KEYFIELD INTERNATIONAL BERHAD

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

WHISTLEBLOWING POLICY AND PROCEDURES

1. OBJECTIVES

The whistleblowing policy and procedures of KEYFIELD INTERNATIONAL BERHAD and its subsidiaries ("Keyfield" or "the Group") is designed to:

a) support the Group's values;

b) ensure genuine concerns of over conduct which if proved, constitutes a disciplinary offence or a criminal offence ("Improper conduct") can be raised in good faith without fear of reprisals while safeguarding the whistleblower's confidentiality; and

c) provide a transparent and confidential process for dealing with concerns.

2. KEY PRINCIPLES

The key principles underpinning the procedure are as follows:

a) internal procedures to facilitate necessary whistleblowing, in a timely and responsible manner, are in place and made known to all employees of Keyfield;

b) all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;

c) the identity and personal information of the whistleblower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;

d) the whistleblower and the alleged wrongdoer will be treated fairly. The whistleblower 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);

e) personal information, including the identity, of the whistleblower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis; and

f) the Group 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. SCOPE

All employees, members of Board of Directors, business associates such as customers, service providers, vendors, suppliers, contractors and other stakeholders who may have a business relationship with Keyfield as well as members of the public are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance, and other malpractices at the earliest opportunity, in good faith and in an appropriate way.

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

a) corruption, bribery, blackmail and fraud;

b) breach of data privacy;

c) criminal offences or any breach of the laws of Malaysia or any other legal jurisdiction;

d) miscarriage of justice;

e) acceptance of gifts/ favours beyond the threshold allowed by the company;

f) misappropriation of funds, assets, theft or embezzlement or gross mismanagement;

g) impropriety (including financial and operational, etc.) within the company;

h) gross mismanagement within the company (including serious potential breach to the interest of society and environment);

i) breach of Group's code of conduct and business ethics, including sexual, physical or other abuse of human rights;

j) knowingly assisting, directing or advising a person to commit any of the above Improper Conduct;

k) any act or omission that jeopardises the health and safety of the company's employees or the public; and

l) concealment of any, or a combination of the above.

This policy and procedures does not apply to workplace-related grievances, including employee complaints or dissatisfaction concerning working conditions, interpersonal relationships, or management decisions that may affect employee welfare. Such matters shall be addressed to the Human Resources or Crewing Department.

4. WHISTLEBLOWER PROTECTION

Protection provided to non-anonymous whistleblower covers the followings:

- Confidentiality of information. For example, information on identity, occupation, residential address, place of employment, etc.

- Protection against retaliation and detrimental action by adopting a zero-tolerance approach towards harm, intimidation, harassment, discrimination, termination, suspension of work, threat or anything that causes damage by any person on the whistleblower who makes a report in good faith. For example, when a whistleblower had given information about a corrupt employer, he is protected under Whistleblower Act against dismissal from work by the employer.

Any attempt to retaliate against, victimize, or intimidate whistleblower making the report in good faith is a serious violation of the Policy and shall be dealt with through serious disciplinary action and procedures.

If a whistleblower reasonably believes that he/she is being subjected to detrimental action/reprisal as a consequence of whistleblowing, he/she may consult or report to the ARMC Chairman.

5. WRONGFUL REPORT

Since an allegation of Improper Conduct may result in serious personal repercussions for the person who has allegedly committed an Improper Conduct, any person who intends to lodge any report of Improper Conduct shall ensure that the Whistleblowing Report is made in good faith and not for personal gain or motivation.

Whistleblower Protection will be revoked if:

- the whistleblower himself/herself participated in the improper conduct.
- the whistleblower willfully made a false statement.
- the disclosure is frivolous or vexatious.
- the disclosure is made solely to avoid dismissal/disciplinary action.

If the report is found to be made with malicious intent, this may lead to disciplinary measures such as formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

6. REPORTING PROCEDURES

6.1 Filing Whistleblowing Report

If any stakeholder reasonably and in good faith believes that Improper Conduct exists within the Group, the stakeholder should report the concern promptly through either one of the following whistleblowing channels:

(a) complete the Whistleblowing Report Form in **Appendix I** and submit it to the ARMC via email at whistleblowing@keyfieldoffshore.com; or

(b) complete and submit the online whistleblowing form available at https://keyfieldoffshore.com/whistle-blowing-direct/, which is received directly by the ARMC.

In order for the Company to investigate Improper Conduct reported, the whistleblower shall provide important information and sufficient details in the Whistleblowing Report Form which includes the following:

(a) particulars of the whistleblower i.e. name and staff number (if the whistleblower is an employee of the Group) and contact particulars (email address or telephone number);

(b) details of the Improper Conduct, including a description of the incident, the date, time, and place of its occurrence and the identity of the alleged person(s) involved.

Whistleblowers' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the whistleblower (i.e. if the evidence is required in court), a dialogue will be carried out with the whistleblower concerned as to whether and how the matter can progress further. Any anonymous disclosure will not be entertained. However, the ARMC Chairman reserves his/her right to investigate any anonymous disclosure.

