

KERTIH TERMINALS SDN BHD

WHISTLEBLOWING POLICY



Policy Statement

KTSB is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, KTSB provides avenue for all employees of KTSB and members of the public to disclose any improper conduct within KTSB.

Objective of the Policy

This policy is to provide an avenue for all employees of KTSB and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

Scope of the Policy

This policy is designed to facilitate employees to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- I. Fraud;
- II. Bribery;
- III. Abuse of Power;
- IV. Conflict of Interest;
- V. Theft or embezzlement;
- VI. Misuse of Company's Property;
- VII. Non compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute and act of misconduct under KTSB Code of Conduct or criminal offence under relevant legislations in force.

This policy is not to invalidate the existing disciplinary procedures but to provide more avenues for employees to disclose improper conduct committed or about to be committed to the Company.

Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of KTSB and its subsidiaries. This policy also applies to members of the public, where relevant.

Procedure in Making a Disclosure

All disclosures are to be channeled in accordance with the procedures as provided under this policy.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within KTSB, to the extent reasonably practicable, provided that the disclosures is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and rules and procedures involved.

Anonymous Whistleblower

Any anonymous disclosures will not be entertained. Any employee who wishes to report improper conduct require to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

Notification

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

KTSB reserves the right to amend this policy from time to time.