

INTEGRITY HANDBOOK

EXECUTIVE DIRECTOR'S STATEMENT

Dear Steelhawkians,

Bribery and corruption have a serious impact on the social, economic and political environment of many countries. It effects individuals and businesses all over the world. We must always act with integrity, take accountability for results, and do the right thing, even when the right thing is hard to do.

I am personally committed to the fight against bribery and corruption. As part of this commitment, the Board, the Management and I are determined to ensure STEEL HAWK remains a place where all our people have the opportunity to fulfil their potential in a nurturing environment that encourages the right behavior. We are absolutely committed to winning with integrity.

The Handbook isn't something you read once. It's a guide to putting our values into action. Everyone is responsible for reading and understanding how the Handbook applies to them and what they do at STEEL HAWK

I count on all of you to follow this Integrity Handbook, and to report violations without fear of retaliation.

Do remember that integrity matters. It matters to our clients, partners, colleagues, and communities. Success will come and go, but integrity is forever.



Dato' Sharman K. Michael
Executive Director
Steel Hawk Engineering Sdn Bhd

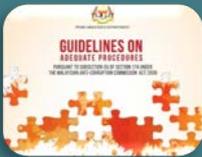


Corporate Liability

Section 17 (A) MACC Act 2009



**Don't take risk
Take responsibility**



**Adequate Procedures:
Ensuring business is done with Integrity**



**Building strong anti-bribery and anti-corruption
program – holistic approach to defend your
company**



It's time to set the record straight



**Fraud and Corruption
Be Aware**



Correcting the past and defending the future

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EPCC INTEGRATED ENGINEERING TURNKEY CONTRACTOR

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1.0 INTRODUCTION

We are fully committed to working with integrity. As we strive to be in the forefront of safety developments, we must continue working with integrity by doing what is right and being accountable and responsible for our decisions and actions.

This handbook is based on STEEL HAWK ENGINEERING SDN BHD policies and processes. It is in line with the applicable laws and regulations in Malaysia in accordance with:

- ❖ The Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister's Office pursuant to Section 17A (5) of the Malaysian Anti-Corruption Commission Act 2009.
- ❖ The qualifying requirements of the Anti-Bribery Management System ISO: 37001:2016 ("ISO 37001").

This Integrity Handbook is intended for every employees and stakeholders whoever and wherever you are.

All stakeholders, be it shareholders, management, employees, contractors, providers, agents or any party under contract with Steel Hawk Engineering Sdn Bhd, are expected to read, understand and comply with the requirements set in this Integrity Handbook.

If you have any questions or concerns, please consult the Integrity & Governance Unit (IGU).



2.0 WHO DOES THIS HANDBOOK APPLY TO?

ALL STEEL HAWKIANs AND STAKEHOLDERS

Irrespective of their position or role:

- ❖ All must comply with the Integrity Handbook, policies, procedures and all applicable laws of Steel Hawk Engineering Sdn Bhd
- ❖ Heads of Departments and Managers are responsible to communicate and ensure compliance with this Integrity Handbook within their respective business units / departments.

BUSINESS ASSOCIATES

- ❖ This Integrity Handbook also applies to all Steel Hawk Engineering Sdn Bhd business associates which includes vendors, contractors, sub-contractors, consultants, agents, representatives, and other intermediaries who are performing work or services, for and on behalf of Steel Hawk Engineering Sdn Bhd
- ❖ All employees, regardless of their position or role, are responsible to communicate this Integrity Handbook to their business associates.

ALL PARTIES ENGAGING WITH STEEL HAWK

This Integrity Handbook applies to all parties that are currently engaged with Steel Hawk Engineering Sdn Bhd or have intentions to engage with Steel Hawk Engineering Sdn Bhd in the future.



3.0 OUR RESPONSIBILITY

Read and Declare

- ❖ All employees and business associates must read, understand, accept and comply with this Integrity Handbook.
- ❖ We also expect all parties that are engaging with Steel Hawk Engineering Sdn Bhd to read, understand and comply with this Integrity Handbook.

