



GROUP HUMAN RESOURCE

Whistleblowing Policy

Prepared by	:	ESTHER KUAN			
Reviewed by	:	LIM HONG KHENG			
Approved by	:	BOARD OF DIRECTORS OF TROPICANA CORPORATION BERHAD			
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1.0 POLICY STATEMENT

Tropicana Group is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. The Group aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, Tropicana has developed this Whistleblowing Policy to provide a structured reporting channel and guidance to all employees and third parties to whistle blow on genuine concerns without fear of retaliation, victimization and/or subsequent discrimination.

This policy is to be read in conjunction with Tropicana's Code of Conduct, and the Group's Anti-Bribery and Anti-Corruption Policy.

2.0 OBJECTIVE

2.1 The objectives of this Policy are as follows:

- To provide employees and third parties with proper internal procedures in disclosing cases of Improper conduct;
- To manage disclosures of Improper Conduct in an appropriate and timely manner;
- To provide protection to Whistleblowers from Detrimental Action that may result from disclosure of Improper Conduct; and,
- To provide fair treatment to both the Whistleblower and the alleged wrongdoer when a disclosure of Improper Conduct is made.

2.2 To set out the processes to management the overall system and implementation of the Whistleblowing Policy. The flowchart of the processes is attached in Appendix 1.

3.0 SCOPE OF THE POLICY

3.1 This Policy applies to Company's Directors and Employees, including employees on contract and any other stakeholders/persons providing services to the Group.

3.2 This policy does not apply to grievances concerning an individual's terms of employment or an employee performance matter and such matters shall be dealt with in accordance with Group Human Resource guidelines and policies.

3.3 Should it be determined during the preliminary investigation that the matter disclosed does not fall within the scope of this policy, such matters shall be transferred and dealt with by the appropriate personnel of relevant department for appropriate procedures and actions to be taken.

3.4 This policy is not to invalidate the Grievance Handling Policy and Procedure but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company.

4.0 REFERENCE

4.1 Whistleblowing form

5.0 DEFINITIONS

5.1 Below is the list of terminologies and abbreviation of words that are used in this policy.

- 5.1.1 Company Tropicana Corporation Berhad and its group of companies
- 5.1.2 Whistleblowing Is the disclosure of Improper Conduct based on one's reasonable belief that any person has engaged, is engaging or preparing to engage in Improper Conduct. This applies even in circumstances where information regarding Improper Conduct is supposed to be treated as confidential.
- 5.1.3 Whistleblower Is a person who discloses information of Improper Conduct in accordance with this Policy
- 5.1.4 GHR Group Human Resource, a division of the Company that is focused on activities related to employee(s).
- 5.1.5 Improper Conduct Is any conduct which if proven, constitutes a serious Disciplinary Offence or a criminal offence. Improper Conduct includes, but are not limited to the following:
- Criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
 - Failure to comply with legal or regulatory requirements
 - Misuse of Company's funds or assets;
 - An act or omission which creates a substantial and specific danger to the lives, health or safety of employees or the public of the environment;
 - Unsafe work practices or substantial wasting of company resources;
 - Abuse of power by and officer of the Company; and
 - Concealment of any of the above.
- 5.1.6 Disciplinary offence Any action or omission which constitutes a breach of discipline in the Company as provided by law or the Company's code of conduct, policies and/or contract of employment.
- 5.1.7 Good faith The Whistleblower who intends to make a report must have reasonable grounds for believing its existence and has reliable information before reporting such improper conduct; must undertake such reporting in good faith and in the best interest of the Group.
- 5.1.8 Detrimental action
- Any action causing injury, loss or damage to the Whistleblower;
 - Any action of intimidation and harassment against the Whistleblower;
 - Any direct or indirect retaliation or attempted retaliation, discrimination or victimization;
 - Interference with the lawful employment or livelihood or the Whistleblower, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the Whistleblower's employment, career, professions, trade, or business of the taking of disciplinary action; and
 - A threat to take any of the actions as stated above.

6.0 PROTECTION OF A WHISTLEBLOWER

- 6.1 Upon making a disclosure in good faith, based on reasonable grounds and in accordance with and pursuant to this Policy
- The Whistleblower shall be protected from any Detrimental Action within the Company as a direct consequence of the disclosure; and
 - The Whistleblower's identity and such other confidential information of the Whistleblower shall not be disclosed.
- 6.2 The protection against Detrimental Action is extended to any person related to or associated with the Whistleblower.
- 6.3 It is to be noted that any person who has not acted in good faith shall not be entitled to any protection under this Policy. If allegations are proven to be malicious or founded on bad faith, any protection provided may be revoked and parties responsible may be subject to appropriate action, including but not limited to legal action, where applicable.

