

WHISTLEBLOWER POLICY

“Whistleblowing”, in the context of the Capital Markets & Services Act 2007 (“CMSA”), involves the disclosure of information to the relevant authorities by auditors and specific employees of a public-listed company, who in the course of carrying out their duties, discover breaches of the securities laws or the rules of the stock exchange or any matter which may adversely affect, to a material extent, the financial well being of the said listed company.

In tandem with provisions of the CMSA, which offer protection to such persons against harassment or victimisation as a result of such disclosures, companies are encouraged to establish internal procedures for handling employee concerns, to assist companies to address any shortcomings within its processes, and to facilitate good governance practices.

All employees of the Scomi Group of Companies 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. The Structure adopted by the Group establishes a clear line of communication and reporting of Disclosures for employees at all levels, and provides alternative lines of communication depending on the person(s) who is/are the subject of such Disclosure.

The Whistleblower Policy applies to all employees of the Group and is designed to enable them to raise concerns internally at a high level, and to disclose information which he reasonably believes shows malpractice or impropriety. The Whistleblower Policy is intended to cover matters which are of public concern and may at least initially be investigated separately, but may then lead to the invocation of other internal procedures, for example disciplinary proceedings. These matters may include, but are not necessarily limited to the following areas:

- financial malpractice, impropriety or fraud;
- failure to comply with laws or regulations;
- dangers to health & safety or the environment;
- criminal activity;
- improper or unethical conduct or behaviour;
- non-compliance with Group or Group Company policies and procedures;
- sexual harassment; and
- attempts to cover-up any of the above matters

Whistleblowers can make the disclosures electronically through the Scomi Group Bhd. Intranet, in writing or verbally to the Disclosure Officer. As far as reasonably practicable, Disclosures should be made privately and in person to the Disclosure Officer. Whistleblowers can choose to remain anonymous as the company has put in safeguards to protect the identity of the Discloser.