



CENERGI SEA BERHAD WHISTLEBLOWING POLICY

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1. POLICY PURPOSE

Cenergi SEA Berhad, its subsidiaries (“Cenergi Group”) encourages anyone to raise genuine reports as soon as practically possible on any non-compliance of Cenergi Group’s policies and procedures in an appropriate way. Cenergi Group implements a Whistleblowing Policy to encourage employees, stakeholders and all third parties to volunteer disclosing any improper conduct or unfair practices that has occurred within Cenergi Group whilst providing the necessary protection to the individual reporting the event.

2. POLICY INTENT

This policy intends to allow any employee and any other stakeholder, be it shareholders, directors, customers, partners, suppliers, consultants, service providers, agents or members of the public, to report, in a transparent and confidential manner, any alleged improper conduct or unfair practices, which will be thoroughly investigated by Cenergi Group, and suitable action, if required, will be taken whilst protecting the individual reporting the incident against any adverse action for raising the allegation.

The Whistleblower Protection Act 2010 provides safe avenues to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith, by protecting the Whistleblowers’ identities, providing them with immunity from civil and criminal proceedings and protecting them from detrimental action.

3. DISCLOSURE OF “IMPROPER CONDUCT”

Disclosure may be made to Cenergi Group if it relates to an “improper conduct”, committed or about to be committed, involving:

- i. criminal offences by the Cenergi Group’s employees and directors including fraud, corruption or abuse of power;
- ii. misuse of Cenergi Group’s funds or assets;
- iii. gross mismanagement within Cenergi Group ;
- iv. breach of Cenergi Group’s Code of Business Conduct and Employee Handbook by its employees;
- v. breach of Cenergi Group’s policies;
- vi. assisting a person to commit any of the above instances of improper conduct; and
- vii. detrimental action taken against Whistleblowers or persons closely associated with Whistleblowers.

The above list is not exhaustive and includes any act or omissions, which is proven, will constitute an act of improper conduct or may amount to a criminal offence under the relevant legislations in force.

4. TYPES OF PROTECTION FOR “WHISTLEBLOWERS”

No	Types of Protection	Whistleblowers Protection Act 2010
i.	The identity of the Whistleblower and the information provided is kept confidential and not to be disclosed to anybody, even during the trial in court.	Section 7(1)(a)
ii.	Whistleblowers should not be liable to any civil action, criminal or disciplinary consequences of such disclosure.	Section 7(1)(b)
iii.	Whistleblowers are protected from any act prejudicial to the outcome of the reaction disclosures have been made.	Section 7(1)(c)
iv.	Protection is also given to those who have connection / relationship with the Whistleblower.	Section 7(3)

5. EXCLUSION FROM PROTECTION

Potential Whistleblowers are also reminded that there may be instances wherein their protection would be revoked or excluded. The Whistleblower protection does not extend to the following disclosures and will be revoked by Cenergi Group pursuant to Section 11 of the Whistleblower Protection Act 2010:

- i. where the disclosures of improper conduct which are -
 - a. frivolous or vexatious.
 - b. known to the Whistleblower to be false or untrue; or
 - c. made solely or substantially to avoid dismissal or other disciplinary action.
- ii. where the Whistleblower has participated in the improper conduct so disclosed; or
- iii. where the Whistleblower commits an offence under the Whistleblower Protection Act 2010.

Any person who makes a disclosure of improper conduct to Cenergi Group, knowing or believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

6. RAISING CONCERNS AND REPORTING CHANNELS

6.1. Raising a concern

- i. Whistleblowers should make their disclosures in writing and to provide sufficient details which include the following:
 - a. the type or description of improper conduct;
 - b. the name of individuals who have committed or are involved in the improper conduct; and
 - c. the 'how', 'what', and 'where' in relation to the improper conduct including supporting documents or evidence, if any.
- ii. For the purposes of recording and providing feedback, the person reporting the incident, the Whistleblower, must :
 - a. reveal his/her identity and address the way he/she can be contacted.
 - b. personally attends and meets with Cenergi Group's officers either at the office or at any place designated.
- iii. Any person who elects to remain anonymous is advised that no Whistleblower protection will be accorded and Cenergi Group's's ability to investigate the alleged improper conduct is limited to the extent of the contents of the report received by Cenergi Group.
- iv. Whistleblowers will be informed by the Designated Person of the outcome of the investigation and action taken, if any, by the appropriate disciplinary authority or the other appropriate authority, the employer or the other appropriate person or the Public Prosecutor, as the case may be.

