

**SARAWAK PLANTATION BERHAD
REGISTRATION NO. 199701035877 (451377-P)
WHISTLE BLOWING POLICY**

WHISTLE BLOWING POLICY STATEMENT

The Company is committed to the highest level of moral values and principles, emphasising transparency, being faithful and honest and being accountable and taking full responsibility in the conduct of its business and operations.

The Company also focuses on ethical conduct in the discharge of its duties, ensuring high quality service both within and outside the organisation.

In order to realise the above corporate values, the Company provides avenues for all its employees and members of the public to disclose any unethical or illegal conduct within the Company.

OBJECTIVE OF THE WHISTLE BLOWING POLICY

This policy is intended to provide the avenue for all employees of the Company and members of the public to disclose any unethical or illegal conduct within the Company using proper procedures provided herein and in a confidential manner without compromising the identity and safety of the employee or any member of the public who reports such allegations.

SCOPE OF THE WHISTLE BLOWING POLICY

The Company has created a safe environment for any employee or member of the public to report any unethical or illegal conduct and that is through an internal channel. Such unethical or illegal conduct includes any of the following acts:

- (1) Fraud;
- (2) Theft or embezzlement of Company's property or funds;
- (3) Abuse of power;
- (4) Misuse of Company's property;
- (5) Bribery;
- (6) Non compliance with Company's procedure; and
- (7) Conflict of interest.

Above are just examples of some of the unethical or illegal conduct covered under this policy. It is not an exhaustive list. Unethical or illegal conduct also includes acts of omission, which if proven, will constitute an act of misconduct as defined in the Company's Employee's Handbook or a criminal offence under any relevant legislation or ordinance in force in Sarawak and Malaysia.

APPLICABILITY OF THE WHISTLE BLOWING POLICY

The Company's whistle blowing policy shall apply to all employees of the Company and its Group of Companies. It also applies to members of public, where relevant.



PROCEDURE IN MAKING A REPORT

Any report made must be channelled through the procedures as provided under the Company's whistle blowing policy.

PROTECTION TO THE WHISTLEBLOWER

A whistleblower under the Company's whistle blowing policy is defined as the person who exposes any kind of information or activity that is deemed illegal, unethical or not correct within the Company or its Group of Companies.

Protection of confidentiality of identity of the whistleblower will be accorded to the extent that it is reasonably practicable. In relation to an employee who whistleblows internally, he/she will also be protected against any adverse and detrimental actions for reporting such unethical or illegal conduct committed or about to be committed within the Company or in any of its Group of Companies to the extent that it is reasonably practicable, provided it was reported in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower was genuinely mistaken as to the facts, rules and procedures involved.

A disciplinary action against the whistleblower which occurs on account of poor job performance or misconduct by the whistleblower and which is independent of any disclosure made by the whistleblower shall not be protected under this policy.

ANONYMOUS WHISTLEBLOWER

All reports made to whistle blow on any unethical or illegal conduct must be accompanied by the whistleblower's name and address in order for the Company to extend to him/her the necessary protection.

Anonymous reports will not be entertained but the Company reserves the right to investigate these anonymous reports in the manner it deems fit.

NOTIFICATION

Upon conclusion of the investigation into the unethical or illegal conduct, the whistleblower will be notified of the outcome of the investigation.

