IOIPG Malaysia REIT
Management

IOIPG REIT MANAGEMENT SDN BHD
Company Registration No. 202501026083 (1627496-A)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

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IOIPG REIT MANAGEMENT SDN BHD (202501026083 (1627496-A))
WHISTLEBLOWING POLICY

1. POLICY STATEMENT

IOIPG REIT Management Sdn Bhd ("Manager"), in its capacity as the Manager of IOIPG Malaysia Real Estate Investment Trust ("IOIPG REIT"), is the responsible entity of IOIPG REIT.

The Manager is committed to achieving and maintaining the highest standards of work ethics in the conduct of its business in line with the Manager's Code of Business Conduct & Ethics, the Anti-Bribery and Anti-Corruption Policy, and good corporate governance practices.

With the introduction of the Whistleblower Protection Act 2010 (the "Act"), the Manager has established a whistleblowing channel which encourages its employees, customers, suppliers, and other stakeholders to raise genuine concerns about possible improprieties in matters of financial reporting, compliance, suspected violations of the Manager's Code of Business Conduct & Ethics and/or Anti-Bribery and Anti-Corruption Policy, and to disclose any improper conduct or other malpractices within the Manager (i.e. whistleblowing) in an appropriate way.

2. OBJECTIVE

The objective of this Whistleblowing Policy ("Policy") is to provide a formal, confidential channel ("Whistleblowing Channel") to enable the Board of Directors ("Board"), employees ("Employees") of the Manager and all agents, vendors, service providers, contractors, suppliers, consultants, and customers of the Manager, as well as members of the public, to report in good faith concerns of any Improper Conduct (as defined in Section 6 below) within the Manager without fear of retaliation.

3. SCOPE

This Policy covers all reports made against the Employees involved in any Improper Conduct.

A report of Improper Conduct may be made by:

a) any Employee who has knowledge of an Improper Conduct committed by another Employee; and
b) any external party that has knowledge of an Improper Conduct committed by the Employees.

4. WHO IS A WHISTLEBLOWER

A whistleblower is a person who could be an employee, agent, vendor, contractor, supplier, consultant, or customer of the Manager, or any member of the public, who makes a report of Improper Conduct that has occurred within the Manager.

In line with the Act, the Whistleblowing Channel serves as a confidential and trusted reporting channel and the Manager encourages all the Employees and any other stakeholders to make disclosures of any alleged Improper Conduct in good faith. Only genuine concerns of any suspected and/or real misconduct should be reported via the Whistleblowing Channel. The report should be made in good faith with a reasonable belief that the information relating to the same is substantially true, and not for personal gain.

5. PROTECTION TO WHISTLEBLOWER

a) Anonymity

This Policy allows the whistleblower to either identify himself/herself, or if the whistleblower wishes, to remain anonymous when reporting suspected Improper Conduct.

b) Confidentiality

The whistleblower shall be accorded protection of anonymity or confidentiality of identity, and disclosure will only be made on a "need to know" basis or as required by law, court, and/or relevant regulatory authorities. Where resolution cannot proceed without revealing the whistleblower's identity (e.g. evidence required in court), a dialogue will be carried out with the whistleblower to decide how to proceed. All reports or disclosures shall be kept confidential.

c) Immunity

In line with the Act, a whistleblower shall not be subject to civil or criminal liability, and the Manager provides the following assurance:

i. Protection against reprisals or retaliation, and immunity from disciplinary action by the whistleblower's immediate superior or any other person in authority, which includes protection from harassment, mistreatment, retaliation, adverse employment or career consequences, or discrimination.
ii. No disciplinary action shall be taken provided the report:
    - is made in good faith with a reasonable belief of truth;
    - is not made with malicious intent or ill will;
    - is not frivolous or vexatious; and
    - is not made for personal gain or agenda.

6. IMPROPER CONDUCT

Improper conduct, unethical behaviour, malpractice, illegal act, or criminal offence ("Improper Conduct") includes, but is not limited to:

i. Any unlawful or illegal activity;
ii. Breach of the Manager's policies and procedures;
iii. Gross mismanagement or dereliction of duties;
iv. Fraud, theft, embezzlement, or misappropriation of the Manager's funds or assets;
v. Bribery, corruption, or blackmail;
vi. Criminal breach of trust or abuse of power and/or position;
vii. Improprieties and irregularities in accounting and financial reporting;
viii. Conflict of interest within the meaning of the Manager's Conflict of Interest Policy;
ix. Misuse of the Manager's tangible or intangible properties;
x. Danger to health and/or safety of any employee or individual;
xi. Damage to the environment;
xii. Sexual harassment; and
xiii. Acting as an accomplice to, or deliberately concealing, any or a combination of the above matters or other acts of wrongdoing.

7. REPORTING AND REVIEWING PROCEDURES

The Audit Committee ("AC") shall be responsible for the oversight and interpretation of this Policy, as well as monitoring implementation to ensure its effectiveness and integrity. The Board shall maintain overall oversight of whistleblowing matters and receive updates from the AC.

