

STEEL HAWK WHISTLEBLOWING POLICY

Policy Statement

STEEL HAWK is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, **STEEL HAWK** provides avenue for all employees of **STEEL HAWK** and members of the public to disclose any improper conduct within **STEEL HAWK**.

Objective of the Policy

This policy is to provide an avenue for all employees of **STEEL HAWK** and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

Any acts of Bribery, including *failure to report*, shall constitute as a serious misconduct and offence and shall be subjected to the provision of MACC Act 2009.

Scope of the Policy

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offences) through the whistleblowing channels. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's Property; and
- vii. Non Compliance with Procedure.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under **STEEL HAWK's** Code of Conduct and Business Ethics (CoBE), Integrity Handbook, Employee Handbook or any criminal offence under relevant legislations in force.

This policy is not to invalidate the Grievance Procedure and/or the Disciplinary Action Process and Procedures (DAPP) but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected in the Collective Agreements, Employee Handbook and CoBE shall be operative based on the purpose and objective of their existence.

Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of **STEEL HAWK**. This policy also applies to members of the public, where relevant including but not limited to **STEEL HAWK's** suppliers, subcontractors and service providers.

Procedure in Making a Disclosure

All disclosures shall be made in accordance with the procedures as provided under this policy.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within **STEEL HAWK**, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Anonymous Whistleblower

Any anonymous disclosure will not be entertained without evidence attached in their report. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. **However, the Company reserves its right to investigate into any anonymous disclosure.**

Notification

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, provided that the his/her contact details are made available.

STEEL HAWK reserves the right to amend this policy from time to time.