

# **KEYFIELD INTERNATIONAL BERHAD**

Registration No. 202001038989 (1395310-M)  
(Incorporated in Malaysia)

## **WHISTLE-BLOWING POLICY**

### **1. INTRODUCTION**

All employees, customers and suppliers (“stakeholders”) are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

The whistle-blowing policy of KEYFIELD INTERNATIONAL BERHAD (“Keyfield” or “the Company”) is designed to:

- a) Support the company’s values;
- b) Ensure stakeholders can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- c) Protect a whistle-blower from reprisal as consequence of making a disclosure;
- d) Provide a transparent and confidential process for dealing with concerns. This policy not only covers possible improprieties in matters of financial reporting, but also:
  - Fraud;
  - Corruption, bribery or blackmail;
  - Criminal offences;
  - Failure to comply with a legal or regulatory obligation;
  - Miscarriage of justice;
  - Endangerment of an individual’s health and safety; and
  - Concealment of any, or a combination, of the above.

### **2. PRINCIPLES**

The principles underpinning the Policy are as follows:

- a) internal procedures to facilitate necessary whistle-blowing, in a timely and responsible manner, are in place and made known to all employees of the company;
- b) all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- c) the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- d) the identity and personal information of the whistle-blower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;
- e) the whistle-blower and the alleged wrongdoer will be treated fairly. The wrongdoer will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);
- f) personal information, including the identity, of the whistle-blower and the alleged wrongdoer shall only be revealed on a ‘need-to-know’ basis; and

- g) the Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue.

### **3. COVERED CONCERNS**

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- a) corruption, bribery and fraud;
- b) criminal offence or any breach of the laws of Malaysia or any other legal jurisdiction;
- c) acceptance of gifts/ favour beyond the threshold allowed by the company;
- d) misuse and/or misappropriation of the company's funds or assets;
- e) impropriety (including financial and operational, etc.) within the company;
- f) gross mismanagement within the company (including serious potential breach to the interest of society and environment);
- g) breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
- h) act or omission jeopardising the health and safety of the company's employees or the public.

### **4. REPORTING PROCEDURE**

If any stakeholder believes reasonably and in good faith that malpractices exist in the Company, the stakeholder should report this immediately to the whistle-blowing committee. Reporting shall be made in writing by filling in the Report Form in Appendix I. The completed Report Form should be sent to [whistleblowing@keyfieldoffshore.com](mailto:whistleblowing@keyfieldoffshore.com).

However, if for any reason the stakeholder is reluctant to do so, then the stakeholder should report the concerns to the Audit and Risk Management Committee ("ARMC") Chairman.

Employees concerned about speaking to another member of staff can communicate, in confidence, to the ARMC Chairman by emailing his/her concern to the ARMC Chairman. Any anonymous disclosure will not be entertained. However, the ARMC Chairman reserves his/her right to investigate into any anonymous disclosure.

These concerns will be managed by the ARMC Chairman and he/she shall have the right to decide whether to inform the Management or the Board of Directors or relevant enforcement authority(ies)(if the ARMC Chairman concluded that such incidents to be reported, based on the facts gathered), depending on the seriousness of the reported incident(s) and on need-to-know basis, without revealing the identity of the whistle-blower. The ARMC Chairman, at the cost to be borne by the Company, shall have the right and authority(ies) to decide on the next course of actions with the advice of the external professionals or experts, if required.

Whistle-blowers' identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the whistle-blower raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the whistle-blower concerned as to whether and how the matter can progress further.

## **5. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE**

If the Person (i.e. the whistle-blower) has, or is found to have:

- committed a wrongdoing;
- taken serious risks which would likely cause a wrongdoing to be committed;
- made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous or malicious complaints); or
- participated or assisted in any process pursuant to this policy otherwise than in good faith,

the corrective actions to be taken against that Person will be determined by the ARMC Chairman and the Chief Executive Officer, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

Any attempt to retaliate, victimise or intimidate against anyone (whistle-blower) making report in good faith is a serious violation of the Policy and shall be dealt with serious disciplinary actions and procedures.

## **6. PROTECTION**

The identity and personal information of the whistle-blower will be protected and kept confidential, unless the whistle-blower agrees otherwise or unless otherwise required by law.

The whistle-blower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure.

If a whistle-blower reasonably believes that he is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he may consult or report to the ARMC Chairman.

## **7. ADMINISTRATION**

This Policy is administered by the ARMC with the assistance of the Whistle-blowing Committee and overseen by the Board of Directors.

Contact persons:

ARMC Chairman: Puan Julannar Binti Abd Kadir  
Email: [whistleblowing@keyfieldoffshore.com](mailto:whistleblowing@keyfieldoffshore.com)

*This Whistle-Blowing Policy was adopted by the Board on 22 February 2021 with revisions approved on 16 July 2021.*

STRICTLY CONFIDENTIAL

**KEYFIELD INTERNATIONAL BERHAD  
 WHISTLEBLOWING REPORT FORM**

<b>Informant's Particulars</b>	
<b>Name:</b>	<b>Telephone No.:</b>
<b>Staff No.:</b> (if applicable)	<b>E-mail:</b>
<b>Incident to be reported</b> <i>(please supply as much information as possible on the particulars of the incident to be reported and use a separate sheet if the space provided is insufficient )</i>	
<b>Time and Place:</b>	
<b>Person(s) involved:</b>	
<b>Details of the incident:</b>	
Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents.	
<p><b>The informant hereby confirms that he/she is willing to give a statement in respect of the incident stated in this report (the "Incident"). The informant understands that all personal data submitted by him/her will only be used for purposes which are directly related to the Incident, and may be transferred to parties who will be involved in (i) the processing and/or investigation of the Incident; (ii) the undertaking and/or conduct of disciplinary proceedings; and/or (iii) law enforcement. The informant shall have the right to request access to and correction of his/her personal data submitted in this report. The informant hereby declares that all information given herein is made voluntarily and true to the best of his/her knowledge, and he/she will ensure that his/her participation will be kept confidential</b></p>	
<b>Signature:</b>	<b>Date:</b>