



KUALA LUMPUR KEPONG BERHAD

197301001526 (15043-V)

GROUP WHISTLEBLOWING POLICY

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GROUP WHISTLEBLOWING POLICY

[KLKB-HR-001]

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1. INTRODUCTION AND DEFINITION

- 1.1 Kuala Lumpur Kepong Berhad and its group of companies ("Company") is committed in ensuring integrity from all its stakeholders. The Company views seriously any wrongdoing on the part of any of its stakeholders and as a means to ensure that the standards by which the Company subscribes to are upheld and maintained.
- 1.2 This Group Whistleblowing Policy ("Policy") establishes a framework where stakeholders can raise in confidence possible corporate misdemeanours.
- 1.3 Stakeholders include employees, business partners, customers, contractors, suppliers, trading and joint-venture ("JV") partners, shareholders and members of the public, where relevant.
- 1.4 For the purpose of this Policy, whistleblowing is defined as:

"The disclosure of information or activity of an individual or organisational malpractice by a person who has or had access to data, events or information about an actual, suspected or anticipated wrongdoing or by employees and/or members of the Company and those who are within its control. These include activities that are deemed illegal, unethical, or incorrect.

The 'whistleblower' is the person who makes such report.

2. SCOPE OF POLICY

- 2.1 The Policy is applicable to all stakeholders of the Company.
- 2.2 The Policy shall be read in conjunction with the relevant laws and regulations of the respective countries where we operate and in the event of any conflict with this Policy, the laws and regulations of the said country shall prevail.

3. PURPOSE

- 3.1 The Policy provides an avenue to raise a legitimate concern about the actual or suspected improprieties at the earliest opportunity for expeditious investigation.
- 3.2 The whistleblowing channel has been created to help stakeholders to raise their concerns, without fear of retaliation and provide protection from reprisals and victimisation in respect of whistleblowing which is done in good faith.
- 3.3 This Policy is not intended to replace in any way and is in addition to any existing grievance or complaints procedures relating to personal grievances concerning an individual's terms and conditions of employment, performance assessments or other aspects of the working relationship.



4. REPORTABLE INCIDENTS

4.1 Anyone who makes a disclosure must reasonably believe that:

4.1.1 They are acting in the Company's best interest and/or public interest;

4.1.2 The disclosure tends to show past, present or future wrongdoing that may include but not be limited to the following :

- a. concerns about the operational, accounting, internal control, omission of duties or auditing matters;
- b. criminal offences (may include financial impropriety such as fraud, corruption, theft, malpractices, and/or misuse of the Company's properties, assets, or resources);
- c. failure to comply with an obligation set out in law of the land, rules, regulations, policies and practices;
- d. conduct which is an offence or breach of law;
- e. conflict of interest;
- f. miscarriages of justice;
- g. misappropriation of assets;
- h. misuse and/or unauthorised disclosure of confidential information;
- i. breaches of the Company's policies which may include but not limited to the following:
 - endangering someone's health and safety;
 - sexual harassment;
 - acts that cause negative effects to the environment and communities;
 - fraud against investors or the making of fraudulent statements to the stock exchange regulators, investors, government/state authorities and general public;
 - deliberate efforts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with preparation, examination, audit or review of any documents of the Company. This includes providing false or misleading information (including suppression or wilful omission of any material facts or information);
 - any other matters which can cause losses to the Company and/or damage to its reputation; or
 - covering up or abetting in any wrongdoing with regards to any of the aforementioned matters.

4.2 If an employee is aware of any wrongdoing committed by another employee of the Company, the Company expects such wrongdoing to be reported, and the complainant will be protected against reprisal. However, if such employee fails to do so, he or she may be considered as a complicit in the wrongdoing and bear some blame for the harm to the Company.

5. PROTECTION AGAINST REPRISALS

5.1 Anyone filing a written complaint concerning a wrongdoing or suspected wrongdoing must act in good faith and have reasonable grounds to believe that the information and allegations are substantially true.



- 5.2 All genuine whistleblowing done in good faith under the Policy and to the extent permitted by the prevailing laws, will be protected against any loss or retribution in connection with the disclosure. Whistleblowers who commit genuine mistake with regards to the disclosure will similarly be protected.
- 5.3 The Company shall not tolerate any direct or indirect harassment, discrimination or victimisation (including informal pressure) against the whistleblowers and shall take the appropriate action to protect them.
- 5.4 On the other hand, employees of the Company who deliberately made any allegation that found to be malicious/false may be subjected to disciplinary action.

