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## Whistleblowing Policy and Procedure

### 1.0 Whistleblowing Policy

- 1.1 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.
- 1.2 Recognizing the above-mentioned core values, TPB provides avenue for all TPB employees, stakeholders and business partners who are aware of a potential malpractice or misconduct to report such matters, in good faith, with-out fear of reprisal

### 2.0 Objective

This policy is to provide a channel for all TPB employees, stakeholders 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, stakeholders and business partners who report such allegations.

### 3.0 Scope

- 3.1 This policy is designed to facilitate employees, stakeholders 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 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 including all forms of active and passive bribery;
- k) Any act that poses danger to health and safety;
- l) Any act that cause damage to environment;
- m) Nepotism and
- n) Concealment of any of the above

3.2 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 Resources and Administration Manual shall be operative based on the purpose and objective of their existence.

#### **4.0 Procedure in Making Disclosure**

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

#### **5.0 Protection and Notification**

- 5.1 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.
- 5.2 A Whistleblower would need to reveal his/her identity when making a report. Nevertheless, the identity of Whistleblower bribery reporter will be kept as private and confidential. The system also allows anonymous reporting.
- 5.3 Where the Whistleblower is an employee and the disclosure are made in good faith, the employee will be protected from harassment, discrimination or victimization. Anyone who retaliates against a Whistleblower shall be subject to disciplinary action, where applicable, termination of the Board or employee status.
- 5.4 The Whistleblower shall receive a report, at least a preliminary one if more in-depth investigation is required, within five (5) working days of his submission regarding the investigation, disposition or resolution of the issue. He shall be informed of the development before the resolution of the issue.
- 5.5 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.
- 5.6 In the event that the resolution is not to the satisfaction of the Whistleblower, he has the right to report the event to the appropriate legal or investigative agency such as the external auditor or Malaysian Anti-Corruption Commission (MACC).

## 6.0 Procedure

### 6.1 TPB Whistleblowing Formal Complaint

6.1.1 A person can report the incident to Group Chief Executive Officer and Managing Director (GCEO & MD) and/or Head of Human Resources, Administration and Facility Management.

6.1.2 The report shall be lodge through Whistleblowing Form (FM-SYS-12) or phone, email and/or letter which shall be properly documented. Email reports can be sent to the GCEO & MD at [ceo@tpb.com.my](mailto:ceo@tpb.com.my) or Head of Human Resources, Administration and Facility Management at [hrhead@tpb.com.my](mailto:hrhead@tpb.com.my).

### 6.2 Complaint to Malaysian Anti-Corruption Commission (MACC)

6.2.1 A person can report the incident to MACC through Complaint Management System (CMS).

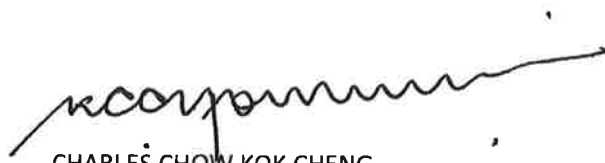
6.2.2 Details of the procedure can be referred to <https://www.sprm.gov.my/en/enforcement/complaints-management-system>

6.3 Nevertheless, it is recommended the person lodge the complaint through TPB Whistleblowing Formal Complaint before reporting to MACC.

6.4 GCEO & MD and/or Head of Human Resources, Administration and Facility Management has authority to assign the investigation team or independent party to investigate the complaint.

6.5 During the investigation, all related reports and materials will be promptly investigated, and appropriate corrective action(s) will be taken if warranted by the investigation.

6.6 The investigation and dealing with whistleblowing are managed as stated in the procedure of Employee Handbook, Chapter 4: Industrial Relations and Grievance Policy that has been established by Human Resources Department.



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1<sup>st</sup> June 2020

