



SKYWORLD DEVELOPMENT BERHAD

WHISTLEBLOWING POLICY

21 November 2025

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1.0 POLICY STATEMENT

SkyWorld Development Group (“SkyWorld”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. Recognizing the above, SkyWorld has in place an avenue for all employees of SkyWorld and members of public on disclosure of any improper conduct within SkyWorld as we want to embed a culture across the Group where wrongdoing is not tolerated.

2.0 OBJECTIVE OF THE POLICY

- a. Provide employees and stakeholders with a transparent and proper internal reporting channels and guidance to disclose any improper conduct or wrongdoing within SkyWorld.
- b. Promote alignment with the Whistleblower Protection Act 2010, and this policy should be read together with SkyWorld’s Code of Business Conduct.
- c. This policy is not applicable to personal grievances concerning an individual’s terms and conditions of employment, or other aspects of working relationship, and disciplinary matters. Such matters should be dealt under the existing Talents policies and procedures.

3.0 SCOPE OF THE POLICY

Improper Conduct includes, but not limited to:

- a. Fraud, theft, embezzlement or misappropriation of company funds or assets;
- b. Bribery, corruption or money laundering;
- c. Conflict of interest;
- d. Unauthorized disclosure or use of confidential information of Company;
- e. Misuse of SkyWorld properties, assets or resources;
- f. Harassment (mental, physical and sexual)
- g. Workplace bullying, cyberbullying and gross misbehaviors (verbal or physical).
- h. Criminal breach of trust, abuse of power and position or blackmail;
- i. Breach of SkyWorld’s Code of Business Conducts or other SkyWorld policy;
- j. Non-compliance with laws, regulations, requirements of statutory bodies or public policies.
- k. Any other conduct which may cause loss to SkyWorld, or otherwise detrimental to the interests of shareholders, customers and the public

4.0 PROTECTION AND EXCLUSION OF WHISTLEBLOWER

4.1 Confidentiality of Identity

4.1.1 All reports or disclosure or such other details shall be kept confidential.

4.1.2 Assurance against reprisal or retaliation, and immunity from disciplinary action, provided:

- a. Only genuine concerns are reported, and the report is made in good faith and the whistle-blower does not provide false or misleading information knowingly, negligently or recklessly in the report.
- b. The disclosure is not made with malicious intent or ill will.
- c. The disclosure is not frivolous or vexatious; and
- d. The report is not made for personal gain or agenda.

5.0 DISCLOSURE PROCEDURE AND CHANNEL

5.1.1 SkyWorld allows donation and contribution to external parties. Disclosure must be provided in writing, via email or letter, and include the following information:

- a. Details of the person(s) involved;
- b. Brief summary of the allegation;
- c. Date(s) or place(s) of the allegation;
- d. Other relevant information if any.

6.0 WHISTLEBLOWING CHANNEL AND ESCALATION PROCEDURE

Report to Chairman of Audit Committee

(Email: whistleblower@skyworld.my)



Set up Investigation Team to further investigate



Submit investigation report with recommendation (within 2 weeks from received date)



Action mandated carried out accordingly



Case closed

====THE END====