

GLENEALY PLANTATIONS SDN BHD

Whistleblower Policy

1. Policy Purpose

- 1.1 Glenealy Plantations Sdn Bhd (GPSB) Group of Companies and its subsidiaries (“the Group”) are committed to acting professionally, fairly and with highest integrity in all the Group’s business dealings and relationships wherever the Group operates in an honest, transparent and ethical manner. A reference to the Company shall mean any company within the Group as the context required. This policy is subject to amendment from time to time.
- 1.2 This policy is part of the Group’s corporate governance to support the mitigation of the risk of corruption, malpractices and other wrongdoings, and provide an internal mechanism for investigation, prevention and remedy for:-
- any actual or potential Improper Conduct(s) within the Group; and
 - grievance with Improper Conduct(s) elements;
 - that could adversely impact the Group and/or cause the Group to fall short of the Group’s social and corporate responsibilities or have an impact on the Group’s reputation.
- 1.3 This policy shall be read in conjunction with all applicable policies of the Group

2. Application

- 2.1 This policy is intended to provide an oversight and responsibilities of parties in charge, set out the reporting process, and provide protection to and confidentiality of the Whistleblower. This policy does not to invalidate any grievance procedure in place. Pure grievances such as employee, industrial relations and human resources related issues which does not have any elements of Improper Conduct(s) are excluded from the operation of this policy and should be directed to the Group Human Resource Department.
- 2.2 Relevant Parties who knowingly conceal any acts of any alleged Improper Conduct(s) by anyone shall be construed as aiding and abetting those Improper Conduct(s) (if proven) and shall be subjected to disciplinary action (if applicable) or other forms of action by the Group under this policy.

3. Definition

- 3.1 “**ABAC Policy**” means the Group’s Anti-Bribery and Anti-Corruption Policy dated 1 June 2020 as may be amended from time to time.

3.2 A **“Whistleblower”** is any Relevant Party who makes a report of an alleged or an Improper Conduct(s), in Good Faith, and in accordance with this policy.

3.3 **“Detrimental Actions”** shall include:-

- (a) Action causing injury, loss or damage;
- (b) Intimidation or harassment (including sexual harassment);
- (c) Interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person’s employment, career, profession, trade or business or the taking of disciplinary action; and
- (d) A threat to take any of the actions referred to in paragraphs (a) to (c).

3.4 **“Good Faith”** means when the Whistleblower disclose any alleged Improper Conduct(s) in accordance with this policy, the Whistleblower must act in good faith and must:-

- (a) have reasonable grounds for suspicion;
- (b) have first-hand knowledge or information of the facts and NOT obtained from third party or ‘hearsay’;
- (c) reasonably believe that the information and allegations are substantially true;
- (d) not be malicious; mischievous, frivolous, vexatious and/or defamatory;
- (e) not be involved in the Improper Conduct(s); and/or
- (f) not act for personal gain. If the case involves the Whistleblower’s personal interests, it must be informed at the outset, at the time of making the report.

3.5 **“Improper Conduct(s)”** mean any malpractices, wrongdoings, irregularities and/or suspicious conducts, which if proven, constitutes an act of misconduct under the ABAC Policy and/or any other internal policies in place and/or any criminal offence under the applicable laws in force and shall include, but are not limited to the following:-

- (a) breach/failure to comply with legal or regulatory obligations;
- (b) corruption and/or bribery;
- (c) fraud, theft and/or embezzlement;
- (d) blackmail, harassment and/or bullying;
- (e) money laundering;
- (f) abuse of power by any director or officer of the Group;
- (g) conflict of interest;
- (h) misuse of the Group’s fund or property;
- (i) misuse of the Group’s information;
- (j) breach of policies and / or procedure;
- (k) actions which can cause physical danger/harm to the Group;
- (l) forgery or alteration of any documents belonging to the Group;
- (m) any unlawful act, whether criminal or civil in nature;
- (n) gross mismanagement within the Group;
- (o) falsifying payroll records or overtime claim;
- (p) falsifying travel and entertainment expenses and/or utilizing company funds to pay for personal expenses; and/or
- (q) concealment of any or a combination of the above.

3.6 “**Relevant Parties**” or “**Relevant Party**” shall mean employees, directors of the Group as well as Business Partners and other third parties dealing with the Group.

3.7 The following terms shall have the same definition as set out in the ABAC Policy:-

(a) “**Business Partner(s)**”; and

(b) “**third party**”.

4. Guidance

Reporting Responsibilities

4.1 All Relevant Parties have the responsibility to disclose any alleged Improper Conduct(s) concerning the Group promptly, as soon as they come into possession of a reasonable suspicion of the alleged Improper Conduct(s). In the event of any uncertainty, the Relevant Party should seek clarification from the whistleblowing channel as set out in paragraph 4.10 below.

Safeguards

4.2 In the spirit of openness, the Group will support the Whistleblower provided always such Whistleblower is acting in Good Faith and in accordance with this policy whereby:-

- such Whistleblower shall not suffer any Detrimental Action, regardless of the results of the investigation; and
- such Whistleblower should immediately lodge a report through the secured whistleblowing channel provided in paragraph 4.10 should he/she suffer any Detrimental Action.

