

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 and assessed promptly. Matters falling within the scope of this Policy will be investigated appropriately, and corrective or disciplinary action will be taken where warranted.

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.
- **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.

What This Channel Is Not For

This whistleblowing channel is not intended for general guest feedback, service complaints, reservation or billing enquiries, dissatisfaction with products or facilities, or requests for service recovery. Such matters should be directed to the relevant hotel/resort Guest Relations or operational team.

However, guests and customers may use this channel where they have information concerning fraud, theft, bribery, harassment, discrimination, abuse, serious safety or security breaches, deliberate misconduct, concealment or other wrongdoing described above.

SUTERA HARBOUR

(A Subsidiary of GSH Corporation Group)

How to Raise a Concern

If you have reasonable grounds to suspect that an employee, vendor, business partner or other person connected with Sutera Harbour Group is involved in wrongdoing falling within the scope above, please lodge a 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

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THE PACIFIC SUTERA HOTEL
Eastworth Source Sdn. Bhd. (Company No: 262801-T)

• THE MAGELLAN SUTERA RESORT
Advanced Prestige Sdn. Bhd. (Company No: 262386-A)

• SUTERA HARBOUR MARINA, GOLF & COUNTRY CLUB
Wholly owned and managed by Sutera Harbour Golf & Country Club Bhd. (Company No. 219040-P)

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

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