

RIVERVIEW RUBBER ESTATES, BERHAD

Whistleblowing Policy

1.1 OVERVIEW

To blow the whistle on someone is to alert a third party that a person has done, or is doing, something wrong. So, literally, “whistle-blowing” means that one makes a noise to alert others about a misconduct.

This Whistle Blowing Policy (“the Policy”) is a specific means by which any Employee or Stakeholder (i.e. shareholders/ customers / suppliers) can report or disclose through established channels, genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with company and regulatory requirements (“reportable misconduct”) that is taking place / has taken place / may take place in the future; of which they become aware and to provide protection for the individual who report allegations of such malpractice / misconduct / wrongdoings.

1.2 OBJECTIVE

The Policy is designed to support to the following:

- Be committed to decent business ethics of sincerity, integrity and responsibility;
- To provide a transparent and confidential process in handling the reported case;
- To uphold the moral duty of a Company by protecting the interest of all its stakeholders;
- To encourage reporting and disclosure through established channel, without fear of retaliation or reprisal should they act in good faith when whistleblowing; and
- To promote good corporate governance and to uphold integrity in all of Company’s operational activities and business dealings.

The principles underpinning this Policy are as follows:

- All concerns raised will be treated fairly and properly.
- Riverview will not tolerate harassment or victimization of anyone raising a genuine concern.
- Riverview will ensure no Whistle Blower will be at risk of suffering some form of reprisal as a result of raising a concern even if he is mistaken. The Group, however, does not extend this assurance to someone who maliciously raise a matter he knows is untrue or is acting for personal gain.
- The submission of a false or frivolous report may have consequences for the Whistle Blower and he may be liable for damages towards anyone who suffered from such false report.

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1.3 WHISTLEBLOWING SCOPE

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained. If the investigation later reveals that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

- The scope of matters covered by this Policy is not only related to concerns and complaints regarding financial matters but also the following (not exhaustive):
- financial malpractice, impropriety or fraud;
- corruption, bribery or blackmail;
- failure to comply with laws or regulations or group/company policies and procedures;
- criminal offences and miscarriage of justice;
- endangerment of an individual's health and safety;
- falsification or destruction of business or financial records, or misrepresentation or suppression of financial information; or
- concealment of any or a combination of the above.

Examples of Misconduct/ Wrongdoings:

- theft
- misappropriation of assets
- illicit and corrupt practices
- criminal breach of trust
- bribery
- sexual harassment
- disclosure of company's information without proper authorization
- abuse of position
- questionable and improper accounting
- deliberate concealment of any of the above matters or other acts of wrongdoing
- profiteering as a result of insider knowledge

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1.4 CONTENT OF DISCLOSURE

All disclosure made should contain the following information:

- Details of the person(s) involved including Whistle Blower;
- Details and reasons of the allegation
- Location and date / time the alleged misconduct took place;
- Any supporting evidence (if available); and
- Other relevant information.

1.5 REPORTING CHANNEL

If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within Riverview, the employee should report to immediate superior or management.

Concerns should be raised with the immediate superior; if for any reason this is not possible or inappropriate, the concern should be raised to the higher Management as follows:

Name : Mr. Sures Naidu
Via Email : whistleblowing@riverview.com.my
Via Mail : Mark: Strictly Confidential
Riverview Rubber Estates Berhad
33 (1st Floor)
Jalan Dato' Maharajalela
30000 Ipoh, Perak

In the event where reporting to the Management is a concern, the report should be addressed to the Chairman of the Audit Committee as follows:

Name : En. Mohd. Razali bin Mohd. Amin
Via Email : ac.chairman@riverview.com.my
Via Mail : Mark: Strictly Confidential
Riverview Rubber Estates Berhad
33 (1st Floor)
Jalan Dato' Maharajalela
30000 Ipoh, Perak

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1.5 REPORTING CHANNEL (CONT'D.)

The management who receives the report shall maintain all report received, tracking their receipt, investigation and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

1.6 INVESTIGATION

The management may decide not to investigate a report if in his opinion the complaint:

- is trivial; or
- is frivolous or vexatious; or
- if the Whistle Blower has had knowledge for more than 12 months of the disclosed matter and failed to give a satisfactory explanation for the delay in making the disclosure.

Should the management determine that a Whistle Blower's report warrants an investigation, he or such other officer as may be identified will conduct an investigation with complete independence and confidentiality, in the shortest possible time given the resources are available.

The following principles shall be applied to all investigations:

- confidentiality of information and communications must be maintained.
- issues must be addressed promptly.
- the investigation must be located and assess all evidence that either substantiates or refutes the complaint.
- decisions should be made only on the basis of relevant evidence that is available.
- all actions and the conduct of the investigation must be unbiased and must not draw conclusions until all the evidence had been collated and reviewed.
- Individuals who are suspected of having been involved with improper conduct should be informed of the issue as soon as practicable and be given the opportunity to provide explanations, details and responses to any allegations.

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1.7 NON-DISCLOSURE OF IDENTITY

In order to enable Riverview to accord the Whistleblower with the necessary protection under the “Whistleblower Protection Act 2010” and also to obtain more details on the allegation / report, the Whistleblower is encouraged to disclose his / her personal identity. However, Whistleblower may choose to remain anonymous, although in some instances it may limit the ability for thorough investigation due to insufficient information.

This Policy provides assurance that Riverview will always protect the confidentiality of all allegations raised and the identity of the Whistleblower.

1.8 PROTECTION ACCORDED TO THE WHISTLEBLOWER

A Whistleblower will be accorded with protection under the policy 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 as well as the rules and procedures involved.

This Policy provides assurance that if retaliation happens to an employee or external party, he / she must report to the Whistleblowing channels by substantiating the claim with factual information or documentation. If the act of retaliation is committed by an employee of Riverview, the management will institute the necessary disciplinary action. However, if the act of retaliation is committed by an external party and if it's proven, Riverview may take action to hold the external party accountable including instituting civil and / or criminal actions against him / her in the court of law.