



MEMO

DATE	30 December 2017	REF NO:	MEMO/GCEO/103/2017
TO	All Locations (HQ/Estates/Mills/Refinery/Singapore & Kuching Office)		
FROM	GCEO		
CC	COO, GPC & PCs, CM & ACMs, CO-Refinery, HOD/Sr. Managers		
SUBJECT	INTERNAL WHISTLE-BLOWING POLICY & PROCEDURE		

The above matter refers.

Kindly be informed that the above internal whistle-blowing policy and procedure has been approved by the management and will take effect immediately.

The management is committed to the protection of individuals who report in good faith instances or allegations of illegal or unacceptable behaviour occurring within the group. This internal Whistle-blowing Policy and procedure describes how that commitment is implemented. This policy and procedure is an integral part of SOPB Group's compliance program and in particular supports the operation and enforcement of its Code of Conduct. Its aim is to encourage the reporting of matters that may cause financial or non-financial loss to SOPB Group or damage its reputation.

All reporting or disclosure shall be kept confidential by the appointed persons, and all disclosures can be made in a strict confidential to the following through personal or company email, or phone contact.

Appointed Person	Contact No.	Email	Remarks
Disclosure Coordinator	085-436969 ext 4511	d_coordinator@sop.com.my	
Group Chief Executive Officer	085-436969 ext 1102	paul@sop.com.my	
Group Executive Chairman	085-436969 ext 1101	lch@sop.com.my	
Group General Counsel	085-436969 ext 4511	g_counsel@sop.com.my	For Anonymous disclosure

An In-house Whistle-blowing Disclosure System will be set-up in SOPB staff Portal to enable any person (SOPB employee) to report/make your disclosure through this system. The management will announce to you once the said System is ready for usage.

/2...

SOPB, Pg.2 – Internal Whistle-Blowing Policy & Procedure (MEMO/GCEO/103/2017)

Please be reminded that any person purporting to be a Discloser and made malicious, false or vexatious allegations of improper conduct against an employee, then this false reporting conduct should be considered a serious matter and render the person concerned subject to disciplinary proceedings which may include 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 in a subsequent investigation.

Enclosed please find the abovementioned policy and procedure. Please do not hesitate to contact the undersigned or HR Department (SHRM/AHRM) if you need further clarification on the above.

Kindly be guided accordingly.



Paul Wong Hee Kwong
Group Chief Executive Officer

Encl.

SARAWAK OIL PALMS BERHAD

Registration No. 196801000358 (7949-M)



WHISTLE-BLOWING POLICY & PROCEDURE – 11/21

1. OVERVIEW

Sarawak Oil Palms Berhad and its Group of Companies (“SOPB”) are committed to achieve and maintain high standard of integrity, accountability and ethical behavior in the conduct of its businesses and operations. SOPB takes a serious view of 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 OPSP.

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. Whistleblower 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:

- a) Bribery, corruption or other illegal conduct or activity;
- b) Criminal offense;
- c) Sexual harassment;
- d) Actual or suspected fraud;
- e) Misappropriation of monies;
- f) Abuse of power and position;
- g) Improprieties in matters of financial reporting;
- h) Unauthorized or misuse of company’s properties;
- i) Endangerment of an individual’s health and safety;
- j) Misrepresentation/Deception of facts or information with intention to mislead;
- k) Disclosure of confidential information without prior approval;
- l) Any action which intimidate or coerce a Director or Management or employee of SOPB;
- m) Non-compliance with company’s procedures; or
- n) Concealment on any violation.

3.4. The improper conduct under paragraph 3.3 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 offence 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’.



WHISTLE-BLOWING POLICY & PROCEDURE – 11/21

4. REPORTING IN GOOD FAITH

SOPB expects the whistleblower 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 willfully false, then that conduct itself will be considered a serious matter and the whistleblower may be subject to appropriate actions, up to and including legal action, where applicable.

5. PROTECTION TO WHISTLEBLOWER

Any whistleblower 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 identity details will be kept strictly confidential to afford protection to the whistleblower.

6. REPORTING IMPROPER CONDUCT

6.1 All reporting or disclosures by a whistleblower who has knowledge or is aware of any improper conduct within SOPB are to be directed to the designated person in accordance with the procedures under the policy.

6.2 Disclosures can be made in a strict confidential to the following persons :-

6.2.1 Disclosure Coordinator (DC)

Contact number : 085-436969 (Ext.4511), 016-8088980 Country code +60
Email : d_coordinator@sopb.com.my (mark "Strictly Confidential")
Address: Sarawak Oil Palms Berhad
No.124-126, Jalan Bendahara,
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: paulwhk@sopb.com.my (mark "Strictly Confidential")
Address: Sarawak Oil Palms Berhad
No.124-126, Jalan Bendahara,
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,
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: Fong Yoo Kaw, Victor
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,
P.O.Box 547, 98007 Miri, Sarawak



WHISTLE-BLOWING POLICY & PROCEDURE – 11/21

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,
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 issue.

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 Documents

7.11 Flowchart (Refer to [Appendix 1](#))



WHISTLE-BLOWING POLICY & PROCEDURE – 11/21

8. ANONYMOUS DISCLOSURE

If an employee or stakeholder is not willing to make a Protected Disclosure to SOPB's designated person 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 the GGC only and will be kept confidential, but it would help in any subsequent investigation. GGC is reachable at:

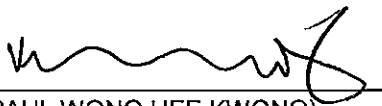
Hotline No. : 085-436969 (Ext.4511), 016-8088980. Country code +60
Email : g_counsel@sopb.com.my (mark "Strictly Confidential")
Mail : The Group General Counsel (mark "Strictly Confidential")
Sarawak Oil Palms Berhad
No.124-126, Jalan Bendahara, P.O.Box 547, 98007 Miri, Sarawak

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 : 22 November 2021

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



APPENDIX 1

