

WHISTLEBLOWER POLICY



SEALINK INTERNATIONAL BERHAD

REGISTRATION No. 200701042948 (800981-X)

Revised on

12th April 2023

Background

Whistleblowing is a form of Disclosure. It involves a Person, i.e. the whistleblower, who raises serious concerns at an early stage about risks of wrongful activities or reporting a wrongdoing. For the purpose of this Policy, 'Person' includes any person who is employed by any companies in the Group, as well as those described in the "***Who Can Disclose***" section set out on page 2 of this Policy.

Sealink International Berhad ("Sealink" or the "Company") and its subsidiaries (the "Group" or "Sealink Group") are committed to transparency, integrity and accountability in the conduct of their business and affairs. The Board of Sealink expects wrongdoings, such as fraud, corruption, financial impropriety or gross mismanagement/misconduct to be reported and, accordingly, facilitates this through a structured internal mechanism.

For this purpose, the Board of Sealink has developed procedures for:

- (a) the receipt, retention and treatment of complaints received by the Group regarding financial, internal control, auditing or operational matters;
- (b) submissions by Group employees, on a confidential basis and in good faith, concerning questionable operational, financial, compliance or auditing matters, as this provides additional protection to employees who come forward with information about actual or potential corporate fraud or malpractices involving employees or officers in the Group;
- (c) any complaints that it receives regarding the Group's financial statement disclosures, overriding of internal controls, auditing matters, violations of the Group's adopted policies or breaches of any legislations that affect the Group; and
- (d) other wrongful activities or wrongdoings.

This Policy provides an alternative avenue for Persons to raise concerns if the usual lines of communication are not available. Nothing in this Policy shall interfere with other established operational policies and processes.

Scope of Policy

The purpose and objectives of this Policy are:

- to facilitate Disclosure as early as possible and in a responsible manner by putting in place clear internal procedures;
- to address Disclosure in an appropriate and timely manner. When Disclosure matters are addressed, they may be prioritised according to the nature or gravity of the alleged wrongdoing(s) or reported risk(s) and the magnitude of the repercussions;
- to protect a whistleblower from reprisal as a direct consequence of making a Disclosure and to safeguard such person's confidentiality; and
- to treat both the whistleblower and alleged wrongdoer fairly. The whistleblower shall be informed of the status of the Disclosure. The alleged wrongdoer shall be informed of the allegations (though not necessarily at the start of the investigation) and given an opportunity to respond to the allegations. The identities and personal information

of the whistleblower and the alleged wrongdoer shall be revealed only to persons involved in the investigation or any other processes on a “need-to-know” basis only.

Monitoring and Review

In general, all Disclosures pursuant to this Policy shall be made to the Prescribed Officer who is an officer of Sealink designated by the Chief Executive Officer cum Managing Director (“CEO”) from time to time. At this juncture, the Chairman of Audit Committee (“AC”) shall be the Prescribed Officer.

The Prescribed Officer is responsible for ensuring compliance with this Policy and shall prepare a report on confidential complaints, which includes the following information:

- number of complaints;
- types of complaints;
- nature of process or resolution; and
- whether the allegation was founded or not.

This report shall be used for statistical purposes only and presented to the Board of Sealink on a periodic (e.g. quarterly, semi-annual or annual) basis.

This Policy shall be reviewed, as needed, and may be amended from time to time, as deemed necessary by the Board, to ensure its relevance and effectiveness in keeping with Sealink’s changing business environment, administrative or operational needs.

Reporting Procedures

This Policy is intended to complement the normal channels of communication and reporting lines within the Sealink Group. Persons shall first consult or raise their concerns with their immediate supervisors or heads or, where appropriate, the CEO. However, if their complaints or concerns remain unresolved, this Policy provides an avenue for such Persons to escalate the Disclosures to the relevant channel detailed on the Contact Information section at the end of this Policy.

1) Who Can Disclose

Any of the following Persons can make a Disclosure:

- employees in the Sealink Group, including full-time employees, those on contract basis, temporary or short-term employees, where applicable;
- people performing services for, and suppliers of the Sealink Group, including contractors;
- members of the public who are natural persons, not being incorporated or unincorporated bodies.

