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1.0 Policy Statement

Perdana Petroleum Berhad and its subsidiaries (the **%Group+**) aims to achieve a high standard of transparency, integrity and accountability in the conduct of its business and operations. The Group takes a serious view of any misconduct / wrongdoing on the part of any of its employees, management and directors, with respect to their obligations to the Group's interests. In order to achieve this, **Perdana Petroleum Bhd** (the **%Company+**) provides an avenue for all employees of the Group and Stakeholders (i.e. suppliers, customers, shareholders or members of the public) (collectively referred to as **%Whistleblowers+**) to report or disclose any improper conduct within or pertaining to the Group.

2.0 Objective of the Policy

To provide an avenue for all Whistleblowers to report or disclose any improper conduct, and protection for Whistleblowers, in compliance with the requirements of this Whistleblowing Policy.

3.0 Scope of the Policy


This policy allows Whistleblowers to disclose any improper conduct (wrongdoing, misconduct or criminal offence) through an internal channel. The types of improper conduct include, but are not limited to, the following:

- (a) Fraud, corruption or bribery (which includes, but is not limited to, soliciting/ receiving bribes/kickbacks);
- (b) Criminal acts (which includes, but is not limited to, misappropriation of funds / assets, criminal breach of trust, forgery, theft or insider trading);
- (c) Failure to comply with any legal or regulatory or health, safety, security and environmental (**HSSE**) obligation;
- (d) Deliberate concealment of information (which includes, but is not limited to, intentional omission, attempt to cover-up or providing false and misleading information);
- (e) Breach of confidentiality or misuse of confidential information;
- (f) Unethical conduct or conflicts of interest or abuse of power; and
- (g) Malpractices (which includes, but is not limited to, questionable or improper accounting, operational or administrative practices).

4.0 Whistleblowing Committee

The Whistleblowing Committee is chaired by an Independent Director and its members shall consist of the Head of Legal Department, Head of Human Resource Department and Head of Internal Audit Department.

The Internal Audit Department shall be the Secretariat of the Whistleblowing Committee.

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5.0 Reporting of Improper Conduct

Any employee or stakeholder who has knowledge or is aware of any improper conduct committed or about to be committed within the Group is encouraged to report or disclose such improper conduct to the Whistleblowing Committee.

6.0 Reporting Channels

Reporting or disclosure of improper conduct (referred to as ~~%Disclosure~~) could be made to ANY of the following reporting channels by completing the prescribed **Whistleblowing Form (as attached)**, in strict confidential manner:-

- Email to wbc@perdana.my; or

- Mail to:

PPB Whistleblowing Committee
No. 6-8, Jalan Seri Utara 1,
Seri Utara, Batu 7, Jalan Ipoh,
68100 Kuala Lumpur.

7.0 Disclosure of Identity


To enable the Company to accord the Whistleblower with the necessary protection under this policy and to facilitate investigation of the allegation, the Whistleblower is required to disclose the following personal details, which will be kept confidential:-

- Name;
- NRIC / Passport No.; and
- Contact details i.e. office contact number / hand phone number / email.

Only genuine disclosures / allegations should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. If the investigation later reveals that the disclosure was made with malicious intent, the appropriate action can be taken against the Whistleblower.

8.0 Anonymous Whistleblower

Disclosure or report by any anonymous Whistleblower will not be entertained. Any Whistleblower who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. Notwithstanding this, the Company and Whistleblowing Committee reserve the right to investigate into any anonymous disclosure in the event that relevant and reliable evidence are tendered.

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9.0 Investigation of Disclosures

All disclosures reported under this policy will be taken seriously and are subject to investigation.

Any investigations conducted by the Whistleblowing Committee shall comply with the established procedures of the Company. Upon completion of an investigation, the Whistleblowing Committee will submit its investigation report and recommendations to the Audit & Risk Management Committee, who will review and recommend appropriate action(s) to the Board of Directors for decision.

10.0 Protection to Whistleblower

A Whistleblower will be protected by confidentiality of identity, to the extent reasonably practicable. An employee who whistleblows will also be protected against any adverse and detrimental actions (such as discrimination, demotion or loss of job) for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided always that any disclosure is made in good faith and without malice.

In the event that the Company is required by law or regulatory authorities to release information (including Whistleblower's personal details), prior written notice of the information the Company propose to disclose to be in compliant with its obligation will be given, unless there is insufficient time or opportunity to do so, or where it is expressly prohibited by law or the directives / rules of the said supervisory or regulatory body.

Such protection is accorded even if the investigation later reveals that the Whistleblower is genuinely mistaken as to the facts and the rules and policies involved.

A whistleblower will not be accorded protection if:-

- the whistleblower participated in the improper conduct;
- the whistleblower willfully discloses a false statement;
- the disclosure is made with malicious intent; or
- the disclosure is frivolous or vexatious.

11.0 Notification

As a general rule, Whistleblowers will be informed of the results of an investigation as soon as possible after the disclosure is resolved or acted upon. However, in some circumstances, privacy, confidentiality or other legal constraints may limit the feedback that can be provided.

If feedback has not been provided regarding a disclosure, a Whistleblower can ask the Whistleblowing Committee for an update.

Perdana Petroleum Berhad reserves the right to amend this policy from time to time.