Lead by Example

- ❖ HOD's and Managers must communicate this Integrity Handbook to their team members, business associates and any other parties they engage with.
- ❖ We must also encourage our business associates and other parties to report any concerns or possible violations of Steel Hawk Engineering Sdn Bhd policies and procedures via the whistleblowing channels.
- ❖ HOD's and Managers must respect and maintain open, honest and constructive communication with their team members. This means encouraging them to ask questions, make suggestions and report concerns or possible violations.

Understand the Consequences

- ❖ Failure of employees to comply with this Integrity Handbook may result in disciplinary action, up to and including termination of employment or dismissal.
- ❖ Failure of business associates to comply with Steel Hawk Engineering Sdn Bhd policies and procedures shall be deemed to be a fundamental breach of any contract with Steel Hawk Engineering Sdn Bhd and may result in the termination of the business relationship with Steel Hawk Engineering Sdn Bhd

Additional Policies

- ❖ Information in this Steel Hawk Engineering Sdn Bhd Integrity Handbook is derived from Steel Hawk Engineering Sdn Bhd' policies and procedures, and should be read together with the following:
 - Integrity Policy
 - Whistleblowing Policy
 - Corporate Disclosure Policy

DO'S

- ✓ Read, understand, comply with this Integrity Handbook.
- ✓ Sign the Integrity Declaration.
- ✓ Attend mandatory anti-bribery and corruption training.
- ✓ Act with honesty and integrity.
- ✓ Ask for a detailed invoice (products purchased, services provided, etc.) to justify all payments by Steel Hawk Engineering Sdn Bhd
- ✓ Indicate precisely on the invoices prepared by Steel Hawk Engineering Sdn Bhd the quantity of products supplied and all other information.
- ✓ Immediately report any concerns or suspected violations to the Integrity Manager or by using the Whistleblowing Channels.

DON'T'S

- ✗ Participate in any illegal or illicit acts of bribery or corruption.
- ✗ Misuse your position in Steel Hawk Engineering Sdn Bhd name for your or other's benefit, or to the detriment of the Steel Hawk Engineering Sdn Bhd.
- ✗ Fail to report any real or suspected incidents of misconduct, bribery or corruption.
- ✗ Conceal, alter, destroy or otherwise modify any information on incidents of misconduct, bribery or corruption.
- ✗ Collude with business associates in making false claims relating to work orders / projects /products and services.
- ✗ Misuse Steel Hawk Engineering Sdn Bhd resources.

4.0 ANTI-CORRUPTION & BRIBERY

Steel Hawk Engineering Sdn Bhd has a zero-tolerance position on all forms of bribery and corruption. Steel Hawk Engineering Sdn Bhd is committed to the highest standards of integrity, impartiality, openness, and accountability in the conduct of its business and operations.

What is bribery and corruption?

In line with Malaysian Anti-Corruption Commissions Act 2009 and its guidelines and procedures, Steel Hawk Engineering Sdn Bhd has developed and implemented a comprehensive set of measures to combat bribery and corruption of all forms possibly related to its operations.

Bribery

Under the Malaysian Anti-Corruption Commissions Act, "gratification" or commonly called "bribery" means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organization.

Corruption

According to Transparency International, "corruption" means the abuse of entrusted power for personal gain. However, corruption has a broader definition than bribery. This Handbook therefore refers to "bribery and corruption" as a standard term to cover all types of gratification.

OFFENSES

Engaging in bribery and corruption is a criminal act, and if found guilty, may result in conviction. If you participate in bribery and corruption, you may be subject to:



Imprisonment up to 20 years; and

A fine of not less than ten times the sum or value of the relevant bribe (gratification) or RM1,000,000.00, whichever is higher (no upper limit).



STEELHAWKIANS SHALL NOT:

- give or offer any bribe;
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has in good faith raised concerns about possible bribery or corruption.
- accept or seek any bribe;
- give or offer any payment or anything else of value to a government official to facilitate or speed up a legitimate procedure or action (also known as a facilitation payment).

