

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 Human Rights Defenders (HRD's) 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.

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.

The Group exercises a zero-tolerance policy against any threats against whistleblowers; safeguarding the confidentiality of those involved in the process in order to prevent harm, protect and respond to complaints on any alleged threats or violence.

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.



Bumitama Agri

Excellence Through Discipline

APPENDIX A

Whistle – Blowing Process

