

CODE OF BUSINESS ETHICS (CoBE) OF THE ATTANA HOSPITALITY GROUP SDN BHD ('AHG')

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ATTANA
HOTELS & RESORTS

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TABLE OF CONTENTS

OUR FOUNDATIONS & HOW WE PUT OUR CORE VALUES INTO PRACTICE	i
DEFINITIONS	ii
1.0 Our CoBE, Its Principles and Coverage	1
1.1 Background	1
1.2 Who Does It Apply To?	2
1.3 Responsibility and Compliance to the CoBE	2
1.4 What Happens If You Fail to Comply with CoBE?	3
2.0 Our Foundations on How We Do Our Business as a Team	4
2.1 Integrity, Diligence, Care & Professionalism	4
2.2 Organisation, Management and Key Responsibilities	4
2.3 Equal Opportunities	4
2.4 Discrimination and Harassment	5
2.5 Safe and Sound Working Environment	5
2.6 Communication and Social Media Policies	6
2.7 Proper Use of IT Systems	6
2.8 Usage of Company Facilities/Properties	7
2.9 Intellectual Property	7
2.10 Dealing with Confidential Information	7
2.11 Personal Data Protection	8
2.12 Strict Prohibition of Substance Abuse	8
3.0 Our Customers Count on Us To Do the Right Thing	9
3.1 Our Stand Against Corruption	9
3.1.1 Anti-Bribery Guide & Law	9
3.1.2 Making Facilitation Payment	9
3.1.3 Corruption Risk Assessment Process	10
3.1.4 Prohibition on Commissions, Discounts and Secret Profits	11
3.1.5 Accounting for Secret Profit or Gains	11
3.2 No Gift Policy of AHG Group	11
3.3 Hospitality and Entertainment	12
3.4 Political Contributions	12
3.5 Managing Guests' Assets and Information	12
4.0 Our Conduct in Dealing with Stakeholders	14
4.1 Due Diligence on Third Parties	14
4.2 Assets Management And Sales & Marketing	14
4.3 Protection of AHG Group's Assets	15
- Fraud, Financial and Documentary Integrity	15
- Intellectual Property and Proprietary Information	15
4.4 Internal Controls and Reporting	16
- Financial and Non-Financial Controls	16
4.5 Avoidance of Conflict of Interest	16
- Business Relationship	16
4.6 Corporate Social Responsibility, Donation and Sponsorships	17
4.7 Anti-Money Laundering and Anti-Terrorism Financing	17
5.0 Our Conduct in Dealings with Public Officials and Regulators	18
5.1 Compliance Culture	18
5.2 Dealings with Public Officials	18
5.3 Dealings with Regulators	18
6.0 Where Can You Go for More Information?	19

OUR VALUE

CREATIVE

We continuously improve our standards in meeting internal and external requirements

RESPECT

We treat all people with dignity and value the collective power of teamwork

ATTENTIVE

We take an active interest to ensure the success of our business

FRIENDLY

We build lasting relationships

TRUSTWORTHY

We are transparent with the highest moral standard of corporate and individual ethics, in all that we do

DEFINITIONS AND INTERPRETATIONS

Term	
AMLA	: Anti-Money Laundering and Anti-Terrorism Financing
AHG	: Attana Hospitality Group Sdn Bhd, a wholly-owned subsidiary company of PNB
Attana	: Attana Hotels & Resorts Sdn Bhd
AHG Group	: AHG and/or the following entities, whichever is applicable: <ul style="list-style-type: none">i Attana Assets Sdn Bhd;ii Attana Hotels & Resorts Sdn Bhd;iii Bold Hotel & Residences Kuala Lumpur Sdn Bhd;iv Bold Hotel Kota Bharu Sdn Bhd;v Attana Golf Sdn Bhd;vi Villea Rompin Bhd;vii Villea Port Dickson Sdn Bhd;viii Villea Morib Sdn Bhd;ix Espira Seri Petaling Sdn Bhd;x Espira Kinrara Sdn Bhd; andxi Any other company and/or entity managed by Attana or sanctioned by the BOD.
ABC Policy Statement	: AHG Group Anti-Bribery and Anti-Corruption Policy Statement
BOD	: Boards of Directors of AHG Group
CoBE	: Code of Business Ethics of AHG Group
Committee Members	: Members of all committees established by AHG Group
Confidential Information	: Confidential information can be any information in any form whatsoever not generally known, and proprietary to the AHG Group including but not limited to privileged information concerning AHG Group's customers, fellow employees and suppliers, Information in relation to the identity of security holdings and financial circumstances of customers, information relating to employees and directors personal holdings, information obtained from business, AHG Group's financial information, AHG Group's examination reports/ information produced by regulators where certain reports made by those regulatory agencies are the property of those agencies and are strictly confidential, AHG Group's proprietary information, where certain non-financial information developed by AHG Group (such as business plans, guest lists and records, methods of doing business, employee records, models, computer software, source codes, databases and related documentation) is valuable information that is proprietary and confidential, electronic and voice communication systems and Information of AHG Group's security systems.
CSR	: Corporate Social Responsibility
COO	: Chief Operating Officer
Customer	: A new or existing customer which also includes guests, client, vendor, and business partner
Disciplinary Action	: 'Disciplinary Action' as stated in the AHG Employee Handbook
Head of Properties	: The Officer-In-Charge of the hotels, Resorts and Golf Club of AHG Group
MACC	: Malaysian Anti-Corruption Commission
MACC Act	: Malaysian Anti-Corruption Commission Act 2009
MOTAC	: Ministry of Tourism, Arts and Culture, Malaysia
PDPA	: Personal Data Protection Act 2020
PIP & Due Diligence	: Procurement Integrity Pact of AHG Group and Due Diligence Process
PNB	: Permodalan Nasional Berhad

1.0 OUR COBE, ITS PRINCIPLE AND COVERAGE

1.1 BACKGROUND

In AHG Group, our shared core values bind us together as a strong and unified cohesive team, allowing us to work harmoniously, stronger and competitively.