Any Detrimental Action is a serious breach of this policy and all directors and/or employees involved in the Detrimental Action will be:-

- (a) subject to disciplinary action in accordance with the relevant policy of the Group; and
- (b) may subsequently lead to termination of employment or removal of office (where applicable).

All third parties (including Business Partners) involved in the Detrimental Action may lead to termination of relationship and/or contracts with the Group.

4.3 The Group shall ensure that the identity of the Whistleblower be kept and treated in strict confidence to the fullest possible extent and in accordance with Whistleblower Protection Act 2010.

The identity of the Whistleblower may be disclosed in order to facilitate investigations and/or take appropriate actions for investigations. All personnel, directly or indirectly, involved in the investigation shall protect the identity of the Whistleblower and witnesses from any unauthorized disclosure before, during and after an investigation.

4.4 The protections as set out in paragraph 4.3 above will be removed immediately in the event of the following:-

- it is found that the Whistleblower is not acting in Good Faith;
- a report is made not in accordance to this policy;
- the Whistleblower has participated in the Improper Conduct(s) reported; and
- the report is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

Report of Improper Conduct(s)

4.5 In the case of an employee:

- The employee is encouraged to seek face-to-face guidance with an immediate superior in the best position to address the concern.
- Where it is not possible or inappropriate to do so, the employee is encouraged to speak or write to the Head of Human Resource of the Group Human Resource Department.

4.6 For Relevant Parties other than employees of the Group, such Relevant Parties can use secured whistleblowing channels as set out in paragraph 4.10.

4.7 All reports of alleged Improper Conduct(s) should include the name, designation and contact details of the Whistleblower and, where possible, such report shall be signed by the Whistleblower. The Group strongly encourages all whistleblowers to put their names to their allegations whenever possible, as anonymous reports will not be accorded any protection unless it falls under the exception of any applicable policy of the Group. Nonetheless, these reports will still be considered based on the individual merit of each circumstance. The Whistleblower is advised to provide the following information, where possible, applicable and be supported by evidence, to facilitate investigation:-

- (a) brief description including but not limited to the type/activity of the Improper Conduct(s);
- (b) the date, time and location of the incidence;
- (c) identity of the wrongdoer;
- (d) other personnel involved;
- (e) transaction amount and type (if it is known);
- (f) anyone effected by the act of the wrongdoer;
- (g) supporting evidence and/or documents; and/or
- (h) other details deemed to be useful to facilitate investigation and action to be carried out.

4.8 In any event, all Relevant Parties should not be discouraged from making a report just because such party is unsure whether there is sufficient evidence to support the allegations.

4.9 In the event that the alleged Improper Conduct(s) is reported verbally, the Whistleblower, with the assistance from the recipient, shall record the report in writing.

Secured Whistleblowing Channel

4.10 The details of the secured whistleblowing channels are as follows:-

e-mail : whistleblower@samling.com.my
telephone call : +603-6412 3938
letter : Samling Management Services Sdn Bhd,
C-3A-1, Plaza Arkadia,
No. 3, Jalan Intisari Perdana,
Desa ParkCity, 52200
Kuala Lumpur, Malaysia.

Investigation and Disciplinary Action

4.11 Once a report is made, the Group Human Resource Department will, and where appropriate and deemed required, appoint appropriate independent third-party consultants to assess the allegation.

- The Whistleblower will be informed that the alleged wrongdoer is being investigated.
- The Whistleblower may be required to provide additional information, clarification and/or evidence in subsequent investigations or inquiries.

- The alleged wrongdoer will be given an opportunity to respond to all allegations.
- Upon completion of the investigation, the Whistleblower will be informed of the outcome of investigation.

4.12 If the allegation of Improper Conduct(s) is substantiated, appropriate disciplinary action will be taken against the wrongdoer, up to and including dismissal or termination of employment, removal from office, or termination of any contractual relationship (where relevant), in accordance with the applicable Group's policies. Notwithstanding the foregoing, the Group shall be entitled to take all legal actions and/or seek all remedies available in respect of the allegation, including reporting the matter to the relevant regulatory authorities.

5. Administration

Communications and Training

5.1 Training on this policy forms part of the induction process for all new employees and directors. All existing employees and directors will receive regular, relevant trainings on how to implement and adhere to this policy and the applicable laws. All employees and directors must formally accept and declare conformance to this policy on an annual basis or as and when deemed required by the Group Human Resource Department. This policy must be communicated to all third parties (including Business Partners) at the outset of the Group's business relationship with them and as appropriate thereafter.

Policy Review

5.2 The Group will monitor the effectiveness of the implementation of this policy and conduct regular risk assessments to identify the malpractices and other wrongdoings risks potentially affecting the Group when the Group deems necessary or as required under the applicable laws.

5.3 This policy will be amended from time to time to take into account relevant developments in the laws as well as the circumstance of the business of the Group, evolving industry and international standards.

6. References

6.1 Whistleblower Protection Act 2010;

6.2 The Group's Anti-Bribery and Anti-Corruption Policy; and

6.3 The Group's detailed Whistleblower Policy

7. Policy Distribution

7.1 All employees in the Group; and

7.2 Business Partners of the Group

Date: 01 June 2020