



COMPANY POLICY

WHISTLEBLOWING POLICY

Doc No: CG-HRA-WB-08

Rev. No: 1

Date: 29 November 2022

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WHISTLEBLOWING POLICY

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1. ABBREVIATIONS & DEFINITIONS

AC – Audit Committee

Company - Carimin Petroleum Berhad and its subsidiaries

Detrimental Action – any action by other employees or Management on an employee who has made a WB report such as unfair dismissal, victimization, demotion, suspension, intimidation, harassment, discrimination or any action which causes injury, loss, damage or any other retaliatory actions by the Company.

Employee – any employee of the Company and shall include contract personnel, temporary staff, trainees and interns.

HOD - Head of Department

HRD - Human Resource Department

MACC – Malaysian Anti-Corruption Commission, also known as SPRM

Management – HODs, Head of Business Units/Subsidiaries and the MD

MD - Managing Director of the Company

WB – Whistleblowing

WBCM – WB Case Management

Whistleblower – a person that makes a report of improper conduct or dealings, wrongdoings, dangerous or hazardous situations and any issues pertaining to the operation of the Company.

2. INTRODUCTION

Carimin Petroleum Berhad (“CPB” or “Company”) and its subsidiaries (“the Group”) is committed to implement a high standard of corporate governance and business integrity.

In recognising the abovementioned values, the Group provides avenue for all employees of the Group, third parties and members of the public to raise concerns or disclose any improper conduct within the Group and to take appropriate action to resolve them effectively.

3. OBJECTIVES

The intended objectives of this policy are:

- i. To encourage and develop a culture of openness, accountability and integrity.
- ii. To provide avenues for employees to raise genuine concerns or allegation through the appropriate channels upon discovery of possible misconduct.
- iii. To ensure the protection to individual who reports the concern or allegation in good faith in accordance with the procedures.
- iv. To enable Management to be informed at an early stage about acts of misconduct.

4. REFERENCES

This procedure shall be read and applied in conjunction with the following laws, regulations, policies and SOPs.

- 4.1 Relevant legal and regulatory requirements, including but not limited to:
 - a) Whistleblower Protection Act 2010 (Act 711)
 - b) Malaysian Anti-Corruption Commission Act (Act 694)
 - c) Employment Act 1955 (Act 265)
 - d) Employee Regulation 1957
 - e) Employment (Termination and Layoff Benefits) regulation 1980
 - f) Personal Data Protection Act 2010 (Act 709)
- 4.2 Company Policies and Procedures:
 - a) Whistleblowing Case Management Procedure (CG-CCC-WBCM-02)
 - b) Anti-Bribery and Corruption Policy (CG-HRA-ABNC-07)
 - c) Code of Conduct and Business Ethics (CG-HRA-OD-05)
 - d) Human Resource Policies And Procedures (CG-HRA-HRP-03)
 - e) Domestic Inquiry (CG-HRA-DI-09)

5. ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain or interest.

If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

6. SCOPE OF THE POLICY

This policy applies to the Group.

All Directors and employees of the Group working at all levels and grades and any third parties associated with the Group, which may include but not limited to customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives, officials and shareholders are encouraged to report or disclose through established channels, concerns about any violations of the Code of Conduct and Business Ethic of the Group, including, but not limited to the following:-

- (i) Fraud or dishonesty;
- (ii) Breaches of policies, procedures and applicable laws and regulations;
- (iii) Bribery or corruption;
- (iv) Abuse of power;
- (v) Conflict of interest;
- (vi) Insider trading;
- (vii) Criminal breach of trust;
- (viii) Sexual harassment;
- (ix) Misuse of confidential information; and/or
- (x) Other acts of wrong doing.

7. CONFIDENTIALITY

The identity of whistleblower will be kept confidential. Consent of whistleblower will be sought should there be a need to disclose identity for investigation purposes.

8. PROTECTION

The Group assures the whistleblower who raises issues of concern that he/she will be protected from interference with his/her lawful employment or livelihood,

including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to his/her employment, career, profession, trade or business or the taking of disciplinary action as a result of his/her reporting, provided the report is made in good faith and without malice.

Any party that retaliates, including harassment and victimization, or cause detrimental action against whistleblower who has reported allegations in good faith may be subject to appropriate action, up to and including legal action, where applicable.

9. REVOCATION OF PROTECTION

The protection stated in Section 8 above shall be revoked by the Group if:

- i. The whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- ii. The whistleblower made his/her disclosure without good faith;
- iii. The disclosure was frivolous or vexatious; or
- iv. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistleblower himself/herself.

10. ACTION

All WB reports will be managed and investigated according to our **Whistleblowing Case Management Procedure (Doc No CG-CCC-WBCM-02)**.

Every WB report received will be given a reference number and recorded in a **WB Register (WBR)**.

If required, assistance from other resources within or outside the Group can be sought. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee of the Company ("AC") for their deliberation. Decision taken by the AC will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation arising.

11. WHISTLEBLOWING REQUIREMENTS

The whistleblower should provide the following information:

- (i) Details of the whistleblower (strongly encouraged, however whistleblower **may choose to remain anonymous**)
- (ii) Type of activity/conduct
- (iii) Details of suspected personnel involved
- (iv) Details of incident (including date, time and location of incident)
- (v) Any supporting/documentary evidence

12. REVERTING TO COMPLAINANT

The whistleblower will be informed on the progress and status of the investigation, except for cases where contact details are not provided. However, the Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owed to someone else.

13. WHISTLEBLOWING CHANNELS

The established channels for whistleblowing reporting are as follows:

- a) General WB email wb@carimin.com as contained in our website, www.carimin.com.
- b) For employees, any concern should be raised with the immediate superior and/or the Head of Department (HOD). The complaint shall then be handled as per the WBCM Procedure. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Managing Director of the Company ("MD"). The channel of reporting to the MD is as follows:

By Mail: **Strictly Confidential**
Carimin Petroleum Berhad
B-1-6, Megan Avenue 1,



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189, Jalan Tun Razak,
50400 Kuala Lumpur

Attention: The Managing Director

By email: wb2@carimin.com

- c) If for any reason, it is believed that reporting to Management is a concern or not possible or appropriate, then the concern should be reported to the Chairman of AC of the Company as follows:

By Mail: Strictly Confidential
Carimin Petroleum Berhad
Third Floor, No. 77, 79 & 81,
Jalan SS 21/60, Damansara Utama,
47400 Petaling Jaya,
Selangor

Attention: The Audit Committee Chairman

By email: wb1@carimin.com

14. REVIEW OF THE POLICY

This policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

15. BOARD APPROVAL

This revised policy was reviewed and approved by the Board of Directors of the Company on 29th November, 2022.