Examples: Anything of Value that Includes:

- Gifts
- Travel Expenses
- Charitable or Political
- Kick backs
- Secret Commissions
- Entertainment
- Favors
- Contribution
- Unofficial Fees
- Payment in Kind
- Meals
- Rewards
- Cash and Cash Equivalent
- Internship and job offer
- Sexual Favors



WHAT HAPPENS WHEN YOU COMMIT A CORRUPT ACT?



LOSS OF TRUST



REPUTATIONAL DAMAGE



SEVERE FINES & PENALTIES



JAIL TIME



TERMINATION OF EMPLOYMENT

Do not give or receive bribes! If you do so;

- You are committing a crime
- You can be convicted, if found guilty
- You can be liable for financial penalties or imprisonment or both.
- You would also automatically commit a major misconduct.
- You will be terminated.

5.0 OPEN DOOR & NON-RETALIATION

Steel Hawk Engineering Sdn Bhd practices an "open door" and "no retaliation" approach. We encourage all employees and stakeholders to present ideas, ask questions, or voice concerns about any subject, especially those related to Steel Hawk Engineering Sdn Bhd policies and procedures, guidelines, and ethical or legal issues.

Anyone who raises a concern about possible breach will be supported by the management. No one shall be subject to any retaliation. Due action will be taken if there are any retaliations directly or indirectly against anyone who reports a known or suspected violation of Steel Hawk Engineering Sdn Bhd policies.

Steel Hawk Engineering Sdn Bhd encourages employees and third-party contractors to report known or suspected legal or ethical violations or violations of this Handbook or policies. In the event, that you are of the opinion that you are being punished after making a report in good faith, you must contact the Integrity Unit with your concerns.

6.0 CORPORATE DISCLOSURE CONFIDENTIALITY OF INFORMATION

Steel Hawk Engineering Sdn Bhd, its shareholders, the Board of Directors and the management recognize the importance of disseminating factual and accurate information to preserve its integrity and social responsibility.

Examples of confidential / sensitive information;

- Non-public information that might be of use to competitors or harmful to Steel Hawk Engineering Sdn Bhd or our clients or employees.
- Trade secrets.
- Information about proprietary business assets.
- Business plans and strategies.
- Intellectual Property.
- Client and third-party provider personal information or other material information that could be beneficial to other parties or damage the client and the third-party provider.
- Details of employee's wages, and other specific information that has been communicated to the employees as confidential.

You should never;

- Disclose information to the public unless you are specifically authorized to do so.
- Share sensitive and confidential information without authorization from your immediate superior.
- Say anything that may disclose confidential information or cause harm to our reputation. Conceal facts or omit information that may be relevant to a disclosure.

It is imperative for an employee to be aware of the Steel Hawk Engineering Sdn Bhd policy on confidentiality. If any employee, officers or any person has any doubts as to their responsibilities under the Corporate Disclosure Policy, they should seek clarification and guidance from the Integrity Unit.



7.0 GIFTS, ENTERTAINMENT AND HOSPITALITY

A gift can be any item of cash value, including meals, or entertainment expenses that is expensed to or for an employee of the Steel Hawk Engineering Sdn Bhd. In this context, a gift means the giving or receiving with the intent to influence the recipient's judgment or in exchange for a favor (bribe, payoff, kickback).

Meals, entertainment, travel and hospitality should never be offered as a means of influencing another person's business decision. Each should only be offered if it is appropriate, reasonable, for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose of travel is business. Adult entertainment is strictly prohibited.

