



NGC ENERGY

WHISTLEBLOWER

POLICY

POLICY STATEMENT

NGC Energy is committed to promote and maintain high standards of transparency, accountability, ethics as well as good Corporate Governance practices in its businesses, operations and in the workplace.

In line with this commitment, and NGC Energy's pursuit towards open communications and developing a culture where it is safe to raise genuine concerns, we provide avenues for employees, business partners and members of the public to disclose any wrongdoing and/or improper conduct within NGC Energy.

POLICY OBJECTIVE

This policy aims to provide an avenue for employees of NGC Energy, its business partners and members of the public to disclose any improper conduct or any action that is or could be harmful to the reputation or safe operations of NGC Energy and/or compromise the interest of stakeholders in accordance with the provisions of this policy.

It is also the intention of this policy to provide protection for the whistle blower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality who reports such allegations.

SCOPE OF THE POLICY

This policy is designed and applicable to facilitate employees and members of the public to disclose any improper conduct (including criminal offense) through internal channels and may include the following:

- i. Fraud, bribery, corruption or forgery
- ii. Criminal breach of trust or involvement in unlawful acts
- iii. Conflict of interest or breach of confidentiality
- iv. Abuse of power, financial malpractices or gross mismanagement
- v. Misuse of Company's funds, assets or theft
- vi. Non compliance with Company policies and procedures
- vii. Damage to the environment or danger to the health and safety of any individual.
- viii. Any other conduct which may cause loss to the Company, or otherwise be detrimental to the interests of the shareholders, clients and the public.
- ix. Any other unethical conduct.

The above list is not exhaustive and shall include any attempt to conceal or suppress information relating to any misconduct or wrongdoing.

This policy is not intended for employees' grievances or complaints as governed by in the Company's Human Resources Policies and Procedures Manual.

WHISTLEBLOWING PROCEDURE

Disclosures are to be made in line with the Policy and can be submitted via whistle@ngcenergy.com or via a letter addressed to:-

Whistle Officer, Lot 3A-01, level 3A, Tower Block, Menara Millennium, 8, Jalan Damanlela, Bukit Damansara, 50490 Kuala Lumpur.

Please be assured that the channel above is a safe avenue to lodge concern(s) - independently handled email/channel without management interference. The disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

SAFEGUARDS UNDER THIS POLICY

A person making a disclosure will be provided with protection of confidentiality as far as practicable. Protection will also be accorded to employees against unfair treatment, harassment or victimization for disclosing any improper conduct, provided that the disclosure is made in good faith. This holds true even if the results of any such investigation reveals that the disclosure made is mistaken as to the facts and procedures involved.

ANONYMOUS ALLEGATIONS

This policy encourages person(s) making a disclosure to put his/her name and their contact details to the allegation(s) as appropriate follow up questions and investigation may not be possible unless the source of the information is identified. Disclosures given anonymously are much less powerful and may create difficulties in resolving the issue or concern.

As such, disclosures lodged anonymously will be at the Company's discretion for further action and must contain sufficient information for the Company to determine its seriousness, credibility, likelihood of confirming the allegation's source and done in good faith.

NOTIFICATION

Upon completion of the relevant procedures, the whistleblower will be notified on the outcome of the disclosure. NGC Energy has a right to direct the disclosure to other relevant grievances channel if any such disclosure does not fall under this policy.