



Strongly committed to professionalism and integrity in our conduct of business, Sutera Harbour Resort has a zero-tolerance policy towards any form of fraudulent, illegal, unethical or improper activity.

Our whistle-blowing policy provides for the reporting of actual or suspected wrong-doings for investigation and disciplinary action.

Some examples of unethical practices include, but are not limited to:

- failure to comply with a legal duty;
- miscarriage of justice;
- criminal offence;
- endangering the health and safety of any person;
- improper conduct or unethical behaviour;
- intentional error or fraud in the preparation or review of any financial statement;
- significant deficiencies in or intentional non-compliance with the company's internal accounting controls;
- violations of policy & procedures
- unsafe working conditions
- fraud, theft and embezzlement
- discrimination physical and abusive practices
- safety/health violations
- bribery/kickbacks
- improper billing
- misuse of property or records
- discrimination of gender/race
- alcohol & substance abuse
- sexual harassment
- hostile work environment
- quality of service
- compliance and standards of conduct violations
- internal theft issues
- deliberate concealment of any of the above;
- any improprieties.

How to raise a concern or make a report

If you suspect any of Sutera Harbour Resort's employee or partner to be involved in fraudulent, illegal, unethical or improper activities, please lodge a report through any of the following whistle-blowing channels:

By Mail:

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

Attention: Whistle Blowing Committee – Private and Confidential

By Email :

Name	Designation	Email address
1. Mr. Gilbert Ee	Group CEO	gilbert.ee@gshcorporation.com
2. Mr. Kenneth Goi	Group COO	kenneth.goi@gshcorporation.com
3. Mr. Alex Ng	Group CFO	alex.ng@gshcorporation.com