

	WHISTLEBLOWING POLICY	Policy. No	SSSB/CGRM/001
		First Issue Date	1 ST JANUARY 2024
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1.0 OBJECTIVES

Senari Synergy Group is committed to conducting its business professionally, ethically and with the highest standard of integrity. This Whistleblowing Policy ("Policy") reinforces Senari Synergy's core value of Uncompromising Integrity on its employees to be honest, disciplined, and respected members of their individual professions and functions.

This Policy provides a framework for responsible and secure reporting of concerns about irregularities within the Senari Synergy Group's operations. The Policy outlines a formal and confidential way in which all employees of Senari Synergy and/or the stakeholders can express their concerns on any form of improper conduct at an early stage and disclose the information via official channels or direct to Head of Corporate Governance and Risk Management (Head CGRM) or Chief Corporate Officer (CCO).

2.0 SCOPE

This Policy is applicable to all the Directors, Employees and Business Associates of the Senari Synergy Group or any other companies or individuals having dealings or arrangements with the Group. Any companies where Senari Synergy Sdn Bhd does not have any controlling interests are encouraged to adopt this Whistleblowing Policy or similar principles and standards, whichever is more stringent.

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3.0 Definitions

Company	Senari Synergy Sdn Bhd
Senari Synergy Group	Senari Synergy Sdn Bhd and its subsidiary companies which includes Senari Synergy Ventures Sdn Bhd, Senari Synergy Port Sdn Bhd, Senari Synergy Facilities I Sdn Bhd, Senari Synergy Facilities II Sdn Bhd, Senari Synergy Facilities III Sdn Bhd, Senari Synergy Development Sdn Bhd, IOT Management Sdn Bhd, Tanjung Manis Oil Terminal Management Sdn Bhd, ASSAR Refinery Services Dua Sdn Bhd and any other associate/ new subsidiaries of the Company.
Employees	Full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and on contract/ fixed-term contracts.
Business Associates	External party with whom Senari Synergy Group has, or plans to establish, some form of business relationship including but not limited to clients, customers, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries, and investors.
Improper Conduct	Any conduct which is proved, constitutes a disciplinary offence or a criminal offence.
Disciplinary Offence	Any action or omission which constitutes a breach of discipline in a public body or private body as provided by law or in a code of conduct, a code of ethics, or circulars or a contract of employment, as the case maybe.
Whistleblower	Any person who makes a disclosure of improper conduct to the organization based on his reasonable belief that any person has engaged, is engaging, or preparing to engage in improper conduct and such disclosure is made in good faith. The whistleblower shall lodge the report either via official channels or directly to the Head CGRM or <u>Chief Corporate Officer (CCO)</u> . Once officially reported and received by Head CGRM or <u>CCO</u> , the information shall not be disclosed to anybody.
Head CGRM	Head of CGRM is appointed by Senari Synergy Sdn. Bhd. to lead the Corporate Governance and Risk Management matters.
<u>CCO</u>	Chief Corporate Officer, appointed by Senari Synergy Sdn. Bhd. to lead the Group Corporate Services.

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Designated Team	The Designated Team (DT) shall comprise of the Chairman and members of the CGRM Board with the Head CGRM <u>or Chief Corporate Officer</u> as the secretariat. The DT shall appoint the Investigation Team.
Investigating Team	The investigation team shall be carried out by, and reported to, personnel who are not part of the role or function being investigated. The appointment of the Investigation Team shall be either the same rank or higher than the alleged person.
HCM	Human Capital Management (HCM) is a department under the Group Corporate Services.

4.0 Making a report

4.1 A Whistleblower may make a disclosure on an improper conduct via options as below:

- i. The Senari Synergy Whistleblowing Channel, e-form, at www.senarisynergy.com.my
- ii. Face-to-face reporting with the Head of CGRM or CCO.
- iii. Write-in to the Head CGRM or CCO, No 20 & 21, Wisma KAFAZ, Jalan Tun Datuk Patinggi Hj Abdul Rahman Ya'kub, 93050 Kuching, Sarawak.
- iv. Email to whistleblower@senarisynergygp.com managed by Head CGRM and CCO.

4.2 The disclosure shall include:

- i. Description of improper conduct and details of person(s) involved.
- ii. Background and history of the issues concerned, including the dates and location.
- iii. Reason(s) why the Whistleblower is particularly concerned about the situation.
- iv. Supporting and documentary evidence, if any, to support the disclosure.

4.3 A Whistleblower shall identify himself / herself when submitting a complaint / disclosure, which include name, contact details and department / company name.

4.4 Anonymous disclosure may be considered at the discretion of the DT. In exercising this discretion, the factors to be taken into account would include:

- i. The seriousness of the issue raised.
- ii. The credibility of the concern.
- iii. The likelihood of confirming the allegation from other sources.

4.5 Although the Whistleblower is not expected to prove beyond reasonable doubt the truth of the disclosure, the Whistleblower shall need to demonstrate that there are reasonable grounds for his/her concern and provide sufficient information to the Head CGRM or CCO for further action.

