

WHISTLEBLOWING POLICY

Jawala Inc. (“Jawala”) is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, the policy aims to support good management practices and sound corporate governance practices.

This policy aims to provide a structured mechanism for employees and others to raise or report concerns about ongoing or suspected wrongful activities or wrongdoings to provide reassurance that they will be protected from reprisals or victimisation for whistleblowing in good faith.

For the purpose of this policy, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of Jawala including its subsidiary, Jawala Plantation Industries Sdn Bhd (herein-after referred to as “Jawala Group”).

The Board of Directors (“BOD”) of Jawala has a stewardship responsibility to communicate the requirements of this policy and to guide the organisation in dealing with concerns arising from wrongful activities or wrongdoings.

The Policy of the BOD is:

1. To encourage active exercise of the obligation to report wrongdoings

All employees and others are required to report any ongoing or suspected wrongful activities or wrongdoings at the earliest possible stage through the proper channel of reporting so that immediate action can be taken. The report should be made directly to the Chief Financial Officer email: julietan@jawalainc.com and/or the Audit Committee Chairman email: info@jawalainc.com or leowjim2015@gmail.com

2. To use internal disclosure to report wrongdoings

As far as reasonable, internal disclosure is encouraged.

3. To protect the whistleblower

Where the disclosure is made in good faith, the whistleblower will be protected against victimisation or other adverse treatment.

4. To ensure appropriate and fair disciplinary action

All action taken against the alleged wrongdoers would be fair and without prejudice.

5. To require that an effective whistleblowing guideline be established and maintained by Jawala Group

Whistleblowing guidelines must be sufficient to:

- a) Establish formal and robust whistleblowing guidelines, including hotline accessibility
- b) Prohibit legal sanctions for retaliatory action taken against the whistleblower;
- c) Establish timely feedback/ response and remedial and/ or corrective action;
- d) Ensure that this policy is properly communicated to all employees;
- e) Establish procedures to maintain records confidentiality and retention; and
- f) Embed integrity, transparency and accountability within the business.

Datuk Jema Khan

Group Executive Chairman of Jawala Inc.

Dated: 2nd January 2018

Amended: 18 September 2018