TAS OFFSHORE BERHAD

Registration No. 200801008892 (810179-T)

WHISTLEBLOWING POLICY

1. INTRODUCTION

1.1 TAS Offshore Berhad ("**TAS Offshore**" or "**Company**") and its subsidiaries (collectively referred to as the "**Group**") are committed to upholding high standards of corporate governance, transparency, integrity and accountability in all business conduct and dealings.

1.2 This Whistleblowing Policy ("**Policy**") provides a secure and confidential channel for reporting any actual, suspected or attempted improper conduct, without fear of reprisal, retaliation or detrimental action.

1.3 Reports of bribery or corruption under the Group's Anti-Bribery and Anti-Corruption Policy ("**ABAC Policy**") shall be made through the whistleblowing channel established under this Policy.

2. SCOPE

2.1 This Policy applies to all Directors, Employees, Business Partners and other stakeholders who have dealings with the Group and made a report under this Policy ("**Whistleblower**"), provided that the Report is made in good faith, based on reasonable grounds, and is not made for personal gain or with malicious intent.

2.2 This Policy is designed to enable Whistleblowers to report genuine concerns relating to improper conduct, including but not limited to the following:

- bribery and corruption;
- fraud;
- financial irregularities;
- theft;
- abuse of power;
- conflict of interest;
- harassment in the workplace;
- misuse of social media or business communications; and
- violation of any law and regulation.

3. CONFIDENTIALITY

3.1 The Group accepts reports made anonymously through the designated whistleblowing channel, in accordance with the Guidelines on Adequate Procedures. Where a Whistleblower chooses not to disclose their identity, the Group will endeavour to assess and investigate the matter to the extent reasonably practicable. However, the ability to conduct a thorough investigation may be limited where the Whistleblower is unavailable for follow-up. Whistleblowers are encouraged to provide their contact details where possible to facilitate a more complete investigation, and may request that their identity be kept confidential in accordance with this Policy.

3.2 The Group will treat all reports, including the identity and personal information of the Whistleblower, as confidential to the extent reasonably practicable and permitted by law.

3.3 The identity and personal information of the Whistleblower may only be disclosed on a need-to-know basis where necessary for the assessment, investigation or resolution of the report, or where required by law, regulation or any relevant authority. Such disclosure may be made to the Board of Directors, Audit Committee, investigation team, authorised officers, external advisers, regulatory authorities, law enforcement agencies or other relevant parties.

3.4 If the Whistleblower does not provide sufficient information, or does not consent to the disclosure of information necessary for the investigation, the Group may be unable to proceed with or complete the investigation.

3.5 Where appropriate and permissible, the Whistleblower may be informed of the status or outcome of the investigation. However, the Group is not obliged to disclose details where such disclosure may breach confidentiality, legal obligations, regulatory requirements or the rights of any person.

4. PROTECTION TO WHISTLEBLOWERS

4.1 A Whistleblower will be protected under this Policy if the Report is made in good faith and based on reasonable grounds. This protection applies even if the investigation later finds that the Whistleblower was mistaken about the facts, rules or procedures involved.

4.2 The Group prohibits any reprisal, retaliation or detrimental action against a Whistleblower who makes a Report in good faith.

4.3 The protection under this Policy includes protection from disciplinary action by the Group arising from the making of the report, and from detrimental action such as dismissal, demotion, suspension, harassment, intimidation, discrimination or other adverse treatment.

4.4 Any person who retaliates against a Whistleblower, or against any person who assists in an investigation, may be subject to disciplinary and/or other appropriate action, including legal action where applicable.

4.5 Where a Whistleblower is involved in the improper conduct reported, the making of the report will not automatically exempt the Whistleblower from investigation, disciplinary action, criminal prosecution or civil liability. However, the Group may take into account the Whistleblower’s disclosure and cooperation when determining the appropriate action.

4.6 Any person who knowingly makes a false, frivolous, vexatious or malicious report, or who makes a report without reasonable grounds to believe that the matter reported is substantially true, may be subject to disciplinary action and/or other appropriate action.

5. REPORTING PROCEDURES

5.1 The whistleblowing form is available on the Group's website and is attached as **Appendix A**. Where the Whistleblower chooses to identify themselves, the form requests the Whistleblower's personal and contact information to facilitate the investigation and any necessary follow-up. Whistleblowers who wish to remain anonymous are not required to complete the personal information fields and may omit their signature.

5.2 The completed whistleblowing form shall be submitted by email to the designated whistleblowing channel set out in **Clause 6.1**.

5.3 Upon receipt of a report by the designated whistleblowing channel, the report shall be handled in accordance with the procedures set out in this Policy.

5.4 The Whistleblower shall, where practicable, be provided with an acknowledgement of receipt of the report within two (2) working days.

5.5 For the purpose of convenient reference, a flow chart illustrating the whistleblowing process is attached as **Appendix B-1 and B-2 (as applicable)**.

6. WHISTLEBLOWING CHANNEL

6.1 Reports relating to improper conduct shall be submitted through the designated whistleblowing channels set out below.