Common sense and moderation should prevail in business entertainment and the payment of travel and lodging expenses engaged in on behalf of Steel Hawk Engineering Sdn Bhd. Employees should provide business entertainment to or from anyone doing business with Steel Hawk Engineering Sdn Bhd only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

The use of Steel Hawk Engineering Sdn Bhd funds or assets for gifts, gratuities, or other favors to Government Officials or any other individual or entity (in the private or public sector) that has the power to decide or influence Steel Hawk Engineering Sdn Bhd commercial activities is prohibited, unless all of the following circumstances are met;

GIFTS FROM THIRD PARTIES

- ❖ If a gift is given to employees of the same department from the same Third Party, the combined maximum value must not exceed RM80.00 in the same year.
- ❖ An employee may accept gifts of a maximum value of RM50.00 from the same Third Party, however, the above shall also apply.
- ❖ Third Parties will include any current or prospective supplier, vendor, contractor or customer.
- ❖ Expenses for gifts to Third Parties must be appropriately reported, documented, and entered into the Company's gift register
- ❖ Employees may offer reasonable and appropriate gifts to Third Parties for legitimate business purposes so long as it is properly documented and justified.
- ❖ All gifts must be registered, however, for combined gifts with high value or depending on the circumstances of the gift, the Integrity Manager shall seek the further approval from the CEO or Integrity Management Committee (Special circumstances).
- ❖ Personal gifts to employees should not be provided as performance rewards.

GIFTS TO FELLOW STEEHAWKIANS

- ❖ Employees may provide gifts to fellow employees as long as the gifts are in good faith, reasonable, appropriate and paid for by the employee and not expensed to Steel Hawk Engineering Sdn. Bhd.

Even in the above exceptional circumstances, employees and directors are expected to exercise proper judgment in handling gift activities and conscientiously maintain the highest degree of integrity.

REGISTER OF GIFTS AND HOSPITALITY

All gifts and / or hospitality should be recorded in Steel Hawk Engineering Sdn Bhd Gift and Hospitality Register and signed by your superior. The Register of Gifts and Hospitality is kept by the Integrity Unit.



Can I ever accept a give?



Only accept if it is:

- ✓ Modest in value (max RM 50 in the same year).
- ✓ A token item like a pen, t-shirt or logo branded item.
- ✓ Symbolic, or modestly priced, inscribed trophy or plaque.
- ✓ Approved for a large group of employees.
- ✓ Declared and entered into the Company's gift register.



Do not accept if it is:

- Given in exchange for some action.
- Any value of cash or a cash equivalent like a gift card or gift certificate.
- In the form of stocks or securities.
- More than modest in value.

DO'S

- ✓ Seek prior approval from the Top Management before you offer or accept any form of hospitality, save and except for meals.
- ✓ Only offer and accept meals if it falls within thresholds set out in this section and subject to prior approval from your HOD /Manager.
- ✓ Accurately record and report to the Integrity Unit.

DONT'S

- ✓ Offer or accept any hospitality that may create a sense of obligation, or comes with a direct/indirect suggestion, hint or expectation of special treatment or create a conflict of interest that would be perceived negatively.
- ✓ Offer or accept any hospitality that creates a conflict of interest that would be perceived negatively.
- ✓ Exchange hospitality frequently with the same person or party over a period of time.
- ✓ Offer or accept hospitality in the form of travel, transportation and accommodation.
- ✓ Offer or accept meals from business associates and parties engaging with Steel Hawk Engineering Sdn Bhd unless it meets the limited exceptions in this section and prior approval is sought from your HOD/Manager.

8.0 CONFLICTS OF INTEREST

In line with our commitment to integrity, we must always be able to demonstrate that all decisions have been made in the best interests of Steel Hawk Engineering Sdn Bhd and free from personal bias. This means that we need to manage any actual, perceived or potential conflicts of interest. We shall declare conflicts of interest on a scheduled basis and where actual, potential or perceived conflicts arises.

WHAT IS CONFLICT OF INTEREST?

A “conflict of interest” arises in a situation where you are or may be in a position to take advantage of your role by using confidential information, assets or intellectual property for the benefit of yourself or your family members / relatives.

Common examples of actual, perceived or potential conflicts of interest include the following:

- Pursuing, awarding or maintaining Steel Hawk Engineering Sdn Bhd business opportunities for personal gain or to the benefit of close relatives or friends.
- Holding outside jobs or affiliations, including directorships that may affect the Steel Hawk business;
- Holding investments directly or indirectly in businesses or assets that are contracted to do business for or on behalf of Steel Hawk Engineering Sdn Bhd;
- Offering jobs or affiliations to close relatives or friends;
- Receiving money, property, services or other forms of financial personal benefits from suppliers or other third parties doing, or proposing to do, business with Steel Hawk Engineering Sdn Bhd;
- Influencing the results of a bid or tender;
- Offering or accepting gifts, hospitality and entertainment without permission.
- Accepting sponsorship from providers or third parties who are involved at your site or in your area of business.



