



GOLDEN LAND BERHAD

(Company No. 298367-A)

WHISTLEBLOWING POLICY OF GOLDEN LAND BERHAD

(Adopted on 26 August 2014 and revised on 27 August 2016)

Golden Land Berhad (“the Company”) and its subsidiaries (“the Group”) are committed to achieve and maintain high standard of integrity, accountability and ethical behaviour in conducting its businesses and operations.

In order to achieve the standard, the Company encourages all its employees and stakeholders to disclose any improper conduct in accordance with the procedures as provided under this policy and provide protection to employees and stakeholders who report such allegations.

1. OBJECTIVES

The objective of this policy is to provide and facilitate a mechanism for any reporting individual (“RI”) to report concerns about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse and to assist the Company on fraud detection.

2. TYPES OF WRONGDOING

Wrongdoing shall mean, but not limited to, incidents of non-compliance of approved policies, fraudulent acts, misappropriations, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety and any irregularities that can impact the Company’s reputation from such illegal and irresponsible acts.

3. REPORTING IN GOOD FAITH

The Company expects all parties to act in good faith and have reasonable grounds when making a report. If allegations are made with malicious intent, the Company will take appropriate action against the parties concerned including legal action, where applicable.

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4. PROTECTION FROM RETALIATION AND REPRISAL

The Company views retaliation or reprisal against the whistleblower seriously. The Company provides assurance to the whistleblower that he/she would be protected from retaliation or reprisal from his/her reporting superior, manager or department head.

The Company assures that no disciplinary action can be taken against the whistleblower on condition that the information provided is accurate, factual and there is no element of malicious intent.

5. CONFIDENTIALITY

All complaints reported to the Company are treated as confidential. Information will only be closed on need-to-know basis and with the written permission from the Audit Committee Chairman of the Board.

The identity and particulars of the RI shall also be kept private and confidential unless it is required by law, court or authority.

6. PROCEDURES FOR REPORTING

The whistleblower should promptly report the suspected on instances of wrongdoing to the Company.

The report must be in writing, submit via post or email, to ensure that there is a clear understanding about the issues raised. The report should be sealed and marked with "Private and Confidential" and addressed to the following Person In-Charge:-

Audit Committee Chairman or
Company Secretary or Human
Resource Manager Golden Land
Berhad A-09-03, Empire Tower
Empire Subang, Jalan SS16/1
47500 Subang Jaya, Selangor

Email : auditchairman@glbhd.com or cosec@glbhd.com or hr@glbhd.com

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7. PROCEDURE FOR HANDLING REPORTS OF WRONGDOINGS

The Person In-Charge who received the report must promptly act to investigate and resolve the issue. A proper record has to be maintained on the complaints, investigation and resolution.

All investigations shall be tabled to the Audit Committee that has the authority to ensure effective implementation of the whistle blowing policy. The Audit Committee shall update the Board of Directors on the status of investigation and recommend appropriate course of action to the Board for deliberation and approval.

If the case necessitates further action on the part of the Human Resource (“HR”) department, a copy of the summary report will be provided to HR department.

The whistleblower shall be informed on the outcome of the investigation.

8. WHISTLEBLOWER PROTECTION ACT 2010

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the act shall prevail.