
WHISTLEBLOWING POLICY & PROCEDURE – 08/26

1. OVERVIEW

Sarawak Oil Palms Berhad and its Group of Companies (“SOP”) are committed to achieving and maintaining high standards of integrity, accountability, and ethical behavior in the conduct of its businesses and operations. SOP takes a serious view of any improper conduct affecting the Group, as well as any sustainability-related grievances arising from the implementation of the Company’s Oil Palm Sustainability Policy (“OPSP”).

In line with the Company’s OPSP, SOP has updated this Policy to support its implementation.

2. OBJECTIVES

The Whistleblowing Policy & Procedure (“the Policy”) is established to provide employees and stakeholders with a safe, confidential, and transparent mechanism to report, in good faith, any actual or suspected illegal, unethical, improper, or unsafe conduct observed within or in relation to SOP.

The Policy outlines the reporting channels, procedures, and responsibilities for handling such disclosures while ensuring that whistleblowers who make reports in good faith are protected against retaliation, victimization, discrimination, or any other form of detrimental action.

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

3. SCOPE OF THE POLICY

The Policy applies to all employees, Management, Directors, contractors, vendors, suppliers, business partners and other stakeholders of SOP. It establishes two (2) reporting channels:

(a) Reporting of Improper Conduct

To enable employees to report any suspected improper conduct involving the Group.

(b) Reporting of Sustainability Grievances

To enable employees and external stakeholders to raise sustainability-related concerns arising from the implementation of the OPSP.

4. DEFINITIONS

4.1 Whistleblower

Whistleblower refers to an individual who makes a disclosure or reports allegations under this Policy.

4.2 Improper Conduct

Improper Conduct refers to any act or omission, including 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 use or misuse of company’s properties;

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- i) Endangerment of an individual's health and safety;
- j) Misrepresentation/Deception of facts or information with the intention to mislead;
- k) Disclosure of confidential information without prior approval;
- l) Any action that intimidates or coerces a Director, member of Management or employee of SOP;
- m) Non-compliance with the company's policies or procedures; or
- n) Concealment of any violation.

4.3 Sustainability Grievance

A Sustainability Grievance refers to any complaint or concern relating to the implementation of the Group's OPSP, including but not limited to:

- a) Environmental degradation;
- b) Labour or human rights concerns;
- c) Community complaints;
- d) Land rights;
- e) Responsible sourcing;
- f) Sustainability certification standard compliance;
- g) Other sustainability-related matters.

The examples of Improper Conduct and Sustainability Grievances set out in paragraphs 4.2 and 4.3 are not exhaustive. Any act or omission that may constitute a breach of the Group's Code of Business Conduct and Ethics, applicable laws, regulations, or the Group's OPSP may also be reported under this Policy through the appropriate reporting channel.

5 REPORTING IN GOOD FAITH

SOP expects every whistleblower or person making a report under this Policy to act in good faith and to ensure that any disclosure or report is made honestly, without malicious intent and based on reasonable grounds.

Any person who knowingly makes a malicious, false or vexatious allegation of Improper Conduct or Sustainability Grievance may be subject to appropriate action. Where the person is subject to SOP's disciplinary procedures, appropriate disciplinary action may be taken in accordance with the Group's policies and procedures. Where the person is an external stakeholder, SOP reserves the right to pursue appropriate legal action, where applicable.

However, no action shall be taken against any person who makes a disclosure or report in good faith, even if the allegation or concern cannot be substantiated following investigation.

6 PROTECTION TO WHISTLEBLOWER

Any whistleblower who wishes to report any improper conduct and/or grievance is required to provide his/her name, NRIC number, contact telephone number (mobile, home and/or office), email address and name of organization (if applicable). The disclosure of such information is required to enable the Company to communicate with the whistleblower where necessary, obtain further information or clarification, and facilitate a comprehensive and effective investigation.

All personal information provided by the whistleblower shall be kept strictly confidential. The Company shall take reasonable steps to protect any whistleblower who makes a report in good faith against discrimination, retaliation, harassment, victimization, or other adverse action arising from or in connection with the report.

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7 REPORTING CHANNEL FOR IMPROPER CONDUCT

This section applies only to reports of Improper Conduct as defined in this Policy.

- 7.1 All reporting or disclosures made by a whistleblower who has knowledge of or reasonably believes that any improper conduct has occurred within SOP shall be submitted in strict confidence to any of the following designated persons through the respective reporting channels:

7.1.1 Disclosure Coordinator (DC)

Contact number : 085-436969 (Ext.4511) / 011-26805179 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

7.1.2 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

7.1.3 Group Executive Chairman (GEC)

Name : Mr. Ling Lu Kuang, Jeff
Contact number : (65) 65366221 (Ext. -) Country code +65
Email: jeffling@sopb.com.sg (mark "Strictly Confidential")
Address: Sarawak Oil Palms Berhad
No.124-126, Jalan Bendahara,
P.O.Box 547, 98007 Miri, Sarawak

- 7.2 If the reporting channels above present a conflict of interest or are otherwise inappropriate, disclosures may be made directly to the Group Audit Committee as follows: -

7.2.1 Group Audit Committee

Name: Mr Chua Chen San
Contact number: 085-436969 (Ext.1101) Country code +60
Email : chensanchua@gmail.com (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No.124-126, Jalan Bendahara,
P.O.Box 547, 98007 Miri, Sarawak

- 7.3 Upon receipt of a report, the designated person shall conduct a preliminary assessment to determine whether the matter falls within the scope of Improper Conduct under this Policy.
- 7.4 Where appropriate, an investigation shall be conducted to establish the facts of the matter. The investigation may include the collection of relevant information, supporting evidence and interviews with the relevant parties. All reports and investigations shall be handled in strict confidence.
- 7.5 Upon completion of the investigation, the findings and appropriate recommendations shall be submitted to the relevant approving authority for consideration and further action, where applicable.
- 7.6 Where the allegation is substantiated, appropriate corrective, disciplinary or other actions shall be taken in accordance with the Group's policies, procedures and applicable laws.