6.2 Handling Whistleblowing Report

6.2.1 Acknowledgement Receipt

Upon logging a Whistleblowing Report, the ARMC Chairman shall provide the non-anonymous whistleblower with an acknowledgement of receipt of the report within three (3) working days from receipt date of Whistleblowing Report.

6.2.2 Registering Report

Any Whistleblowing Report(s) shall be promptly notified by the ARMC Chairman to the Group Chief Compliance Officer ("GCCO") for recording in the Whistleblowing Register, unless the GCCO is implicated in the matter. In such circumstances, the Whistleblowing Register for the case shall be maintained by ARMC or independent external party appointed by the ARMC Chairman. The Whistleblowing Register shall include the assigned case number, summary of the complaint, method of communication, date the complaint was received, country of origin, complaint category, case status, and any other relevant information.

6.2.3 Preliminary Assessment

The ARMC Chairman shall ensure that an independent and suitably qualified person is appointed to perform the relevant responsibilities where necessary. Any individual(s) who is implicated in, connected to, or may have a conflict of interest in relation to a reported allegation shall not participate in the assessment, investigation, review, deliberation, or decision-making process relating to that allegation.

A preliminary assessment of the complaint, the details of the complaint received, and the recommended next steps to be taken ("Incident Report") shall be prepared and submitted to the ARMC within fourteen (14) working days from the receipt of the Whistleblowing Report. The ARMC Chairman may delegate the assessment and report preparation to the GCCO or any independent external party ("Prescribed Person").

Subsequently, where necessary, the Prescribed Person may obtain or engage insourced/outsourced expertise or specialist skills to support the assessment and to provide relevant advice within their respective areas of competence, to the extent practicable and without disclosing the identity of the whistleblower or the alleged wrongdoer.

The whistleblower may also be requested to provide additional information or supporting evidence to facilitate the assessment. Where the whistleblower is unable to provide the critical information required for the determination of the outcome, the Prescribed Officer shall record the matter in the Incident Report as "insufficient information", together with justifications where applicable.

Where appropriate and subject to the nature of the allegation, the alleged wrongdoer may be requested to provide information, clarification, or feedback in relation to the allegations raised, without disclosing the identity of the whistleblower or any confidential information, and in a manner that does not prejudice the integrity of the assessment.

ARMC shall review the Incident Report to establish whether an outcome can be reached or whether further investigation is warranted within fourteen (14) working days from the receipt date of Incident Report.

6.2.4 Investigation

Where a further investigation is warranted, the ARMC Chairman shall direct that investigation be conducted either by the same Prescribed Person or by appointing a new Investigator.

Subsequently, where necessary, the Investigator may obtain or engage insourced/outsourced expertise or specialist skills to support the investigation and to provide relevant advice within their respective areas of competence, to the extent practicable and without disclosing the identity of the whistleblower or the person alleged to have committed the Improper Conduct. The Whistleblower shall give his/her full cooperation to the investigation.

The Investigator shall prepare and submit an Investigation Report to the ARMC for review within sixty (60) working days from the date the Whistleblowing Report is lodged. Any extension of the time required for the completion of the investigation shall be subject to the ARMC's approval. ARMC shall review and decide on the outcome of the Investigation Report within fourteen (14) working days from the receipt date of Investigation Report.

All information, documents, records and reports relating to the investigation shall be kept securely to ensure its confidentiality.