AHG Group offers uniquely local experience for our guests. Each with its distinctive sparkle, thoughtfully evolved, and complemented by service designed and delivered with our guest in mind. Our guests are our guiding light. A powerful source of energy and inspiration as we continue to polish our craft in our journey to create stays as unique and special as they are.

VISION

To be recognised as a premier Malaysian Hospitality Group that delivers unique crafted experience that exceeds guests' expectation, which ultimately helps the Group generates reasonable shareholders' wealth

MISSION

To deliver the best hospitality experience to our guests by managing profitable and operationally efficient hospitality assets as well as maintaining consistent high-level service standards

HISTORY RE-EXAMINED

AHG is a premier Malaysian Hospitality Company that owns and manages a portfolio of hotels and resorts, and golf clubs worth more than RM800 million. Taking forward the legacy of Permodalan Nasional Berhad's rich hospitality offerings, we continue to place our guests at the core of our every step whilst generating wealth for our shareholder. Being entrusted by PNB, it is important to safeguard the reputation of our holding company, PNB. We take our responsibility highly and are serious and fully committed to conduct our business with high level of ethical standards.

OUR CoBE

This CoBE is overarching to the various guidelines of the AHG Group's policies and procedures, and other rules and regulations applicable to AHG Group. It promotes a culture of compliance, professionalism, ethical standards and responsible conduct among its BOD, Committee Members, management, employees and stakeholder, as well as its business counterparties in relation to any conducts that may have an adverse impact to the hospitality industry. It provides references to the underlying AHG Group's policies, which offers specifics, up-to-date ethical and legal guidance to assist AHG Group in making business decisions professionally, prudently and legitimately.

It covers, among others, the following topics:

- Our foundations on how we do our business as a team;
- How our stakeholders count on us to do the right thing;
- Conflict of interest and no gift policy
- Our dealings with business counterparties, customers and communities;
- Protection of AHG Group's assets;
- Financial and documentary integrity, internal controls and reporting;
- Protection of Confidential Information;
- CSR; and
- Our dealings with public officials and regulators.

1.0 OUR COBE, ITS PRINCIPLE AND COVERAGE

The purpose of this CoBE is to:-

- Ensure compliance to the rules and regulations of AHG Group as well as all the internal policies and procedures;
- Uphold the reputation of AHG Group and maintain public confidence; and
- Uphold the highest standard of personal integrity and professionalism of AHG Group

This CoBE may not be exhaustive or include all policies of AHG Group. It is meant to provide a general guidance for resolving a specific legal, business and ethical issues within AHG Group and its counterparties.

1.2 WHO DOES IT APPLY TO?

This CoBE is applicable to BOD, Committee Members, senior management and employees of AHG Group, stakeholders of AHG Group, as well as its business counterparties.

BUSINESS COUNTERPARTIES, AGENTS, ADVISERS & BUSINESS REPRESENTATIVES OF AHG GROUP

All persons and entities acting for and on behalf of AHG Group are required to comply with this CoBE. These include but are not limited to, business counterparties, vendors, suppliers, consultants, agents, advisers, contractors and subcontractors with respect to the work performed for, or services provided to AHG Group. We will only deal with business counterparties, agents and business representatives who comply with applicable laws and regulations and have been approved in accordance with the AHG Group's due diligence processes.

1.3 RESPONSIBILITY AND COMPLIANCE TO THIS CoBE

Employees of AHG Group together with business counterparties, agents and business representatives are expected to perform and work with honesty and integrity at all times and must comply with this CoBE.

We will not tolerate any improper conduct or a violation of this CoBE or any applicable laws. All incidents, whether these relate to yourself, direct reports or others must be reported to the appropriate officer/department in AHG Group.

All parties are expected to comply with other applicable policies and procedures issued by AHG Group from time to time.

1.0 OUR COBE, ITS PRINCIPLE AND COVERAGE

How do you report a violation of CoBE?

Should you have any, you may raise your concern with any of the following:

- Your Supervisor; or
- Head of Human Resources; or
- Business Process and Compliance Department at ahr.bpc@attanahotels.com

We will not tolerate any form of intimidation and victimisation against any individual who reports in good faith of a suspected violation of the CoBE.

We strictly prohibit acts of retaliation that targets a person because he or she has provided information in good faith or assisted an investigation into a possible violation of law.

Protection from retaliation is provided under the Whistleblowing Policy of AHG Group.

In the case of any dispute over the applicability of this CoBE, the decision of the Whistleblowing Committee of AHG, shall be final.

1.4 WHAT HAPPENS IF YOU FAIL TO COMPLY WITH THIS CoBE?

The BOD, Committee Members, senior management and employees are required to comply with the provision of this CoBE and the applicable laws. You may be subjected to Disciplinary Action or legal liability for noncompliance.

AHG Group and its employees together with all persons and entities acting for and/or on behalf of AHG Group are individually responsible and accountable for adhering to company's policies, standards and procedures. Additionally, all employees of AHG Group are accountable for providing the resources necessary to maintain a defined and expected performance levels in discharging their duties for AHG Group.