2) What To Disclose

A Disclosure may be made if it relates to any or a combination of the following wrongdoings by any person in the conduct of the Group’s business or affairs:

- offering or accepting a bribe in return for a favour;
- corruption or fraud;
- criminal offence;
- misuse of the Group's funds or assets;
- gross mismanagement within the Group;
- serious financial irregularity or impropriety within the Group;
- serious breach of Sealink's Code of Conduct/Ethics;
- an act or omission which creates a substantial or specific danger to the lives, health, or safety of the Group's employees, the public or the environment;
- failure to comply with the provisions of relevant statutes in Malaysia and/or other legislations abroad that affect the Group, where the wrongdoer knowingly disregards or does not comply with such provisions; and
- knowingly directing or advising a person to commit any of the above wrongdoings.

This Policy excludes grievances, complaints or concerns about:

- matters which are trivial, frivolous, malicious or vexatious in nature or motivated by personal agenda or ill will;
- matters pending or determined through Sealink's disciplinary proceedings; and
- matters pending or determined through any tribunal or authority or court, arbitration or other similar proceedings.

A wrongdoing may occur in the course of the Group's business or affairs or at any workplace, i.e. any related workplace in the Group's business or affairs, for example, at the Group's premises, at an event organized by the Group, or during a conference attended by the Group's employees in the course of work.

If a Person is unsure whether a particular act or omission constitutes a wrongdoing under this Policy, the Person is encouraged to seek advice or guidance from the immediate superior or head or, where appropriate, the CEO.

3) *When To Disclose*

A whistleblower shall come forward with any information or document that the whistleblower, in good faith, reasonably believes and discloses a wrongdoing, which is likely to happen, is being committed or has been committed.

The whistleblower needs to demonstrate reasonable grounds for the concerns. However, the whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a Disclosure. If the whistleblower knows, as a matter of fact, that there are serious risks that a wrongdoing is going to take place, such genuine concerns shall be raised at that early stage.

Disclosure shall be made within one (1) month of coming upon such information or document. Delaying the Disclosure may be detrimental to the whistleblower as well as any investigation, and makes it harder for Sealink to address and resolve the concerns.

4) *How To Proceed*

Generally, all Disclosures pursuant to this Policy shall be made to the Prescribed Officer, except in circumstances specified below:

- a) A Disclosure can be made in writing, orally, via electronic mail (“email”) or short messaging system (“SMS”);
- b) The Prescribed Officer shall commit to writing a Disclosure made verbally and the whistleblower is to confirm the written statement. As far as is reasonably practicable, such Disclosure shall be made in a private room within the Group’s premises;
- c) A Disclosure shall include at least the following particulars:
 - if the whistleblower is an employee of Sealink, his/her name, designation, current address and contact numbers;
 - if the whistleblower is not an employee of Sealink, his/her name, name of employer and designation, current address and contact numbers;
 - basis or reasons for his/her concerns, including as much details of the wrongdoing as are reasonably possible, for instance, its nature, the date, time and place of its occurrence and the identity of the alleged wrongdoer;
 - particulars of witnesses, if any; and
 - particulars or production of documentary evidence, if any.

The whistleblower may be asked to provide further clarifications and information from time to time, for example, if an investigation is conducted.

The whistleblower form is attached in **Appendix A**.

- d) The Prescribed Officer shall screen and assess the Disclosure to determine whether it is related to a wrongdoing or excluded from the scope of this Policy, and shall prepare general recommendations to the deciding authority. This initial process shall not take more than **two (2) weeks** from the day the Prescribed Officer receives the Disclosure. It shall be completed immediately if the wrongdoing is capable of causing irreparable harm to the Sealink Group;
- e) A Disclosure can be made directly to the **AC** in either of the following circumstances:
 - where the wrongdoing involves the Prescribed Officer; or
 - where the wrongdoing does not involve the Prescribed Officer but the whistleblower, in good faith, reasonably believes that there will be a cover-up or that the Prescribed Officer is personally conflicted (for

instance, the Prescribed Officer is a close friend of the alleged wrongdoer); and

