



**STRAITS ENERGY
RESOURCES BERHAD**

Company No: 199601040053 (412406-T)

WHISTLEBLOWING POLICY

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WHISTLEBLOWING POLICY

1. Introduction

Straits Energy Resources Berhad (formerly known as Straits Inter Logistics Berhad) (“Straits” or “the Company”) is committed to the highest professional standards of Integrity and strives to provide assurance to its shareholders and customers that it operates its business ethically and in accordance with applicable laws and regulations.

Straits places high value on the level of trust and integrity expected of its employees within its Group of Companies (“Group”). It is an avenue to encourage and enable employees and others to raise legitimate concerns to be objectively investigated and addressed within the Company prior to seeking resolution outside the Company.

Therefore, Straits have established adequate and secured Whistleblowing reporting channels for Straits employees and external parties to report any suspected fraud, corruption, criminal activity or unethical conduct/behaviour in the workplace without facing any adverse consequences such as retaliation.

2. Definitions

a) Whistleblowing

This occurs when an employee/other stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he/she is aware of through his/her work/dealing.

b) Whistleblower

The employee/other stakeholder who discloses or reports the wrongdoing.

3. Objectives

The Whistleblower Policy aims to achieve the following objectives:

- a) Safeguard Straits Group’s reputation;
- b) Protect Whistleblowers from detrimental actions;
- c) Facilitate timely escalation of improper conduct in a professional manner; and
- d) Investigate and manage disclosed or reported improper conduct through established appropriate processes to ensure consistent and timely response;

4. Scope Of Reporting

The following shall constitute “Improper Conduct” (misconduct or criminal offence):

- a) Any form of financial crime, including fraud;
- b) Bribery and corruption;
- c) Harassment, abuses and intimidation;
- d) Conflict of Interest and potential abuse of position for personal gains;
- e) Serious breach of the Group’s Code of Ethics and Conduct;
- f) Unauthorized disclosure of sensitive data or information to outsiders (third party);
- g) Misuse of the Group’s Properties, assets or resources;
- h) Non-Compliance to the Group’s Policies and Procedures;
- i) Regulatory breaches or non-compliance to regulatory requirements;
- j) Criminal breach of trust;
- k) Acts or omissions which are deemed to be against the interests of the Group;
- l) Danger to health and safety of any employee of the Group or any other individual;
- m) Damage to the environment;
- n) Unethical behaviour;
- o) Other illegal acts and malpractices; and
- p) An accomplice to or deliberate concealment of any or a combination of the above matters or other acts or wrongdoing.

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later reveals that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

5. Disclosures Channels

All employees and third parties are to disclose any concern in a confidential manner. Third parties should report to the dedicated channel assigned by the Group. Employees should report to their immediate superior where possible. If for any reason, it is believed that this is not possible or appropriate, employees shall report to the dedicated channel assigned by the Group:-

- a) Secured Email Address at corporate@straits-energyresources.com
- b) Secured Hotline number +603 – 6419 1266



5. Disclosures Channels (Contd.)

- c) Secured P.O. Box Mail Address at
B-07-06, Plaza Mont Kiara
2, Jalan Kiara, Mont Kiara
50480 Kuala Lumpur

In the case where reporting to management is a concern, then the report should be made to the Chairman of the Audit Committee:-

- a) Secured Email Address at corporate@straits-energyresources.com
- b) Secured Hotline number +603 – 6419 1266
- c) Secured P.O. Box Mail Address at
B-07-06, Plaza Mont Kiara
2, Jalan Kiara, Mont Kiara
50480 Kuala Lumpur

6. Content Of Disclosure

All disclosure made herein should contain the following information:

- a) Details of the person(s) involved;
- b) Details of the allegation
- c) Nature of the allegation
- d) location and date / time the alleged misconduct took place
- e) Any supporting evidence (if available); and
- f) Other relevant information

7. Non-Disclosure Of Identity

In order to enable the Group to accord the Whistleblower, the necessary protection under the “Whistleblower Protection Act 2010” policy and also to obtain more details on the allegation/report, the Whistleblower is encouraged to disclose his/her personal details.

However, Whistleblower may choose to remain anonymous, although in some instances it may limit the ability for thorough investigation due to insufficient information.



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This Policy provides assurance that Straits will protect the confidentiality of all allegations raised and the identity of the Whistleblower at all times.

8. Protection Accorded To The Whistleblower

A Whistleblower will be accorded with protection under the policy provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts as well as the rules and procedures involved.

This Policy provides assurance that if retaliation happens to an employee or external party, he/she must report to the Whistleblowing channels by substantiating the claim with factual information or documentation.

If the act of retaliation is committed by an employee of Straits Group, the Management will institute the necessary disciplinary action.

However, if the act of retaliation is committed by an external party and if it's proven, Straits Group may take action to hold the external party accountable including instituting civil and/or criminal actions against him/her in the court of law.