

# POLICY ON WHISTLE BLOWING

## INTRODUCTION

In line with good Corporate Governance Practices, Board of Directors and Management of Evergreen Fibreboard Berhad (the “Company or EFB”) and its Subsidiaries (“the Group”) encourages its employees and business associates to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate manner provided in this policy.

## OBJECTIVE

This “**Whistle Blowing Policy**” is designed to:

- (a) Support the company’s values;
- (b) Ensure employees can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- (c) Protect a whistle-blower from reprisal as a consequence of making a disclosure; and
- (d) Provide a transparent and confidential process for dealing with concerns. This policy not only covers possible improprieties in matters of financial reporting, but also:

- **Fraud;**
- **Corruption, bribery or blackmail;**
- **Criminal offences;**
- **Failure to comply with a legal or regulatory obligation;**
- **Miscarriage of justice;**
- **Endangerment of an individual’s health and safety; and**
- **Concealment of any, or a combination, of the above.**

## Principles

The principles underpinning this Policy are as follows:

- (a) Internal procedures to facilitate necessary whistle-blowing, in a timely and responsible manner, are in place and made known to all employees of the company;
- (b) All disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- (c) The Group will not tolerate harassment or victimization of anyone raising a genuine concern;
- (d) The identity and personal information of the whistle-blower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;
- (e) The whistleblower and the alleged wrongdoer will be treated fairly. The wrongdoer will be informed of the status of his/her disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);

- (f) Personal information, including the identity, of the whistle-blower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis; and
- (g) The company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue.

### **Covered Concerns**

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- (a) Corruption, bribery and fraud;
- (b) Criminal offence or any breach of the laws of Malaysia;
- (c) Acceptance of gifts/ favor beyond the threshold allowed by the company;
- (d) Misuse and/or misappropriation of the company's funds or assets;
- (e) Impropriety (including financial and operational, etc.) Within the company;
- (f) Gross mismanagement within the company (including serious potential breach to the interest of society and environment);
- (g) Breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
- (h) Act or omission jeopardizing the health and safety of the company's employees or the public.

### **Reporting Procedure**

If any employee believes reasonably and in good faith that malpractices exist in the work place, the employee should report this immediately to his/her Immediate Superior. However, if for any reason the employee is reluctant to do so, then the employee should report his / her concerns in the following steps:-

#### **Step 1**

Report (Verbally or Written) directly to the Executive Directors or call any of these numbers directly if he/she prefers to be anonymous.

H/P : 6012-7705419 (Kuo Jen Chang)

H/P : 6012-7108807 (Kuo Jen Chiu)

H/P : 6012-7178918 (Mary Lim)

and / Or

#### **Step 2**

If he/she still fails to get any response, he/she shall directly report concerns to the Company Secretary by contacting 60-7-3352536 (Ms Julie Leong) or write to her email at [SCH.JB@symphony.com.my](mailto:SCH.JB@symphony.com.my) .

Employees who may be concerned about speaking to another member can also use our " Online Complaint Form " to raise his / her concerns. This Form is available on the group's website at [www.evergreengroup.com.my](http://www.evergreengroup.com.my).

Through this channel, the receiving party for complaints will provide the reporting party advice on

the complaint being raised and will also be inform the person handling the case and its progress.

If these channels have been followed and if employees still have unresolved concerns or if employees feel the matter is grave in nature that it cannot be discussed with any of the appointed persons above, he/she should contact the Senior Independent Director (Mr Kuan Kai Seng) on his mobile at 60-12-7203038 or write to his email at [kuankaiseng@gmail.com](mailto:kuankaiseng@gmail.com) being the director identified in the company's annual report as one to whom concerns may be conveyed.

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can progress further.

### **Consequences of Wrongdoing or Wrongful Disclosure**

If the Person (i.e. the whistle-blower) has, or is found to have:

- Committed a wrongdoing;
- Taken serious risks which would likely cause a wrongdoing to be committed;
- Made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous or malicious complaints); or
- Participated or assisted in any process pursuant to this policy otherwise than in good faith, the corrective actions to be taken against that Person will be determined by the Disciplinary Committee and this may disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

### **Protection**

The identity and personal information of the whistle-blower shall at all times be protected and kept confidential, unless the whistle-blower agrees otherwise or unless otherwise required by law. The whistle-blower will also be protected from reprisal, including any form of harassment and victimization, as a consequence of his disclosure.

If a whistle-blower reasonably believes that he is being subjected to reprisal, including harassment and victimization, as a consequence of whistle-blowing, he may consult or report / call directly to the Senior Independent Director (Mr Kuan Kai Seng) on his mobile at 60-12-7203038 or write to his email at [kuankaiseng@gmail.com](mailto:kuankaiseng@gmail.com) .

**This policy has been adopted by the Board of Directors on 01 June 2013 and subsequently been reviewed on 15th October 2014.**

# WHISTLE BLOWING

To be complete in ink and return this form to:

Executive Directors

Mr Kuo Jen Chang or Mr Kuo Jen Chiu or Ms Mary Henerietta Lim

Evergreen Fibreboard Berhad

PL0 22 Parit Raja Industrial Area,

86400 Batu Pahat, Johor, Malaysia

Tel : 607 - 4541933

Fax : 607 -4542933

E-mail : [enquiry@efb.com.my](mailto:enquiry@efb.com.my)

or

Senior Independent Director (Mr Kuan Kai Seng)

Email address: [kuankaiseng@gmail.com](mailto:kuankaiseng@gmail.com).

or

The Company Secretary

Ms Julie Leong

Email address : [SCH.JB@symphony.com.my](mailto:SCH.JB@symphony.com.my)

1. Name of the person(s) you are reporting.

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2. Department in which that person works.

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3. Please provide a summary of the alleged improper conduct, wrongdoings, corruption, fraud, waste or abuse of power that you are reporting.

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4. Please attach a separately any documentations to support your claim.

5. Provide information on relevant witnesses, if any, including email, telephone number and/or the best way to get in touch with them.

Witness #1  
Name: \_\_\_\_\_ Email: \_\_\_\_\_ Phone No: \_\_\_\_\_

Witness #2  
Name: \_\_\_\_\_ Email: \_\_\_\_\_ Phone No: \_\_\_\_\_

6. Please provide dates that the alleged activity occurred \_\_\_\_\_

7. Location of where Activity taken place \_\_\_\_\_

8. Please provide any other information you may find relevant.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Note : We will not document information concerning your name if you wish to remain anonymous; however, if you do not want to be anonymous please provide information below:-

Name: \_\_\_\_\_

Contact No: \_\_\_\_\_ Email Address: \_\_\_\_\_

**\*If you decide to remain anonymous, please contact us within 7 (seven) working days from your report, as we may need more information concerning the alleged activities reported.**

\*\*\*\*\*END\*\*\*\*\*