- in either circumstance, there shall be no referral to a higher authority. The AC has the authority to make the final decisions, including any of those mentioned in Paragraph (f) below. The AC may designate any persons, other than the Prescribed Officer, from within or outside of Sealink to conduct any investigation or to carry out any other process pursuant to this Policy (for example use of the independent internal audit function or other outside professionals for the purpose of conducting an investigation);
- f) Following Paragraph (d) above, the Disclosure together with the general recommendations, shall be referred by the Prescribed Officer to the AC who has the authority to make final decisions, including any of the following:
- rejection of the Disclosure;
 - directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - resolution without recourse to an investigation;
 - directing investigations of the Disclosure and any persons involved or implicated;
 - suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact-finding or to avoid any employee's exposure to threat or harm;
 - designating the Prescribed Officer or any other persons from within or outside of the Sealink Group to conduct any investigation or to carry out any other process pursuant to this Policy;
 - obtaining any other assistance; and
 - referring to the police or any other appropriate enforcement authority;
- g) If the Disclosure involves the CEO or a Director or any other persons following Paragraph (e) above other than the Prescribed Officer, the Disclosure shall be referred directly to the AC Chairman who shall then be responsible for the investigation and recommendation to the Board of Directors of Sealink. The Board has the authority to make final decisions. All such concerns shall be set forth in writing and forwarded in a sealed envelope to the Chairman of the Audit Committee, in care of the Company Secretary, in an envelope labelled with a legend such as, ***“To be opened by the Audit Committee Chairman only, in the presence of the Company Secretary. Being submitted pursuant to the “Whistleblower Policy” adopted by the Board”***

If the Person wishes to discuss any matter with the AC Chairman or the AC as a whole, the Person shall indicate this in the submission and include a telephone number at which he or she may be contacted. Any such envelopes received by the Company Secretary shall be forwarded promptly and unopened to the AC Chairman.

Being informed and having the opportunity to be heard

The whistleblower shall be informed of the status of his/her Disclosure matter as far as is reasonably practicable. The whistleblower and alleged wrongdoer are expected to give his/her full cooperation in any investigation or any other process carried out pursuant to this Policy.

The alleged wrongdoer may be asked to attend a meeting to discuss the allegations and shall take all reasonable steps to attend the meeting. He/she shall be given an opportunity to answer the allegations at the meeting, and his/her own answers shall be recorded in the minutes of the meeting. The meeting may be adjourned for Sealink to obtain any advice or proceed with further investigations. A meeting may not necessarily be held at the early stages of an investigation.

In the event the whistleblower is implicated or discovered to be or has been involved in any wrongdoing, he/she may also be investigated so as to complete the fact-finding process. An investigation is not, and shall not be treated as, a reprisal against the whistleblower. It is to facilitate decision making. The whistleblower may then be asked to attend a meeting to discuss the allegations and shall take all reasonable steps to attend that meeting. He/she shall be given an opportunity to answer the allegations at that meeting, and his/her own responses shall be recorded in the minutes of that meeting. That meeting may be adjourned for Sealink to obtain further advice or proceed with further investigations.

The whistleblower and, if applicable, the alleged wrongdoer shall be notified in writing of the decision on the wrongdoing (e.g. whether the wrongdoing occurred or not; or whether the alleged wrongdoer is guilty or not), and the basis thereof.

Handling/Discussion of an Investigation

- 1) No information concerning the status of an investigation shall be given out. The proper response to any inquiry is, “*I am not at liberty to discuss this matter*”;
- 2) Under no circumstances shall any reference be made to “the allegation,” “the crime,” “the fraud,” “the forgery,” “the misappropriation,” or any other specific reference;
- 3) The reporting individual shall be informed of the following:
 - do not contact the suspected individual in an effort to determine facts or demand restitution; and
 - do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Prescribed Officer.

Consequences of wrongdoing or wrongful Disclosure

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

- committed a wrongdoing;
- 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 shall be determined by the CEO, if so delegated by the CEO, the Senior Management, which may include disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with the Group or other forms of disciplinary measures.

Protection under this Policy

Upon making a Disclosure in good faith, based on reasonable grounds and in accordance with the procedures set out in this Policy:

- the whistleblower shall be protected from reprisal within the Group as a direct consequence of his/her Disclosure; and
- the whistleblower's identity shall be protected, i.e. kept confidential, unless otherwise required by law or for purposes of any proceedings by or against the Group.

The identities and personal information of the whistleblower and the alleged wrongdoer shall be revealed to persons involved in investigations or any other processes on a "need-to-know" basis.

The Prescribed Officer shall retain as a part of the records any such complaints or concerns for a period of up to at least seven (7) years.