FLOWCHART OF THE REPORTING PROCESS

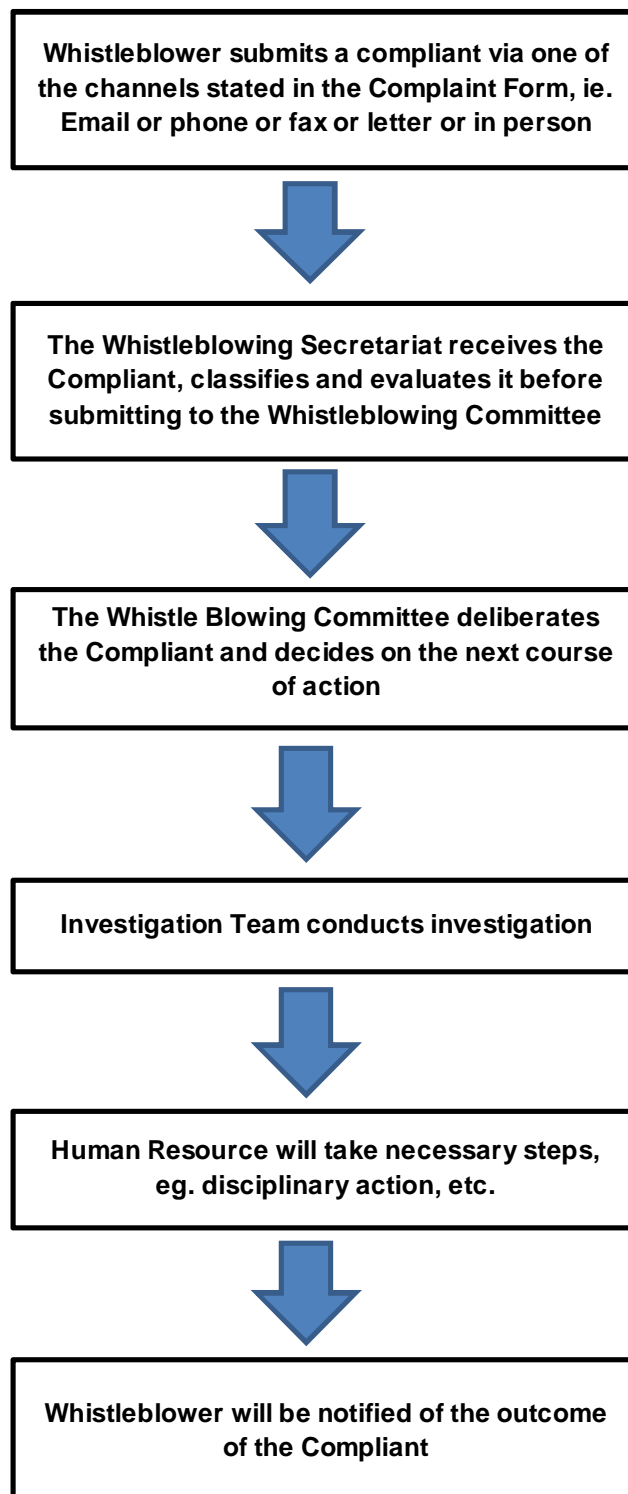
The flowchart of the reporting process is as per Appendix 1.

AMENDMENT TO THE WHISTLE BLOWING POLICY

The Company reserves the right to amend its whistle blowing policy from time to time as it deems fit.



APPENDIX 1



**SARAWAK PLANTATION BERHAD
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WHISTLE BLOWING – COMPLIANT FORM**

COMPLAINANT'S DETAILS

Complainant's name :
NRIC No. :
Employee No. :
(if employee of the Company)
Contact Details:
Office Telephone No :
Handphone No :
Home Telephone No :
Email Address :
Address :

DETAILS OF THE UNETHICAL OR ILLEGAL CONDUCT

Description / Nature of the :
unethical or illegal conduct
Name of person who :
committed or is about to
commit the unethical or illegal
conduct
Date of unethical or illegal :
conduct
Place of unethical or illegal :
conduct
Name of Witness :
Telephone no of witness :
Evidence / Documents to :
support the compliant
(including photos)



REASONS

Reasons for the Compliant :

DECLARATION

I hereby declare that I am making this compliant voluntarily and all the information provided herein are true and made without malicious intent. I also understand that the Company will have absolute discretion to decide on the manner in which investigation into this compliant is carried out and how the information is used. I will co-operation fully with the Company as and when called to do so.

SIGNATURE

Signature of the Complainant :

Date :

This Complaint Form can be submitted, in strict confidence to the Company in any of the following manner:

Email : email to whisblow@spbgroup.com.my

Telephone : 082 233550

Fax : 082 233670

By letter : Submit this duly filled Compliant Form together with the relevant evidence to
Sarawak Plantation Berhad
The Whistle Blowing Committee
8th Floor Wisma NAIM
2 ½ Mile Rock Road
93200 Kuching

In person : Fill in this Compliant Form supported by relevant evidence and see the Executive Director in person to report the unethical or illegal conduct

The Complainant's details and identity is assured of confidentiality at all times.

If the details provided under the "Complainant's Details" field are subsequently discovered to be fake, the compliant will be treated as a poison pen letter and dismissed. Further the Complainant, if he/she is an employee of the Company, will be subject to disciplinary action.

