

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Whistleblowing	Policy No: 02-00
Applies to: All Employees	Page: 1 of 2
Date: 28 February 2017	Approved by: Dato' Ho Cheng Chong @ Ho Kian Hock

Objective:

The Board and Management encourages its employees to report on any suspected or known wrongdoings, and misconduct, and to protect the employee who in good faith has reported such misconduct from any form of disadvantage or reprisal.

Policy and Protection

Employees who have legitimate grounds to report misdeeds can report internally to the Company's Management with assurance that the Management will take matters seriously and respond appropriately.

The Employee known as the "Reporting Party" (RP) will be assured:

1. Anonymity;
2. Confidentiality; and
3. Protection (provided that the RP is not involved in the reported case).

Reporting Procedures

The RP may make their report in writing, via email or by telephone to any senior management and / or the Managing Director; In addition, the RP may also report independently to the IA head at:

The Head of the Internal Audit Department
Keck Seng (Malaysia) Berhad (Property Division)
10-16, Jalan Sagu 8
Taman Daya
81100 Johor Bahru
Johor
Tel: 607-3555866 (ext 124)

A report will be drawn up using the prescribed form (Refer to 02A-00). Confidentiality on the fact that a report has been made and to the name of the whistleblower will be maintained to the greatest extent possible.

However, if the whistleblower self-disclose his or her identity, the Company will no longer be obliged to maintain confidentiality.

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The name of the employee making the report will be disclosed in the report. Anonymous reports will not be investigated. The report will consist of the following details:

- Date of the reported incident(s)
- Place of the reported incident(s)
- Incident(s) that took place
- Why the RP thinks that there is violation or breach?

Unspecified violations or broad allegations without proper supporting evidence will not be investigated.

Whistleblowers are the RP and not the investigating party. They are not to act on their own in conducting any investigative activities unless requested by investigators. The RP should also refrain from obtaining evidence that he or she do not have a right to access, as improper access is in itself a misconduct.

The filing of a report in bad faith is considered a gross misconduct and will subject the RP, if he or she is an employee of the Company to disciplinary proceedings by the Company.

Procedures in handling reported cases

1. Maintain all records of complaints and reports;
2. Investigate with appropriate assistance and facts, as necessary, including interviews with relevant parties and identified witnesses;
3. Resolve and conclude as soon as practicable;
4. Investigation report to be submitted to the Managing Director or Senior Independent Director for further review and decision;
5. Disclose or report to authorities if necessary or routed to Human Resource (HR) Department if necessary action is required from HR.