7.1 Reporting Channel

If the whistleblower suspects or knows that any Improper Conduct has occurred, is occurring, or is likely to occur, the whistleblower is encouraged to make a disclosure through any of the following reporting channels:

a) Whistleblowing Channel: email to AC Chairman

b) Letter:

IOIPG REIT
Level 3A, IOI City Tower 2
Lebuh IRC, IOI Resort City
62502 Putrajaya, Malaysia
(Attention: AC Chairman)

Although verbal communication is acceptable, reports are encouraged to be made in writing, so as to ensure clear understanding and accuracy of the issues raised, prevent loss or distortion of facts and details through recollection solely based on memory, and to facilitate the investigation process.

7.2 Contents of Disclosure

If the whistleblower is unsure of the type of evidence needed, the whistleblower is advised to make the disclosure in writing and to provide sufficient details which include the following:

a) Identity of the whistleblower
- Name
- Designation
- Department/Segment/Business Unit and company name
- Name of employer/company
- Contact details – office/mobile/home telephone number
- Current correspondence address
- Email address

b) Details of the allegation/Improper Conduct
- Nature/type of improper conduct (e.g. theft, conflict of interest, etc.)
- Where (place) and when (date and time) the alleged Improper Conduct took place
- Detailed account of the allegation/Improper Conduct and how it is perpetrated/committed
- Chronology of events (if possible)
- Particulars of persons/parties involved
- Particulars of witnesses (if any)

c) Other relevant information; and

d) Supporting documentary evidence, if available.

Alternatively, the whistleblower is encouraged to make use of the Whistleblower Report Form. The Form will aid the whistleblower in providing adequate information to the Audit Committee to assess the allegation and conduct an investigation.

7.3 Procedure for Handling Report

The Manager will maintain a record of the reports and will track their receipt, investigation, and resolution. The AC will seriously consider each disclosure and pursue it to the extent that the information received allows and based on the evidence that is available.

Any report or complaint pertaining to bribery, corruption, or violation of the Anti-Bribery and Anti-Corruption Policy shall be received, investigated, and resolved by the Internal Audit function (“IA”) in accordance with its terms of reference.

a) Preliminary Assessment

Upon receipt of the report, firstly the respective Heads of Department are required to coordinate with the designated internal audit manager or personnel appointed by the AC to conduct a preliminary assessment of every report of Improper Conduct received in order to determine whether there is merit in initiating an investigation.

An investigation will only be conducted by the IA if the information in the allegation is sufficiently specific and clear, has merit, and can be substantiated. This may require a preliminary interview with the whistleblower (if applicable) or any other witnesses to obtain additional information.

The IA will hand over the report after obtaining the concurrence of the AC to the relevant committee/department/person-in-charge depending on the type of report:

- Customer complaints – to Quality Management or Service Quality
- A breach or violation of the Anti-Bribery and Anti-Corruption Policy – to Head of Legal and Compliance
- A breach of the Employee's terms of employment or issues relating to human resources – to People and Culture Department
- Suspected fraud or misappropriation – to the IA
- Key management personnel or Directors – to the AC or, where applicable, to the Board

The Manager reserves the right to disregard any baseless allegations or false accusations. Malicious and false allegations will be viewed seriously and treated as gross misconduct and, if proven, may lead to disciplinary action including dismissal, termination, reprimand, penalties, sanctions, and/or legal actions.

b) Investigation

i. If an investigation is to be conducted, the relevant committee/department/person-in-charge shall conduct the investigation.
ii. Employees shall give their full cooperation during the investigation process.

c) Findings of Investigation

i. Upon the conclusion of an investigation carried out by the committee/department/person-in-charge, the investigation findings, including recommended corrective actions (where necessary), will be forwarded to the Head of Legal and Compliance, if the IA deems appropriate. The Head of Legal and Compliance will present a summary report to the AC on a quarterly basis, or earlier where warranted, taking into consideration the nature, significance, and urgency of the investigation findings and the corresponding corrective measures, if any.
ii. The summary of the whistleblowing activities for the quarter, including status and outcome (if any), will also be tabled to the Board.

8. REWARD

A discretionary cash reward will be given to the whistleblower who has provided genuine, credible, valid, and complete information made in good faith and without malicious intent or personal agenda. The information must be original and derived from the independent knowledge or analysis of the whistleblower and not known from any other sources.

The amount of the cash reward shall be decided by the Board at its absolute discretion on a case-by-case basis, taking into consideration various factors including but not limited to:

- The significance of the whistleblower's information to the success in proving the guilt of the wrongdoer;
- The degree of assistance provided by the whistleblower; and
- The interest of the information to IOIPG REIT and/or the Manager.

9. POLICY MAINTENANCE

This Policy, together with all supplementary policies and procedures, shall be treated as a living document and will be reviewed at least annually, or earlier where necessary, to ensure that it continues to achieve its intended objectives and remains aligned with applicable regulatory requirements, governance standards, and best practices.