



ALAM MARITIM RESOURCES BERHAD

WHISTLEBLOWING POLICY AND PROCEDURES

1. POLICY STATEMENT

- a) Alam Maritim Resources Berhad (“AMRB”) is committed to achieving and maintaining high standards with regards to behaviour at work as set out in AMRB’s Vision and Mission.
- b) In order to achieve these standards, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- c) AMRB views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- d) The policy and procedures are applicable to all companies within AMRB Group.

2. WHISTLEBLOWING

- a) Whistleblowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements that are taking place / have taken place / may take place in the future.
- b) The types of improper conduct which fall under this policy include :
 - (i) Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
 - (ii) Forgery or alteration of any document or account belonging to companies within the Group;
 - (iii) Forgery or alteration of a cheque, bank draft, or any other financial document;
 - (iv) Misappropriation of company’s funds, securities, supplies, or other assets;
 - (v) Impropriety in the handling or reporting of money or financial transactions;
 - (vi) Profiteering as a result of insider knowledge of the Group’s activities;
 - (vii) Conduct which is an offence or a breach of law;
 - (viii) Financial malpractice;
 - (ix) Breach of the Group’s Code of Business Ethics;

- (x) Abuse of power and position for personal gain;
- (xi) Any act that poses danger to health and safety;
- (xii) Any act that causes damage to environment; and
- (xiii) Concealment of any of the above.

Other types of improper misconduct which do not come directly under the scope of this policy should be dealt with under the company's existing disciplinary and grievance procedure.

- c) Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

3. PROCEDURES

- a) Any concern in respect of Key Management/Senior Management should be reported to the following authority using the Company's Whistle Blowing Form:

ALAM MARITIM RESOURCES BERHAD,
No. 38F Level 3, Jalan Radin Anum,
Bandar Baru Sri Petaling,
57000 Kuala Lumpur,
Malaysia.

Attention: Chairman of Board Audit Committee

and copied to the Group Managing Director of AMRB

- b) Any concern in respect of other general Staff should be reported to the following authority using the Company's Whistle Blowing Form:

ALAM MARITIM RESOURCES BERHAD,
No. 38F Level 3, Jalan Radin Anum,
Bandar Baru Sri Petaling,
57000 Kuala Lumpur,
Malaysia.

Attention: Group Managing Director of AMRB

and copied to the Head, Group Human Resource of AMRB.

4. ACTION

- a) All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Group Internal Audit, Group Human Resource Department, Group Legal Department, etc). The progress of investigation will be reported to the Board Audit Committee no later than at the next scheduled meeting.
- b) Reports received anonymously will be treated as confidential.
- c) The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- d) Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- e) Where possible, steps will also be implemented to prevent similar situation arising.

5. FURTHER ACTION

- a) If for any reason, the person making the report is not satisfied with the way his report had been dealt with by the Chairman of BAC, he can escalate his report to the Chairman of the Company.
- b) Chairman of the Company will deliberate the report with his Committee members and decide on the appropriate course of action.