7.0 ANONYMOUS WHISTLEBLOWER

- 7.1 Anonymous reports are not encouraged as it would be difficult to ascertain the facts and follow-up on the matter for investigation purposes.
- 7.2 The Company shall not be expected to follow up on any anonymous reports. The Company may however consider investigating the allegations after considering the seriousness and credibility of the allegations and the impact of the allegations if confirmed.

8.0 WHISTLEBLOWING CHANNELS

- 8.1 A disclosure of Improper Conduct may be reported to the Head of Group Human Resource Department and shall be marked as "Confidential" or via the Whistleblowing form.
- 8.2 Disclosure of Improper Conduct may also be reported via electronic e-mail to whistleblower@tropicana.com.my

9.0 INFORMATION REQUIRED FOR INVESTIGATION

- 9.1 As a guide, the information to be furnished by a Whistleblower is set out in the whistleblower form.
- 9.2 Where a whistleblower identifies himself, the Group will maintain the confidentiality of the Whistleblower to the extent that is practical and appropriate under the circumstances, having regard to all relevant legal requirements.
- 9.3 A Whistleblower can enhance the efficiency of investigating concerns by providing complete and accurate information in the report. Information which would be useful in assessing the Whistleblower's concerns include:
- The details of the improper conduct;
 - The date, time and location of the improper conduct;
 - The identity and designation (if any) of the wrongdoer (s);
 - Particulars of witnesses or other parties involved, if any;
 - Particulars or copies of documentary evidence, if any;
 - Any other details that are useful to facilitate screening and investigation.

10.0 PRE-SCREENING AND INVESTIGATION PROCESS

- 10.1 An appointed panel will screen and assess the complaints made by whistleblowers to determine the nature and seriousness of the allegations and may proceed to conduct a preliminary or full investigation based on the evidence and nature of the complaint.
- 10.2 In the event a further investigation is necessary, an appointed special investigation team will be formed to conduct further investigation.
- 10.3 Interviews may be conducted with any relevant witnesses and all relevant data and materials relevant to the Improper Conduct shall be retained.
- 10.4 All interviews and activities carried out in the course of investigation shall be recorded and reduced to writing and files.
- 10.5 The investigating team shall have free and unrestricted access to all records of the Company and shall have the authority to examine, obtain and/or make copies of all or portion of the contents of documents, files and others where applicable as it is necessary to assist in the investigation of the Improper Conduct.

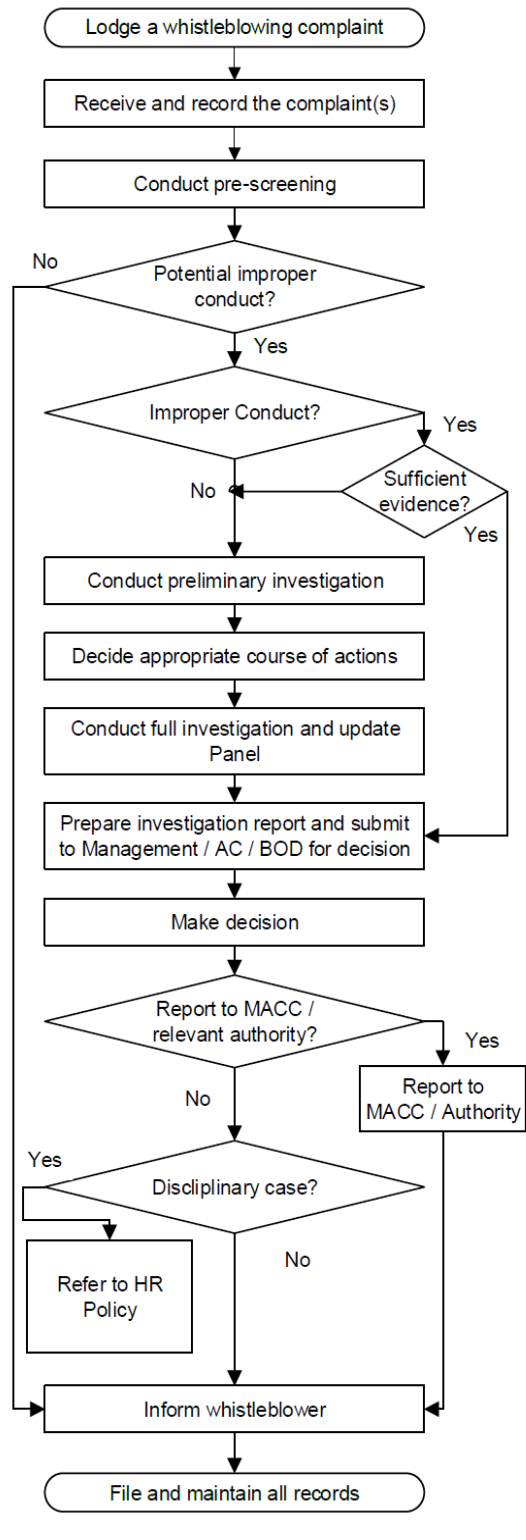
11.0 REPORTING OF OUTCOME

- 11.1 Subject to legal constraints, the Whistleblower and the alleged wrongdoer will be notified of the outcome of the investigation

