



WHISTLE-BLOWING POLICY

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.

2. OBJECTIVES

The Whistle-Blowing Policy (“The Policy”) are established to assist Employees and stakeholders to raise concerns, without fear of retaliations on any improper conduct that may be observed within SOPB. In order to achieve the standard policy, SOPB encourages all Employees and stakeholders to disclose any improper conduct and will be processed through a transparent and confidential procedures as provided under this policy who report such allegations.

The objective of The Policy is to govern the reporting and handling of any improper conduct. The Policy does not replace the Group's existing policy for handling employee grievances or similar complaints.

3. SCOPE OF POLICY

3.1 Whistleblower refers to individual who makes such disclosure or reports such allegations.

3.2 Improper conduct shall mean, but not limited to any act of malpractice or an unethical behavior to the following:

- a) Corruption;
- 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) 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; or
- m) Concealment on any of the above or combination of the above.

3.3 The improper conduct under paragraph 3.2 is not exhaustive and includes any other act or omission, which if proven, will constitute an act of improper conduct pursuant to SOPB's Code of Business Conduct and Ethics or pursuant to any criminal offense under the relevant law in force.

4. REPORTING IN GOOD FAITH

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



5. PROTECTION TO WHISTLEBLOWER

Whistleblower who wish to report any improper conduct within SOPB is required to disclose his/her name, NRIC number and contact telephone (mobile, home and/or office). These identity details will be kept confidential to afford protection to the whistleblower.

6. REPORTING IMPROPER CONDUCT

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 this policy.

Disclosures can be made in a strict confidential to the Group Executive Chairman and Group Chief Executive Officer (GCEO) as follows:

Group Executive Chairman

Name : Tan Sri Datuk Ling Chiong Ho
Contact number : 085-436969 (Ext. 101)
Email : lch@sop.com.my (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad,
No. 124-126, Jalan Bendahara, P. O. Box 547,
98007 Miri, Sarawak.

Group Chief Executive Officer (GCEO)

Name : Paul Wong Hee Kwong
Contact number : 013-838 5899
Email : paul@sop.com.my (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad,
No. 124-126, Jalan Bendahara, P. O. Box 547,
98007 Miri, Sarawak.

In the case where reporting to management is a concern, then the disclosures can be made in a strict confidential to the Group Audit and Risk Management Committee Chairman as follows:

Group Audit and Risk Management Committee Chairman

Name : Fong Yoo Kaw @ Fong Yee Kow, Victor
Contact number : 085-436 969
Email : victor.fong@sop.com.my (mark "Strictly Confidential")
Address : Sarawak Oil Palms Berhad
No. 124-126, Jalan Bendahara, P. O. Box 547,
98007 Miri, Sarawak.

The reporting should contain the following information:

- a) Details of the person(s) involved;
- b) Details of the allegation such as nature, time and place;
- c) Any supporting evidence; and
- d) Other relevant information.