



# Whistle-Blowing Policy

## 1. Declaration of Board of Directors

The Board of Directors unconditionally declares that it:

- (a) is against any form of impropriety;
- (b) encourages any employee to raise matters of concern (Whistle Blower); and
- (c) will deal with and follow up on such matters with due safeguard for the protection and interests of the Whistle Blower.

## 2. Objective of the Policy

The purpose of the policy is to:

- (a) provide a mechanism to detect and address unacceptable conduct;
- (b) ensure employees can raise concerns without fear of suffering retribution; and
- (c) provide a transparent and confidential process for dealing with concerns.

## 3. Coverage of Policy

The policy covers the following matters of concern:

- (a) questionable financial reporting and accounting practices;
- (b) criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
- (c) failure to comply with legal or regulatory obligations;
- (d) unsafe work practices or substantial wasting of Company resources; and
- (e) concealing any of the above.

## 4. Safeguards of Whistle Blowers

The Company is committed to the following safeguards:

- (a) protect and respect the rights of any employee who raises matters of concern under this policy in good faith;
- (b) will not tolerate any reprisals, discrimination, harassment, intimidation or victimization of anyone raising a genuine concern or that person's colleagues or relatives;
- (c) will take reasonable steps so that any employee making a disclosure will retain their anonymity unless they agree otherwise; and
- (d) will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are genuinely mistaken.



It must be clear that for an anonymous report to be investigated, it must contain sufficient evidence to form a reasonable basis for investigation. It must also be appreciated that following a successful investigation, a statement by the person reporting the concern may be requested to enable appropriate action to be taken to address that concern. It must also be clear that the above safeguards are not extended to anyone who maliciously raises a matter they know are totally untrue.

## 5. Reporting Procedure

Matters of concern may be made orally or in writing as soon as possible. People who raise the concern are to note the following procedures:

(a) Information to be provided are:

- The specific concern;
- The reason(s) for the concern;
- The background and history of the concern with relevant dates;
- Is the concern previously raised with anyone else before, and if so, with whom; and
- Why the concern persists.

(b) The persons to contact (in the following order) are:

- Chairman, Audit Committee;
- Member of Audit Committee; or
- Any Independent Director.

(c) Channel for receiving concerns :

A letter box is placed at each company's main entrance (ie. at the side of the reception counter).

Any staff can drop any correspondences or reports into the letter box.

Any contents in the letter box will be collected on a weekly basis by the following personnel:

- a) Ms Nguyen ( Secretary) for Latitude Tree Vietnam Joint Stock Company;
- b) Ms Zeng Li Yan (Purchasing Manager) for RK Resources Co., Ltd;
- c) Mr Aniq (Assistant HR Manager) for Latitude Tree Holdings Berhad and Latitude Tree Furniture Sdn Bhd;
- d) Mr Chen Cheng Lung (General Manager) for Grob Holz Co. Ltd;
- e) Mr Wu Kun Liang (General Manager) for Rhong Khen Timbers Sdn Bhd; and
- f) Ms Tan Chai Foon (Assistant HR Manager) for Rhong Khen Industries Sdn Bhd.

All correspondences collected will be forwarded to Head Office for verification and discussion by Risk Management Committee.

Any applicable or important issues/matters with complete basic information will be reported to the Audit Committee.



## 6. Investigation Process

- (a) Employees who have raised concerns will be informed within 14 days on:
  - The person appointed to handle the matter;
  - How to make contact with that person;
  - Any further assistance required from the Whistle Blower;
  - Whether further investigation will take place and if not, why not; and
  - How the Company proposes to deal with the matter to be investigated.
- (b) The extent of contact between the contact person and the Whistle Blower will depend on the nature of the matter raised, the difficulties involved and the clarity of information provided.
- (c) If necessary, the Company will seek further information from the Whistle Blower.
- (d) Where any meeting is arranged including off-site if the Whistle Blower so wishes, the Whistle Blower can be accompanied by a union or professional representative or a friend.
- (e) There should be an attempt to resolve the matter within 28 days of the report of concern.
- (f) Identity of the Whistle Blower shall not be disclosed without prior consent. If identity has to be revealed (e.g. in court), the Company will enter into dialogue with the Whistle Blower to determine whether and how to proceed.
- (g) At the end of the investigation, a report of the findings will be presented to the Board of Directors who will then determine the action to be taken.
- (h) Once the matter has been concluded, a report will be made to the Whistle Blower. The report will explain the findings and actions taken as comprehensively as possible but within commercial, legal and confidential constraints

Revised on: 23 September 2021