

RISK MANAGEMENT

OVERVIEW

As a result of our global activities, we are exposed to various types of risks, including fluctuations in commodity prices, foreign currency exchange rates, counterparty & credit risk and interest rates, which may affect our operational results and financial positions. We have a very robust risk management framework in place to ensure that all such risks are systematically identified, quantified, monitored, mitigated and managed on a regular basis.

RISK GOVERNANCE STRUCTURE

Our risk management activities are governed by our risk management system that is designed to identify, quantify, monitor, and manage various risks encountered in our operations and minimise the adverse effects from the unpredictability of risks in our operating and financial performance. Our system comprises processes and policies designed to address risks such as commodity prices, foreign currency exchange rates, counterparty & credit defaults, and interest rates.

The on-going compliance of these risk management processes and policies are carried out by the Heads of the respective operating units, but exposure limits are centrally set and monitored, thus operating under a global governance framework. Overall responsibility to monitor and assess risk lies with the independent risk function headquartered at our Singapore Corporate office. Head of Risk Management, who reports directly to the Chief Executive Officer is a key member of the Executive Risk Management Team and works proactively with the trading teams to analyse changing market conditions and ensure that hedging strategies are focused on current market dynamics.

The Risk Department reports to the Head of Risk Management and is responsible for identifying, assessing, monitoring, and improving the overall effectiveness of our risk management system, the review and setting of trade positions, and limits to manage our overall risk exposure. The Risk Department monitors and assesses risks on a regular basis and holds periodical meetings with our marketing and operations teams. The Risk Department has the authority to make temporary increases or changes to risk limits, but such increases or changes must always remain within our overall risk management guidelines and framework of the Group. Our flat corporate governance structure with short and direct channels of communication and control enables efficient monitoring and execution.

Where the execution of any activity will result in the breach of any applicable limits in our risk management guidelines and framework, specific approval for that activity must be sought and obtained from the Executive Risk Management Team prior to the execution of the activity. Any risk-related issues which are outside the scope of our risk management guidelines and framework are reported to the Team consisting of our Chairman, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer and Head of Risk Management (the "Executive Risk Management Team").

KEY RISK EXPOSURES

Our business is primarily exposed to the following key risks:

Commodity Price Risk

Commodity prices fluctuate for many reasons, such as changes in resource availability, production cost, demand for competing commodities and substitutes, sovereign policies and regulation, global and regional economic conditions, global and regional weather conditions, natural disasters, and diseases etc., all of which impact global markets and demand for our commodities. Furthermore, changes in such supply and demand conditions impact the expected future prices of each commodity. Our Group is predominantly exposed to volatility in vegetable oil market prices. To ensure consistency in our manufacturing production, we enter into forward crude palm oil ("CPO") purchase contracts in addition to maintaining CPO inventories. Similarly, to meet our customer's requirement, we enter into forward physical sales with them. The sale and purchase commitments for commodities we deal in may not typically match at the end of each business day, resulting in timing differences.

The Group uses derivative instruments, predominantly exchange traded futures for the purpose of managing exposures associated with commodity prices. The derivative instruments that we use for hedging purposes are intended to reduce the volatility in our operations. While these derivative instruments are subject to fluctuations in value, those fluctuations are generally offset for the hedged exposures by the changes in fair value of the underlying exposures. Despite such hedging, we remain exposed to basis risk. We have established policies that limit the amount of permissible unhedged fixed price commodity positions, which are generally a combination of volumetric

and Value-At-Risk (“VAR”) limits. However, as our major portion of inventories are valued at cost or net realisable value, whichever is lower, no compensating fair value gain is recognised in our reported financial statements for inventories. Our net commodity position consists of our inventory of raw material and finished goods, forward purchase and sale contracts, and associated derivative instruments. The fair value of this position is a summation of the fair values calculated by valuing all our positions at quoted market prices for the period where available or utilising a close proxy. VAR is calculated on the net position and monitored at the 95% confidence interval.

The Group has been consistently working to actively manage and mitigate this inherent risk by systematic diversification of our product portfolio such as by increasing the sales volumes of consumer pack segment and value-added products.

Foreign Exchange Risk

The Group’s functional and reporting currency is US Dollars (“USD”). Our key origin’s exports are denominated in USD. Majority of our expenses and domestic sales are denominated in the respective subsidiary’s local currency. The primary currencies we are exposed to directly or indirectly are Malaysian Ringgit, Euro, Singapore Dollar, Indonesian Rupiah, Australian Dollar and Chinese Yuan. For hedging our foreign exchange risk we enter into currency forwards with reputed financial institutions along with structuring natural hedge to the extent possible. As our consolidated financial statements are prepared in USD, this requires many of our subsidiaries financial statements to be translated from their respective local currency to the Group’s reporting currency USD. The fluctuations in the currency exchange rates due to this translation process also leads to foreign exchange gains or losses recognised in our reported financial statements.