6. CONFIDENTIALITY

- 6.1 The Company encourages whistleblowers to identify themselves when reporting. All information provided shall be treated with confidentiality.
- 6.2 There may be situations where the Company would need to disclose the confidential information provided by the whistleblower which may include but not be limited to the following circumstances:
- where the Company is under a legal obligation to disclose the information provided;
 - when the information is readily available in the public domain;
 - where the information is given on strict confidential basis to legal or auditing professionals with the purpose of seeking professional advice; or
 - where the information is provided to the authorities for possible criminal investigation.

7. PROCEDURE FOR RAISING A CONCERN AND/OR MAKING A REPORT

7.1 How To Make A Report:

- 7.1.1 Ideally the concerns should be raised in writing using one of the Reporting Methods stated in Appendix 1.
- 7.1.2 If the whistleblower is uncomfortable to submit the complaint in writing, arrangement can be made to meet the personnel in the manner as stated in Appendix 1.
- 7.1.3 Anonymous report or complaint is discouraged. However, such report will still be reviewed if it contains enough evidence or merits to commence investigation.
- 7.1.4 Whistleblower may choose to report in the format set out in Appendix 2.
- 7.1.5 Whistleblower may be requested to assist when more information is needed during the investigation of the complaint.

8. REVISION

- 8.1 This Policy may be reviewed at the Company's absolute discretion and amendment may be made where necessary or appropriate.

REPORTING METHODS

Option 1

Report to immediate supervisor, manager or Head of Department (where applicable).

Option 2

If the matter raised involves the above persons, or if you prefer that they not be told, you may report to the following designated officers:

- a. Respective Head of Human Resources;
- b. Respective Head of the Business Sectors –
 - Group Plantations Director;
 - CEO, KLK OLEO;
 - Managing Director, KLK Land;
- c. KLK Group Chief Operating Officer; *or*
- d. Chairman of the Audit and Risk Committee of the Company.

Option 3

You may also submit your complaint in a sealed envelope clearly marked “Private & Confidential” and post it to the Company’s Head Office at the following address:

Wisma Taiko,
No. 1, Jalan S.P Seenivasagam,
30000 Ipoh, Perak, Malaysia.

Attn: [Designated officers mentioned in Option 2 above, where applicable]

Option 4

A report can be made via e-mail to hrd@klk.com.my and addressed to the relevant designated officer in Option 2 with the required information. The report made via e-mail to the designated officer in Option 2 must be specifically indicated as Whistleblowing Report.

Option 5

You may opt to report through telephone call to +605-240 8000 (ext 2865) or +6018-2237800 (Mobile and WhatsApp) and speak to the Human Resources Personnel. The call recipient will record the conversation in accordance with the format set out in Appendix 2.

Option 6

You may also scan the following QR code to submit your complaint.





WHISTLEBLOWING FORM

1. Are you a KLK employee?
Adakah anda kakitangan KLK?
() Yes, I am an employee / *Ya, saya adalah kakitangan KLK*
() No, I am an external party (eg. vendor, etc) / *Tidak, saya pihak luaran (contohnya, vendor)*

2. Do you wish to remain anonymous?
Adakah anda mahu kekal tanpa nama?
() Yes / *Ya ----- go to Q7*
() No / *Tidak --- go to Q3*

3. Name
Nama

4. Email
Emel

5. For KLK employee, please state your Department / OC
For external party, please state your Company Name
Bagi kakitangan KLK, sila nyatakan Bahagian / OC anda. Bagi pihak luaran, sila nyatakan nama syarikat anda.

6. Contact No.
Nombor telefon

7. Subject
Tajuk

8. Details of allegation. Please describe in details with as much specific factual information as possible (eg. identity of those involved in the incident, date, time, place of incident)
Preincian rungutan. Sila huraikan secara terperinci dengan seberapa banyak maklumat fakta yang khusus dan jelas (Contohnya, identiti individu yang terlibat dalam kejadian, tarikh, masa, tempat kejadian, dan lain-lain)



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9. Are there any additional relevant details and evidence you would like to submit (eg. document, photograph, voice recording, videos, etc)? If so, please send them via one of the following methods:

Adakah anda ingin menyerahkan butiran dan bukti lain yang berkaitan (contohnya, dokumen, gambar, rakaman suara, video, dan lain-lain)? Sekiranya ya, sila salurkan melalui salah satu cara berikut:

Email / Emel : hrd@klk.com.my;

Or/ Atau

By post/ Pos : Wisma Taiko, No. 1, Jalan S.P. Seenivasagam, 30000 Ipoh, Perak (Attn: Head of HR)

() Yes / Ya

() No / Tidak

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