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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 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.

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

All disclosures are to be channelled to Whistleblowing Council of Perspective Lane (M) Sdn Bhd, the holding company of TPB (“PLSB Whistleblowing Council”). PLSB Whistleblowing Council consists of two (2) members i.e. the Chief Executive Officer and Director of PLSB and the Secretariat. The members of PLSB Whistleblowing Council may invite other Director(s) of PLSB, Finance Head of PLSB or such other person(s) to attend meeting(s) as may be appropriate.

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

- 5.1 Whistleblowing Council 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 of reasonable practice.
- 5.2 A Whistleblower would need to reveal his/her identity when making a report. Nevertheless, the identity of the 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 is 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 after the report, 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 with 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 incident 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 PLSB Whistleblowing Council. The contact details are as following:

**Address : Level 4A, No.88 Jalan Perdana, Taman Tasik Perdana, 50480  
Kuala Lumpur**

**Telephone No : 03-20927207**

**Email address : whistleblowing@plsb.my**

- 6.1.2 The report shall be lodge through Whistleblowing Form (FM-SYS-12) or phone, email and/or letter. The phone report shall also be properly documented.

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

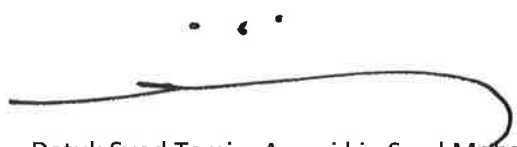
- 6.2.1 A person can report the incident to MACC through Complaint Management System (CMS).

- 6.2.2 The details of the procedure can be found in <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 PLSB Whistleblowing Council will assess the disclosure and make decision on the necessary actions to be taken before communicating the same to TPB Management. If an investigation is required, PLSB Whistleblowing Council shall instruct TPB Management to carry out the investigation and the outcome of the investigation to be reported to PLSB Whistleblowing Council. PLSB Whistleblowing Council may instruct TPB Management to appoint a third party to conduct the investigation, subject to the sensitivity of the disclosure, or in an attempt to avoid a conflict of interest and thereafter the third party shall report directly to PLSB Whistleblowing Council on the outcome of the investigation.

6.5 Depending on the outcome of investigation, TPB Management will follow the procedure of Employee Handbook, Chapter 4: Industrial Relations and Grievance Policy that has been established by Human Resources Department once informed by PLSB Whistleblowing Council.



Datuk Syed Tamim Ansari bin Syed Mohamed  
Executive Chairman  
1<sup>st</sup> September 2021