

WHISTLEBLOWING POLICY

1.0 PURPOSE

- 1.1 The objective of this document is to address the avenues available for all employees of PT Resources Holdings Berhad and its subsidiaries (“Group”) and all agents, vendors, contractors, suppliers, consultants, customers and those who performs services for or on behalf of the Group (collectively known as “stakeholders”) as well as members of public to:
- (a) raise concerns about any improper conduct by members of the Group (including any actual, attempted or suspected improper conduct); or
 - (b) inadequacies of the Group’s compliance programmes,
- without fear of retaliation and to offer protection for such persons (including the employees of the Group) who lodges a report.
- 1.2 The types of improper conduct that may be raised under this Policy are concerns that could have an adverse impact on the operations and performance of the Group. Such concerns include, without limitation:
- (a) accounting or auditing matters or irregularities of a financial nature, legal and/or ethical nature, such as:
 - (i) fraud (e.g. financial fraud, document fraud or embezzlement);
 - (ii) serious deficiencies or deliberate error (in e.g. financial reports or statements, or in internal accounting controls);
 - (iii) breach of antitrust regulations (e.g. price fixing)
 - (iv) bribery or corruption; or
 - (b) other irregularities of a general and/or operational nature, such as serious endangerments concerning the vital interests of the Group or the life or health of individuals, environmental crimes, major deficiencies as regards security in the workplace and serious forms of discrimination or harassment.
- 1.3 The term subsidiaries in this document covers the following:
- MHC Coldstorage Sdn Bhd
 - MO Foodmart Sdn Bhd
 - HGMC Holding Sdn Bhd

2.0 WHISTLEBLOWING POLICY AND PROCEDURE

- 2.1 Employees and stakeholders who encounter actual, attempted or suspected improper conduct by members of the Group, including violations of the Group's policies, are required to lodge a report on the improper conduct promptly and this is their responsibility. Additionally, employees and stakeholders are also encouraged to report inadequacies of the Group's compliance programmes (such as the Group's anti-corruption programme).
- 2.2 The Group practices an open-door policy and encourages all employees to share concerns and suggestions with superior(s) and colleague(s) who is able to address them in an appropriate manner.
- 2.3 Aside from that specific whistleblowing channels are stated below:
- (a) Emails & Mails:
- 2.3.a.1 Managing Director: heng@mhccoldstorage.com
- 2.3.a.2 Group Financial Controller: jasper.lai@ptresourcesgroup.com.my
- 2.3.a.3 Head Office: Tower K03-5-12, UOA Business Park, Jalan Pengaturcara U1/51A, Seksyen U1, 40150 Shah Alam, Selangor.
- 2.4 Although a report may be lodge anonymously, we strongly urge the whistleblower to provide details when lodging a report including those stated below.
- (a) Name of the individual raising the concern;
- (b) Contact particulars of the individual raising the concern (contact number and residential address) and his or her department and immediate supervisor (if applicable);
- (c) Details of the concern (including nature, parties involved, date, time, location of the incident and etc);
- (d) Name of possible witness(es) to the incident (if any); and
- (e) Supporting evidence in any form (if any).
- 2.5 Reports made in good faith, either anonymously or otherwise, will be looked into in a timely manner. The whistleblower should not fear consequences of lodging reports done in good faith, regardless of the outcome of any investigations.
- 2.6 The whistleblower shall be protected against reprisals or retaliations from the Management of the Group where he/she makes the reports in good faith and the Group shall take reasonable steps to ensure he/she is granted immunity from any disciplinary action by the whistleblower's immediate supervisor or Head of Department or any other person exercising power or authority over the

whistleblower in his/her employment. Any such reprisal or retaliation against the whistleblower is considered a serious breach of this Whistleblowing Policy and Procedure.

- 2.7 The Group shall take reasonable steps to ensure that identity of the whistleblower shall be kept confidential to the extent possible. Whistleblowers are cautioned that their identities may become known for reasons outside of the control of the Group. The identity and personal information of the whistleblower may be revealed to persons involved in investigations or any other processes that are deemed necessary to assist investigations.
- 2.8 The Group encourages employees and external whistleblowers to identify themselves when possible. Concerns or irregularities expressed anonymously are more difficult to act upon effectively, but will still be looked into. All concerns or irregularities raised will be treated with confidence and reasonable efforts will be made to ensure that confidentiality is maintained throughout the investigation process.

3.0 REVIEW OF THE POLICY

- 3.1 The Board will monitor compliance with the Policy regularly and review the Policy at least ONCE every THREE (3) years to ensure that it continues to remain relevant and appropriate.