



**GREEN OCEAN CORPORATION BERHAD**  
**(200301029847 (632267-P))**

## **WHISTLEBLOWING POLICY**

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### **1. INTRODUCTION**

Green Ocean Corporation Berhad (“GOCB”) and its subsidiaries is committed to achieving and maintaining the high standards of transparency, accountability and integrity. In order to achieve the standards, the Board of Directors has introduced this “Whistleblowing Policy” (“Policy”) sets out avenues where legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

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

The Policy is designed to enable stakeholders and employees to raise concerns internally at the highest level and to disclose information which the employees believe the possible presence of malfeasance or wrongdoing within GOCB, including but not limited to the following: -

- √ Financial malfeasance, wrongdoing or fraud;
- √ Misuse and/or misappropriation of the GOCB’s fund or assets;
- √ Failure to comply with legal or regulatory obligations;
- √ Endangerment of an individual’s health & safety or the environment;
- √ Criminal offence;
- √ Breaches of Group Policies;
- √ Improper conduct or unethical behaviour or misuse of confidential information; and/or
- √ Concealment of any of the above or a combination.

The Policy is not designed to question financial or business decisions taken by the Board or management nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

### **3. SAFEGUARDS**

GOCB recognises that the decision to report a concern can be difficult. The employees should raise genuine concerns without fear of reprisals because he/she is doing his/her duty towards GOCB.

### **4. CONFIDENTIALITY**

GOCB will treat all concerns raised within the context of the Policy in a confidential and sensitive manner. The identity of the employee making a disclosure shall be kept confidential as long as it does not frustrate any investigation. However, the Policy encourages employees to put their name to their concern whenever possible in order for the Company to accord the necessary protection to her/him.

#### 4. CONFIDENTIALITY (CONT'D)

GOCB will not entertain any anonymous disclosure. However, the Company reserves its right to investigate into any anonymous disclosure. Any report should also be based on good faith with a reasonable belief that the information and any allegations are sustainably true and not acting for personal gain.

Please note that:

- ✓ Employees must disclose the information in good faith;
- ✓ Employees must believe it to be substantially true;
- ✓ Employees must not act maliciously or make false allegations; and
- ✓ Employees must not seek any personal gain.

If, however, an employee makes malicious allegations, and to the extent he persists in making them whilst in-depth investigation shows no substantiation of the alleged facts, disciplinary action or dismissal may be taken.

#### 5. REPORTING PROCEDURES

5.1 All disclosures are to be channelled in accordance with the procedures provided herein.

5.2 Disclosures can be made in strict confidential manner, marked “**Confidential**” and “**Strictly to be opened by addressee only**” to: -

The Chairman of Audit Committee  
Green Ocean Corporation Berhad  
Lot 742, 4<sup>th</sup> Mile, Jalan Kapar  
42100 Klang, Selangor Darul Ehsan  
Malaysia  
Email: [whistleblowing@greenoceancorp.com](mailto:whistleblowing@greenoceancorp.com)

5.3 As it is essential for GOCB to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much detail and be as specific as possible. The disclosures should contain the following information: -

- (a) Details of the person(s) involved;
- (b) Details of the allegations such as nature, time and place;
- (c) Other relevant information; and
- (d) Any supporting evidence.

5.4 All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

5.5 At the appropriate time, the whistleblower making the disclosures may need to come forward as a witness.

## **6. HANDLING THE COMPLAINTS**

- 6.1 The Chairman of the Audit Committee may direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.
- 6.2 GOCB reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.
- 6.3 If, at the conclusion of an investigation, GOCB determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

## **7. REVIEW OF THE POLICY**

GOCB reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organisational changes within GOCB.