As counterparties, you are also required to understand and comply with the relevant aspects of this CoBE. Violation of the CoBE may result in the removal from the panel list or blacklisting by AHG Group. Business counterparties are encouraged to adopt similar principles and standard behavior

2.0 OUR FOUNDATION ON HOW WE DO OUR BUSINESS AS A TEAM

2.1 INTEGRITY, DILIGENCE, CARE AND PROFESSIONALISM

It is the responsibility of the respective Boards of Directors to ensure that AHG Group comply with all the relevant laws and regulations applicable to them. They must also ensure that only a competent person carries the function, transactions and dealings, and must ensure him/her conduct the business with integrity, due care, skill and diligence. As the owner and manager for hotels, resorts & golf clubs owned by AHG, AHG Group always acts in the best interest of its stakeholders and not in any way jeopardise or prejudice the stakeholders' interest. AHG Group is expected to organise and control its affairs responsibly and effectively, with adequate risk management and supervisory system and maintain adequate resources, in conducting its business in a manner that promotes a fair and orderly business.

Employees of AHG Group shall demonstrate high standards of professionalism, exercise due care, skill, competent and diligence when dealing with customers, and provide prompt, efficient and continuous service to customers, including treating them with respect. You shall keep up to date with knowledge and comply with the applicable laws, rules and regulations in your respective functions.

2.2 ORGANISATION, MANAGEMENT AND KEY RESPONSIBILITIES

Safeguarding of stakeholders' assets should be our number one responsibility. To commensurate with its hospitality business as well as other ancillary business, we have put in place an adequate and effective internal controls framework, to prevent and detect abusive or inappropriate business practices. Among the written policies and framework, being established at PNB and AHG Group level include, but are not limited to the following:

- Enterprise Risk Framework, PNB
- Internal Assurance Framework, PNB
- Integrity Charter & Framework, PNB
- Compliance Charter & Framework, PNB
- Anti- Bribery & Corruption Policy Statement
- Whistle Blowing Policy
- Conflict of Interest Policy
- No Gift Policy
- Information Technology Policy
- AMLA Policy
- PIP & Due Diligence Process

2.3 EQUAL OPPORTUNITIES

We respect and treat each employee fairly and equally and will not tolerate any form of abuse or harassment towards our employees or anyone at any of our premise. We are committed to a working environment that promotes equal employment opportunities and prohibits discriminatory practices, including any form of discrimination under the applicable laws.

If, at any time you feel that you have been treated less favourably without reasonable justification, you may raise the matter with your supervisor or to the Human Resource Department.

2.0 OUR FOUNDATION ON HOW WE DO OUR BUSINESS AS A TEAM

2.4 DISCRIMINATION AND HARASSMENT

We value the individual differences, experiences and capabilities of each employee. Our collective strength enhanced by the diverse backgrounds and perspective of our teams – makes AHG Group a better place to work and a better business partner. AHG Group does not tolerate any forms of harassment, threats and violence whether verbal, physical or visual. We are encouraged to speak up if the conduct of other employee makes us feel uncomfortable, and to report any form of harassment, threat and violence when it occurs. Our employees also have the right to be treated with dignity and respect at all times. They should be able to do their jobs without being verbally, physically or visually abused.

If you are subjected to discrimination by any employee of AHG Group, or visitor of AHG Group in terms of physical or verbal abuse or harassment, inside and outside of the premise of AHG Group, or during work, you should inform your supervisor or the Human Resources Department immediately. An employee of AHG Group who has been found to have acted discriminatorily or committed acts of harassment will be subject to Disciplinary Action.

What would you do?

What if your manager is the one discriminating against you? Who do you turn to?

All employees have the right to a positive work environment, free of harassment and discrimination. If you feel your manager is discriminating against you, seek help from the **Human Resources Department**.

2.5 SAFE AND SOUND WORKING ENVIRONMENT

We are committed to provide a high-quality working environment, in accordance with the best practice on health, safety and environment standards, which protects employees' health and welfare in all office locations. We maintain an in-house policy on safety and health, whereby every staff is responsible to commit and comply. This policy would also apply in external environment for example during property or sales visits, roadshows, exhibitions and company events. Any unsafe environment must be reported to the Human Resource Department, AHR.

A strong security culture shall be embedded within the processes and the behavior of individuals. We promote mutual respect and non-discrimination when it comes to dealing with customers. This applies regardless of gender or marital status, nationality, ethnic or national origins, political views, disability or medical condition, religion, sexual orientation or age. We do not tolerate any form of discrimination or harassment towards our employees. Courtesy and respect are the important aspects of a sound working environment and business relationships. Employees must always act in a respectful and professional manner and treat colleagues and business relations (including customers) with fairness, respect and dignity. Employees are encouraged to promote an atmosphere of openness and good communication.

2.0 OUR FOUNDATION ON HOW WE DO OUR BUSINESS AS A TEAM

2.6 COMMUNICATION AND SOCIAL MEDIA POLICY

PUBLIC STATEMENT

No employee is permitted to make any public statement to any organization or individual, including the media or press on AHG Group's policy, decision, staffing, system, legal matters, events, or business unless with written permission by AHG Group or any person authorized by AHG Group.

The communication with media and press shall ordinarily be handled by the Communications Department, AHR or such other departments as may be determined by AHG Group. The employee is required to liaise with the Head of Communications Department AHR or any other relevant departments prior to any release of news, statements, information, publication, data, advertisements and interviews that may reasonably be associated with AHG Group. Disciplinary Action may be taken against the employee who makes any public statement without prior permission of AHG Group.

SOCIAL MEDIA

An employee who identifies himself/herself to be associated with AHG Group on the online/social media is responsible with regards to the contents, commentaries or postings shared, uploaded, published or transmitted via any internet-based applications or virtual platforms that are capable of delivering messages and allowing interactions among people in mass forum or closed groups.

