



TROPICANA
CORPORATION BERHAD

GROUP HUMAN RESOURCE

Whistleblowing Policy

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1.0 What is a Whistleblower Act?

The Whistleblower Protection Act 2010 protects whistleblowers who work for the Tropicana Group and members of the public to report any form of misconduct.

2.0 What is a Whistleblowing Policy?

A whistleblower as defined by this policy is an employee of Tropicana Group or a member of the public who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy.

3.0 What is a Whistleblowing Definition?

A whistleblower is anyone who has and reports insider knowledge of illegal activities occurring in an organization or a company. Whistleblowers can be employees, suppliers, contractors, clients or any individual who somehow becomes aware of illegal activities taking place in a business either through witnessing the behavior or being told about it.

4.0 Why is a Whistleblowing Important?

Whistleblowing is an important source of intelligence to help government identify wrongdoing and risks to public service delivery. But many concerns go unreported, and the intelligence that does exist is not routinely collected and shared.

5.0 Policy Statement

TROPICANA GROUP is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner. Recognizing the abovementioned values, TROPICANA provides avenue for all employees of TROPICANA GROUP and members of the public to disclose any improper conduct within the TROPICANA GROUP

6.0 Objective of the Policy

This policy is to provide an avenue for all employees of TROPICANA GROUP and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

7.0 Scope of the Policy

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's Property;
- vii. Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under TROPICANA GROUP's Code of Conduct or any criminal offence under relevant legislations in force.

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.

8.0 Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of TROPICANA GROUP and its subsidiaries. This policy also applies to members of the public, where relevant.

9.0 Procedure in Making a Disclosure

All disclosures are to be channel in accordance with the procedures as provided under this policy.

10. Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within TROPICANA GROUP, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

11.0 Anonymous Whistleblower

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

12.0 Notification

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

13.0 TROPICANA GROUP reserves the right to amend this policy from time to time.

14.0 Please refer to the Group Human Resource Head of Departments if there are any queries or questions.