6.2. Reporting channel

Any improper conduct that concerns Cenergi Group are encouraged to be reported to any of the relevant Designated Person through the communication channels as set out in the table below;

GROUP	ALLEGED WRONG DOER	DESIGNATED PERSON	EMAIL ADDRESS	LETTER
Group A	Chairman	Chairman of Audit Risk Committee	chairman.arc@cenergi-sea.com	Sealed letters with indicative labels such as "To be opened by [name of the Designated Person] only", addressed to -
	Any member of Cenergi's Board of Directors	Chairman	chairman@cenergi-sea.com	
	Group Chief Executive Officer	Chairman	chairman@cenergi-sea.com	
Group B	Any member of Senior Leadership	Chairman	chairman@cenergi-sea.com	["Name of Appropriate Designated Person"] Cenergi SEA Berhad, Level 4, Block E, Dataran PHB, Saujana Resort, Section U2, 40150, Shah Alam, Selangor
	Any other person not specifically identified above, such as – Other Cenergi's Employees, Subsidiaries, Vendor and/or its Employees	Chairman	chairman@cenergi-sea.com	

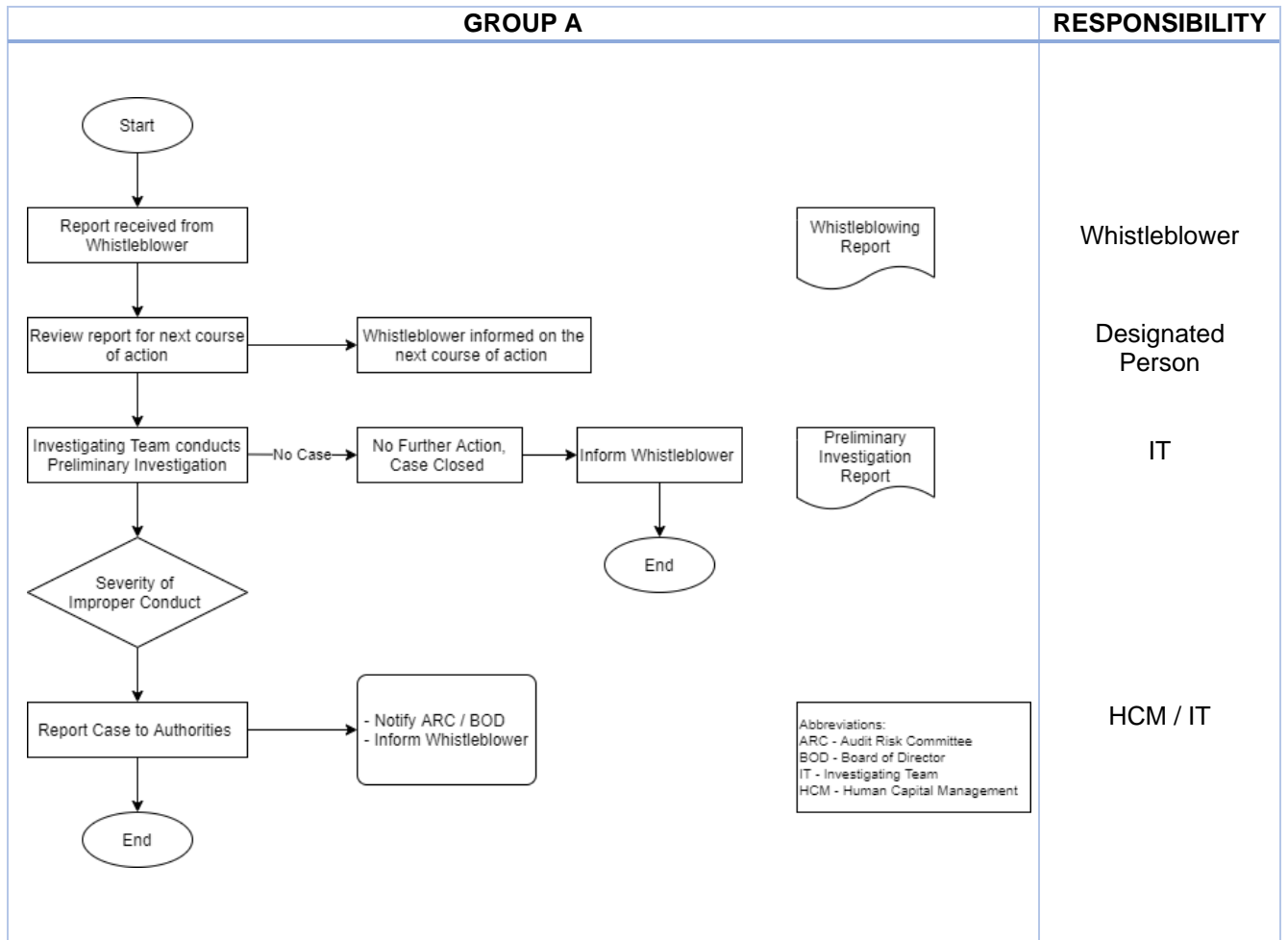
6.3. General enquiry or complaint

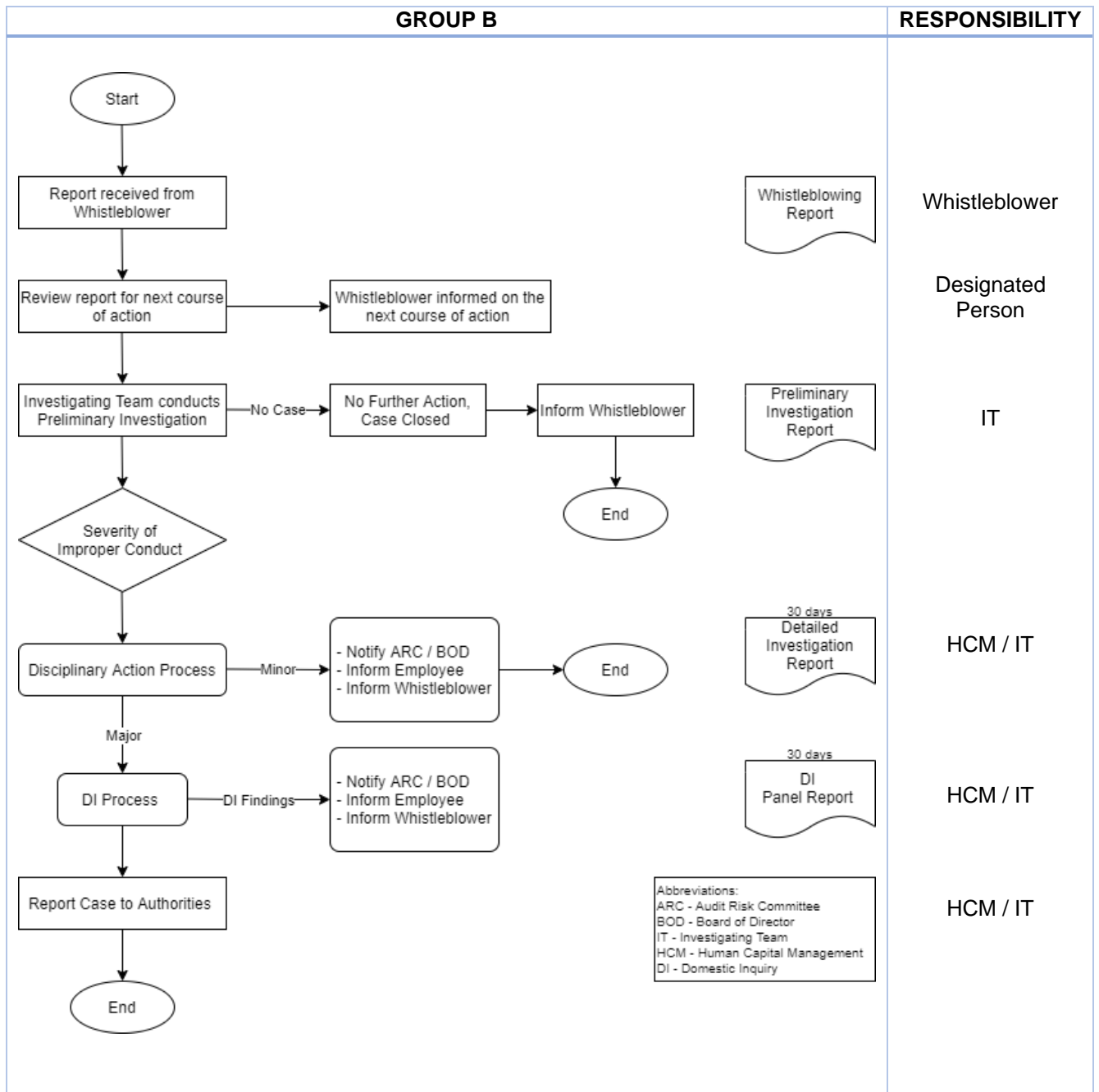
If the subject matter of the disclosure is other than "improper conduct", such as a general enquiry or a complaint on services provided by any company or subsidiary under Cenergi Group, members of the public may contact the following:

General Manager, Corporate Services Division ,
Level 4, Block E, Dataran PHB,
Saujana Resort, Section U2,
40150 Shah Alam, Selangor.
Malaysia.

Email : gmcsd@cenergi-sea.com
General Line : +603 5885 0454
Fax Line : +603 5885 1474

7. WHISTLEBLOWING PROCESS FLOW





Cenergi Group SEA Berhad

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