to be taken by the Group.
- 6.2 In instances where the disclosure of improper conduct is not substantiated, the Designated Recipient shall inform the whistleblower accordingly.
- 6.3 Where a serious misconduct points towards a significant weakness in the Group's internal control functions, the Audit Committee of HAMSB shall determine whether a further investigation or an in-depth evaluation of the internal control systems is warranted .
- 6.4 The persons, teams or committees responsible to conduct an investigation in accordance with this Policy shall be referred to as the "Investigation Team".
- 6.5 The initial process of addressing a disclosure should not take more than two (2) weeks from the day the Designated Recipient receives the disclosure. The investigation of the disclosure should be finalised as soon as practicable, and given priority, particularly if the alleged wrongdoing is capable of causing significant financial or reputational harm to the Group.
- 6.6 In the event the disclosure is rejected, the Designated Recipient shall inform the whistleblower within two (2) weeks of the decision.
- 6.7 Where necessary, the Audit Committee of HAMSB reserves the right to consult with legal counsels and experts based on the subject matter of whistleblowing report.
- 6.8 The Audit Committee of HAMSB shall undertake any other corrective actions based on the best interest of the Group.

7.0 Reporting to enforcement agencies

- 7.1 Depending on the nature of the disclosure made by the whistleblower, the Group may be required to report the disclosure to enforcement agencies such as the Malaysian Anti-Corruption Commission, Securities Commission, Bursa Malaysia Securities Berhad and the Companies Commission of Malaysia.
- 7.2 In reference to **Chapter 15.16 of the Main Market Listing Requirements by Bursa Malaysia Berhad**, in the event the Audit Committee of HAMSMB is of view that a disclosure reported to the Board of Directors was not satisfactorily resolved and thus, resulting in a breach of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad, the Audit Committee of HAMSMB shall immediately report the matter to the Exchange.
- 7.3 All Directors and employees of the entities of the Group are required to comply with **Section 25 (1) to (4) of the Malaysian Anti-Corruption Commission Act 2009. Section 25(1) of the Malaysian Anti-Corruption Commission Act 2009** states that: "Any person to whom any gratification is given, promised or offered, in contravention of any provision of this Act shall report such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer".
- Directors and employees should report any improper conduct, as set out under Paragraph 5.4, directly to the Chairman of the Audit Committee of HAMSMB and after consultation with the Audit Committee members, report the matter to the Commission or police officer. The disclosure reported shall be made in writing and the whistleblower shall include information reported to the Chairman of the Audit Committee of HAMSMB and Commission or police officer, as the case may be.
- 7.4 Protection accorded to whistleblowers who lodge a report to the enforcement agencies shall be dealt with in accordance to Section 7(1) of the Whistleblower Protection Act 2010 as opposed to protection mechanisms outlined in this Policy.

8.0 Being informed and having the opportunity to be heard

- 8.1 Co-operation by parties involved:
- (a) The whistleblower shall be informed of the status of his disclosure as far as reasonably practicable.
 - (b) The whistleblower and the alleged wrongdoer are expected to give their full co-operation in any investigation or any other process carried out pursuant to this Policy.
 - (c) Any evidence taken from the whistleblower or the alleged wrongdoer shall be noted and the accuracy shall be agreed with the Group in writing.
 - (d) In the event the whistleblower is implicated or discovered to be or have been involved in any alleged wrongdoing, the whistleblower may also be investigated so as to complete the fact-finding process.

An investigation conducted by the Appointed Officer and his team (collectively referred to as the "Investigation Team") shall not be treated as a reprisal against the whistleblower. The whistleblower may be requested to attend a meeting to discuss the allegations and must take all reasonable steps to attend that meeting. The whistleblower shall be given an opportunity to answer the allegations at that meeting, and the answers shall be recorded in the minutes of that meeting. The meeting may be adjourned for the Investigation Team to obtain further advice or proceed with further investigations.

