



1. OVERVIEW

Sarawak Oil Palms Berhad and its Group of Companies ("SOPB") are committed to achieve and maintain a high standard of integrity, accountability and ethical behaviour in the conduct of its businesses and operations. SOPB takes a serious view towards any improper conduct on the part of any of its employees, management, directors and vendors ("The Employee") in particular with respect to their obligations to SOPB's interests.

In line with the inception of the Company's Oil Palms Sustainability Policy ("OPSP"), SOPB hereby updates this Policy to support the implementation of the Oil Palms Sustainability Policy.

2. OBJECTIVES

The Whistle-Blowing Policy ("The Policy") is established to allow employees and stakeholders to raise concerns on any improper conduct that may be observed within SOPB without fear of retaliations. This includes any grievances raised by any relevant stakeholder with respect to this OPSP or likewise any issues raised against palm product suppliers on sustainability unless otherwise specified.

SOPB encourages all employees and stakeholders to report any improper conduct which will be reviewed in a transparent and confidential manner.

The Policy does not replace the Group's existing policy for handling employee grievances or similar complaints.

3. SCOPE OF THE POLICY

- 3.1. Whistle-blower refers to an individual who makes such disclosure or reports such allegations.
- 3.2. In terms of implementation of the OPSP, The Policy is also applicable to SOPB's palm products production and sourcing
- 3.3. Improper conduct shall mean any of the following act committed but not limited to:
 - 3.3.1. Bribery, corruption or other illegal conduct or activity;
 - 3.3.2. Criminal offense;
 - 3.3.3. Sexual Harassment;
 - 3.3.4. Actual or suspected fraud;
 - 3.3.5. Misappropriation of monies;
 - 3.3.6. Abuse of power and position;
 - 3.3.7. Improprieties in matters of financial reporting;
 - 3.3.8. Unauthorized or misuse of company's property;
 - 3.3.9. Endangerment of an individual's health and safety;
 - 3.3.10. Misrepresentation of facts or information with intention to mislead;
 - 3.3.11. Disclosure of confidential information without prior approval;
 - 3.3.12. Any action which intimidate or coerce a director, management or employee of SOPB;
 - 3.3.13. Non-compliance with company's procedures; or
 - 3.3.14. Concealment of any violation.
- 3.4. The above list is not exhaustive and is taken to include any other act or omission pursuant to SOPB's Code of Business Conduct and Ethics or any criminal offense under the relevant law in force.
- 3.5. Any reporting regarding the implementation of OPSP as well as sourcing of palm products is to be classified as 'Grievance'.



4. REPORTING IN GOOD FAITH

SOPB expects the whistle-blower to be equally liable for his/her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. If allegations are proven to be wilfully false, then that conduct itself will be considered a serious matter and the whistle-blower may be subject to appropriate actions, up to and including legal action, where applicable.

5. PROTECTION OF WHISTLE-BLOWER

Any whistle-blower who wishes to report any improper conduct and/or grievance is required to disclose his/her name, NRIC number and contact telephone (mobile, home and/or office). These details will be kept strictly confidential to afford protection to the whistle-blower.

6. REPORTING IMPROPER CONDUCT

6.1. All reporting or disclosures by a whistle-blower who has knowledge or is aware of any improper conduct within SOPB are to be directed to the designated persons in accordance with the procedures under The Policy.

6.2. Disclosures can be made to the following persons:-

6.2.1. Disclosure Coordinator (DC)

Contact number : 085-436969 (Ext.4511), 011-35342197. Country code +60.
Email : **d_coordinator@sopb.com.my** (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, 98007
P. O. Box 547, 98007 Miri, Sarawak

6.2.2. Group Chief Executive Officer (GCEO)

Name : Mr Paul Wong Hee Kwong
Contact number : 085-436969 (Ext.1102), 013-8385899. Country code +60.
Email : **paul@sopb.com.my** (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, 98007
P. O. Box 547, 98007 Miri, Sarawak

6.2.3. Group Executive Chairman (GEC)

Name : Tan Sri Datuk Ling Chiong Ho
Contact number : 085-436969 (Ext 1101). Country code +60.
Email : **lch@sopb.com.my** (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, 98007
P. O. Box 547, 98007 Miri, Sarawak

6.3. If the reporting lines above are a concern, then the disclosures can be made alternatively with the Group Audit and Risk Management Committee Chairman as follows:-

6.3.1. Group Audit and Risk Management Committee Chairman

Name : Foo Yoo Kaw
Contact number : 085-436969 (Ext 1101). Country code +60.
Email : **victor.fong@sopb.com.my** (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, 98007
P. O. Box 547, 98007 Miri, Sarawak



6.4. The reporting should contain the following information:

- 6.4.1. Details of the person(s) involved;
- 6.4.2. Details of the allegation such as nature, time and place;
- 6.4.3. Any supporting evidence; and
- 6.4.4. Other relevant information.

7. REPORTING OF GRIEVANCE

7.1. Any stakeholder may raise their grievances through the following channel:

7.1.1. Head of Sustainability (HOS)

Contact number : 085-436969 (Ext 3201); 019-8850998. Country code +60.
Email : **sop.sustainability@sopb.com.my** (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, 98007
P. O. Box 547, 98007 Miri, Sarawak

- 7.2. The Sustainability Department "The Department" upon receipt of complaint(s) will place on record under SOPB Grievance List.
- 7.3. The Department shall then assess and investigate the issue raised.
- 7.4. Upon assessment, The Department will, if required, engage with the stakeholder to obtain further information regarding the issues.
- 7.5. The Department after due considerations, will propose an action plan and bring the issue to the attention of the Group Sustainability Committee.
- 7.6. At the Group Sustainability Committee level, an action plan will be developed and communicated to the stakeholder for mutual consent.
- 7.7. The final action plan mutually agreed will be implemented by Group's relevant departments.
- 7.8. Verification may be conducted by a third party appointed by the stakeholder or by the concerned parties themselves.
- 7.9. The whole process will be recorded under SOPB Grievances Report.
- 7.10. The stakeholder shall provide the following information on any issue raised:

- 7.10.1. Full Name
- 7.10.2. Name of Organization (If any)
- 7.10.3. Address
- 7.10.4. Contact Number/ Email
- 7.10.5. Description of the grievances
- 7.10.6. Supporting Document

7.11. Flow Chart (Refer to Appendix I)

8. ANONYMOUS DISCLOSURE

If an employee or stakeholder is not willing to make a Protected Disclosure to SOPB's designated persons in paragraph 6 above, the employee can make an anonymous disclosure to the Group General Counsel (GGC). A disclosure to GGC may be provided on an anonymous basis, or on the basis that the Discloser's identity is revealed to GGC only and will be kept confidential, but it would help in any subsequent investigation. GGC is reachable at:

Hotline No. : 085-436969 (ext. 4511), 011-35342197. Country code +60.
Email : **g_counsel@sopb.com.my** (mark "Strictly Confidential")



Mail : The Group General Counsel (mark "Strictly Confidential")
Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, P.O.Box 547, 98007 Miri, Sarawak

9. FALSE REPORTING (FOR IMPROPER CONDUCT ONLY)

Any person acting as a Discloser but makes malicious, false or vexatious allegations of improper conduct against an employee will be subject to disciplinary proceedings which may lead to suspension, demotion or termination of employment. However, no action will be taken against an employee who makes a Protected Disclosure in good faith which cannot be substantiated during subsequent investigation.

10. APPROVAL

Approved Date : 02 JANUARY 2019

Approved By : 
(PAUL WONG HEE KWONG)
SOPB Group Chief Executive Officer



Appendix I

