



WHISTLEBLOWING POLICY

1. PURPOSE

This policy is intended for Perisai Petroleum Teknologi Bhd (“PPTB” or “the Company”) and its subsidiary companies (“the Group”).

All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group and have a professional responsibility to disclose any known malpractices or wrongdoings (hereon referred to as “Concerns”). The policy adopted by the Group establishes a clear line of communication and reporting of concerns for employees at all levels, and provides alternative lines of communication depending on the person(s) who is/are the subject of such concerns.

2. SAFEGUARDS

A person or entity making a protected disclosure is commonly referred to as a “Whistle-blower”. Whistle-blowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistle-blowers are protected against being dismissed or penalised by the Group, and the Company will consider mitigating circumstances if the Whistle-blower himself/herself is involved in the activity that he/she reports.

In order for the Whistle-blower to be protected under this policy, the Whistle-blower 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 incidents took place as well as supporting evidence, if any.

A Whistle-blower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

3. CONFIDENTIALITY

PPTB will ensure that the Whistle-blower’s identity and concerns are dealt with in a confidential and sensitive manner. The Group gives the assurance that it will not reveal the identity of the Whistle-blower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law. The Group’s assurance of confidentiality can only be completely effective if the Whistle-blower likewise maintains confidentiality.

4. PROCEDURES

4.1 Process for disclosure

I) Impropriety

This policy covers:

- improprieties or irregularities (including financial and operational);
- suspected fraud or criminal offences (including corruption, bribery or fraud);
- breach of confidentiality; miscarriage of justice;
 - intentional misrepresentations, misstatements, omissions, directly or indirectly affecting financial position/standing or operation of the Group;
- endangerment of an individual's health and safety; and
- failure to comply with legal or regulatory requirements.

II) Reporting procedures

If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within the Group, the employee should report this immediately to the Chairman of the Audit Committee (“AC”) of the Company in writing, providing as much details as possible and specifying:

- (i) the Whistle Blower's full name, NRIC number and contact details;
- (ii) the background, date and history of the concerns;
- (iii) suspected personnel involved
- (iv) the reasons for the concerns;
- (v) details of witnesses and all factual corroborating evidence as is available;
- (vi) whether the Whistle Blower has any personal interest in the matter;
- (vii) whether action has already been taken by anyone.

Any improper activities disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

- Chairman of AC
Address : Suite 3A-17, Level 17, Block 3A
Plaza Sentral, Jalan Stesen Sentral 5
Kuala Lumpur, Wilayah Persekutuan
E-mail : ayoges@yahoo.com

Any employment-related concerns can be reported to:

- Managing Director (“MD”)
Address : Suite 3A-17, Level 17, Block 3A
Plaza Sentral, Jalan Stesen Sentral 5
Kuala Lumpur, Wilayah Persekutuan
E-mail : izzet@perisai.biz

Disclosures shall be in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as *“To be opened by the Chairman of AC or MD only”*; or be done via email to the abovementioned email address(s).

III) Handling of a reported allegation

The action taken by the Group in response to a report of Concern under this policy will depend on the nature of the concern. The Chairman of AC or MD shall receive information on each report of Concern and follow-up information on actions taken.

4.2 Investigator

The Internal Auditor or Head of Human Resource, as the case maybe, shall be the named Investigator unless the Chairman of AC or MD assign/appoint another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of AC or MD.

4.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group’s Code of Ethics or Conduct, the results of the investigation shall be reported to the Chairman of AC or MD, as the case

maybe, in accordance with the applicable procedures for company conduct and the administration of discipline.

Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

5. POLICY MATTERS

This policy shall be published at the PPTB's website and shall be displayed prominently at all the Group premises.

6. MONITORING AND PERIODIC REVIEW OF POLICY

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed periodically to assess its effectiveness.

This policy is adopted by the Board of Directors on 27th September 2018.