

WHISTLERBLOWER POLICY
FAR EAST HOLDINGS BERHAD
(14809-W)
(Incorporated In Malaysia)

1.0 INTRODUCTION

- 1.1 FEHB is committed to ensuring that its employees and business partners are free to raise concern regarding bribery, corruption or other “Improper Conduct” (defined below) without being subjected to victimization, harassment or discriminatory treatment, and to have such concern properly investigated.
- 1.2 The purpose of this Policy is to:-
- (a) promote the importance of detecting Improper Conduct;
 - (b) encourage the reporting of Improper Conduct and any other matters that may cause financial or non-financial loss to FEHB or damage to FEHB reputation; and
 - (c) help to protect people who report Improper Conduct in good faith from discrimination, harassment and retaliation.
- 1.3 Whistleblowing is not about highlighting grievances. It is about reporting real or perceived Improper Conduct. A report may damage the career or reputation of the person who is the subject of an allegation. Therefore, if a report is not made in good faith or the report is found to be malicious, deliberately misleading or frivolous, the person responsible for making the report may be subject to disciplinary action.
- 1.4 FEHB is committed in promoting a culture of ethical behavior. FEHB will ensure that protection is offered to anyone who reports concern in good faith in accordance with this Policy.
- 1.5 This Policy is an important part of the FEHB’s culture. The FEHB’s culture is a fundamental set of behaviors and principles that underpins all of our activities. The Company is committed to ensuring that everything we do reflects the FEHB’s Culture.

1.6 The FEHB's Culture includes the following:-

- (a) code of conduct;
- (b) policies;
- (c) structures and systems; and
- (d) work practices and allocations.

1.7 The Policy is intended to supplement all applicable laws, rules and other corporate policies including, without limitation, FEHB's Admin Manual, Foreign Labour Manual, Accounting Procedure, Security Manual and Plantation Operation Manual.

2.0 SCOPE

2.1 This Policy applies to, with respect to Far East Holdings Berhad and each of its wholly-owned subsidiaries and its substantial associates, all of FEHB's:-

- (1) Directors, employees (whether permanent, fixed-term, casual or temporary) and contract staff (together, employees); and
- (2) Stakeholders, contractors, suppliers, customers, consultant or other service providers.

2.2 If a contractor, consultant, vendor, service provider or supplier (each, a Business Associate), acting in good faith, believes that FEHB or any of its employees has engaged in Improper Conduct, the Business Associate should report the matter to FEHB's designated Disclosure Officer.

3.0 DEFINITIONS

3.1 In this Policy:-

- (1) **Compliance Committee** comprises the following:-
 - (a) Executive Director, Plantations;
 - (b) General Manager;
 - (c) Plantation Controller;
 - (d) Senior Regional Manager;
 - (e) Head of Internal Audit;
 - (f) Finance Manager ; and
 - (g) Head of Corporate Affairs and Secretarial.

- (2) **Detrimental Treatment** includes dismissal, disciplinary action, threats or other unfavourable treatment.
- (3) **Disclosure** means any good faith communication that discloses information that may give evidence to Improper Conduct.
- (4) **Disclosure Officer** means Head of Internal Audit.
- (5) **Improper Conduct** means conduct by a person or persons connected with FEHB which, in the view of a Whistleblower, is not acting in good faith:-
 - (a) tantamount to bribery or some other form of corrupt activity;
 - (b) is fraudulent;
 - (c) is illegal (including theft, drug sale/use, violence or threatened violence, and criminal damage against property);
 - (d) is unethical;
 - (e) amounts to a material misappropriation or misuse of FEHB's assets and resources;
 - (f) involves a substantial risk to safety, health, the environment or the community; or
 - (g) is in breach of any FEHBs' policies including, without limitation, FEHB Admin Manual, Accounting Procedure, Security Manual Foreign Labour Manual and Plantations Operations Manual.
- (6) **Whistleblower** means a person who makes a report in connection with Improper Conduct or activities that are detriment to the integrity of the Company and its Group.

4.0 REPORTING

Responsibility to report

- 4.1 FEHB will not tolerate Improper Conduct. All employees have responsibility to report Improper Conduct by making a Disclosure in accordance with this Policy.

Disclosure Line

4.2 The Company recognizes that employees may not feel comfortable making a Disclosure to a Manager and that they might wish to report a matter anonymously.

4.3 Disclosure can be made to the Disclosure Line by telephone, by e-mail or by mail to the number/address set out below:-

Telephone	09-5141936 @ 948 @ 339 - Disclosure Officer
E-mail	disclosure@fareh.po.my
Address	Far East Holdings Berhad Level 23, Menara Zenith Jalan Putra Square 6, 25200 Kuantan Pahang Darul Makmur (Attn: Disclosure Officer - Private and Confidential)

What happens when I lodge the report?

4.4 When you lodge the report, Disclosure Officer will make a record of all the relevant data provided by you and endeavor to obtain sufficient information to conduct an investigation. You will have the option of either identifying yourself or remaining anonymous.

4.5 Subject to any whistleblower protection requirements set out in any relevant law Whistleblower Protection Act 2010 (Malaysia), the investigating staff will promptly provide a full report to the Compliance Committee of the Disclosure. If you make an anonymous Disclosure to the Company, your identity will remain incognito.

5.0 PROTECTION

5.1 An employee who wishes to raise a concern or report regarding Improper Conduct may be worried about possible repercussions. FEHB encourages openness and will support anyone who raise genuine concern in good faith under this Policy, even if they turn out to be mistaken.

5.2 FEHB is committed to ensuring that no one suffers Detrimental Treatment as a result of their refusal to take part in conduct that may tantamount to Improper Conduct, or their actions in reporting Improper Conduct.

- 5.3 If a Whistleblower suffer Detrimental Treatment in the circumstances described in paragraph 5.2, he or she must inform his or her Manager immediately. If the matter is not remedied promptly by the Manager, the Whistleblower should raise the matter with a member of the Compliance Committee.

6.0 INVESTIGATION OF DISCLOSURE

- 6.1 All Disclosure are taken seriously and are subject to investigation.
- 6.2 FEHB will investigate all Disclosure made under this Policy as soon as possible after the matter has been reported from the Disclosure Officer. The investigation will be conducted in a timely, thorough, confidential and fair manner.
- 6.3 Any investigations and proceedings arising from this Policy must follow the proper processes of FEHB's policy, where applicable. If after the completion of the investigation, the person who conducted the investigation determines that Improper Conduct has occurred, the Disclosure Officer will make recommendations to the General Manager or Executive Director, Plantations.

7.0 CONFIDENTIALITY

- 7.1 The identity of the Whistleblower (where known to FEHB), the fact that the Whistleblower has made a Disclosure and the content of the Disclosure will be kept confidential and no details of the Whistleblower's participation in this process will be included in his or her personnel file or performance review.
- 7.2 The Disclosure will not be disclosed to anyone except those who need to know for the purpose of investigating the matters referred to in the Disclosure.

8.0 COMMUNICATION

- 8.1 As a general rule, Whistleblowers will be informed of the results of an investigation as soon as possible after the concern is resolved or acted upon. However, in some circumstances privacy, confidentiality or other legal constraints may limit the feedback that can be provided to the Whistleblower.

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