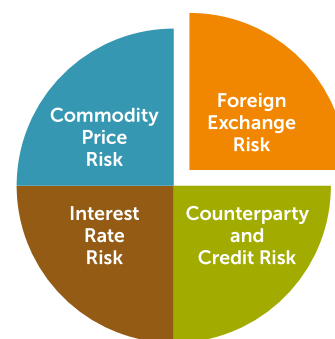
Counterparty and Credit Risk

We are subject to counterparty and credit risks that arise through our physical sales and purchase transactions. The Group actively monitors credit and counterparty risks through regular reviews of exposures and credit analysis by the Risk Department and Treasury team. The limits are approved by the Risk Department after due analysis of the party and with consideration of Group’s risk appetite as well as the size of relevant transactions in comparison to Group’s Balance Sheet. While fixing credit limit for a customer, besides considering their financial position and

operating history, we also perform a market background check. As a practice, we do not grant open credit to new customers. Existing credit limits are periodically reviewed after considering their payment records, transaction sizes, and the lengths of our relationship, besides prevailing market conditions. The operating teams take their compliance obligations regarding international sanctions extremely seriously with support from the Controller, Legal and Treasury Departments.

Interest Rate Risk

Predominantly our borrowings are from short-term trade finance banking facilities. These are used to fund our operations. Our marketers typically factor in the interest expenses arising from the cash conversion cycle into their selling price and recover it from the customers. Therefore, short-term interest movements are not a significant risk for us.



SETTING OF RISK LIMITS

The Executive Risk Management Team establishes and reviews periodically our overall risk tolerance thresholds, measured in terms of VAR, a statistical risk measure. The team is responsible for overall systems, procedures and processes for risk management. Such risk tolerance threshold is based on a percentage of total shareholders’ funds after taking into account, among other things, the Executive Risk Management Team’s view on the overall production capacity of refining and processing operations, the market in which trading activities take place, the price (and price trend) of raw materials, track record of management in managing its risk exposures in the prior period and financial budgets including projected sales volume and turnover. The risk tolerance threshold is also based on the counterparty’s background, financial performance, and management team. The risk tolerance threshold refers to the maximum potential loss if all trading and operations across all products and geographical regions materialise at the same time. Such threshold limits are approved by our Board Audit Committee who also periodically reviews and discusses the historical actuals thereagainst.

RISK MANAGEMENT

REPORTING AND REVIEWING STRUCTURE

Our Risk Department is responsible for the capture and measurement of Group-wide risk and ensuring compliance with our risk management system, procedures and processes. The Risk Department analyses and reviews our risk exposure with oversight from the Executive Risk Management Team. With respect to risks related to the use of derivative financial instruments, once limits for derivatives positions have been established by our Executive Risk Management Team, our Risk Department monitors our trading activities to ensure compliance within these limits.

On a case-by-case basis, the Risk Department may recommend to the Executive Risk Management Team to amend established limits. If approved by the Executive Risk Management Team, the revised limits are implemented and monitored by the Risk Department. If the revised limits exceed the Board Audit Committee approved thresholds, then such revised limits will be effective only with due approval from the Board Audit Committee. Any breach

(whether of trading limits or non-adherence to established policies), disclosed or revealed by the Risk Department will be acted upon by the Executive Risk Management Team. Where the Executive Risk Management Team considers the breach to be significant (whether in terms of financial impact or otherwise), the Executive Risk Management Team will report it to the Board Audit Committee.

Our Internal Audit Department supports in assessing risks and controls for the areas such as operations continuity, health and safety, cybersecurity and IT, stocks and quality, and in monitoring overall compliance to the systems and procedures implemented in the Group. Results of these activities are reported to the Audit Committee by the Group's Head of Internal Audit, accompanied by action plans to strengthen control and further mitigate risks wherever required. Our Audit Committee regularly reviews our internal control systems, internal audit reports, and risk tolerance threshold limits including meeting our internal and external auditors without the presence of the management.

Audit Committee

- Chaired by Audit Committee Chairman
- Review overall risk management guidelines/ frameworks/ policies and systems
- Review/ recommend and approve risk limits



Executive Risk Management Team

- Comprises Chairman, CEO, COO, CFO & Head of Risk Management
- Monitor and improve overall risk management system
- Ensure compliance with trading policies and limits



Risk Department

- Monitor respective risks
- Ensure compliance with trading policies and limits

Internal Audit

- Headed by the Group's Head of Internal Audit
- Assess risks and controls for operations continuity, health & safety, cybersecurity & IT, stocks and quality, and monitoring overall compliance to the systems and procedures implemented in the Group
- Submit report to the Audit Committee with actions plans to strengthen control

