



Bumitama Agri Limited

## **WHISTLEBLOWER POLICY**

### **Commitment**

Bumitama Agri Limited and its subsidiaries (the Group) is committed to observing, upholding and attaining high standards of corporate governance, business integrity and professionalism in its business and operations; based on the foundation of its corporate culture and values and SGX Code of Corporate Governance outlined in the Group "Code of Conduct" including complying with all applicable laws, regulations, policy and practices.

### **Purpose**

The purpose of this Policy is to encourage the reporting, as required under our Code of Conduct of any suspected of fraud or corrupt conduct, or irregularities or any other form of inappropriate behaviour (reportable conduct). While this would generally be through the normal channels of line management, there may be times where an employee or contractor or etc. believes it is inappropriate or difficult for matters to be reported through these channels. In these cases it is important that employees or contractors or etc. have another avenue through which to express their concerns in order to protect their identity.

### **Application**

The Policy applies to all full time and part time employee and to contractors and relevant stakeholders .

### **Definition of Whistleblower**

A director, manager, employee or contractor or service provider, or person from surrounding community, or customer, or supplier, or NGO, or other stakeholder of the Group who wishes to report conduct they believe is in breach of our 'Code of Conduct' or in breach of the law and where the individual perceives a need to avail themselves of protection against reprisal for having made the report. A whistleblower may or may not elect to remain anonymous.

### **What to Report**

Any suspected fraud, theft, threat, abuse, corrupt conduct, inappropriate behaviour, colluding with others to cheat, irregularities, conflict of interest, illegal activity, misuse of Group's properties, involving or impacting the Group or its employees in any way; these concerns, acts or activities which may cause financial or non-financial loss to the Group, or damage the Group's reputation. These concerns must have some reasonable foundation for being raised.

### **Who to Report To**

The Head of Internal Audit is the person to whom matters should be reported in the first instance through whistleblower mobile number: 081286419700 or Email: [audit.pengaduan@bumitama.com](mailto:audit.pengaduan@bumitama.com).

### **Confidentiality**

In addition to our legal obligations, the Group extends its assurance of confidentiality to all other matters. All information received in respect of other reportable conduct will be held in strictest confidence and, where clearly desired by the individual, the identity of the person will not be disclosed without permission.



However there may be circumstances where information provided may require disclosure such as:

- Where the Group is under legal obligation to disclose the information provided;
- Where the information is already in the public domain;
- Where the information is given on a strict confidentiality basis to legal or auditing professionals for the purpose of obtaining professional advice; and
- Where the information is given to the police for criminal investigation.

### **Investigation**

The investigating officer will ensure that all reports are investigated promptly and appropriately. In this regard the officer will assume no guilt on the part of any party until proven otherwise. Where any wrongdoing is uncovered, the officer will apply the guidelines of the Code of Conduct and its regulation.

If there are concerns as to the safety of the whistleblower, he or she may request leave of absence or a temporary change of workplace. Such requests will be given appropriate consideration.

### **Feedback**

Where an individual reports suspected reportable conduct the whistleblower will receive feedback on the progress of the investigation and whether anything has come to light that may give them cause for concern.

### **Protection**

The Group is committed to ensuring that any individual is not disadvantaged in any way from validly raising concerns about suspected reportable behaviour. In particular, such a person will not be disadvantaged by dismissal, demotion, harassment, discrimination or bias.

If the whistleblower feels that reprisals have been taken, the individual can appeal through any one of management or Head of Internal Audit or Corporate Secretary to the Audit & Risk Committee of the BAL Board.

### **Penalties for Breach of this Policy**

Where any Officer, employee or contractor of BAL breaches this policy, this will be considered a breach of the Code of Conduct and dealt with as such.

### **Reward**

Management may provide reward for employee who raises valid concerns about suspected reportable behaviour.

### **Other complaint channel**

The Group has three channels of complaint for specific purposes:

- Whistleblower policy that focusing on fraud, irregularities, and inappropriate conduct on operational and financial concerns.
- Grievance procedure which mainly accommodate complaint on sustainable concerns.
- Quick Response Services (QRS) which primarily provides employee a hotline for any HR related concerns.



**APPENDIX A**

**Whistle – Blowing Process**

