

## SAPURA INDUSTRIAL BERHAD (COMPANY NO. 17547-W)

### WHISTLE-BLOWING POLICY

#### OBJECTIVES

The Audit Committee of Sapura Industrial Berhad Group ("SIB Group") has implemented policies and procedures to help prevent and detect fraud, bribery, corruption, or illegal, improper or unethical activities or business conduct ("improper conduct").

SIB Group's Whistle-Blowing Policy ("Policy") provides a mechanism for employees and other parties, including members of the public to report in good faith any genuine concerns regarding attempted, suspected or actual improprieties in the conduct of SIB Group's business, at the earliest opportunity and in a systematic manner.

Disclosures made via this Policy will enable SIB Group's to take preventive and corrective action against any attempted, suspected or actual improper conduct within the SIB Group. Such action can be taken by SIB Group in a discrete and organised manner without risking the negative consequences that come with public disclosure, such as the loss of SIB Group's image or reputation, financial distress, loss of investor confidence or a drop in its share value. Employees and any other parties are encouraged to disclose their concerns regarding improper conduct within SIB Group or any breaches or inadequacies in SIB Group's policies, procedures or internal controls. These disclosures may be made anonymously. Whistle-blowers will be able to help SIB Group to monitor and keep track of any improper conduct within SIB Group that would otherwise not be easily detected through other internal controls.

The aim of this Whistle-Blowing Policy is to provide an avenue for, and to encourage any party to raise concerns or receive advice regarding any concerns involving improper conduct in an independent and unbiased manner. Whistle-blowers are not required to prove the issues raised. They should, if possible provide as much information known to them for SIB Group to take appropriate steps.

SIB Group will keep the identity of the whistle-blower and the information reported in a secure information management system. The whistle-blowing report will be treated confidentially so as to protect the identity of the whistle-blower and the identity of others involved or referenced in the whistleblowing report. Disclosure of confidential information will only be made to parties involved in the investigation, where it is required to facilitate the investigation.

The Board of Directors and the management of SIB Group give their assurance that all concerns raised will be treated fairly and properly and that whistle-blowers will not be at risk to any form of victimisation, retribution or retaliation ("detrimental action") from their superiors or from any party within SIB Group due to their disclosure. Any attempt to retaliate, victimise or intimidate a whistle-blower who has made a report in good faith is a serious violation of this Policy and shall result in disciplinary proceedings being initiated against the perpetrator, and may result in dismissal.

However, protection relating to confidentiality or against detrimental action will only be granted when the disclosure was made in good faith or with reasonable belief. Therefore, protection pursuant to this Policy does not extend to those who are found to have raised the matter under false or malicious intention.

## **ADMINISTRATION OF THIS POLICY**

This Policy is administered by SIB Group's Integrity Officer and overseen by the Audit Committee. Whistle-blowing reports should be recorded in writing where possible, detailing the description of the improper conduct, name of individual who have committed or are involved in the improper conduct and the "how", "what" and "where" in relation to the improper conduct. A whistle-blower may include supporting documents or any other evidence as part of their report.

Report on any unethical, unlawful and improper conduct can be made via email at [whistleblower@sapuraindustrial.com.my](mailto:whistleblower@sapuraindustrial.com.my).

## **WHISTLEBLOWER PROTECTION ACT 2010**

The Whistle-blower Protection Act 2010 provides protection to whistle-blowers who report improper conduct to an enforcement agency. Further information can be obtained from the Malaysian Anti-Corruption Commission ("MACC") website :

<https://www.sprm.gov.my/index.php/en/prevention/prevention-strategy/197-perundangan-anti-rasuah/1061-whistleblower-protection-act-2010-act-711>

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