



WHISTLE-BLOWING POLICY

TABLE OF CONTENTS

SUBJECT	PAGE
INTRODUCTION	3
DEFINITIONS	4
1. OBJECTIVE	5
2. ELIGIBILITY	5
3. GRIEVANCE PROCEDURE	5
4. INVESTIGATORS	6
5. DECISIONS	6
6. RETENTION OF DOCUMENTS	6
7. AMENDMENTS	6

INTRODUCTION

Greenyield Berhad and its Group of subsidiaries (the "Company") has formulated a whistle-blowing policy to encourage the employees to disclose any malpractice or misconduct of the Company's Code of Conduct ("Code") of which they become aware of and to provide protection for the reporting of such alleged malpractice and misconduct.

The Company also reserves the right to amend, delete or augment any provision in this Policy as and when it deems necessary.

DEFINITIONS

In this Whistle-Blowing Policy, unless where the context requires otherwise, the following words and abbreviations shall have the following meanings:-

Audit Committee	: The Audit Committee constituted by the Board of Directors of the Company
Company	: Greenyield Group of Companies
Employee	: A person under the employment of the Company including permanent, contract and temporary employment. Where an employee is employed under a contract, the terms and conditions of his contract shall apply where they differ from the policies in this Code.
Protected Disclosures	: Any communication made in good faith that disclosed or demonstrates information that may evidence malpractice or misconduct.
Whistle-Blower	: An employee making a protected disclosure under this policy

All references of the masculine gender shall include the feminine gender unless otherwise expressly stated. All words importing the singular number shall include the plural number and vice versa.

1. OBJECTIVE

This Whistle-Blowing Policy has been formulated to achieve the following:-

- a) To provide a process for the employees to raise genuine concerns;
- b) To encourage the employees to disclose any malpractice or misconduct of which they become aware of;
- c) To ensure that all allegations are thoroughly investigated and appropriate action be taken accordingly;
- d) To protect the Whistle-Blower from adverse employment actions, harassment or other forms of discrimination, even if the allegations are proven to be incorrect or unsubstantiated; and
- e) To take all necessary steps to preserve the anonymity of the Whistle-Blower.

2. ELIGIBILITY

All employees are eligible to make Protected Disclosures under this Policy.

3. GRIEVANCE PROCEDURE

- a) All Protected Disclosures should be addressed to the Chairman of the Audit Committee of the Company.
- b) Protected Disclosures should be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or Bahasa Melayu.
- c) Protected Disclosures should be forwarded under a covering letter which shall bear the identity of the Whistle-Blower. The Chairman of the Audit Committee shall detach the covering letter and discuss the Protected Disclosures with the Audit Committee and if deemed fit, report the occurrence to the Chairman of the Board of Directors.
- d) Upon the discussion between the Audit Committee and the Chairman of the Board of Directors, the Protected Disclosures shall then be forwarded to an appropriate investigator to undertake the necessary investigation and inquiry.
- e) Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extend of the concern.
- f) The Whistle-Blower must disclose his or her identity. Anonymous disclosures will not be entertained.

4. INVESTIGATORS

- a) The Audit Committee together with the Chairman of the Board of Directors shall have the discretion to appoint the appropriate investigator.

- b) The appointed investigator shall be an independent and unbiased both in fact and perceived.
- c) The investigators are required to conduct a process towards fact-finding and analysis.
- d) Investigators have a duty of fairness, thoroughness, objectivity, ethical behavior, and observance of legal and professional standards.
- e) Investigators shall submit a report of findings to the Audit Committee and the Chairman of the Board of Directors.

5. DECISIONS

If an investigation concludes that an improper or unethical act has been committed, appropriate disciplinary actions will be taken against the defaulting officers or employees in accordance with the existing Disciplinary Actions as specified in the Code of Conduct adopted by the Company.

6. RETENTION OF DOCUMENTS

All Protected Disclosures together with the results of an investigation relating thereto shall be retained by the Company for a minimum period of Seven (7) years.

7. AMENDMENTS

The Company will review this Code annually and reserves the right to amend, delete or augment any provision in this Policy as and when it deems necessary.