

IMPORTANT NOTES FROM WHISTLEBLOWING POLICY OF THE AHG GROUP

1. Introduction

1. Whistleblowing can be defined as deliberate, voluntary disclosure or reporting of an individual or organisation malpractice, wrongdoings or suspected improper conduct within the organisation by any person.
2. AHG observes high standards of business and personal ethics in carrying out its duties and responsibilities. AHG upholds honesty and integrity in fulfilling its roles and to comply with all laws and regulations.
3. In line with the Whistleblower Protection Act 2010, and good corporate governance practices, AHG encourages all concerned parties to highlight any concerns of Improper Conduct without fear of detrimental action, victimisation or discriminatory treatment.

2. Scope of Policy

1. The Whistleblowing Policy of the AHG Group (the Policy) is intended to facilitate disclosures relating to corruption/bribery, wrongdoings, malpractices, misdemeanor, illicit dealings, offensive behaviour, indiscipline, any violation of established policies and procedures or any action harmful to the reputation and interest of AHG Group in its commitment to promote greater level of transparency and accountability.
2. This Policy covers all complaints of Improper Conduct concerning 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.

3 Reporting Procedures

A Whistleblower may make a disclosure of improper conduct to the Whistleblowing Committee of AHG in writing, using secured channels such as online form, e-mail or regular mail, containing brief summary of the improper conduct.

4 Definitions and Interpretations

Term	Definition
Improper Conduct	: means any conduct which may constitute as a disciplinary or criminal offence.
AHG Group	: means Attana Hospitality Group Sdn Bhd and/or the following entities, whichever is applicable: (a) Attana Assets Sdn Bhd; (b) Attana Hotels & Resort Sdn Bhd; (c) Perdana Kuala Lumpur City Centre Sdn Bhd; (d) Perdana Kota Bharu Sdn Bhd; (e) Villea Port Dickson Sdn Bhd; (f) Villea Morib Sdn Bhd; (g) Villea Rompin Bhd; (h) Espira Kinrara Sdn Bhd; (i) Attana Golf Sdn Bhd; and (j) Any other hotels, resorts and golf clubs managed by AHR;
Whistleblower	: means any concerned party who makes a disclosure of Improper Conduct.

5 Confidentiality

1. The Whistleblower, the recipient of the report made under this Policy or any person who is involved in the investigation process shall not disclose information relating to disclosure or any part thereof, proceedings or outcome of, except where:
 - i) disclosure is made to those who are authorised under this Policy and have a legitimate need to know; or
 - ii) disclosure is made to any third party on a strictly confidential basis for the purposes of obtaining professional advice; or
 - iii) disclosure is required by law or any statutory authority.