



**BARAKAH OFFSHORE PETROLEUM BHD (980542-H)**

# **WHISTLE BLOWING POLICY**

**DOCUMENT NO: BOP/GEN/R/01-007**

**EFFECTIVE DATE: 23 October 2013**

## 1. **GENERAL**

The Board members, the Management and all employees (collectively refers as the “Parties”) of Barakah Offshore Petroleum Berhad (“Barakah” or “Company”) and its subsidiary and associate companies (collectively refers to as the “Group”) shall maintain a workplace that practice good corporate governance and upholds integrity in all its operational and business activities. The Group takes serious view of any Wrongdoing (refer item 3 for its further elaboration) on the part of any of its employees, management, directors and vendors, in respect to their obligation to the Group’s interest.

The Group has established its whistleblowing channels to help stakeholders raise concerns, without fear of retaliation, on any Wrongdoing that they may observe in the Group.

It is also the duty of Parties to report any breaches or violations contrary to:-

- i. The terms and conditions of service;
- ii. Group’s policies and procedures; or
- iii. Applicable laws.

This Policy shall also similarly apply to any vendors, partners, associates or any individuals including the general public in the performance of their assignments or conducting the business for or on behalf of the Group.

## 2. **SCOPE OF WHISTLEBLOWING POLICY**

The primary purpose of this policy is to govern the reporting and handling of Wrongdoing at the Group. This policy does not replace the Group’s existing policy for handling employee grievances or similar complaints, which will continue to be administered by its Human Resource Department.

## 3. **WRONGDOING**

Parties can report suspected or instances of Wrongdoing to the Chairman of ARMC. Wrongdoing, shall mean, but not limited to:

- a. Fraud;
- b. Taking or giving kickbacks, bribery, favours, privileges
- c. Blackmailing;
- d. Misappropriation of monies or asset;
- e. Illicit and corrupt practices;
- f. Criminal breach of trust;
- g. Misuse of information
- h. Giving false or misleading information Conceal (including suppression of any material facts or information);

- i. Questionable and improper accounting;
- j. Violation of laws and regulations;
- k. Violation of Group's policies;
- l. Act of omissions which deemed to be against the interest of the Group , laws, or regulation;
- m. Endangerment of employees or public health and safety; and
- n. Deliberate concealment of any or a combination of the above or other acts of wrong doing.

#### **4. REPORTING IN GOOD FAITH**

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 and the rules and procedures involved.

The protection to the Whistleblower can be revoked under the following circumstances, inter alia:-

- i. The Whistleblower participated in the improper conduct;
- ii. The Whistleblower wilfully disclose a false statement
- iii. The disclosure is made with malicious intent; and/or
- iv. The disclosure is frivolous/vexatious

All complaints reported to the Chairman of ARMC are treated with strict confidence. However party's consent will be sought should there be a need to disclose his/her identity for investigation purposes. The investigations process may be affected if such consent is withheld. Information will only be disclosed on the need to know basis and with permission from the Chairman of ARMC. The party's identity will not be reveal unless it is required by the law.

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#### **5. PROTECTION FROM RETALIATION**

Any party that retaliates against the Whistleblower acting on good faith may be subject to appropriate action, up to and including legal action, where applicable.

#### **6. WHISTLEBLOWING CHANNELS**

The Whistleblower should promptly report the suspected or instances of wrongdoing to the Chairman of ARMC.

Parties submitting the complaints via emails or letter should disclose their names, contact emails and numbers, details of person(s) involved, nature of allegation, where and when the incident occurred and provides evidence, if possible. The report format can be found in the

attachment and whistleblower will need to provide as accurate as possible to enable investigation to be conducted thoroughly.

Upon receipt of the complaint, the Chairman will determine whether the nature of the complaint falls within the category of Wrongdoing. If it is a Wrongdoing, the internal auditor will proceed with the investigation.

The whistleblower may be informed on the outcome of the investigation.

All Investigation report shall be tabled to the ARMC that has the authority to ensure effective implementation of the whistleblowing policy. The ARMC shall update the Board of Directors on reports that require their attention and approvals.

**WHISTLEBLOWING CASE MANAGEMENT**

**ATTACHMENT**

COMPLAINTS DETAILS	
Name of person alleged	
Designation of the person alleged	
Department	
Company of person alleged	
Allegation details	
Location of incident	
Time and date of incident	
Estimated value involved (Please state currency)	
Supporting evidence	(please attached, if any)

Other parties involved		
<b>WHISTLEBLOWER (COMPLAINANT) DETAILS</b>		
Name of reporter		
Contact number		
Email address		
Company name		
I declare that the above report is made by me without malicious intent, not careless but is made after due and careful consideration.		
Date reported:	Signature:	
<b>FOR OFFICE USE</b>		
Case reference number		
Date received		
Remarks		