An employee who is authorized as the Admin/ Editor/Moderator for the official online/social media to interact with other users on behalf of AHG Group in such capacity shall ensure that all contents, information and response are accurate and consistent with relevant policies or standards. Where appropriate, the Admin/Editor/Moderator must consult the respective Head of Property/Department in respect of the subject matter before releasing any corporate information into the public domain and shall not at all times express his/her personal opinion on official online/social media.

The grant of access and use on personal account or as customer/visitor on other online/social media does not give the employees right to share, upload, publish or transmit Confidential Information, personal data, sensitive or negative issues, infringement of copyright, business trademarks or intellectual properties, defamatory, pornographic or offending materials as the case may be.

All employees shall exercise due care and limit the activities of online/social media during office hours which must not interfere with his/her duties and responsibilities and must comply with AHG Group's social media policies.

2.7 PROPER USE OF IT SYSTEMS

Access to the network and IT systems of AHG Group are for legitimate business purposes only and must be used responsibly. The use of network and IT systems of AHG Group may be monitored for the purposes of information security, operational management, maintenance, business needs and to ensure that all usage comply with all relevant laws and regulations.

Consistent with this CoBE is other IT policies and procedures of AHG Group that are in effect from time to time. This includes Information Security Policy of AHG Group, which sets out more detailed and comprehensive guidelines for the preservation of information security and the use of the systems, and other relevant social media policies.

2.0 OUR FOUNDATION ON HOW WE DO OUR BUSINESS AS A TEAM

2.8 USAGE OF COMPANY FACILITIES/ PROPERTIES

All employees shall use the facilities/properties provided by AHG Group for official purposes only and shall not abuse the usage and its privileges.

If an employee is found to have abused or misused the facilities/properties for purposes not related to AHG Group's business, he/she may be subjected to Disciplinary Action.

An employee is responsible for the safekeeping, upkeep and proper use of all assets, facilities, resources and records belonging to AHG Group that are provided to him/her for the performance of his/her duties.

An employee must further take all necessary steps to prevent theft, loss, damage to, or misuse of assets, facilities, resources and records belonging to AHG Group, the occurrence of which should be reported immediately to the relevant division/department. Assets, facilities, resources and records belonging to AHG Group may not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes, except with the appropriate specific authorisation of AHG Group.

Subject to applicable laws, an employee may be liable for any loss of or damage to assets, facilities, resources and records arising from willful misconduct or negligence or careless action or as a result of action taken without the approval of AHG Group.

All employees must also comply with all policies and procedures established from time-to-time concerning the preparation, maintenance and disposal of AHG Group's books and records. Additionally, all other assets of AHG Group must be revealed and recorded at the time of transactions and at the time of disposals.

2.9 INTELLECTUAL PROPERTY

All employees must comply with all laws, regulations and contractual obligations regarding the valid intellectual property rights of any party, including patents, copyrights, trade secrets and other proprietary information.

2.10 DEALING WITH CONFIDENTIAL INFORMATION

Every employee must take precaution to protect the Confidential Information. It is the responsibility of every employee as well as the BOD/Committee Members to safeguard all Confidential Information and to protect the interest of AHG Group. You are not to disclose it to anyone outside AHG Group or to anyone inside AHG Group who does not have a need to know such information. This obligation survives your employment with AHG Group. Where such information if released, could have a significant effect of their operations, their business reputations or the market price of their securities and disclosing such information could expose both you and AHG Group to liability for damages. You must be aware of the consequences or implications for divulging or exposing Confidential Information to external parties.

You are advised to take the following steps:

- i. Keep all Confidential Information secure and safe;
- ii. Avoid leaving Confidential Information in an open environment;
- iii. Avoid discussing Confidential Information publicly; and
- iv. Inform the respective supervisor of any leakage of information

No employee shall use Confidential Information for personal advantage/benefit or monetary gain.

2.0 OUR FOUNDATION ON HOW WE DO OUR BUSINESS AS A TEAM

2.11 PERSONAL DATA PROTECTION

We respect the privacy and confidentiality of personal data of the directors, management, employees, business counterparties and customers. Personal data should be kept private and protected, unless access is granted for specific purposes. If you have access to such data, you are required to comply with the applicable laws, such as PDPA, and also AHG Group's policies. Appropriate measures must be taken if you are dealing with personal data in terms of collection, processing, disclosure, integrity, access, security, storage and retention.

We value the confidentiality of our employees' information. Only those with appropriate authorization may access employment records, and they may do so only for legitimate legal or business purposes. You have certain rights to access your own records.

AHG Group as the data user and the employee as a data subject shall adhere to the principles outlined by the PDPA, the regulations and orders made when processing personal data.

In dealing with customers' information, we have established and implemented written policies and procedures to maintain confidentiality of customers' records and information which include policy relating to access by a service provider or a subcontractor (as the case may be) and measures relating to access by employees managing proprietary accounts.

Any customer's information must not be disclosed to a third party or an unauthorised person, unless prior consent has been obtained from the customer or where there is a legal or regulatory requirement to disclose such information.

An employee also has a duty to continue protecting the confidentiality of customers' information even after cessation of his/her employment. Confidential Information concerning a customer may be given or made available to third parties only with prior written consent of the customer or when disclosure is authorised under any laws and regulations of respective countries to be made to the authority investigating into an offence specified in such law, regulations and other permitted disclosures.

Data Integrity Principle

Subject to the conditions set by Attana Group, employees shall be held liable for the abuse or misuse of the personal information/data accessible from Attana Group's facilities such as email, internet, web or system.

