

**SUNGEI BAGAN RUBBER COMPANY (MALAYA) BERHAD**  
**(Incorporated In Malaysia: 3327-U)**

**WHISTLE BLOWING POLICY & PROCEDURES**  
**(Approved by The Board of Directors on 28 May 2018)**

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**A. WHISTLE BLOWING**

Whistle Blowing is a specific means by which an employee or stakeholder can report or disclose through established channels, concerns about:

- Unethical behavior;
- Illegal acts;
- Failure to comply with regulatory requirements; or
- Any possible serious violations of internal policies, procedures or external laws by the perpetrators.

This includes events which are taking place, has taken place or may take place in the future.

Only genuine concerns should be reported under the Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

**B. PROCEDURE**

- Any employee concerns should be raised with his/her immediate superior.
- If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Executive Director – Mr. Cheong Mun Hong.
- In the case where reporting to Management or the Executive Director is a concern, then the report should be made to the Chairperson of the Audit Committee.
- The appointed person will act promptly to investigate the issue.

To report any incidents to the Executive Director or Chairperson of the Audit Committee directly via electronic mail, the Company's contact details are as follows:

- By Electronic Mail:

Company Electronic Mail: [feedback@sungeibagan.com](mailto:feedback@sungeibagan.com)

- Company's Registered Address:

Sungei Bagan Rubber Company (Malaya) Berhad  
Suite 6.1A, Level 6, Menara Pelangi, Jalan Kuning,  
Taman Pelangi, 80400 Johor Bahru, Johor

For contact via the Company Secretary, who will then inform the designated Director accordingly, the Company Secretary's contact details are as follows:

- By Electronic Mail:

Company Secretary's Electronic Mail: SCH.JB@symphony.com.my

- By Phone:

Symphony Corporatehouse Sdn Bhd  
Ms Julie Leong Siew Foong / Ms Zarina Binti Ahmad  
Contact: 607-332-3536

### **C. ACTION**

- All reports will be investigated promptly by the person receiving the report. If required, he/she can obtain assistance from other resources within the Group. The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- Steps will be implemented to prevent future situations of a similar nature.

### **D. PROTECTION**

The Whistle Blowing policy gives protection to such persons against harassment or victimization as a result of such disclosure. Therefore, employees and stakeholders are encouraged to raise only genuine concerns about possible improprieties at the earliest opportunity via the appropriate channel:

- All concerns raised will be treated fairly and properly;
- The Company will not tolerate harassment/victimization of the person raising genuine concerns;
- The person making a disclosure will retain anonymity unless he/she agrees otherwise;
- The Company will ensure the person will not be at risk of suffering any form of reprisal as a result of raising a genuine concern;
- The Policy provides employees and stakeholders a secure channel of reporting impropriety in the knowledge that the matter will be treated confidentially;
- An effective Whistle Blowing procedure will encourage an open, honest and accountable culture amongst all employees and stakeholders to express their concerns, without fear of victimization or termination of employment.

### **E. FURTHER ACTION**

If for any reason, the person making the report is unsatisfied with the way the report was handled, he/she can escalate his/her report to the Chairman via the Company Secretary.