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- 4.6 Senari Synergy expects the Whistleblower to make disclosure in good faith, free from malicious intent, and ulterior motive. If allegations are proven to be insufficient in evidence, therefore, this disclosure will not be further investigated.

5.0 Protection of the Whistleblower

- 5.1 The Whistleblower's identity shall be kept confidential and protected as outlined under this Whistleblowing Policy.
- 5.2 Any Employee who become a Whistleblower and makes a report of improper conduct in good faith shall not be subject to unfair dismissal, victimization, demotion, suspension, intimidation or harassment, hostility, discrimination, any action causing injury, loss, or damage or any other retaliatory by Senari Synergy.
- 5.3 The protection conferred to the Whistleblower under this Whistleblowing Policy may and shall be revoked under the following circumstances:
- The report of Improper Conduct is not made in good faith; or
 - The Whistleblower him/herself has participated in the Improper Conduct reported; or
 - The report of Improper Conduct is made solely or substantially with the motive to avoid dismissal, termination of contract or other disciplinary action; or
 - The Whistleblower breaches his/her obligations of confidentiality under this Policy.
- 5.4 An employee making allegations or reports that that are proven to be frivolous, vexatious, or willfully false will be subject to disciplinary action (which may include termination of employment). In the case of customers, suppliers, subcontractors or consultants, continuity of business relationship shall be reviewed and Senari Synergy reserves to exercise its right in relation to such business relationship.
- 5.5 Any form of retaliation undertaken by an employee against any Whistleblower for reporting an irregularity in good faith is prohibited and considered to be in breach of the Company's Policy and Procedures. In such cases, disciplinary measures shall be taken against the said employee (which may include termination of employment).

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6.0 Whistleblowing Process

- 6.1 All Whistleblowing disclosure shall be channeled to the Head CGRM *or* CCO. The following steps will follow suit which is to review the whistleblowing report and prepare investigation proposal for DT's evaluation & decision to proceed or otherwise.
- 6.2 If the initial evaluation indicates that the disclosure has no basis or merits or it is not a matter to be dealt with under this Policy, it may be dismissed by the DT at this stage. Notification will be given to the Whistleblower of the decision to dismiss the reported disclosure and reasons for not proceeding with the report.
- 6.3 If the DT deemed that investigation is required, the DT shall appoint an Investigation Team to carry out a thorough investigation into the disclosure.
- 6.4 Upon conclusion, the Investigation Team will submit a report on the findings and recommendations, at the same to present to the DT.
- 6.5 The DT shall deliberate and decide on the next required action.

7.0 Investigation Process

- 7.1 The Investigation Team shall maintain objectivity, impartiality and fairness throughout the investigation process and conduct its investigation activities competently and with the highest levels of integrity. The Investigation Team shall perform its duties independently from those responsible for or involved in operational activities and from employees liable to be subject of investigations and shall also be free from any conflict of interest, improper influence, and fear of retaliation.
- 7.2 All investigations of whistleblowing reports decided by DT shall be conducted by the appointed Investigation Team only. The Whistleblower or any other personnel shall not attempt to conduct their own investigation.
- 7.3 The Whistleblower shall cooperate with the Investigation Team. Meetings may be arranged off-site as designated by the Investigation Team, to protect the confidentiality of the Whistleblower.
- 7.4 Members of the Investigation Team shall have access to all relevant records. Documents provided for investigation purposes shall be acknowledged accordingly.
- 7.5 All employees within the Group are expected to cooperate and provide the necessary assistance to the Investigation Team. There should not be any attempt to deliberately destroy, alter or remove any documentary information or evidence and any such attempt by any employees may result in disciplinary actions.
- 7.6 The Investigation Team may decide to meet with the employee(s) under investigation and/or other persons suspected to have been involved or to have any knowledge of the alleged improper conduct. All such meetings shall be conducted in the strictest of

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confidence, and all matters discussed shall be documented by the Investigation Team.

7.7 Upon completion of the investigation, the Investigation Team shall submit a written report of its findings and recommendations. The Investigation Report containing the following shall be properly documented:

- i) The specific allegation(s) of improper conduct,
- ii) Relevant information, supporting evidences obtained during the course of the investigation; and
- iii) Conclusions made and justification.

7.8 The Investigation Team shall present the Investigation Report findings, action and/or recommendation to the DT for further deliberation and decision.

7.9 All information provided in the whistleblowing reports shall be treated with the highest level of confidentiality to those who have received or made known about the disclosure.

7.10 Investigation records and reports related to the disclosure are to be kept strictly confidential by the Head CGRM or CCO.

7.11 Head CGRM or CCO to submit Investigation Report and DT's Decision to HCM for further disciplinary action process and administration.

7.12 HCM to notify Head CGRM or CCO of the HCM final process outcome. Case complete.

8.0 Notification Process

8.1 Upon the conclusion of the whistleblowing process, the Whistleblower will be notified by Head CGRM or CCO on the outcome of the disclosure.

9.0 Special Case

9.1 In a situation where the case is directly affecting the State's reputation, the matter shall be referred to the relevant State Authority by the Head CGRM or CCO.

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Appendix A: Whistleblowing Process