2.12 STRICT PROHIBITION ON SUBSTANCE ABUSE

Our employees together with business counterparties, agents and business representatives are prohibited from being at work or on the premises of AHG Group while being impaired by drugs or alcohol or with illegal drugs present in their bodily systems. We provide a safe and productive working environment by ensuring that the workplace is free from any form of substance abuse.

The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances are strictly prohibited and will not be tolerated. Legal action or termination is imminent for any non-compliance.

3.0 OUR CUSTOMERS COUNT ON US TO DO THE RIGHT THING

3.1 OUR STAND AGAINST CORRUPTION

3.1.1 ANTI-BRIBERY GUIDE AND LAW

We are fully committed to the prevention of bribery and corruption and expressly prohibit our employees together with all persons and entities acting for and/or our behalf to be involved in bribery or corruption or any other improper conduct in business dealings irrespective of their nature and where they are performed.

As part of our continuous effort in preventing corruption, we have strengthened our internal control measures with more emphasis and focus given to our high-risk business activities which are susceptible to corruption and fraud. These initiatives are expected to institute a healthy business culture, which will contribute to the overall economic growth.

Any improper payment or receipt, including any offer or agreement to make or accept any form of facilitation payment, or “greasing”, or “enabling payment”, is strictly unacceptable.

Both AHG Group and our employees are subjected to anti-bribery legislation of Malaysia namely MACC Act, and any bribery law in the jurisdiction where AHG Group has business dealings.

Under the MACC Act, it is an offence to give, promise and/or offer a bribe, inducement or improper payment to anyone with the intention of obtaining a business advantage.

The penalties set out in the MACC Act, apply to both companies and individuals. Companies convicted under the MACC Act face penalties as stated under its Section 17A namely, a fine of not less than RM1 million or imprisonment of not exceeding 20 years or both.

Individuals if convicted will face penalties as stated under Section 24 of the MACC Act namely, a fine of not less than RM10,000 and imprisonment of not exceeding 20 years. Any future enhancement/revision made to this act shall be adopted accordingly.

3.1.2 MAKING FACILITATION PAYMENT

Facilitation payment is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Any offering or request to offer, has the same consequences as paying or receiving facilitation payments. Facilitation payment need not involve cash or other financial assets, it can be any sort of advantage with the intention to influence them in their duty. If an employee received or reportedly received a request or offered facilitation payments, he/she must immediately channel these reports accordingly to the Whistleblowing Committee of AHG Group in writing using the secured channels, such as email or post, containing a brief summary of the allegation.

3.0 OUR CUSTOMERS COUNT ON US TO DO THE RIGHT THING

AHG Group Whistleblowing Policy

As part of the efforts in safeguarding ourselves against any practice of corruption, bribery and misuse of power, the Whistleblowing Policy of AHG Group is established in the year 2021. This policy is intended to facilitate disclosures relating to corruption/bribery, wrongdoings, malpractices, misdemeanor, illicit dealings, offensive behaviors, indiscipline, any violation of established policies and procedures, or any action that is harmful to the reputation and interest of AHG Group.

It covers all complaints of improper conduct concerning BOD, management and employees of AHG Group and any other person providing services to AHG Group, including consultants, vendors, trainers, independent contractors, suppliers, agents, external agencies and/or any other party with a business relationship with AHG Group.

A whistleblower shall make a disclosure of Improper Conduct using any of the following whistleblowing channels, not limited to:

1. For cases involving BOD Members, Senior Management and Employees of AHG Group ranking Manager and above:-
 - a. **Telephone Line** : +603 – 2050 5294
 - b. **Email** : ClgO@pnb.com.my
 - c. **Mail Address** : Ketua Pegawai Integriti, Bahagian Pematuhan & Integriti, Permodalan Nasional Berhad Tingkat 26, Menara PNB, 201-A, Jalan Tun Razak, 50400 Kuala Lumpur.
 - d. **PNB Website** : https://www.pnb.com.my/07_2Whistleblowing_EN.php

2. For Cases involving Employees of AHG Group ranking Assistant Manager and below and any other person providing services to AHG Group, including consultants, vendors, trainers, independent contractors, suppliers, agents, external agencies:-
 - a. **Telephone Line** : +603 – 7490 3970
 - b. **Email** : integrity@attanahotels.com
 - c. **Mail Address** : Whistleblowing Committee, Attana Hotels & Resorts Sdn Bhd, Lot 4.1, Level 4, PNB Perdana Commercial Centre, 10 Jalan Binjai, 50450 Kuala Lumpur.
 - d. **Attana Website** : <https://attanahotels.com/whistleblowing/>

3.1.3 CORRUPTION RISK ASSESSMENT PROCESS

Corruption risk management is a management process that helps to identify structural weaknesses that may facilitate corruption or bribery, provides a framework for all employee to take part in identifying risk factors and treatments, and embeds corruption prevention within a well-established governance framework.

3.0 OUR CUSTOMERS COUNT ON US TO DO THE RIGHT THING

3.1.4 PROHIBITION ON COMMISSIONS, DISCOUNTS AND SECRET PROFITS

All employees must not, directly or indirectly, receive or obtain, in respect of any goods or services sold or purchased or other business transacted (whether or not by themselves) by or on behalf of AHG Group, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by AHG Group's policies or procedures.

3.1.5 ACCOUNTING FOR SECRET PROFITS OR GAINS

An employee who directly or indirectly, obtains any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind and whether as a bribe or otherwise), by virtue of his/her position or authority with or on behalf of AHG Group, is required to immediately disclose such receipt and he/she will be liable to render an account of the same and surrender any benefit and/or payment received to AHG Group.

