



AEON CO. (M) BHD. (126926-H)

**WHISTLEBLOWING
POLICY AND MANUAL**

1. Overview

AEON CO. (M) BHD (AEON) is committed to the highest standard of integrity, openness and accountability in the conduct of its business and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, AEON provides avenue for all employees of AEON and members of the public to disclose any improper conduct within AEON.

2. Definition

The word whistleblowing in the context of this Whistleblowing Policy and Manual refers to a situation where internal parties such as employees of AEON, or external parties including members of public raise concerns at the earliest opportunity and in an appropriate way, of any attempted, suspected or actual wrongful activities or malpractices within AEON.

The person who initiates or raises concerns of wrongful activities or any malpractices is referred to as a “whistleblower”.

3. Objective

This Policy and Manual is intended to outline the mechanism that has been put in place to enable employees of AEON and members of the public to raise concerns on any wrongful activities or malpractices, receive feedback on the actions taken and assurance that they will be protected from possible reprisals or victimization.

4. Scope

This Policy and Manual is designed to facilitate whistleblowers to disclose any improper conduct (misconduct or criminal offence) through a designated channel. Such improper conduct includes the following: -

- i. Failure to comply with legal or regulatory obligations;
- ii. Corruption, bribery or fraud;
- iii. Money laundering;
- iv. Insider trading;

- v. Abuse of power;
- vi. Conflict of interest;
- vii. Theft or embezzlement; and
- viii. Misuse of AEON's funds or property.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under AEON's Code of Conduct and Business Ethics (CoBE) or any criminal offence under any relevant legislations in force.

All whistleblowing reports have to be made in good faith with reasonable belief that the information is true and not frivolously/maliciously and not for personal gain; otherwise, the necessary corrective action may be initiated against the whistleblower.

5. Protection & Confidentiality

The identity of the whistleblower and the information reported will be kept in a secure information management system. AEON shall treat the report confidentially so as to protect the identity of the whistleblower and of others involved or referenced in the whistleblowing report on a "need-to-know" basis to facilitate the investigation.

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows will also be protected against any retaliation, adverse and detrimental actions to the extent reasonably practicable, for disclosing any attempted, suspected or actual improper conduct committed within AEON, or by persons acting for AEON, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Protection may still be given by AEON at its discretion to a whistleblower who has participated in the improper conduct, wrongdoings, corruption or fraud.

AEON views any harassments or retaliations in any form or manner by any person against a genuine whistleblower seriously and will treat such acts as major misconduct which if proven may lead to serious disciplinary action including the possibility of dismissal.

Suppliers / Vendors / Tenants / Contractors of AEON and members of the public who become a whistleblower will also be protected by AEON as to his/ her/ its identity in the same manner as provided in this Policy.

The information reported, identity, and personal information of the whistleblower, and persons involved or referenced in the report, including the alleged wrongdoer, may be revealed to persons who are involved in the investigation to assist with their investigation. Such information will also be revealed if required under any other processes or proceedings (i.e. if the evidence is required in court) on a “need to know basis”. However, the identity of the whistleblower will not be disclosed without his/ her/ its prior consent.

6. Procedures

The Whistleblowing Procedures outline AEON’s commitment to have a channel in which AEON employees, suppliers, vendors, contractors and members of the public are able to report instances of unethical, unlawful or undesirable conduct of business within AEON.

The report, or any enquiries relating to attempted, suspected or actual improper conduct or weaknesses in AEON’s processes and procedures can be made in writing (mail), electronic mail (e-mail) or orally (phone) to: -

Name	Mr. Lee Choon Lam
E-mail	whistleblow@aeonretail.com.my
Mail	AEON CO. (M) BHD 3 rd Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia Attention : Mr. Lee Choon Lam Mark : Strictly Private & Confidential

If there is a need to contact someone other than Mr. Lee Choon Lam, the report may be addressed to the Chairman of the Audit and Risk Management Committee (“ARMC”) and/or Deputy Managing Director/Chief Governance Officer of AEON: -

Name	Mr. Abdul Rahim bin Abdul Hamid, Chairman of the ARMC
E-mail	ARMCCChair@aeonretail.com.my
Mail	AEON CO. (M) BHD 3 rd Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia Attention : Mr. Abdul Rahim bin Abdul Hamid Mark : Strictly Private & Confidential

Name	Mr. Tsugutoshi Seko, Deputy Managing Director/ Chief Governanance Officer of AEON
E-mail	seko.tsugutoshi@aeonretail.com.my
Mail	AEON CO. (M) BHD. 3 rd Floor, AEON Taman Maluri Shopping Centre, Jalan Jejaka, Taman Maluri, Cheras 55100 Kuala Lumpur, Malaysia Attention : Mr. Tsugutoshi Seko Mark : Strictly Private & Confidential

The whistleblower should try to provide specific information regarding the type of activity or conduct with as much detail as possible. The whistleblower should also disclose the identity of the person(s) suspected as being involved, how the misconduct happened, when it occurred, and who was affected.

The whistleblower should not be discouraged from making a report due to insufficient evidence to support their report.

Although anonymous reporting will be considered by AEON, a whistleblower is encouraged to disclose his/her identity so that AEON is able to protect him/her pursuant to this Policy.

7. Reporting

All reports received will be analysed by the ARMC to decide on the next appropriate course of action.

In consequence of the investigation, the outcome will be tabled in summary at the ARMC meetings held quarterly. The Chairman of the ARMC shall then report to the Board of Directors (“Board”) on reports and findings that require the Board’s attention and approval.

8. Whistleblower Protection Act 2010

While we encourage you to use our whistleblowing channel, you have an alternative avenue to make a report to an enforcement agency under the Whistleblower Protection Act 2010 (“WPA”). Further information on the WPA can be obtained from the Malaysian Anti-Corruption Commission (“MACC”) website: <https://www.sprm.gov.my/index.php/en/prevention/prevention-strategy/197-perundangan-anti-rasuah/1061-whistleblower-protection-act-2010-act-711>

This Policy was approved and reviewed by the Board of Directors of AEON on the following dates:

Version	Date
1	28 th February 2018
2	20 th May 2020

This policy shall be accessible at www.aeongroupmalaysia.com

————— The End —————