

# GLENEALY PLANTATIONS SDN BHD

## Whistle Blower Policy

Under this Whistle Blower Policy an employee making a disclosure of corruption or of any other improper conduct is assured of protection by the company. The process provides for the matters disclosed to be investigated and dealt with appropriately.

- Any employee may make a disclosure of improper conduct to a senior officer of the company based on his reasonable belief that an employee has engaged, is engaging or is preparing to engage in improper conduct.
- Any officer who makes or receives a disclosure of improper conduct or obtains confidential information in the course of investigation into such disclosure shall not disclose the confidential information to any other than the investigating officer.
- Any breach of the confidentiality will be viewed as a serious disciplinary offense and appropriate action will be taken against the officer concerned.
- The whistle-blower is given immunity from any liability arising by way of administrative process, including disciplinary action, for making a disclosure of improper conduct provided that the whistle-blower has not participated in the improper conduct reported.
- No person shall take detrimental action against a whistle-blower or any person related to or associated with the whistle-blower in reprisal for a disclosure of improper conduct.
- However, the whistle-blower protection may be revoked if in the course of any investigation, the whistle-blower is found to have participated in the improper conduct disclosed or that the disclosure is false/frivolous/vexatious and/or that the disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.
- Any officer who receives a disclosure of improper conduct shall refer the disclosure to the Plantation Director who will initiate an investigation which will be followed by a report that contains the finding of the investigation and recommendations for further steps to be taken, if any, based on the findings of the investigation.
- If the report records a finding that the disclosure of improper conduct is not substantiated, then the whistle-blower shall be informed accordingly.

Date: 27 Feb 2020