8.2 The right to defend or appeal

- (a) Prior to a meeting before the Investigation Team, the alleged wrongdoer, should he be an employee of the Group, shall respond to a Show Cause Letter prepared by the Group Human Resource Department.
- (b) The alleged wrongdoer shall be asked to attend a meeting with the Investigation Team to discuss the allegations and must take all reasonable steps to attend the meeting. He shall be given an opportunity to answer the allegations at the meeting, make an appeal and his answers shall be recorded in the minutes of the meeting.
- (c) The whistleblower shall not be invited to the deliberations with the Investigation Team.

9.0 Confidentiality of identity

9.1 The Group will protect the identity of the Reporting Person(s) who made the report in good faith. Such information will be held to the extent legally permissible and reasonably practicable, in the strictest confidence, both by the Group and the Reporting Person(s) (i.e. the whistleblower's identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against the Group).

However, it must be appreciated that during the investigation process, including any report that may or have to be made to the authorities, may reveal the source of the information, and a statement by the Reporting Person(s) may be required as part of the evidence.

9.2 To maintain confidentiality, no information concerning the status of an investigation shall be divulged to anyone outside the remit of the investigation or deliberation on the outcome of the investigation. The proper response to any inquiry is: "I am not at liberty to discuss this matter". Under no circumstances shall any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation" or any other specific adverse reference.

9.3 Once the whistleblower has provided the disclosure, he shall be informed of the following:

- (a) not to contact the alleged wrongdoer in an effort to determine facts or demand restitution; and
- (b) not to discuss the case, facts, suspicions, allegations, or any other information related to the cause with anyone.

9.4 The whistleblower's identity may be revealed based on the following circumstances:

- (a) to facilitate the investigation process, a statement by the whistleblower may be required as part of the evidence;
- (b) where it is required by the law, enforcement agency, regulatory body or such other body that has the jurisdiction and authority of the law to require such identity to be revealed;
- (c) where it is in the best interest of the Group to disclose the identity of the whistleblower's identity after the concurrence of the Board; or
- (d) the disclosure by the whistleblower was frivolous and in bad faith or for personal gain.

10.0 Protection and revocation of protection

10.1 The Group recognises that the decision by the Reporting Person, particularly an employee to report any one or more of the matters set out in **Paragraph 5.4** above, may be a difficult one to make, including concerns or reprisals by those responsible for such matters.

10.2 The Group shall not tolerate harassment or victimisation of any whistleblower, and shall ensure

that such individual who makes a disclosure in good faith:

- (a) will not be penalised or will not suffer any adverse treatment for doing so; and
 - (b) will be protected to ensure that the individual is not personally disadvantaged in the organisation by having made the report, including, if necessary, filing an appeal to the Audit Committee of HAMSMB.
- 10.3 However, any individual who makes a report recklessly without having reasonable grounds for believing the matter to be substantially true, or makes a report for purposes of personal gain or maliciously, may be subjected to appropriate action(s) by the Group.
- 10.4 The Group wishes to maintain an open and transparent culture and to this end, disclosures made in good faith and for the benefit of the Group will be considered seriously. To facilitate effective investigation, the whistleblower must be prepared to assume responsibility for his actions.
- 10.5 Upon making a disclosure in good faith, based on reasonable grounds, in accordance with the procedure pursuant to this Policy:
- (a) the whistleblower shall be protected from reprisal within the Group as a direct consequence of his disclosure;
 - (b) the whistleblower shall not be subjected to a civil action by the Group; and
 - (c) the whistleblower shall have protection from detrimental action.
- 10.6 The whistleblower's protection shall be revoked if a person is found to have:
- (a) participated in the improper conduct disclosed;
 - (b) made a disclosure in which he knew or believed to be false (for instance, dishonest, frivolous mischievous or malicious complaints);
 - (c) made a disclosure that is frivolous and vexatious;
 - (d) made a disclosure of improper conduct which principally involves questioning the merits of policy pronouncement by the government, including the policy of a public body; or
 - (e) made a disclosure to avoid dismissal or other disciplinary action.
- 10.7 Disclosures that are pending or already determined through the Group's disciplinary proceedings, and disclosures pending through local or international authorities such as the courts, arbitration bodies, or other similar proceedings shall not be further acted upon by the Group, whether the Reporting Person was aware or not of the situation upon disclosure.