12.0 TIMELINE

- 12.1 This Policy is intended to ensure that disclosures made by Whistleblowers are reviewed and actions are taken in a timely manner. It should also be kept in mind that the seriousness and complexity of any complaint may have an impact upon the time taken to investigate the matter.

1.0 PROCESS FLOW

	RESPONSIBILITY	REFERENCE
 <pre> graph TD A([Lodge a whistleblowing complaint]) --> B[Receive and record the complaint(s)] B --> C[Conduct pre-screening] C --> D{Potential improper conduct?} D -- No --> I[Inform whistleblower] D -- Yes --> E{Improper Conduct?} E -- No --> I E -- Yes --> F{Sufficient evidence?} F -- No --> I F -- Yes --> G[Conduct preliminary investigation] G --> H[Decide appropriate course of actions] H --> I1[Conduct full investigation and update Panel] I1 --> J[Prepare investigation report and submit to Management / AC / BOD for decision] J --> K[Make decision] K --> L{Report to MACC / relevant authority?} L -- No --> M{Disciplinary case?} L -- Yes --> N[Report to MACC / Authority] M -- Yes --> O[Refer to HR Policy] M -- No --> I O --> I N --> I I --> P([File and maintain all records]) </pre> <p>Whistleblowers report through the following channels: i. Whistleblowing form ii. E-mail to iii. Write to IA / Chairman of AC</p> <p>Panel assess whistleblower's disclosure to determine whether the report constitutes improper conduct.</p> <p>Management / AC / BOD deliberates and decides the next course of actions based on the final report (actions against staff / Third Party).</p> <p>IA inform whistleblower outcome of the complaint lodged.</p> <p>IA ensure safekeeping of Investigation Papers and other relevant documents for future reference.</p>	<p>Whistleblowers</p> <p>Internal Auditor (IA)</p> <p>Panel (IA & HR)</p> <p>Panel</p> <p>Panel</p> <p>Panel</p> <p>Internal Auditor</p> <p>Panel</p> <p>Internal Auditor, or special team</p> <p>Internal Auditor / Panel</p> <p>Management / AC / BOD</p> <p>BOD</p> <p>Internal Auditor</p> <p>Internal Auditor / Whistleblower</p>	<p>Whistleblowing form</p>
<p>Latest version of documents are maintained in e-QMS. Hardcopies are considered uncontrolled.</p>		

WHISTLEBLOWING FORM

A. DISCLOSURE DETAILS (You may insert information on additional individuals involved in a separate sheet)	
1	PARTY INVOLVED IN CONCERN RAISED (You may insert information on additional individuals involved in a separate sheet)
a.	Name of Alleged Wrongdoer
b.	Designation
c.	Division / Company
d.	How do you know this person?
2	DETAILS OF CONCERN (You may use additional sheets if necessary)
a.	Date / Time / Location
b.	Description of Concern
3	SUPPORTING INFORMATION TO ASSIST INVESTIGATIONS (please attach supporting evidence to substantiate your disclosure and assist in investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary)
a.	Witness Name:
b.	Supporting Evidence Department:
B. REPORTING TO OTHER PARTIES	
1	<p>Have you raised your concern to any other person / department / authority? (Tick whichever applicable)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please state the person / department / authority the report was made / lodged and insert the date of the report. You may attach a copy of the report made.</p> <p>_____</p>
C. PARTICULARS OF WHISTLEBLOWER (You are encourage to provide your contact details to enable us to contact you for further clarification if required)	
a.	Name :
b.	Designation :
c.	Contact No :
d.	E-mail Address :
e.	Relationship with TCB Group (if not employee) :
D. DECLARATION	
<p>I hereby declare that all information provided herein are made voluntarily and are true to the best of my knowledge, information and belief. I do understand that TROPICANA CORPORATION BERHAD shall use the information and materials provided herein throughout the process in accordance with the Group Whistleblowing Policy & Guidance Notes.</p> <p>Name : _____</p> <p>Date :</p>	