	<b>WHISTLEBLOWING POLICY AND PROCEDURES</b>		<b>WBPP</b>		
	<b>SUMMARY OF WHISTLE BLOWING POLICY</b>				
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## Whistle Blowing Policy

**Perdana Petroleum Berhad and its group of companies (the “Group”)** aim 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.

**Whistle Blowing Policy** is implemented to:-

1. Provide an avenue for all employees of the Group and Stakeholders (i.e. suppliers, customers, shareholders or members of the public) to report or disclose any improper conduct within or pertaining to the Group to the Whistle Blowing Committee;
2. Provide proper internal reporting channel to disclose any improper conduct in accordance with the procedures provided in this policy;
3. Address all disclosures in confidential and expeditious manner;
4. Provide protection for the whistle blower and to safeguard such person's confidentiality; and
5. Treat both the whistleblower and the alleged wrongdoer fairly.


The Whistle Blowing Committee is chaired by an Independent Non-Executive Director of the Group and its members consist of the Managing Director, Executive Director, Manager of Human Resource Department and General Manager, Fleet Management. The Committee reports to the Audit and Risk Management Committee of the Group.

Reporting or disclosure of improper conduct (referred to as “Disclosure”) could be made by completing the prescribed **Whistle Blowing Form**, in a strict confidential manner by email to [wbc@perdana.my](mailto:wbc@perdana.my) or mail to PERDANA Whistle Blowing Committee, **Level 18, Block 2, VSQ @ PJCC Jalan Utara, 46200 Petaling Jaya, Selangor**. In order for the whistleblower to be protected under the policy, the whistleblower must disclose his/her name, NRIC number and contact details. The disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

Perdana Petroleum Berhad has a right to direct the disclosure to other relevant grievances channel if the disclosure does not fall under this policy.

**Please download and read the Whistle Blowing Policy for better understanding of a Whistleblower rights prescribed therein.**

Whistle Blowing Policy  
Whistle Blowing Form

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## 1.0 **POLICY STATEMENT**

**Perdana Petroleum Berhad and its subsidiaries** (the "Group" or "Company") is committed 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, 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**

To provide a formal avenue, confidential channel for all Whistleblowers to report or disclose any improper conduct / misconduct and provide protection to the Whistleblowers who report the allegations in accordance with the procedures provided for under this Whistle Blowing Policy.

The Policy may also act as an early warning system and may enable the company to remedy any wrongdoings before serious damage is caused.

## 3.0 **SCOPE**

**3.1** This policy applies to every employees of the Group (including crews), management and directors of Perdana Petroleum Berhad and its subsidiaries).


**3.2** This policy provide an avenue for Whistleblowers to disclose any improper conduct (wrongdoing, misconduct or criminal offence) through 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. Non-Compliance with Procedure;
- 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 main objective of the Whistleblowing Committee ("WBC") is to assist the Board of Directors in protecting the interest of the Company and all stakeholders by reviewing and investigating any improper conduct arising from complaints received make recommendation to the Board or take necessary actions where applicable.

The Whistle Blowing Committee is chaired by an Independent Non-Executive Director of the Group and its members consist of the Managing Director, Executive Director, Manager of Human

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Resource Department and General Manager, Fleet Management. The Committee reports to the Board of Directors of the Group.

The Human Resources Manager shall be the Secretariat of the Whistleblowing Committee.

If the complaint/report/recommendation involves and/or related to the WBC member ("Conflicting Member"), the Secretary will notify the WBC, and the Conflicting Member shall abstain himself/herself from deliberation and voting in respect of the complaint/report/recommendation he/she is conflicted with.

## 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 secured and confidential reporting channels by completing the prescribed **Whistle Blowing Form** (*as attached*), in a strict confidential manner: -

### a) **Internal Reporting:**

- Email to [wbc@perdana.my](mailto:wbc@perdana.my); or
- Mail to: **PERDANA Whistle Blowing Committee**  
Level 18, Block 2,  
VSQ@PJCC, Jalan Utara,  
46200 Petaling Jaya, Selangor.

### b) **External Reporting (Regulatory Authorities):**


- If the whistleblower is unsatisfied with the internal process, they may report directly to:
- Malaysian Anti-Corruption Commission (MACC) – phone number: 1-800-88-6000
  - Securities Commission (SC) – email: [aduan@seccom.com.my](mailto:aduan@seccom.com.my)
  - Bank Negara Malaysia (BNM) – email: [bnmtelelink@bnm.gov.my](mailto:bnmtelelink@bnm.gov.my)

## 7.0 **DISCLOSURE OF IDENTITY**

To enable the Company to accord the Whistleblowers 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:-

- (a) Name;
- (b) NRIC / Passport No.; and
- (c) Contact details i.e. office contact number / hand phone number / email.

The Whistleblowers 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 Whistle blower.

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## 8.0 ANONYMOUS WHISTLEBLOWERS

Disclosure or report by any anonymous Whistleblower may not be considered as authentic. Any Whistleblower who wishes to report improper conduct is required to disclose its identity to the Company in order for the Company to accord the necessary protection to them. Notwithstanding this, the Company and Whistle Blowing Committee reserve the right to investigate into any anonymous disclosure in the event that relevant and reliable evidence are tendered.

## 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 Whistle Blowing Committee shall comply with the established procedures below in section 12.0 of the Company. Upon completion of an investigation, the Whistle Blowing Committee will submit its investigation report and recommendations to the Board of Directors for decision.

