



Sutera Harbour Group Whistleblowing Policy

At Sutera Harbour Group, our reputation as a world-class destination is built upon a foundation of absolute trust, professionalism, and mutual respect. We maintain a strict zero-tolerance policy towards any form of fraudulent, illegal, unethical, or improper behaviour.

Our Whistleblowing Policy provides a secure, confidential, and transparent channel for employees, partners, and stakeholders to voice legitimate concerns. Every report is taken seriously, investigated thoroughly, and met with decisive disciplinary action where necessary.

Scope of Wrongdoing: What to Report

To help maintain our high standards of hospitality and corporate governance, we encourage the reporting of actual or suspected misconduct. For clarity, reportable activities are categorised into the following pillars:

- **Financial & Corporate Malpractice:** Fraud, theft, embezzlement, bribery, kickbacks, improper billing, misuse of company property/records, or intentional errors in financial reporting and internal accounting controls.
- **Workplace Culture & Harassment:** Sexual harassment, bullying, abusive practices, a hostile work environment, or discrimination based on gender, race, or any other status.
- **Safety & Operational Standards:** Unsafe working conditions, endangering the health and safety of any individual, breaches of public health protocols, or actions compromising our quality of service.
- **Legal & Regulatory Breaches:** Criminal offences, miscarriages of justice, non-compliance with legal duties, and violations of internal policies and procedures.
- **Supply Chain & Vendor Integrity:** Violations of the Company's Vendor Ethical Business Practice, Vendor Code of Conduct, procurement integrity requirements, or ethical sourcing standards.
- **Concealment:** Any deliberate attempt to hide or cover up any of the abovementioned infractions.

How to Raise a Concern

If you suspect an employee, vendor, or partner of Sutera Harbour Group is involved in improper activities, please lodge a formal report through our dedicated, confidential channels.

Confidentiality Assurance: All reports are treated with the strictest confidence.

To ensure your report reaches the correct authority immediately, please use the precise contact details below.

By Post / Mail

Sutera Harbour Resort
1 Sutera Harbour Boulevard
Sutera Harbour,
88100 Kota Kinabalu,
Sabah, Malaysia

Attention: Whistle Blowing Committee (Private and Confidential)

By Secure Email

whistleblowing@suteraharbour.com.my