3.2 NO GIFT POLICY OF AHG GROUP

At all times, acceptance of gifts in the form of cash is strictly prohibited. All employees are expected to be courteous when declining gifts and whenever appropriate, to explain the application of the "No Gift Policy" of AHG Group and to thank the givers' goodwill. Employees of AHG Group are not permitted to, either directly or indirectly, present, solicit and/or accept any form of gift to/from contractors, customers, consultants, bankers, agents, brokers, suppliers, vendors, or organisations.

As a guide, the following **TOKENS ARE NOT** considered as gifts under the No Gift Policy of AHG Group:

- Annual calendars or diaries;
- Souvenirs of reasonable values and quantity, such as caps, umbrellas, mugs, key chains, stationeries;
- Group business luncheons or dinners;
- Corporate event gifts of reasonable value and quantity;
- Seasonal festive gives with nominal value;
- Promotional products or services or samples of negligible value to promote its business;
- Mementos from business seminars, trade fairs, conventions or courses;
- Items with no material value/perishable items; and
- Tips of nominal value as good gesture by guest

As a guide, the following are **OCCASIONS** where an employee of AHG Group is permitted to accept the above- mentioned tokens:

- Festival seasons
- Public functions;
- Official functions or gatherings;
- Seminars, trade fairs, conventions and courses/speaking engagements;
- Stage performance or fund-raising/charity activities;
- Awareness campaign, anniversary celebration, product launching/promotion drive;
- Reception during official visits or tours;
- CSR initiatives; and
- Tips of nominal value as good gesture by guest

3.0 OUR CUSTOMERS COUNT ON US TO DO THE RIGHT THING

The lists above are non-exhaustive and are subject to review, addition and deletion from time to time.

In addition, regardless of the exception above, except for tips from guests, all gifts received must be declared by the employees via the Gifts Register which shall be verified by the Head of Properties.

3.3 HOSPITALITY AND ENTERTAINMENT

Entertainment, training, travel and promotional expenses must never be provided or accepted in order to gain competitive advantage as this could be perceived as a bribe.

The offer or receipt of hospitality, entertainment and the provisions of training, travel and promotional expenses must always be:

- Of a reasonable value, quantity and frequency;
- Of a nature that is relevant to the business and circumstances relating to AHG Group;
- Directly related to AHG Group's business interest;
- Permissible under the law; and
- Respectful to this CoBE.

If in doubt as to what is acceptable, you must consult your supervisor or the COO prior to accepting or offering any form of hospitality and entertainment. All hospitality and entertainment received by employees of AHG Group must be properly recorded in the Gifts Register maintained at their respective properties and also verified by the Head of Properties.

3.4 POLITICAL CONTRIBUTIONS

We do not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office. Employees of AHG Group must not make any donation intended to procure political influence.

3.5 MANAGING GUESTS' ASSETS AND INFORMATION

Guests' personal and financial information is safeguarded at all times and not misused, except where disclosure has been authorised in writing by the guests or where such disclosure is required to be made to any relevant authority pursuant to any relevant laws or legal process. In relation to this, we have put in place the relevant systems, policies and procedures. Employees of AHG Group must not make improper use of guests' personal and financial information to gain an advantage for themselves or any other person or to cause detriment to guests.

We ensure only the servicing consultant, or an authorised officer has the access to customers' personal or financial information. They shall not disclose customers' personal and financial information to a third party unless prior written consent is given by the customers or when required by the authorities, pursuant to any court order or any written law, acquire or use any information in relation to customers or potential customers without proper authorization and disseminate or exchange any customer's personal or financial information with another distributor, consultant or a third party or request or procure any customer's personal or financial information from a third party, including another distributor or consultant.

3.0 OUR CUSTOMERS COUNT ON US TO DO THE RIGHT THING

To build a long-lasting relationship and remain relevant in the industry, we maintain and uphold our values, and stay true by treating our customers the way we want to be treated. Honesty, trust and integrity are key elements that play an important role in our daily dealings with customers, business counterparties (agents), and communities. We empower our customers to make informed decisions about the product and services we offer and in selecting the ones that best meet their needs and circumstances.

We strive to provide excellence and are committed to delivering quality service in all our business relationships and dealings.

In doing business professionally, with transparency, and utmost integrity, all appointed agents, suppliers and vendors must upon appointment sign the integrity agreement with AHG Group.

4.0 OUR CONDUCT IN DEALING WITH STAKEHOLDERS

The Establishment of PIP

At AHG Group, we are continuously striving to ensure all procurement processes are conducted with integrity, transparency, and good governance. The establishment of PIP & Due Diligence also yields other benefits such as greater transparency and accountability in contracting which shall indirectly reduce and eradicate corrupt practices, and enhancement of public confidence and trust.

The BOD, Committee Members, senior management and employees of AHG Group who are involved in the procurement activities are responsible and accountable to ensure that such execution of the declaration as specified in the PIP is undertaken as required. AHG Group suppliers and professional service providers are also required to execute the declarations under the PIP within the stipulated stages.

4.1 DUE DILIGENCE ON THIRD PARTIES

All parties providing services to or on behalf of AHG Group must ensure that their personnel assigned to AHG Group are aware that they have to comply with this CoBE in addition to AHG Group specific policies. Prior to appointment, the background due diligence screening will be conducted in order to ensure that we only do business with counterparties that have in place a proper code of conduct/ethics that binds them.

To promote healthy business practices, suppliers, vendors and all AHG Group counterparties must provide assurance and satisfactory confirmation on their background checks of their employees (including their affiliates' employees and their sub-contractors), prior to their assignment to AHG Group to ensure protection of our credibility and image while performing services, or when grant access to any AHG Group's information, technology systems, data, assets and branding. Background check will be done in accordance with, and to the extent permitted by, all applicable laws. We perform additional checks, as it deems appropriate. Any unauthorised use of information through grant access or gain from engagement could result in a violation of this CoBE.