DO'S

- ✓ Declare any actual, potential or perceived conflicts of interest to the Integrity Unit.
- ✓ Regularly declare any conflicts of interest according to the scheduled declarations process.
- ✓ Seek conflicts of interest declarations from business associates you intend to deal with or have dealings with.

DON'T'S

- X Conceal any actual, potential or perceived conflicts of interest that may put your integrity, credibility and decision making in question.
- X Make decisions when there is an actual or potential conflict of interest between you and the other party (such as during contract negotiations or tender evaluation) without first making a disclosure.

9.0 DUE DILIGENCE

It is Steel Hawk Engineering Sdn Bhd requirement to conduct proper due diligence before establishing business relationships or for hiring purposes. It is important for us to know who we are working with whether personnel, business associate or any party who is engaged to work for and on behalf of Steel Hawk Engineering Sdn Bhd. We must conduct due diligence on Steel Hawk Engineering Sdn Bhd Personnel, business associates, projects and major business activities, in particular where there is significant exposure to bribery and corruption risk.

Due Diligence helps Steel Hawk Engineering Sdn Bhd filter through suspicious and illegal counterparties and activities.

You must conduct appropriate counter-party due diligence to understand and identify:

- The business's ownership and details of establishment.
- Background of the Company.
- Whether the Company is legally operating.
- The origin and destination of money, property, and services of the Company.
- Whether the Company has been sanctioned or has in the past been convicted of any actions by regulatory bodies.

DO'S

Conduct due diligence in order to determine the nature and extent of bribery risks:

- ✓ The legitimacy of the entity, corporate registration documents, tax identification number, stock exchange listing information.
- ✓ Necessary licenses, qualifications, experience and resources required.
- ✓ Any history of bribery, fraud, dishonesty, or similar misconduct, or has been investigated, convicted, sanctioned, or debarred for bribery or similar criminal conduct.
- ✓ The identity of shareholders and beneficial owner and senior management.

DON'T'S

- X Commit anything (i.e. funds, positions, contracts) without first conducting the proper due diligence.
- X Bypass any of the due diligence requirements and guidelines.
- X Conceal, alter, destroy or otherwise modify any relevant information that may raise suspicions and would require any additional investigations.



10. ANTI-HARASSEMENT

Steel Hawk Engineering Sdn Bhd seeks to provide a work environment that is free from harassment of any kind and / or any other offensive, degrading, disrespectful or hostile behavior.

Harassment includes unwelcome verbal, visual, sexual, physical or any other conduct of any kind that creates an intimidating, offensive or hostile work environment.

Harassment creates an environment that is intimidating, hostile, or offensive. This would interfere with the performance of an employee's duties and responsibilities as well as affect employment opportunities or compensation and is not in line with our Shared Values.

It is our responsibility to report this type of behavior. Steel Hawk Engineering Sdn Bhd will promptly investigate each complaint and take the necessary corrective action.

11. SOCIAL MEDIA AND COMMUNICATION

Employees of Steel Hawk Engineering Sdn Bhd must comply with the law, and Steel Hawk Engineering Sdn Bhd relevant procedures and policies in their use of social media. They should avoid any expressions that might be deemed offensive, illegal, and observe the criteria of "open, fair and clear" in all communications. At all times, they are required to behave in a professional manner.



It is important, however, for employees to understand the potential damage which may be caused to Steel Hawk Engineering Sdn Bhd, to relationships with colleagues, and to a person's own reputation as a result of personal use of social media in circumstances where someone can be identified, either explicitly or implicitly, as an employee of Steel Hawk Engineering Sdn Bhd. Any use of social media by the employee in voicing their views, opinions, statements or comments are the views of an individual and should not be seen as a representation of Steel Hawk Engineering Sdn Bhd.



