



Whistleblowing Policy

POLICY STATEMENT

- Tradewinds Plantation Berhad (“TPB”) is committed in conducting its operation in a fair, transparent and responsible manner, in compliance with all laws and regulations and by adopting the highest standards of professionalism, honesty, integrity and ethics.
- Recognizing the above mentioned core values, TPB provides avenue for all TPB employees and business partners who are aware of a potential malpractice or misconduct to report such matters, in good faith, without fear of reprisal.

OBJECTIVE OF THE POLICY

- This policy is to provide a channel for all TPB employees and business partners to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and business partners who report such allegations.

SCOPE OF THE POLICY

- This policy is designed to facilitate employees and business partners to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:
 - a) Criminal offence or unlawful act such as fraud, blackmail;
 - b) Forgery or alteration of any document or account;
 - c) Forgery or alteration of a cheque, bank draft, or any other financial document;
 - d) Misappropriation of company’s funds, securities, supplies, or other assets;
 - e) Impropriety in the handling or reporting of money or financial transaction;
 - f) Profiteering as a result of insider knowledge;
 - g) Conduct which is an offence or a breach of law;
 - h) Financial malpractice;
 - i) Breach of the TPB Code of Business Ethics;
 - j) Abuse of power and position for personal gain;
 - k) Any act that poses danger to health and safety;
 - l) Any act that causes damage to environment; and
 - m) Concealment of any of the above.
- This policy is not to invalidate the TPB grievance procedures but to provide more avenues for employees to disclose improper conduct committed or about to be committed. The given procedures as reflected in the Human Resource and Administration Manual shall be operative based on the purpose and objective of their existence.

PROCEDURE IN MAKING DISCLOSURE

- All disclosures are to be channelled in accordance with the procedures as provided under this policy.

PROTECTION AND NOTIFICATION

- TPB undertakes to protect the personal information of the whistleblower under the provisions of the Personal Data Protection Act 2010. A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable.
- A Whistleblower would need to reveal his/her identity when making a report. Anonymous disclosure will not be entertained but TPB reserves the right to investigate such cases.
- Where the Whistleblower is an employee and the disclosure is made in good faith, the employee will be protected from harassment, discrimination or victimization.
- Upon the completion of the whistleblowing process and procedures, the Whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

Whistleblowing Procedures

REPORTING PROCEDURES

- If you are aware of an improper conduct committed or being committed by an employee of TPB you may make a disclosure using any one of the following channels:-

Submission:

- Download the E-Whistleblower Form from the TPB website.
- Supporting documents where available should be submitted with the Whistleblower Form
- All Document (form and attachment) can be submitted via:

Email: ceo@tpb.com.my

Correspondence Address:

Whistleblowing Team
c/o CEO's Office
Tradewinds Plantation Berhad
Lot 6875
Jalan Kerja Air Lama
68000 Ampang,
Selangor.

- The company through the Whistleblowing Team will deliver a response to any report submitted.

TPB reserves the right to amend this policy from time to time

Last Update: 22 JULY 2015