4.2 ASSETS MANAGEMENT AND SALES & MARKETING

Rightful Information and Fair Treatment to All Business Associates and the General Public

Employees of AHG Group who act as the front liners' Sales Managers/Staff have the responsibility to communicate rightful information to customers at all times in order to instill public confidence and to protect the reputation of AHG Group. Information given must be accurate, timely and adequate information concerning the products must be given to assist customers in making an informed investment decision, including information contained in the prospectus disclosure document and product highlights sheet. Additionally, they must be competent and show fair treatment of customers, suppliers/contractors, vendors and the public

Feedbacks and Complaints Handling

We are open to customers' feedbacks and complaints and value their opinion as an input to our professional conduct. Listening to customers' voice helps us to create stronger bond and understanding. Customers' feedbacks also help us to improve our products and services and to do better.

All employees are responsible to attend to all feedbacks and complaints by providing an acknowledgement to the customer and clearly setting out next steps, and, where possible, to resolve at the first point of contact. All feedbacks and complaints are channeled and centralised at the respective division/department responsible for customer service operations.

4.0 OUR CONDUCT IN DEALING WITH STAKEHOLDERS

4.3 PROTECTION OF AHG GROUP'S ASSETS

FRAUD, FINANCIAL AND DOCUMENTARY INTEGRITY

We do not tolerate fraud and have established internal control measures to prevent, detect, report and investigate suspected frauds. Fraud usually involves some form of deceit, theft, trickery, or making false statements, with the objective of obtaining money or other form of benefits. This can have major consequences to us, and the individuals involved.

The following actions can be indications that a fraud has taken place:

- Forgery or alteration of documents;
- Misappropriation of assets of AHG Group, guests, suppliers or contractors;
- Unauthorised handling or reporting of business transactions of AHG Group;
- Falsification of company record or financial statements of AHG Group; and
- Failure to disclose information when there is a legal duty to do so.

The list above is non-exhaustive and subject to review, addition, and deletion from time to time.

We maintain proper records to meet our financial, legal and regulatory operational objectives and requirements in order to accurately record all transactions and dispositions of assets. All financial books, records and accounts are sufficiently detailed to:

- Permit the proper classification of transactions for financial reporting;
- Provide reasonable assurances that the transactions are recorded as necessary to permit the preparation of financial statements in conformance with generally accepted accounting principles;
- Maintain accountability for the use of all assets; and
- Record all transactions in the accounting period in which they occurred.

INTELLECTUAL PROPERTY AND PROPRIETARY INFORMATION

The observance for confidentiality demands high ethical standards in corporate dealings and reinforces public confidence.

You together with your business counterparties, agents and business representatives must keep confidential and never use proprietary information of AHG Group or proprietary information of other parties for personal gain or for the benefit of persons outside of AHG Group. The release (either deliberate or not) of any proprietary information to authorised third parties without appropriate controls and/or protection could cause significant harm to the business of AHG Group.

Proprietary information includes but not limited to financial information, employee information, strategic and operation plans, corporate organisation plans, audit material or reports, information regarding litigations or potential litigations, proposed transactions, copyrights, database rights, drawings and layouts, trademarks in documents, logos, designs and/or undertaken by AHG Group.

If your work requires you to discuss proprietary information of AHG Group with external parties, such discussion must certain extent only occur with the protection of a written confidentiality or non-disclosure agreement.

No one acting for and on behalf of AHG Group will solicit the proprietary information of another entity or will make use of proprietary information of another entity in conducting business for AHG Group.

4.0 OUR CONDUCT IN DEALING WITH STAKEHOLDERS

4.4 INTERNAL CONTROLS AND REPORTING

FINANCIAL AND NON-FINANCIAL CONTROLS

We adopt a clear separation of duties for all job functions either it is financially or non-financially. All jobs in most circumstances will have a three (3) or minimum two (2) layers of checking and verification. For reporting purposes, financial and investments related functions shall have the maker, checker, verifier, and approver. Additionally, we have the Business Process and Compliance Department of AHR and Internal Assurance Department of PNB that verify and check the compliance to regulations, ISO quality standards and the level of integrity in their reporting.

We adopted a three (3)-line of defence model for the management of all risk classes. The model distinguishes among functions that own and manage risk (first line of defence), functions that oversee risk and controls (second line of defence) and functions that provide independent assurance of the effectiveness of the control measures put in place to the senior management and BOD of PNB (third line of defence).

Any further corruption risk is mitigated by having multiple verification that expand from the head of properties and the committee members.

4.5 AVOIDANCE CONFLICT OF INTEREST

Business Relationship

You and your business counterparties, agents and business representatives must avoid conflict of interest situations arising between your private activities and personal interests, and your responsibilities owed to AHG Group

They must not accept directly or indirectly any personal gain, services or loans from a competitor, customer, supplier or contractor of AHG Group. A conflict may arise if they or any of their close associates receive benefits, other than the contractual benefits, as a result of their position with AHG Group. Any suspected conflict of interest must be declared in accordance with the relevant policies and procedures of AHG Group.

The potential situations that may be associated with conflict of interest in terms of personal benefit, personal interest and personal relationships are as follows:

- Outside appointment/business activities;
- Advisory board, board of directors or equivalent fiduciary roles;
- Unpaid professional activities for organisation that has relationship with AHG Group;
- Close relatives who work for organisations that have relationship or compete with AHG Group;
- Previous employment;
- Significant financial interest or holding a position that has significant financial advantages connected to AHG Group or organisation related to AHG Group;
- Relationships with clubs, society and nongovernmental organisations and communities' activities;
- Corporate directorship; and
- Relationship with government officials.