A reprisal means disciplinary actions, which may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit increase, loss of bonus, suspension without pay or termination of employment.

If the Person, in good faith, reasonably believes he/she is being subjected to harassment, victimization, detrimental action or a reprisal as a direct consequence of having made a Disclosure under this Policy, he/she may consult the Prescribed Officer in confidence. Essentially, the complaint shall be processed in a similar manner as a whistle blowing Disclosure and is subject to similar requirements. The Company does not permit retaliation of any kind against the whistleblower for complaints submitted hereunder that are made in good faith. Any such reprisal shall in itself be considered a serious breach of this Policy.

Report of detrimental action form is attached in **Appendix B**.

Policy Governance

The Policy shall be held in the custody of the Company Secretary and shall be reviewed, as considered necessary, in association with the CEO and uploaded in the Company's corporate website and other channels, as appropriate.

Any requirement for amendment shall be deliberated and any recommendation for revision shall be highlighted by the CEO to the Board for approval.

Contact Information

Audit Committee Chairman

Name: Yong Nyet Yun
Sealink International Berhad
Lot 1035, Block 4 MCLD
Piasau Industrial Area
98000 Miri
Sarawak

Telephone: 013-8333881
Facsimile: 085-652480
Email: yny5030@gmail.com

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WHISTLEBLOWER REPORT FORM

**APPENDIX A
CONFIDENTIAL**

REFERENCE NUMBER:

A. PERSONAL PARTICULARS OF WHISTLEBLOWER				
<p>Please note that complaint made anonymous may not be processed or investigated unless the concern/allegation made is of sufficiently serious nature as determined by the Audit Committee (“AC”) Chairman.</p> <p>“Improper Conduct” means any unethical behaviour, malpractices, illegal acts or any other wrongful or improper conduct within the Sealink Group which if proved, constitutes a disciplinary offence or a criminal offence.</p>				
1	Name			
2	I/C No. / Passport No./Staff No.:			
3	Correspondence Address:			
4	Contact No.:	Home:		Email Address:
		Handphone:		
		Office:		
5	Designation / Occupation:			
6	Preferred method of communication:	<input type="checkbox"/> Mail <input type="checkbox"/> e-mail <input type="checkbox"/> telephone / sms <i>(Please tick the appropriate box)</i>		
B. INFORMATION OF SEALINK EMPLOYEE(S) AND DIRECTOR(S) INVOLVED IN IMPROPER CONDUCT				
Individual 1				
1	Name of Sealink Employee / Director:			
	Designation / position in Sealink:			
	How do you know this Person:			
Individual 2				
2	Name of Sealink Employee / Director:			
	Designation / position in Sealink:			
	How do you know this Person:			

Individual 3			
3	Name of Sealink Employee / Director:		
	Designation / position in Sealink:		
	How do you know this Person:		
C. DETAILS OF IMPROPER CONDUCT			
	Date:		Time:
	Place:		
	Details of Improper Conduct:		
D. PREVIOUS REPORT TO LOCAL AUTHORITIES, IF ANY			
	Have you lodged a complaint on this matter to another person / department / authority before? (tick the appropriate box)		<input type="checkbox"/> YES <input type="checkbox"/> NO
	If YES, please state:		
	Report / File Reference No.:		
	Name of Party of Authority Receiving the Report:		
	Position and Department:		
	Date of Report:		
	Status of Report:		
	<i>* Please attach a copy of the report made to the internal or external party or authorities.</i>		

Note:

- **Please attach supporting documents, if any.**
- **If the spaces provided are not sufficient, please use a separate blank sheet.**
- **Please submit the completed form in SEALED envelope and marked**

“To be opened by Audit Committee Chairman only, in the presence of the Company Secretary. Being submitted pursuant to the “Whistleblowing Policy” adopted by the Board”

on the right hand corner of the sealed envelope.

- Please address the envelope to the following addressee:

**Chairman of Audit Committee
Sealink International Berhad
Lot 1035, Block 4, MCLD, Piasau Industrial Area,
98000 Miri, Sarawak.**

- Alternatively, please email the completed Form (together with the relevant evidentiary documents, if any) to the Chairman of Audit Committee at ynty5030@gmail.com with the email subject marked "Private & Confidential".

