

WHISTLE-BLOWING POLICY

Johor Plantations Group Berhad (JPG) has established a Whistle-Blowing Policy which sets out the guidelines and procedures pertaining to whistle-blowing. The Policy aims to encourage employees and stakeholders to report any wrongdoing or improper conduct without fear of retaliation. The policy provides a channel for secure reporting and gives assurance to the informant or whistle-blower that he/she will be protected from retaliation or reprisal. The policy also ensures that complaints or information received will be processed and that appropriate actions which are effective and systematic will be taken.

1. Improper conduct

- 'Improper conduct' is defined as conduct or action which is unlawful and/or in breach of JPG's Code of Business Ethics, rules, regulations, guidelines, policies, and procedures, both written and implied. Improper conduct includes:
 - A. The offence of accepting gratification
 - i. Accepts, obtains, agrees to accept, or attempts to obtain, from any person in any form of gratification for personal interest or on behalf of others related to official matters of JPG.
 - B. The offence of giving gratification
 - i. Gives or agrees to give or offers to any person in any form of gratification for personal interest or on behalf of others related to official matters of JPG.
 - ii. Gives, agrees to give, promises, or offers to any person any gratification whether for the benefit of that person or another person with the intent to obtain or retain the business, or advantage for JPG.

WHISTLE-BLOWING POLICY

- C. The offence of intending to deceive the principal
 - i. A person gives to an agent, or being an agent, uses any receipt, account or other documents which is false or erroneous or defective in any material and is intended to mislead JPG.
- D. The offence of using office or position for gratification
 - i. Abuse of power or authority
 - ii. Conflict of interest
- E. Allowing or assisting a person to commit any of the above instances of improper conduct.
- F. Taking detrimental action against the informant or whistle-blower or persons closely associated with them.

These examples are not exhaustive, and any matter raised under this Policy will be reviewed and considered appropriately.

2. Details of improper conduct and supporting evidence

- Disclosure of improper conduct must be made with sufficient details and supported by documentary evidence and/or information of parties who are able to confirm or support the disclosures, wherever practicable.
- Disclosure of information with the intention to deceive, envy or any intention that is contrary to the principles of law, regulations and the interest of JPG will not be entertained.

WHISTLE-BLOWING POLICY

3. Anonymous complaints

- This Policy encourages informants or whistle-blowers to disclose their identity or how they can be contacted. Anonymous information will be entertained and considered for action subject to the decision of the Board Audit Committee (BAC). Among the matters that will be considered are:
 - i. The seriousness of the content of the disclosed information;
 - ii. The level of the improper conduct contained in the information; and
 - iii. The extent to which such information can be acted upon is subject to the available sources, documents and witnesses.

4. Protection from retaliation

- JPG assures that no action will be taken against any informant or whistle-blower on condition that the information provided is in good faith and has no element of malicious intent.
- JPG views retaliation or reprisal against the informant or whistle-blower seriously. JPG assures that all disclosures are protected with confidentiality and that he/she would be protected against retaliation in any form under this Policy.
- Disciplinary action may be taken, or a police report can be made against any employees or any person who is involved in making a disclosure in bad faith or with the intention to tarnish the image of JPG.
- Employees or any persons who want to disclose or report any improper conduct are free to lodge a report to any enforcement agency if they choose to do so.

WHISTLE-BLOWING POLICY

- Employees or any persons who disclose improper conduct to any enforcement agency shall be protected under the Whistleblower Protection Act 2010.
- The informant or whistle-blower has the option of accessing independent legal and technical advice from an individual or group, as well as the option of third-party mediator.

5. Immunity from protection

- The protection given to an informant or whistle-blower however, does not include immunity from any investigations, disciplinary or other actions arising from any personal wrongdoings, acts of misconduct, or nonperformance on his part.

6. Whistle-blowing channels

- Any improper conduct that is discovered or genuinely suspected shall be reported immediately to:

i. Whistle-Blowing E-Mail: whistleblowing@johorplantations.com

ii. Whistle-Blowing E-Form:
<https://johorplantations.com/whistleblowing>

iii. Write a report:
Chairman
Board of Johor Plantations Group Berhad
Level 11, Menara KOMTAR
Johor Bahru City Centre
80000 Johor Bahru
Johor
Mail: Mark Strictly Confidential

WHISTLE-BLOWING POLICY

- iv. Write a report:
 - Chairman
 - Board Audit Committee
 - Johor Plantations Group Berhad
 - Level 11, Menara KOMTAR
 - Johor Bahru City Centre
 - 80000 Johor Bahru
 - Johor
 - Mail: Mark Strictly Confidential

- v. Write a report or telephone or personally meet:
 - Head of Integrity Unit
 - Johor Plantations Group Berhad
 - Tiram Complex
 - K.B 705 Ulu Tiram Estate
 - 81800 Johor Bahru
 - Johor
 - Mail: Mark Strictly Confidential
 - Telephone: 07-863 1900
 - (Office Hours: 8.00 am to 5.30 pm / Sunday to Thursday)