In addition, employees and directors whom due to their appointment and position, have in possession of any private Confidential Information, must be constantly mindful of the need and the importance of respecting confidentiality and must adhere to the principles of confidentiality and non-disclosure inherent in the AHG Group.

4.0 OUR CONDUCT IN DEALING WITH STAKEHOLDERS

4.6 CORPORATE SOCIAL RESPONSIBILITY, DONATION AND SPONSORSHIPS

Any CSR, donation and sponsorship conducted must not be used as a conduit to circumvent, avoid or evade the laws. This shall not be used as a medium to facilitate fraud, illegal and money laundering activities. All CSR and donations must be carefully evaluated for legitimacy and not be made to improperly influence business outcome. The recipient of the donation must be of legitimate organization and due diligence must be applied to ensure the benefits reach the intended recipient whilst the programmes meet the intended objectives. No CSR, donation and sponsorship shall be made in accordance with the approval limits, to a beneficiary who is controlled or influenced by any political officials or are politically linked. Any donation to be contributed must be approved by the respective Head of Properties or the COO based on the Limit of Authority in CSR Policy of AHG Group.

As a guide, for a charitable payment to be considered acceptable, it should always be:

- Of a reasonable value, quantity and frequency;
- Of a nature that is relevant to the business and circumstances relating to AHG Group;
- Directly related to AHG Group's business interest;
- Permissible under the law and;
- Respectful to this CoBE

4.7 ANTI-MONEY LAUNDERING AND ANTI-TERRORISM FINANCING

The AMLA Policy of the AHG Group provides the guidelines in conducting business with all other relevant parties. Under this policy, we will only conduct business with parties that are engaged in legitimate business activities, with funds derived from legitimate sources.

We perform due diligence on all new clients to ensure the integrity and ethical aspects of their business and also undertake the following actions:

- Perform the Business-based Risk Assessment on the clients and determine their risk appetite level.
- Perform the Relationship-based Risk Assessment to determine the risk parameter for customers profiling.
- Formulate, implement and apply the business and customer risk management and mitigation control.

5.0 OUR CONDUCT IN DEALINGS WITH PUBLIC OFFICIALS AND REGULATORS

5.1 COMPLIANCE CULTURE

Being a subsidiary of a regulated licensed institution, we are obligated to comply with the laws and regulations under which we operate. It is fundamental to whom we are and any violations, or engagement in unfair, deceptive and abusive act/practices may weaken customers' confidence and put our reputation at risk. In addition, we are subject to the requirements of the MOTAC and the requirements of the regulatory bodies such as the Companies Commission Malaysia and MACC.

5.2 DEALINGS WITH PUBLIC OFFICIALS

We have always maintained transparent and fair relationships with government agencies and public officials. Public officials mean individuals having public official functions or acting in a public official capacity. Any business relationship with AHG Group involving interest of a public official who otherwise has a direct relationship with AHG Group, and which interest are not prohibited by AHG Group's Code of Conduct, requires disclosure. In addition, management's specific approval for establishing business relationships with such customers must be obtained at the appropriate committee level.

All employees of AHG Group are prohibited from paying for non-business travel, entertainment and hospitality for any public official or his/her family members at any amount without the permission from the COO. If approval is obtained, employee must ensure the gifts are allowed as per the gift, hospitality and entertainment policy of AHG Group and not excessive and lavish and must be commensurate with the official designation of the public official and not his personal capacity.

5.3 DEALINGS WITH REGULATORS

We strive to build transparent relationship with the regulators and deal in an open, co-operative and timely manner. Certain departments within AHG Group may be subjected to formal or informal queries, and examination by regulators, authorities and government agencies. In this event, employees need to understand proper procedures in engaging with regulators, and to comply with certain necessary approvals.

6.0 WHERE CAN YOU GO FOR MORE INFORMATION?

All employees must confirm receipt of the copy of this CoBE and are required to read and understand this CoBE. Where applicable, the CoBE is to be read appropriately in accordance with the relevant legislations. All employees of AHG Group are required to observe all legislations which may have a more comprehensive coverage on the subject matters contained in this CoBE. External parties, business associates and other stakeholders are encouraged to also read and understand this CoBE.

This CoBE most certainly cannot address each and every situation and therefore, there will be circumstances where there are no clear answers in the choices that needs to be made. We are however, obligated at all times to exercise good judgement and utmost integrity and honesty in all our decisions. Should you require clarification, please contact the Human Resource or Business Process and Compliance Department. For employees of AHG Group, you may refer to your Employees Handbook, which is available at your Human Resources Department for further reference. This CoBE shall be updated from time to time.

Interested parties may direct their queries to the Business Process and Compliance Department at the following channels:



Tel No : +603-7490 3970

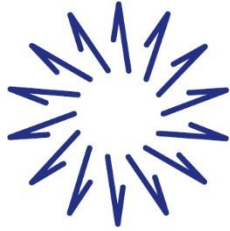


Email : ahr.bpc@attanahotels.com



Address : Business Process & Compliance, Attana Hotels & Resorts Sdn Bhd,
Lot 4.1, Level 4, PNB Perdana Commercial Centre,
10, Jalan Binjai, 50450 Kuala Lumpur

Any complaints pertaining to whistleblowing can be lodged through: www.attanahotels.com



ATTANA
HOTELS & RESORTS

CODE OF BUSINESS ETHICS RECEIPT AND ACKNOWLEDGEMENT

I, _____,
ID/Staff No. _____, hereby confirm receipt
a copy of the AHG Group of Business Ethics ("CoBE"), which I
acknowledge I am required to read and comply.

Signature : _____

Date : _____