

# OUR WHISTLEBLOWING POLICY

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## **1. Commitment**

We are committed to high standard of transparency, accountability and ethic at the workplace. We shall practice good corporate governance and uphold integrity in all its operational activities and business dealings.

## **2. Objectives**

The purpose of this policy is to establish an accessible and confidential trusted reporting channel (whistleblowing channel) which may be used anonymously for internal and external parties to raise concerns in relation to real or suspected wrongdoing incidents or inadequacies of any of our Sustainability Policies.

## **3. Definition**

“Wrongdoing” shall include bribery and/or corruption incidents, financial transactions that may disguise corrupt payments money laundering, actual or suspected fraud, misappropriation of monies, misrepresentation, concealment of facts or information with intention to mislead, violation of laws and regulations, endangerment of personnel or public health and safety, violation of company’s policies and procedures, illegal unethical favors or privileges, criminal offences and blackmailing.

## **4. Reporting in Good Faith**

Personnel, business associates and all internal and external parties are to be encouraged to raise concerns and to report, in good faith, any real or suspected wrong doing incidents or inadequacies of any of our Sustainable Policies at the earliest possible stage.

## **5. Protection against Retaliation and Reprisal**

We note that personnel and business associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential wrongdoing has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

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### **6. Confidentiality**

All complaints reported to the company are to be treated highly confidential. Information will only be disclosed on need-to-know basis. The identity of the whistleblower will not be revealed unless it is required by laws or with the permission of the whistleblower (reporting person).

### **7. Reporting Channel**

Any improper conduct or wrongdoing shall be reported immediately to the Integrity and Governance Unit of the Company who then will perform a preliminary assessment of the seriousness of the matter disclosed. The contact particulars of the Integrity and Governance Unit (IGU) are as follows:-

**Integrity and Governance Unit (IGU)**  
**LRG Rubber Sdn Bhd**  
**28<sup>th</sup> Floor, Wisma Lee Rubber,**  
**Jalan Melaka,**  
**50100 Kuala Lumpur,**  
**Malaysia.**  
**Attn: Ho Han Boon**

**Email: [hohanboon@leeselangor.com.my](mailto:hohanboon@leeselangor.com.my)**  
**Tel: +6012 7988509**

Whistleblowing and reporting of concerns may be made anonymously. All whistleblowing and reporting of improper conduct in good faith and not for malicious intent will be investigated and dealt with appropriately. However, a whistleblower is encouraged to identify himself/herself when reporting for credibility purposes and to allow an avenue for the us to follow up to ascertain the facts or to obtain further information for investigation purposes. Whistleblowers are also encouraged to attach reliable evidence to substantiate the disclosure and assist in the investigation.

To facilitate the use of the whistleblowing or reporting channel, we have prepared a Whistleblowing Form annexed to this Whistleblowing Policy which may be used. The Whistleblowing Form may be submitted together with additional sheets for additional witnesses or supporting evidence if necessary.

Whistleblowers may make reports using the Whistleblowing Form or they may do so in any other format of letters, email or even orally.

# OUR WHISTLEBLOWING POLICY

## ANNEX

### LEE BISCUITS MALAYSIA SDN BHD

#### Whistleblowing Form

##### Important Notice

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All whistleblowing and reporting of improper conduct made in good faith and not for malicious intent will be investigated. This Whistleblowing Form may be used anonymously, but a Whistleblower is encouraged to identify himself/herself when whistleblowing and reporting for credibility purposes and to allow an avenue for the Group to follow up to ascertain the facts or to obtain further information for investigation purposes. You are encouraged to attach reliable evidence to substantiate your disclosure and assist in the investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary.

##### Section A : Disclosure Details

Questions	Answer/Explanation
Name of person(s) involved in the incident or issue	
Department/Designation :	
If money involved, please indicate the amount involved?	
Do you suspect any other people that are involved? Please provide the details, if any.	
Do you suspect that the management is involved? Please provide the details, if any.	
Have you notified anyone? Please provide the details, if any.	
Any witnesses? Please provide the name, department and other relevant details.	
Date, Time and Location of the incident or issue?	
How did you discover the incident or issue?	
Please provide a description of the incident or issue.	

##### Section B : Whistleblower Details

Are you a personnel of the company?	
Name (Not mandatory)	
Contact Number of E-mail Address (Not Mandatory)	