

WHISTLEBLOWING POLICY

1. OBJECTIVE

As part of the Company's commitment to conducting its business activities ethically and professionally, the Company has developed this policy to ensure accountability and to promote a culture within the Company which is consistent with the highest standards of integrity that the Company values and expects from all employees.

To that end, procedures or mechanisms were developed to facilitate: -

- Reports of any suspected or actual wrongdoings on a confidential basis;
- Investigation of such reports by the appointed officer; and
- Protection against reprisal to the individual who reported in good faith.

For the purposes of this policy, the term "**Company**" means Socar Mobility Malaysia Sdn Bhd ("**SMMSB**"), its subsidiaries and affiliated companies (collectively known as the "**Company**").

2. REPORTING PROCEDURES

a) Who can disclose

2.1 Any of the following persons ("**Whistleblower**") can make a report to the Company of any suspected or actual wrongdoing:

- The Company's employees, including employees on contract, temporary or short-term employees and employees on secondment;
- The Company's third-party service providers, independent contractors, vendors and suppliers;
- Members of the public.

b) What can be disclosed

2.2 A disclosure on improper conduct may be made if the Whistleblower has reasonable belief that the alleged wrongdoer has engaged, or is prepared to engage in conduct prohibited by the Company or applicable laws and regulations. Improper conduct includes, but is not limited to:

- Criminal offence under the law, such as fraud, corruption, forgery, cheating, criminal breach of trust, insider trading, abetting or intending to commit criminal offence;
- Acceptance, involvement or solicitation of a bribe, or a favour in exchange for direct or indirect personal benefits;
- Theft;
- Gross mismanagement;
- Abuse of power by any director or officer of the Company;
- Serious breach of Company's policies including the Company's Anti-Bribery and Corruption Policy.

2.3 If an employee is unsure whether a particular act or omission constitutes an improper conduct under this policy, that employee is encouraged to seek advice or guidance from his or her immediate superior or the People & Transformation Department.

c) When to disclose

2.4 As soon as a Whistleblower becomes aware and reasonably believes in good faith that an improper conduct is being committed or has been committed, the Whistleblower is encouraged to make a report through the proper reporting channels as set out in this policy. No substantial evidence of proof is required before a report can be made, but the report should be made in good faith and based on reasonable grounds.

d) How to disclose

2.5 All disclosures pursuant to this policy are to be made to whistleblowing@socar.my.

2.6 The Company may also engage with external service provider(s) as the Company's designated recipient, to receive the whistleblowing reports on behalf of the Company, upon the Company's Board of Directors' approval.

2.7 Whistleblowing reports can also be escalated by any parties to the relevant regulators and law enforcement agencies, including:

- Malaysian Anti-Corruption Commission (“**MACC**”)
MACC Headquarters No. 2 Lebu Wawasan, Presint 7
62250 Putrajaya Malaysia

MACC hotline: 1-800-88-6000

2.8 All disclosure made pursuant to this policy should contain the following information:

- Details of the person(s) involved;
- Details of the allegation;
- Nature of the allegation,
- Location and date / time the alleged misconduct took place;
- Any supporting evidence (if available); and
- Other relevant information.

3. PROTECTION UNDER THIS POLICY

a) Confidentiality

3.1 It is the policy of the Company to allow the Whistleblower to either identify himself/herself or if he/she prefers, to remain anonymous when reporting suspected and/or known instances of misconduct or any wrongdoing mentioned above. However, the Whistleblower is encouraged to disclose his/her personal details as in some instances complete anonymity may limit the ability for thorough investigation due to insufficient information.

- 3.2 Reasonable steps will be taken to maintain the confidentiality of the Whistleblower, unless:
- The Whistleblower expressly agrees otherwise, and provides his/her agreement in writing; or
 - Otherwise required by law.
- 3.3 The Company shall not disseminate to third parties information regarding the Whistleblower, his/her report or any part thereof, including the status or outcome of an investigation into it, except:
- To those who are authorised under this policy;
 - Where it is for the purpose of lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 (“WPA”) or any relevant authorities;
 - If required by law; and
 - On a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.
- 3.4 Where the Whistleblower has chosen to reveal his/her identity when making such report, written permission from the Whistleblower would be obtained before the information is released.

b) Protection against reprisal, retaliation and/or detrimental action

- 3.5 Where the Whistleblower has chosen to reveal his/her identity, it is the policy of the Company to take all necessary steps to protect the Whistleblower against reprisals, retaliation and/or detrimental action as a direct result of the disclosure, such as:
- Intimidation or harassment;
 - Interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person’s employment, career, profession, trade or business or the taking of disciplinary action.

c) Revocation of protection

- 3.6 The protection shall be revoked by the Company if:
- The Whistleblower himself/herself has participated in the improper conduct disclosed;
 - The Whistleblower wilfully made in his/her disclosure of improper conduct a material statement which he/she knew or believed to be false or did not believe to be true;
 - The disclosure of improper conduct is frivolous or vexatious;
 - The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - The Whistleblower, in the course of making the disclosure or providing further information, commits an offence under the WPA.

3.7 The Company also reserves the right to take the necessary disciplinary actions (which may include termination of employment) against any employees in the event a whistleblowing report contains false and vexatious allegations against another individual.

4. INVESTIGATION

4.1 The Designated Recipient who receives the report shall, as soon as reasonably practicable, assess the report and take any actions it deems appropriate, including:

- Rejecting the report if it is of the view that it is groundless, frivolous, and vexatious;
- Directing the concerns or any part thereof for consideration under other internal procedures or the Company's existing disciplinary procedures as set out in the Company's Staff Book, if appropriate and applicable;
- Directing any person from the Company or external party to conduct an investigation on the report;
- Suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee's exposure to threat or harm;
- Obtaining any other assistance (for instance, external auditors or legal advice);
- Referring the matter to the police or any other appropriate enforcement authority.

4.2 The Whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out pursuant to this policy.

4.3 The investigation shall be carried out with due regard to fair process. No adverse action will be taken against any party without first giving them opportunity to be heard.

4.4 The Whistleblower will be informed of the result of any investigation or action or decision taken by the Company as soon as practicable.

5. REVIEW OF POLICY

5.1 This policy may be reviewed and amended, at the Company's Board of Director's discretion from time to time, as and when necessary, to ensure its relevance and effectiveness in keeping with the Company's changing business environment, administrative or operational needs as well as changes to legislations.