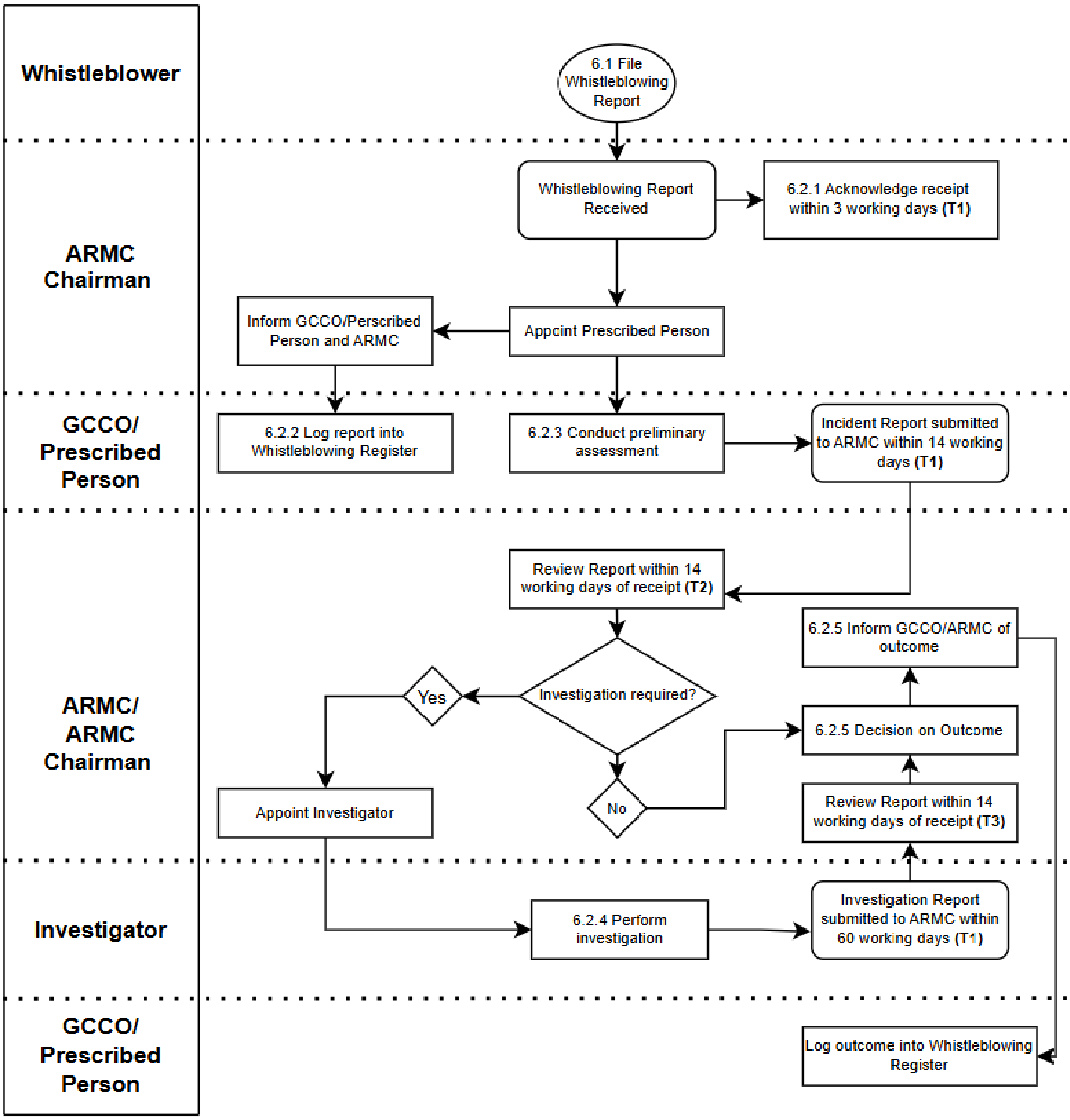
6.2.5 Outcome

The ARMC shall, after reviewing Incident/Investigation Report, decide on the following actions:

- dismiss the complaint;
- adopting the recommended next steps as set out in the Incident/Investigation Report;
- seek further clarification or conduct additional verification of the information and facts received;
- initiating disciplinary actions against the wrongdoer, including but not limited to suspension and legal proceedings;
- referring the matter to the police or any other relevant enforcement authority such as Malaysian Anti-Corruption Commission ("MACC");
- informing affected stakeholders, such as customers, in the event of a customer data privacy breach;
- decide if the complaint should be escalated to the Board for deliberation;
- extend the investigation period for further investigation which shall be completed within thirty (30) days from the date the ARMC Chairman directs such further investigation; or
- any other corrective actions deemed appropriate.

All decisions made above shall be communicated by the ARMC Chairman to the GCCO for updating the case status in the Whistleblowing Register. Where necessary, the whistleblower may be required to lodge a report with the relevant enforcement authorities, together with the with the assistance of the Prescribed Person, where appropriate.

7. PROCESS FLOW



Note

- **T1**: Date of receipt of Whistleblowing Report"
- **T2**: Date of submission of Incident Report
- **T3**: Date of submission of Investigation Report

8. ADMINISTRATION

This Policy and Procedures is administered by the ARMC with the assistance of the Governance, Risk and Compliance ("GRC") Department and overseen by the Board of Directors.

Contact person : ARMC Chairman
Email : whistleblowing@keyfieldoffshore.com

9. RECORD RETENTION

All reports, investigations, and actions taken will be documented and securely stored for a minimum of 7 years, or a duration deemed necessary. Access to these records will be restricted to authorised personnel only.

10. REFERENCES

This policy and procedure shall be read in conjunction with the following policies of the Group:

i. Keyfield Anti-Bribery and Corruption Policy
ii. Keyfield Code of Conduct and Business Ethics Policy

This Whistleblowing Policy and Procedures was adopted by the Board of Directors on 22 February 2021 with the latest revision approved on 13 August 2026.

Appendix I

STRICTLY CONFIDENTIAL

KEYFIELD INTERNATIONAL BERHAD
<u>WHISTLEBLOWING REPORT FORM</u>

Informant's Particulars	
Name:	**Telephone No.:**
Staff No.: **(if applicable)**	**E-mail:**
Incident to be reported (*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)*	
Time and Place:	
Person(s) involved:	
Details of the incident:	
Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents.	
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.	
Signature:	**Date:**