



PUTRAJAYA HOLDINGS

Putrajaya Holdings Sdn. Bhd.

Non-Retaliation Policy

This policy reflects Putrajaya Holdings Sdn. Bhd.'s overarching commitment to upholding the highest standards of integrity, ethical behaviour, transparency and accountability by ensuring that employees, directors, the contingent workforce of KLCC Group of Companies and third parties with business dealings with Putrajaya Holdings Sdn. Bhd. can raise concerns without any fear of retaliation.

Protection against Retaliation

Putrajaya Holdings Sdn. Bhd. strictly prohibits and will not tolerate any form of retaliation against any person who, in good faith and without malicious intent, has made a report or disclosure of violations or potential violations through the relevant reporting channels. Reports are considered made in good faith when the individual has reasonable grounds to believe that the information disclosed indicates a violation or potential violation, even if the concern is later proven to be unfounded.

The types of retaliation prohibited by this policy include blatant acts such as dismissal, demotion, suspension, harassment or public attack, as well as more subtle acts of discrimination against a reporting individual or individuals investigating any misconduct or those cooperating in an investigation.

Retaliation constitutes serious misconduct that may be subject to disciplinary action, including dismissal.

For the avoidance of any doubt Putrajaya Holdings Sdn. Bhd. reserves all rights to inform competent authorities of any violation of the law.

Datuk Sr Mohd. Salem Kailany
Chief Executive Officer
Putrajaya Holdings Sdn. Bhd.

Subject to applicable laws, the protection is not applicable in the following circumstances, among others:

- The individual wilfully participated in the improper conduct that was the subject of disclosure or in any other misconduct uncovered during the course of the investigation.
- The individual participated in the misconduct that is in violation of applicable laws and regulations.
- The disclosure is made with malicious intent.
- The individual knowingly discloses a false statement.
- The disclosure is frivolous or vexatious.
- The disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

Disciplinary or legal actions may still apply in such cases.

Any individual who is being subject to retaliation contrary to this policy may submit a report through the designated reporting channels.

Governance and Implementation

All employees, directors and third parties working for or on behalf of Putrajaya Holdings Sdn. Bhd. shall adhere to this policy and ensure compliance with all applicable laws and regulations in their business dealings with Putrajaya Holdings Sdn. Bhd. Joint venture companies in which Putrajaya Holdings Sdn. Bhd. is not a controlling stakeholder and associate companies of Putrajaya Holdings Sdn. Bhd. are encouraged to adopt this policy or similar principles and standards.

Any violation of applicable laws may result in administrative action, civil or criminal prosecution of Putrajaya Holdings Sdn. Bhd. and its employees, impact business continuity, have contractual implications, and cause significant reputational damage.