



	KIP REIT	 KIP REIT™
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KIP REAL ESTATE INVESTMENT TRUST

Unit B-6, Blok B, Menara KIP, No.1, Jalan Seri Utara 1, Sri Utara off Jalan Ipoh
68100 Kuala Lumpur

ISO 8.9 RAISING CONCERNS: WHISTLEBLOWING POLICY

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<p>Reviewed By CHAN HENG WAH CHIEF EXECUTIVE OFFICER</p>	

This policy was prepared in line with the requirements from s.17A of the Malaysian Anti-Corruption Commission Act 2019 and was approved by the Board of Directors following the Audit and Risk Management Committee's recommendation.

The information contained in this document is property of KIP REIT and to be treated as confidential. It must not be used for commercial or other purposes and/or removed from premises without prior approval from KIP REIT.

CONTROL DOCUMENT

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1.0 WHISTLEBLOWING POLICY

The Company encourages personnel of the Company, any parties with a business relationship with the Company ('Business Associates') and the members of the public to raise concerns and make any disclosures openly and honestly through the proper reporting channels. All disclosures made under this policy shall be dealt with in a confidential manner. Any party wishing to report any Improper Conduct is expected to disclose his/her identity to the Company in order for the Company to accord the necessary protection of his/her identity. Anonymous reporting is discouraged but not prohibited to ensure that all matters can be fully investigated. Concerns raised shall be independently investigated as per the Investigations Policy and, where appropriate, remedial action shall be taken. Upon the completion of the investigation process, the whistleblower ('Discloser') will be notified on the outcome of the disclosure, provided contact details are provided.

2.0 SCOPE

This Policy is designed to facilitate Directors, company Personnel, Business Associates and members of the public to disclose any Improper Conduct through a confidential and structured channel.

Types of wrongdoings that constitute "Improper Conduct" under this Policy include but are not limited to:-

- Stealing or carrying stolen goods;
- Deliberate damage to the Company's property;
- Fighting with or striking another Personnel;
- Gross insubordination;
- Any immoral act within the premises of the Company;

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- Participation in unlawful strike;
- Picketing in the Company premises or land;
- Erection or display of banners, notices, etc. on the Company's property without prior permission from the Company;
- Unauthorised distribution of notices, leaflets, etc. concerning the Company either within or outside the Company premises;
- Embezzlement of the Company fund;
- Under detention or imprisonment for criminal or subversive acts/offences;
- Inciting or aiding another employee to commit any of the above offences;
- Corrupt practices;
- Falsification of documents, etc with intention to defraud; and
- Engaging in private business without prior approval from the Company.

Other matters should be raised with the HR Department.

3.0 REPORTING CHANNEL

The Discloser may raise their concerns via the following medium:

- (i) Email: whistleblower@kipreit.com.my; or
- (ii) Mail: **Chairman of Audit and Risk Management Committee, KRM Sdn Bhd, Unit B-6, Block B, Tingkat 6, Menara KIP, No.1, Jalan Seri Utara 1, Sri Utara Off Jalan Ipoh, 68100 Kuala Lumpur.**

Correspondence from the above method shall be automatically directed to:

- **Chairman of Audit and Risk Management Committee; and**
- **Compliance Officer**

4.0 MINIMUM CONTENT FOR REPORTING

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Any disclosure made should contain the following information:-

- (a) Details of the person(s) involved;
- (b) Details of the allegation;
- (c) Where and when the alleged misconduct/wrongdoing took place;
- (d) Other relevant information;
- (e) Any supporting evidence if available; and
- (f) The reporting individual's name and contact information*.

*Note: required for investigations process (to update the Discloser on the status).

5.0 CONFIDENTIALITY AND ANONYMITY OF REPORTING INDIVIDUAL

All disclosures made under this Policy shall be dealt with in a confidential and professional manner. The identity of the Discloser shall be kept entirely confidential and not be revealed to any party other than the Compliance Officer, Chairman of the ARMC, HR Manager ('Investigation Committee') and the leader of the Investigation Committee (if relevant) without permission from the Discloser.

6.0 ACTION SUBSEQUENT TO REPORT

All reports disclosing misconduct shall be recorded upon receipt and tracked from investigation to resolution. The ARMC shall be informed of all instances reported. The Investigation Committee shall decide whether the claim bears merit and can be substantiated. Upon conclusion of the investigation, the Investigation Committee shall present the rationale on their decisions to either close the matter or suggest further investigations. All relevant parties shall then consider appropriate disciplinary actions to be taken where necessary and a detailed summary shall be kept on records. The Discloser shall be kept informed of the outcome. Further information on the handling of reports is stated in the Investigations Policy.

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The Company recognises that for good corporate governance practices, a transparent and honest approach to reporting is required. No individuals shall be penalised as a result of their reporting save from malicious reporting as below.

7.0 CONSEQUENCES OF WRONGFUL DISCLOSURE

Malicious or false allegations by an employee shall be viewed as a serious matter and may result in disciplinary action.

8.0 ASSURANCES AND PROTECTION AGAINST RETALIATION

The company provides assurance that the Discloser will not suffer any form of retribution, victimization or detriment, for reports that are provided in good faith (i.e. was not done with malicious intent without substantiation in order to damage another person or organisation). Such protection is accorded even if the investigation later revealed that the Discloser is mistaken regarding the facts, rules and procedures involved.

Anyone who retaliates against a Discloser will be subjected to disciplinary action, which may include termination of employment, demotion, or other legal redress.

9.0 REVIEW OF POLICY

The Board of Directors or the ARMC may modify this Policy from time to time. Any changes shall be approved by the BOD. Any reports already lodged by a disclosure which have not reached completion of the process shall remain under the policy in place at the time of the disclosure.