## 10.0 PROTECTION TO WHISTLEBLOWER AND CONFIDENTIALITY AND RETALIATION

A Whistleblower will be protected by confidentiality of identity, to the extent reasonably practicable. An employee who whistle blows will also be protected against any adverse and detrimental actions (such as discrimination, demotion or loss of job, suspension or decrease in salary etc., any assignment which is of poor quality or any threats given to employee verbally or in writing.) 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 agreed 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 investigation revealed that: -

- the whistleblowers participated in improper conduct; or
- the whistleblowers wilfully disclose a false statement; or
- 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, unless the Company takes view that disclosure may impede investigation. In some circumstances, privacy, confidentiality or other legal constraints may limit the feedback that can be provided.

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

## **12.0 INVESTIGATION PROCEDURES**

12.1 Upon submission of a whistle blowing report, the Whistleblower shall be provided with an acknowledgement of receipt of the report within five (5) working days of receipt.

Subsequently, if necessary, the whistle blower and alleged person may be consulted (to the extent possible, without disclosure of identities of the Whistleblower and the person that alleged) factual information.

12.2 WBC shall review the preliminary factual information of the report received and determine whether a full investigation is required.

12.3 During the investigation, an Inquiry (“Inquiry”) with the accused employee should be conducted by the Company. The accused employees are given an opportunity to defend themselves against the allegations and to ensure that any disciplinary action taken by the Company is fair and reasonable.

12.4 Company shall during the Inquiry, after the evidence gathered, and conducting an interview with witnesses and the accused employee, thereafter making recommendations based on the findings of the inquiry.

12.5 The Inquiry shall be conducted internally by the members elected by WBC, or any individual which is deemed impartial and independent, and does not have any element of bias towards the accused employee or directly or indirectly connected to the misconduct. The Inquiry should be conducted in accordance with the principles of natural justice, which include the right to be heard, the right to be informed of the allegations, and the right to a fair and impartial hearing.

12.6 The process of Inquiry:

- a) Notice of Inquiry: Give prior written notice of the inquiry, which includes the date, time, and location of the inquiry, as well as the allegations against the employee.
- b) Selection of Inquiry panel: An inquiry panel approved by WBC (consist of senior employee or a neutral third party who are impartial and should not have any personal interest in the outcome of the inquiry) be selected to conduct the inquiry.
- c) Evidence Gathering: The inquiry panel shall gather evidence from all relevant parties, including the employee, witnesses, and any relevant documents or records.
- d) Decision: The inquiry panel should make recommendations based on the evidence presented during the inquiry. The recommendations shall be endorsed by WBC and approved by the Board. Subsequently the decision should be communicated to both the employee and the company in writing, along with the reasons for the decision.
- e) Appeal: If the employee is not satisfied with the decision, he/she may appeal the findings.

12.7 The above steps must form part of the process of Inquiry prior to making any fair and valid decision by the company. Should any legal advice on performing the Inquiry to ensure


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compliance with relevant laws and regulations and to be consistent with Company's policies and procedures as well as the employment agreement or contracts.

- 12.8 The WBC Chairman may consult with the ARMC or the Board members before making a decision on those cases which may potentially case adverse impact to the Company.
- 12.9 WBC Chairman may consult ARMC or Board on matter involving top management and director for views on whether to:
  - a) to close the case in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation; or
  - b) commence a full investigation in the event the preliminary findings clearly indicate suspicious circumstances and where the top management and director is involved. A special WBC shall be appointed by the Board Chairman to carry out the investigation and findings to ARMC of the investigation and review of results of the investigation of the top management and director; or
  - c) refer to legal advisor (internal and /or external) and relevant authorities such as police or the Malaysia Anti-Corruption Commission ("MACC") where the preliminary findings disclose a possible criminal offence for further action.
- 12.10 If the matter is closed, the WBC shall inform Whistleblower that the matter is closed.
- 12.11 If the matter is to be referred to the authorities, subject to any legal requirements or prohibitions, the WBC will inform the Whistleblower that the matter has been referred to the authorities.
- 12.12 In the event a full investigation is to be carried out, the WBC will inform the Whistleblower of the conduct of a full investigation and the Whistleblower shall give his full cooperation during the conduct of the investigation.
- 12.13 All information, documents, records and reports relating to the investigation shall be kept securely to ensure its confidentiality.
- 12.14 The timeline of the above invetigation procedures shall be based on the process below:

Stage	Action	Timeline
<b>1. Report Acknowledgment</b>	Receipt of complaint and initial screening	Within 5 working days
<b>2. Preliminary Review</b>	Initial assessment of validity	Within 14 working days
<b>3. Full Investigation</b>	In-depth fact-finding and interviews	Within 60-90 working days*
<b>4. Decision &amp; Actions</b>	Report findings to Audit & Risk Committee	Within 10 working days after investigation
<b>5. Feedback to Whistleblower</b>	Inform whistleblower of outcome	Within 7 working days after closure

**Note:** \* Should more than 90 working days is required, a notification shall be sent to the whistle blower notifying the same.

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### 13.0 ADMINISTRATION

13.1 The Whistleblowing Policy & Procedure shall be communicated to all relevant stakeholders.

13.2 All employees, management and directors shall read, understand and comply with this Policy. All employees are expected to uphold the highest standards of ethics, honesty, openness and accountability in line with the Group's commitment to promote good governance, transparency and safeguard the integrity of the Group.

### 14.0 OVERSIGHT AND OWNERSHIP OF POLICY

The Board of Perdana has overall responsibility for this Policy and shall oversee the implementation of this Policy.

The Board has delegated day-to-day responsibility for the administration and implementation of the Policy to the Human Resources and Administrative Manager. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Human Resources and Administrative Manager and obtaining the approval from the Whistle Blowing Chairman before recommending to the Board for approval on those amendments and updates.

The Head of Corporate Affairs shall be responsible for incorporating any amendments and updates into this document when required.

### 15.0 REVIEW AND AMENDMENT

This policy and procedures will be reviewed biennially to ensure they remain effective and compliant with relevant laws and regulations.

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