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- 7.7 All reports, investigation records and outcomes shall be maintained in a secure and confidential manner by the designated person.
- 7.8 The reporting should contain the following information:-
- 7.8.1 Details of the person(s) involved;
 - 7.8.2 Details of the allegation, including the nature, time and place;
 - 7.8.3 Supporting evidence (if available); and
 - 7.8.4 Any other relevant information
- 7.9 Improper Conduct Reporting Process (Refer to [Appendix 1](#))

8 REPORTING CHANNEL FOR SUSTAINABILITY GRIEVANCES

This section applies only to reports of Sustainability Grievances as defined in this Policy.

- 8.1 Any employee or stakeholder may submit their sustainability grievances through the following reporting channel: -
- 8.1.1 **Head of Sustainability (HOS)**
Contact Number : 085-617966 (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
- 8.2 The Sustainability Committee upon receipt of complaint(s) will place on record under SOP Grievance Report List.
- 8.3 The Sustainability Committee shall then assess and investigate the issue raised, and where applicable, notify and engage the relevant Sustainability Sub-Committee.
- 8.4 Upon assessment, The Sustainability Sub-Committee will, if required, engage with the stakeholder to obtain further information regarding the issue.
- 8.5 The Sustainability Sub-Committee after due considerations, will propose a remedial action plan and bring the issue to the attention of the Sustainability Committee.
- 8.6 The Sustainability Committee shall review, advise on, and approved the proposed remedial action plan and communicated to the stakeholder for mutual consent.
- 8.7 The final action plan mutually agreed will be implemented by Group's relevant departments.
- 8.8 Verification may be conducted by a third party appointed by the stakeholder or by the concerned parties themselves.
- 8.9 The whole process will be recorded under SOP Grievances Report.
- 8.10 The stakeholder shall provide a description of the grievance and any relevant supporting documents in respect of the issue raised.
- 8.11 Sustainability Grievances Reporting Process (Refer to [Appendix 2](#))

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9 ANONYMOUS DISCLOSURE

If an employee or stakeholder is not willing to make a disclosure relating to **Improper Conduct or Sustainability Grievances** to SOP's designated persons, the employee or stakeholder may make an anonymous disclosure to the Group General Counsel (GGC). A disclosure to the GGC may be made on an anonymous basis, or on the basis that the Discloser's identity is disclosed only to the GGC and kept strictly confidential, where this would assist in any subsequent investigation.

The GGC may be contacted through the following channel:

Hotline No. : 085-436969 (Ext.1101) Country code +60

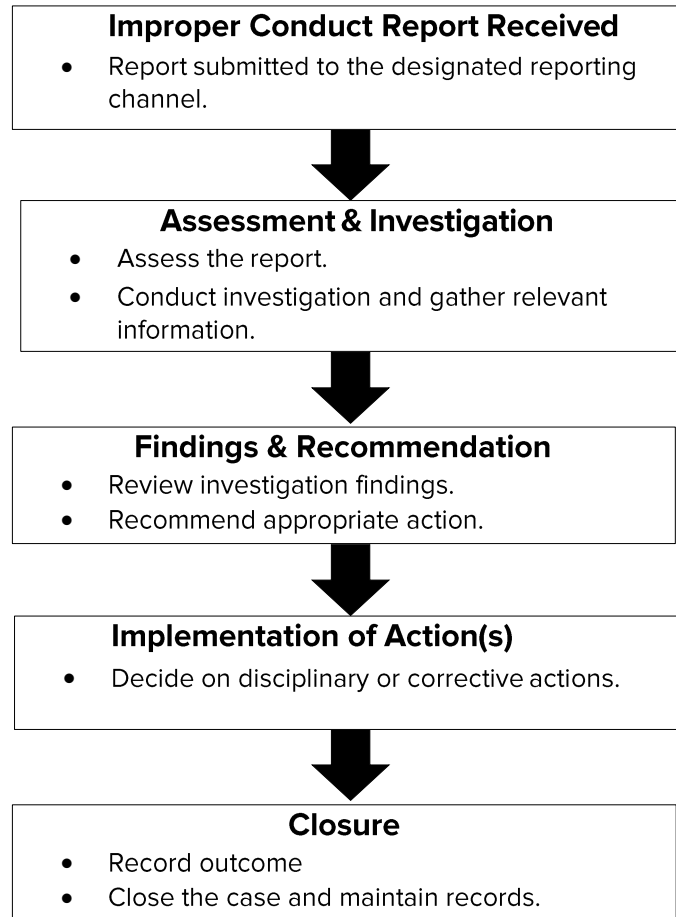
Email : chensanchua@gmail.com (mark "Strictly Confidential")

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

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APPENDIX 1

Improper Conduct Reporting Process



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APPENDIX 2

Sustainability Grievance Reporting Process

