



RESERVOIR LINK ENERGY BHD

WHISTLEBLOWING POLICY

DOCUMENT NO	POLICY	APPROVAL DATE	REVISION
RLEB/CP-002	WHISTLEBLOWING POLICY	19.05.2020	0
RLEB/CP-002	WHISTLEBLOWING POLICY	29.08.2022	1

	PREPARED BY	VERIFIED BY	APPROVED BY
NAME	MOKHTAR HAJI ALI	BONG LEONG SUNG	BOARD OF DIRECTORS
DESIGNATION	GENERAL MANAGER – CORPORATE SERVICES	CHIEF FINANCIAL OFFICER	

CORPORATE POLICY	WHISTLEBLOWING POLICY	Doc No.: RLEB/CP-002
		Rev No.: 1
		Date : 29/08/2022

1. OBJECTIVE & SCOPE

Reservoir Link Energy Bhd (“**RLEB**” or “**the Company**”) and its subsidiaries (collectively known as “**the Group**”) are committed to conduct the Group’s business with the highest level of corporate ethics and embedded culture of transparency and accountability in day-to-day business operations.

This policy provides an avenue for all employees of the Group and business associates to report any genuine concerns in accordance with the procedures as provided for under this policy and to provide protection for the whistleblower(s) who report such allegations.

It is designed to facilitate employees and business associates to report any genuine concern or malpractices (hereinafter referred to as “Concerns”) through the Company’s provided channels. Such concerns or criminal offences include (but not limited to) the following:

- i. Actual / suspected financial crime or fraud;
- ii. Any form of corruption activities;
- iii. Abuse of power;
- iv. Conflict of interest;
- v. Theft or embezzlement;
- vi. Harrassment;
- vii. Criminal breach of trust;
- viii. Questionable and improper accounting;
- ix. Misuse of confidential information and personal data;
- x. Danger to health and safety or to the environment;
- xi. Misuse of Company’s asset and property;
- xii. Non-compliance or breach of RL Policies & Procedures; and
- xiii. Acts or omission which are deemed to be against the interest of the Company, laws, regulations or public policies.

2. CONFIDENTIALITY

Every effort will be made to treat the Whistleblower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to when the Group is obligated to reveal confidential information relating to a whistle-blowing report if ordered to do so by law or for purposes of any proceedings by or against the Group. The Group’s assurance of confidentiality can only be completely effective if the Whistleblower likewise maintains confidentiality.

3. PROTECTION

The Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to whistleblower(s) who submit the reports internally in good faith, even if the allegations prove to be unfounded or mistaken. In addition, a whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the organisation, to the extent reasonably practicable, provided that the disclosure is made in good faith.

CORPORATE POLICY	WHISTLEBLOWING POLICY	Doc No.: RLEB/CP-002
		Rev No.: 1
		Date : 29/08/2022

However the Whistleblower can be revoked under the following circumstances, among others:

- The Whistleblower participated in improper conduct;
- The Whistleblower wilfully discloses a false statement;
- The disclosure is made with malicious intent;
- The disclosure of improper conduct is made solely or substantially with a motive of avoiding dismissal or other disciplinary action; or
- The Whistleblower commits an offence in the course of making a disclosure or providing further information.

4. REPORTING IN GOOD FAITH

Reporting in good faith includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he / she is being retaliated against must contact the Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

5. ANONYMOUS ALLEGATIONS

Although the Company is not expected to address any anonymous allegations, the Company may, however, consider conducting an inquiry of an anonymous allegation after having considered the following:

- i. the seriousness of the concern;
- ii. the credibility of the concern; and
- iii. the likelihood of confirming the concern from credible sources.

6. PROCEDURES

6.1 Process for Disclosure

i. Impropriety

This policy covers improprieties or irregularities, suspected fraud or criminal offences, breach of confidentiality and failure to comply with legal or regulatory requirements.

ii. Reporting

Any concerns shall be reported to the following channels as stated below:

- a) Email to whistleblowing@reservoirlink.com, the email will be re-directed to;

No.	Designation
1	Chairman of Audit Committee
2	Chairman of RLEB

CORPORATE POLICY	WHISTLEBLOWING POLICY	Doc No.: RLEB/CP-002
		Rev No.: 1
		Date : 29/08/2022

- b) Letters/documents/reports (in sealed envelope with labelled “STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY” to be addressed to:

Chairman of Audit Committee

Reservoir Link Energy Bhd
E-33-01, Menara SUEZCAP 2, KL Gateway
No 2, Jalan Kerinchi, Gerbang Kerinchi Lestari
59200 Kuala Lumpur, Malaysia

If the whistleblower, either from an internal or external source makes a report through a third party, i.e., Senior Management who may be the Group CEO/Managing Director, Executive Director, Chief Executive Officer, Chief Financial Officer, General Manager or any other employee, then it is the responsibility of the third party to escalate the report to the right channel as mentioned in (a) and (b) above.

iii. Handling of a reported allegation

All reports of misconduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by the Company’s Board of Directors. The Board shall be informed of any new reports of misconduct and may request to review the log at any time.

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

6.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairman of Audit Committee assigns / appoints another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any actions taken or to be taken as a result of the investigations, to the Chairman of Audit Committee.

6.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group’s Code of Business Conduct (COBC), the results of the investigation shall be reported to the above-mentioned parties accordingly for the next course of action by the relevant party. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

CORPORATE POLICY	WHISTLEBLOWING POLICY	Doc No.: RLEB/CP-002
		Rev No.: 1
		Date : 29/08/2022

7. POLICY MATTERS

This Policy shall be published at the Company's website and made available for all internal and external stakeholders.

8. MONITORING AND PERIODIC REVIEW OF POLICY

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group; and, if necessary, implement changes subject to the approval of the Company's Board of Directors.

This policy will be reviewed periodically and may be amended as it deems appropriate to ensure its relevance and effectiveness.