E.	DECLARATION
1	I hereby declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.
2	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.
Signature: Name: Date:	
For Office Use Only:	
Record No.:	
Officer receiving this report:	
Date:	

REPORT OF DETRIMENTAL ACTION

**APPENDIX B
CONFIDENTIAL**

REFERENCE NO:

A. PERSONAL PARTICULARS OF WHISTLEBLOWER																
<p>Please note that complaint made anonymous may not be processed or investigated unless the concern/allegation made is of sufficiently serious nature as determined by the Audit Committee (“AC”) Chairman.</p> <p>“Detrimental Action” means any reprisal action against a Whistleblower which shall include action causing injury, loss or damage; intimidation or harassment; interference with the lawful employment or livelihood of the Whistleblower, including discrimination, discharge, demotion, suspension, disadvantage, termination, adverse treatment in relation to the Whistleblower’s employment or the taking of disciplinary action; and a threat to take any of the above actions.</p> <p>“Improper Conduct” means any unethical behaviour, malpractices, illegal acts or any other wrongful or improper conduct within the Sealink Group which if proved, constitutes a disciplinary offence or a criminal offence.</p>																
1	Name															
2	I/C No. / Passport No./Staff No.:															
3	Correspondence Address:															
4	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 5px;">Contact No.:</td> <td style="width: 20%; padding: 5px;">Home:</td> <td style="width: 20%; padding: 5px;"></td> <td style="width: 20%; padding: 5px;">Email Address:</td> <td style="width: 20%; padding: 5px;"></td> </tr> <tr> <td></td> <td style="padding: 5px;">Handphone:</td> <td style="padding: 5px;"></td> <td></td> <td></td> </tr> <tr> <td></td> <td style="padding: 5px;">Office:</td> <td style="padding: 5px;"></td> <td></td> <td></td> </tr> </table>	Contact No.:	Home:		Email Address:			Handphone:					Office:			
Contact No.:	Home:		Email Address:													
	Handphone:															
	Office:															
5	Designation / Occupation:															
6	Preferred method of communication: <input type="checkbox"/> Mail <input type="checkbox"/> e-mail <input type="checkbox"/> telephone / sms <i>(Please tick the appropriate box)</i>															
B. INFORMATION OF SEALINK EMPLOYEE(S) INVOLVED IN DETRIMENTAL ACTION																
1	Name of person committing the Detrimental Action:															
	Designation/position in Sealink:															
	How do you know this Person:															

2	Have you personally affected by the Detrimental Action? <i>(tick the appropriate box)</i>	<input type="checkbox"/> YES	<input type="checkbox"/> NO
If NO, please state the particulars of person(s) affected by the Improper Conduct:-			
Name of Employee:			
Designation/position in Sealink:			
How do you know this Person:			
C. PARTICULARS OF DETRIMENTAL ACTION			
Date:		Time:	
Place:			
Particulars:			
D. PREVIOUS REPORT TO LOCAL AUTHORITIES, IF ANY			
Have you lodged a complaint on this matter to another person / department / authority before? <i>(tick the appropriate box)</i>		<input type="checkbox"/> YES	<input type="checkbox"/> NO
If YES, please state:			
Report / File Reference No.:			
Name of Party of Authority Receiving the Report:			
Positon and Department:			
Date of Report:			
Status of Report:			
* Please attach a copy of the report made to the internal or external party or authorities.			

Note:

- Please attach supporting documents, if any.
- If the spaces provided are not sufficient, please use a separate blank sheet.
- Please submit the completed form in SEALED envelope and marked
“To be opened by Audit Committee Chairman only, in the presence of the Company Secretary. Being submitted pursuant to the “Whistleblowing Policy” adopted by the Board”
on the right hand corner of the sealed envelope.
- Please address the envelope to the following addressee:

Chairman of Audit Committee
Sealink International Berhad
Lot 1035, Block 4, MCLD, Piasau Industrial Area,
98000 Miri, Sarawak.
- Alternatively, please email the completed Form (together with the relevant evidentiary documents, if any) to the Chairman of Audit Committee at yvy5030@gmail.com with the email subject marked “Private & Confidential”.

DECLARATION	
1	I hereby declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.
2	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to another department / authority / enforcement agency for purposes of investigation.
	Signature: Name: Date:
For Office Use Only:	
Record No.:	
Officer receiving this report:	
Date:	