



BUMI ARMADA

Speak Up Policy

(Effective from 24th August 2023)

Bumi Armada Berhad (“Company”) is fully committed to conducting business ethically and in full compliance with applicable laws and regulations in all jurisdictions it operates. In order to achieve this, the Company relies on each of its directors, officers, managers and employees (“Employees”), customers, partners, suppliers and agents (“Stakeholders”) to adhere to applicable laws, regulations, Company policies, Anti Bribery and Corruption Policy (“ABC Policy”) and Code of Business Conduct and Ethics (“Code”).

Objective of the Policy

This policy is intended to encourage Employees and Stakeholders to report actual or perceived unethical or illegal conduct of Employees, management, directors and other stakeholders across the Company to appropriate channels in a strictly confidential manner without any fear of harassment, intimidation, victimisation or reprisal for raising concern(s) under this Policy. Specific objectives of the Policy are:

- To ensure all Employees and Stakeholders feel supported in speaking up in confidence and reporting matters they suspect may involve transgressions of applicable laws, regulations, ABC Policy and the Code To proactively prevent and deter misconduct which could impact the financial performance and damage the Group`s reputation;
- To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- To help promote and develop a culture of openness, accountability and integrity

Who May Report?

Employees, Stakeholders or any other concerned parties.

Reporting Hotline

Reports shall be made to an independent third-party hotline (“Reporting Hotline”). The Reporting Hotline is provided by an independent company, Navex Global. When contacting the Reporting Hotline, a party will be assisted in their own language and the Hotline is available 24 hours a day, 7 days a week. The Hotline also provides for reports to be made via a secure website. The particulars of the toll-free number and website are available here: bumiarmada.ethicspoint.com



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Should a reporter prefer to lodge a report directly with the Company, he/she may approach or contact the Compliance Department directly to lodge a report or use the following channels:

Reports pertaining to Employees or Company business:
HOC at ethics@bumiarmada.com

Reports pertaining to senior management of the Company:
Audit Committee at ac@bumiarmada.com

Reports pertaining to the CEO or Company Directors:
Senior Independent Director at vu.kumar@bumiarmada.com

Reports should be as detailed as possible and relevant to guide investigators to conduct investigations expeditiously.

Confidentiality

The Company will treat all reports received pursuant to the Speak Up Policy confidentially. In addition, person(s) reporting may choose to remain anonymous when submitting their report to the Reporting Hotline appointed by the Company for the purposes of receiving reports. Where the reporter has indicated his wish to remain anonymous, the Reporting Hotline will only pass on the content of the report to the Company and the anonymity of the reporter will be guaranteed by the Reporting Hotline.

Investigation

Save for reports addressed to the Audit Committee (AC) or Senior Independent Director (SID), all reports to the Reporting Hotline will be investigated by the Head of Compliance (HOC) who would report all findings and recommendations to the AC or SID. The SID may at their discretion instruct the HOC to investigate complaints and reports addressed to the AC or SID.

Where warranted, the HOC may form a team to conduct the investigations.

The Investigation team may comprise some or all of the following members:

- (1) General Counsel;
- (2) HOC;
- (3) Head of Internal Audit and Risk Management ;
- (4) SVP, Business and Corporate Partnering ; and
- (5) Head, IT.



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The person raising the report will be notified by the HOC of the receipt of the report and again upon conclusion of the matter.

The AC shall oversee any corrective actions if required.

Protection / Non-retaliation against a Reporter

The Group prohibits and will not tolerate any form of discrimination, harassment or retaliation of any kind against a person who has, in good faith reported a potential violation. If a Reporter believes that he/she is being subjected to discrimination, harassment or retaliation for having made a report under this policy, he/she should immediately report these facts to the Chairman of the Audit Committee at ac@bumiarmada.com. Allegations of retaliation will be investigated, and appropriate action taken.

Misuse of the Speak Up Mechanism

Reports should be formulated in an objective and relevant manner providing as much detail and be as specific as possible. Reports should include details of the parties involved, dates or period of time, the nature of the concern, evidence substantiating the complaint, if possible and contact details, in case further information is required. No value judgment or subjective comments on the behaviour of individuals should be made. Abuse of the reporting mechanism is in itself a breach of the Code and any person who submits a report making false or inaccurate information on purpose or with malicious intent is liable for disciplinary action. Any report made in good faith, even if unfounded, will not result in disciplinary action against the reporter.