

PETROS Whistleblowing Policy

1 April 2021



Whistleblowing Policy

Objective

In the conduct of its business and operations, Petroleum Sarawak Berhad (“**PETROS**”) and its subsidiaries (“**PETROS Group**”) are committed to the highest standards of integrity, openness and accountability. PETROS Group aspires to conduct its affairs in an ethical, responsible, and transparent manner.

This Whistleblowing Policy (“this **Policy**”) provides guidance to members of the Board of Directors (“**Directors**”), employees of PETROS and members of the public (including vendors, contractors, advisers and other third parties) on how to report any suspected or actual fraudulent activity or improper conduct or breach of PETROS’ Anti-Bribery & Anti-Corruption Policies and Procedures (“**ABC P&P**”) and its Code of Conduct and Business Ethics (“**COBE**”), in accordance with the procedures as provided for under this Policy.

In relation to any subsidiary of PETROS (“**PETROS Group**”), this Whistleblowing Policy shall apply to those subsidiaries within the PETROS Group. Unless the context otherwise requires, references in this Whistleblowing Policy to “PETROS” shall include such subsidiaries.

Scope

This Whistleblowing Policy sets out the reporting procedures under which Directors, employees and members of the public including but not limited to PETROS’ contractors or their sub-contractors of any tier (“**Whistleblowers**”), are required or encouraged to disclose to PETROS as soon as reasonably possible, any suspected or actual corruption, improper conduct or breach of PETROS’ ABC P&P and PETROS’ COBE through channels as provided under this Policy.

Fraudulent activities and improper conduct include the following:

- bribery;
- fraud;
- malpractices;
- abuse of power;
- miscarriage of justice;
- health and safety risks;
- damage to the environment;
- breach of legal or profession obligations;
- breach of ethics;
- conflicts of interest;
- theft or embezzlement (misappropriation);
- misuse of PETROS’ fund(s) and property(ies);
- non-compliance with the law; and
- non-compliance with the ABC P&P and COBE.

The above list is not exhaustive and includes any act or omission, which if proven, will constitute a criminal offence under relevant legislation in force.

Policy

All Whistleblowers are provided assurance that any report or disclosure made to PETROS which are made in good faith or belief, without malicious intent on any suspected or actual violation of the ABC, COBE or the law, will be accorded protection of confidentiality to the extent reasonably practicable in accordance with the Whistleblowers Protection Act 2010 (Act 711) (the “**Whistleblowers Act**”). Such protection is accorded to all Whistleblowers even if the investigations on the suspected breach or violations later reveal that the Whistleblower is mistaken as to the facts and the rules and procedures involved.

The Whistleblower may lodge a complaint to the relevant enforcement agency including the Malaysian Anti-Corruption Commission (“**MACC**”) of any detrimental action in reprisal, harassment, retaliation or discrimination received or committed by any person against the Whistleblower as a result of his/her report or disclosure of improper conduct. Under the Whistleblowers Act, Whistleblowers are accorded protection from any detrimental act or prejudicial effect of disclosure made including any liability under any civil action, criminal or disciplinary consequences of such disclosure.

Anonymous disclosure will not be entertained. Only genuine concerns or situations should be disclosed. Any employee or member of the public who wishes to report improper conduct is required to disclose his/her identity to PETROS to accord the necessary protection to him/ her. However, PETROS reserves its right to investigate into any anonymous disclosure.

Reporting Procedures

The Whistleblower may make a report or complaint through the following secured reporting channels including reports made in person, by email, telephone or letter who will record the report made. The contact details are as set out below:

- i. **by email:** the Whistleblower may use the dedicated email address set out below which is managed by the Integrity Team for the filing of reports where the sender’s identity is not recorded.

PETROSAAlert@petroleumsarawak.com

- ii. or to the Designated Director appointed by PETROS (“**Designated Director**”) whose dedicated email address is set out below.

Director@petroleumsarawak.com

- iii. **by telephone:** the Whistleblower may call the fixed telephone line to the Integrity Team during office hours from Mondays to Fridays (8.00 a.m. – 5.00 p.m.).

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- iv. **in writing:** the Whistleblower may address the letter to the Head of Integrity Team at the following address:

P.O.Box 00002
Pusat Mel Kuching
801-3B Jalan Tun Razak,
93457 Kuching, Sarawak

In the event the Head of Integrity Team or any member of the Integrity Team is implicated in the report, the Whistleblower may contact the Group Chief Executive Officer or any member of the Board Audit and Risk Committee (“**BARC**”) or Designated Director to make a report.

Any member of public intending to lodge a report of any improper conduct on PETROS' personnel may do so using any reporting channel as outlined in Reporting Procedures above, or by sending a report to the Designated Director in the prescribed form which shall be made available at PETROS' website. The report received from any member of the public will be reviewed in accordance with the investigation procedures under this Policy.

The contents of the disclosure/report shall include the following:

- details of person(s) involved
- nature of allegation
- where and when the alleged misconduct or wrongdoings took place
- supporting evidence and other relevant information, if available

Investigation and Notification

All reports received through any of the abovementioned reporting channels shall be acknowledged by PETROS. PETROS shall, as far as expedient, keep the Whistleblower informed of the action being taken to the extent that this information does not prejudice any investigation or endanger anyone's safety, save for any report made anonymously.

All disclosures or reports will be studied and investigated by the Integrity Team whose actions shall be overseen by BARC. The investigations should establish the facts by making enquiries and collecting relevant documents and other evidence. All investigations shall be treated in a confidential manner.

The outcome of the investigation will be reported to the Board of Directors by BARC.

Reporting Fraudulent Activity to the Authorities

In consequence of the investigations, PETROS may report the fraudulent activity or misconduct activity to MACC or any other relevant enforcement agencies or authorities.

Maintaining Records

The Integrity Team shall maintain appropriate records of all Whistleblowing reports received under this Policy, its handling of the reports and or cases, and the outcome of all whistleblowing reports. These records should be maintained for the appropriate period as required by law.



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