12. GOVERNMENT INTERACTIONS AND POLITICAL PARTICIPATION

Steel Hawk Engineering Sdn Bhd prohibits its personnel from engaging in activities or acts with government officials where such activity or act could raise suspicions of corruption or bribery. You need to maintain honest relationships with governments and their agencies, officials and personnel.

You must not:

- ✓ Offer or accept gifts, entertainment or other benefits to and from Government Officials.
- ✓ Pay for non-business travel, meals, entertainment for any government official or their family members without approval from your Head of Department or Senior Management.
- ✓ Sponsor research by 'think tanks' affiliated or linked to political parties;
- ✓ Be involved with any event organized by, or on behalf, of a political party for which a fee is paid and is not related to, or perceived as, political fundraising.

13. REPORTING AND WHISTLEBLOWING

We strongly encourage reporting (whistleblowing) of real or suspected cases of misconduct, bribery and corruption without fear of retaliation or reprisal.

The purpose of the whistleblowing channel is to enable genuine concerns to be raised by the Steel Hawk Engineering Sdn Bhd employees, directors and others. The Channel provides an opportunity for those concerns to be investigated and for appropriate action to be taken to resolve the matter effectively.



WE AIM TO:

- ✓ Develop a culture of openness, accountability and integrity,
- ✓ Enable prompt action to be taken where necessary,
- ✓ Mitigate any potential financial or reputational damage arising from serious forms of misconduct.

We have formulated a Whistleblowing Policy, which provides channels for secure reporting of concerns about instances of bribery and corruption and other forms of misconduct.

If you wish to submit the report anonymously, you may proceed to file the complaint through the Steel Hawk Engineering Sdn Bhd whistleblowing reporting process to [Steelhawk BDOEthicsLine](#) or email to steelhawk-wb@bdo.my

DO'S

- ✓ Report any real or suspected cases of bribery, corruption or misconduct through the designated whistleblowing channels.
- ✓ Provide detailed, factual information to assist with the investigation (i.e. who, what, where, when, how).
- ✓ Provide your contact details when reporting through whistleblowing channels. While anonymous reporting is allowed, you are strongly encouraged to provide some form of contact details e.g. email, for the Integrity Management Committee to update you on the investigation progress.
- ✓ Encourage business associates or any parties engaging with us to report any concerns through the whistleblowing channels.



14.0 INTEGRITY MANAGEMENT COMMITTEE

Steel Hawk Engineering Sdn Bhd has existing governance measures in place and in efforts to consciously and continuously address the Company's governance needs and to raise the level of corporate governance, the Management under the Chief Executive Officer has introduced a Corporate Integrity Plan based on the Company's existing Integrity Policy.

The Integrity Management Committee is one of the initiatives under the Corporate Integrity Plan that aims to establish a committee of the Steel Hawk Engineering Sdn Bhd Board of Directors to reflect collaboration between the Management and employees as an effort to ensure that the Integrity Unit and all integrity risk control and measures are effective in both design and operation.

The Integrity Management Committee is established as a committee for the purposes of assisting the Management and Board in:

- ✓ Enhancing the independence of the Integrity Unit by providing direction and oversight of its function on behalf of the board.
- ✓ Overseeing the company's systems of disclosure controls and procedures, internal controls and compliance with ethical standards adopted by the company.
- ✓ Ensuring the company is taking necessary corrective actions in a timely manner to address control weaknesses, non-compliance with laws, regulatory requirements, policies and other problems identified.
- ✓ Oversee Steel Hawk Engineering Sdn Bhd system of disclosure controls and procedures and internal controls to ensure that it is in line with the ethical compliance of all Steel Hawk Engineering Sdn Bhd documentation, policies and processes.
- ✓ Oversee the internal controls framework to ensure operational effectiveness and adequate protection of Steel Hawk Engineering Sdn Bhd from misappropriation
- ✓ To guide the next steps and adequacy of a whistleblowing investigation.
- ✓ To monitor the Integrity programs that are conducted in a timely and efficient manner and gauging the effectiveness of programs and training and to put in suggested remedial action to improve programs or training.
- ✓ Act in the best interest of the company independently.
- ✓ To study and review internal controls for anti-corruption and anti-bribery Monitor the implementation of the Anti-Bribery Management System and Anti-Corruption Management System.
- ✓ Review and assess the effectiveness of corporate disclosure, whistleblowing, and breach policies and processes such as but not limited to the code of conduct, integrity policy and other relevant documentation.

