

GRAND CENTRAL ENTERPRISES BERHAD

Registration No. 198401019138 (131696-V)

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

Policy Statement

Grand Central Enterprises Berhad ("GCE") Group is committed to carrying out its businesses and operations in accordance to the highest standards of professionalism, honesty, integrity and ethical responsibilities in its conduct.

Objective of the Policy

It is the policy of GCE Group to encourage employees to report genuine concerns in relation to breach of a legal obligation, miscarriage of justice, danger to health and safety or to the environment and the cover-up of any of these in the workplace, without the risk of reprisal, separation, demotion, suspension or loss of benefits because of the report.

Scope of the Policy

This Policy governs the disclosures, reporting and investigation of misconduct within the Group as well as the protection offered to the persons making those disclosures from detrimental action.

The scope of the policy applies to ALL employees of GCE and its subsidiaries, Board members, external parties, and other stakeholders, where relevant.

Misconduct include:

- Accounting or audit irregularities, fraud
- Bribery or criminal conduct
- Conflicts of interest
- Falsification of company records
- Abuse of power
- Sexual harassment or discrimination
- Theft of cash, goods, services or time
- Non compliance with procedure

Protection to Whistleblower

It is the Group's policy to provide the whistleblower protection in term of confidentiality of information, and safeguard the whistleblower from any act of interference that may be detrimental to the whistleblower. The Group assures that all reports will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out.

Report Observed Violations of Standards or Laws

The Company has established and maintained enterprise-wide procedures for reporting ethical violations in confidence. It is the responsibilities of all associates to report any suspected or actual violation of the law or this Policy. Any suspicious of an action or inaction is illegal or in violation of ethical standards or Company policy, consider the following options:-

- Discuss the concerns with immediate manager
- If the disclosure concerns the aforesaid manager, the employee should raise the concern with the director of the hotel owning company.
- Any disclosure concerning the director should be raised directly to the Chairman of the Audit Committee. Email: **wongtc98@gmail.com**

Policy Compliance

The Company takes its obligations to comply with the laws and this Policy seriously. Violations of this Policy and any Company policy may lead to disciplinary action, up to and including termination.

Compliance Monitoring

A review is performed annually on directors, officers, and a broad range of management associates about whether they are aware of any violations of this Policy and confirm that management associates have read and understood this Policy. GCE reserves the right to amend this policy from time to time.

Contact Details

GCE Head Office
Level 10 Hotel Grand Continental Kuala Lumpur
Jalan Belia / Raja Laut
50350 Kuala Lumpur
Email address: **corporate.relations@ghihotels.com.my**