11.0 Administration

- 11.1 This Policy, which accords in spirit with the requirements of the relevant legislations and regulatory promulgations, shall be reviewed, at the Board's discretion, and amended from time to time, as and when necessary. Changes to the Policy, if any, shall only be made with the Board's approval in writing.
- 11.2 The Policy shall be held in custody of, and filed by, the Group Human Resource Department of the Group.



**Hektar Group
Whistleblowing Form**

A. PARTICULARS OF WHISTLEBLOWER

Name
(As per NRIC/ Passport) : _____

NRIC/ Passport no. : _____

* Employee no. : _____

* Designation : _____

* Department : _____

Correspondence address : _____

Contact number H/P: _____ Office: _____

Email address (if any) : _____

** For employees of Hektar Group only*

B. PARTICULARS OF ALLEGED WRONGDOER

Name of the Alleged
Wrongdoer committing
Improper Conduct : _____

Designation (if known) : _____

Department (if known) : _____

C. DETAILS OF THE IMPROPER CONDUCT

Is there any relationship between the
Whistleblower and Alleged Wrongdoer? Yes No Unknown
Please mark (X) where applicable

If Yes, please specify : _____

Was the improper conduct a one-time
incident that occurred recently? Yes No Unknown
Please mark (X) where applicable

Is the improper conduct an
ongoing issue? Yes No Unknown
Please mark (X) where applicable

Nature of the improper conduct – *Please mark (X) where applicable*

- Involvement in illegal or unlawful activities (e.g. fraud, corruption, bribery, theft, insider trading, blackmail, forgery, etc.)
- Conflict of interest
- Non-compliance to the Group’s policies and procedures and/ or Code of Ethics and Conduct
- Contravention of an Act of Regulation
- Negligence
- Exposure of the Group or an individual to the risk of health and safety, including acts of sexual harassment
- Unauthorised or misuse of the Group’s funds, assets and/ or facilities
- Disclosure of the Group’s confidential information including products or service without proper authorisation
- Mismanagement and/ or abuse of position
- Concealment of any of the above
- Others, please specify:

Please specify further details on the occurrence of improper conduct below (if it has occurred):

Date of occurrence : _____

Time of occurrence : _____

Place of occurrence : _____

Comments (if any) : _____

Have you previously made a Disclosure/ Complaint of the Improper Conduct to any internal or external authorities?

Yes No

If Yes, please provide the following particulars:

Name of authority receiving the Disclosure/ Complaint : _____

Designation (if applicable) : _____

Department (if applicable) : _____

Date the Disclosure/
Complaint was made : _____

Status of the Disclosure/
Complaint (if known) : _____

D. WITNESS(ES)

Were there any other witnesses
to support the Improper Conduct? Yes No

If Yes, please specify the following particulars:

Name : _____ Name : _____

Designation : _____ Designation : _____

Department : _____ Department : _____

Contact no. : _____ Contact no. : _____

Email add. : _____ Email add. : _____

E. SUPPORTING DOCUMENTS

Do you have any documents to support
your concern? (If Yes, please attach)
Please mark (X) where applicable Yes No

F. OTHER COMMENTS

If you have any other comments, please comment below:

G. DECLARATION

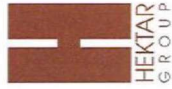
I hereby declare that all the information given herein are made voluntarily and true to the best of my knowledge.

I understand that I will be entitled to the whistleblower protection from the Group as prescribed under **Paragraph 10.0** in the Group's Whistleblowing Policy.

I understand that in the event I have made this Disclosure maliciously or in bad faith, the whistleblower protection prescribed under **Paragraph 10.0** will no longer be applicable to me and I may be subjected to disciplinary or legal proceedings by the Group.

Please forward this Whistleblowing Form together with any supporting documents to the following email:

whistleblowing@hektarreit.com



**Hektar Group
Whistleblowing Policy Procedure Flowchart**