The members of the Committee consist of employees who themselves exhibit a high level of integrity and collectively have broad experiences in Steel Hawk Engineering Sdn Bhd's businesses and have demonstrated the necessary independence and freedom of judgment.

15.0 INTERNAL CONTROLS

Steel Hawk Engineering Sdn Bhd requires you to comply with all policies and procedures established from time to time. These requirements safeguard and supports the integrity and accuracy of all Steel Hawk Engineering Sdn Bhd records and reporting.

You must not:

- ✓ **Conceal, alter, destroy or otherwise modify Steel Hawk Engineering Sdn Bhd records or documents other than in accordance with established, ordinary course procedures (and in no case impede or frustrate an investigation or audit or conceal or misstate information);**
- ✓ **Intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports)**
- ✓ **Establish accounts, companies or arrangements to circumvent or frustrate the Steel Hawk Engineering Sdn Bhd controls, policies or procedures;**
- ✓ **Fail to cooperate fully and truthfully with internal and external audits authorized by the Steel Hawk Engineering Sdn Bhd; or**
- ✓ **Engage in any scheme to defraud anyone of money, property or honest services**

You must also comply with all policies and procedures established from time-to-time concerning the preparation, maintenance and disposal of the Steel Hawk Engineering Sdn Bhd financial books and records.



16.0 FAQ

1. What is Integrity?

Integrity is the quality of being honest and having strong moral principles; moral uprightness. In the aspiration to conduct its affairs in an ethical, responsible and transparent manner, this Handbook supports the Company's shared values and is the core of the Company's governance processes.

2. What is Confidential Information?

Confidential information not only relate to information regarding the Company but also information relating to the Company's customers / partners, which the employee has obtained during the course of his / her employment.

3. How does Steel Hawk Engineering Sdn Bhd protect whistleblowers?

The source of any allegation or evidence shall be treated with utmost confidentiality Steel Hawk Engineering Sdn Bhd will do its utmost to encourage and protect whistleblowers and witnesses, and will protect their identities from unauthorized disclosure.

4. How will I know what happens to my complaint?

The Integrity Manager will notify the outcome of any investigation. However, as a general rule the complainant is not privy to the findings of the investigation. It is important to note that the Integrity Manager does not represent the complainant; his primary role is to investigate the allegation(s) and make recommendations and/or take appropriate action according to its findings.

5. What will happen if I file a report that turns out not to be true?

No one will be punished for reporting concerns in good faith, even if the concerns reported cannot be supported by additional evidence, or are ultimately found to be incorrect. This is also in line with Steel Hawk Engineering Sdn Bhd "Just & Fair Culture".

6. How do I identify a conflict of interest situation?

To identify if you are in a conflict of interest situation, consider your actions and ask yourself, "Are you in a position to derive personal benefit from actions or decisions made by you? Would you be in a position that may affect or influence your impartiality?" If you are not, your personal integrity may be at stake.

17.0 USEFUL LINKS

To report about the whistleblowing, you can email it to the:
steelhawk-wb@bdo.my



STEEL HAWK E-Reporting Channel

[Steelhawk_BDOEthicsLine](#)

STEEL HAWK Integrity Policy

STEEL HAWK Corporate Disclosure Policy

STEEL HAWK Whistleblowing Policy



Malaysian Anti-Corruption Commission, Witness Protection

<https://www.sprm.gov.my/en/operation/witness-protection>



Malaysian Anti-Corruption Commission, My Anti-Corruption Channel

<https://macc.fm>



STEEL HAWK ENGINEERING SDN. BHD.
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