No.	Case Involving	Reporting Channel
1	Employees	Managing Director
2	Director	Chairman of the Audit Committee
3	Chairman of the Audit Committee	Chairman of the Board of Directors

6.2 All reports shall be submitted through one of the following designated channels, addressed as marked "PRIVATE AND CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY":

(a) **Reports against Employees (to the Managing Director):** Email: simonlau@tasoffshore.com; or by post to: Lot 199, Jalan Sungai Maaw, Sungai Bidut, 96000 Sibu, Sarawak, marked "PRIVATE AND CONFIDENTIAL – For the Attention of the Managing Director".

(b) **Reports against a Director (to the Chairman of the Audit Committee):** Email: anthonylingTAS@gmail.com; or by post to: Lot 199, Jalan Sungai Maaw, Sungai Bidut, 96000 Sibu, Sarawak, marked "PRIVATE AND CONFIDENTIAL – For the Attention of the Chairman of the Audit Committee".

(c) **Reports against the Chairman of the Audit Committee (to the Chairman of the Board of Directors):** Email: spuananuTAS@gmail.com; or by post to: Lot 199, Jalan Sungai Maaw, Sungai Bidut, 96000 Sibu, Sarawak, marked "PRIVATE AND CONFIDENTIAL – For the Attention of the Chairman of the Board of Directors".

6.3 Where the subject of the report is the Managing Director, Deputy Managing Director, Group Accountant, Company Secretary, Chairman of the Audit Committee or Chairman of the Board of Directors, the Whistleblower shall escalate the report directly to the next appropriate level as set out in the table above, bypassing any implicated person. Where all reporting channels are compromised or unavailable, the Whistleblower may submit the report directly to the full Board of Directors or seek guidance from the relevant regulatory authority.

6.2 Reports against Employees

6.2.1 Where a report involves an Employee, the Managing Director shall conduct an initial assessment to determine whether the Report warrants further investigation.

6.2.2 If the report does not warrant further investigation, the Managing Director may close the case. The reasons for closure shall be recorded in the Whistleblowing Reporting Register.

6.2.3 If the report warrants further investigation, the Managing Director shall appoint an independent investigation panel comprising one (1) chairman and two (2) members. One (1) of the members shall act as secretary to the panel.

6.2.4 The independent investigation panel shall conduct the investigation and submit its findings and recommendations to the Managing Director.

6.2.5 After considering the findings and recommendations of the independent investigation panel, the Managing Director shall determine the appropriate action to be taken. The final report shall be tabled to the Audit Committee for review.

6.3 Reports against a Director or the Chairman of the Audit Committee

6.3.1 Where a report involves a Director, the Chairman of the Audit Committee shall conduct an initial assessment to determine whether the report warrants further investigation.

6.3.2 Where a report involves the Chairman of the Audit Committee, the Chairman of the Board of Directors shall conduct, or cause to be conducted, the initial assessment.

6.3.3 The Chairman of the Audit Committee, or the Chairman of the Board of Directors, where applicable, may seek legal or other professional advice in relation to the Report.

6.3.4 If the Report does not warrant further investigation, the relevant Chairman may close the case. The reasons for closure shall be recorded in the Whistleblowing Reporting Register.

6.3.5 If the report warrants further investigation, an independent investigation committee shall be established to investigate the report. The person who is the subject of the report shall not be involved in the assessment, investigation, deliberation or decision-making process.

6.3.6 The investigation shall be conducted fairly, objectively, confidentially and proportionately, having regard to the nature and seriousness of the report.

7. INVESTIGATION PROCESS

7.1 All Reports, investigation findings, corrective actions and monitoring actions shall be recorded in the Whistleblowing Reporting Register. The Whistleblowing Reporting Register shall be maintained by the Group Accountant.

7.2 The Audit Committee shall be informed of all new reports of improper conduct and may request to review the Whistleblowing Reporting Register at any time.

7.3 The Whistleblower shall, where appropriate and practicable, be notified within seven (7) working days from receipt of the report whether the matter warrants further investigation. Reports that do not warrant further investigation may be closed, and the reasons for closure shall be recorded in the Register.

7.4 If the report warrants further investigation, the investigation shall be completed as soon as practicable and, where possible, within thirty (30) working days from the date the report is determined to warrant further investigation. Where additional time is required due to the nature, complexity or seriousness of the matter (including matters involving bribery, corruption, procurement, payments, projects or senior management), the investigation period may be extended, provided that the reasons for any extension and the revised expected completion date are documented in the Whistleblowing Reporting Register.

7.5 Where necessary, the person implicated in the Report may be temporarily suspended, reassigned, or restricted from accessing certain records, systems, premises or business matters pending completion of the investigation. Such measures are precautionary and shall not be treated as a finding of wrongdoing.

7.6 The investigation team may obtain further information from the Whistleblower, the person implicated in the report, or any other relevant party necessary for the investigation.

7.7 Subject to legal, regulatory and confidentiality requirements, the Whistleblower may be informed of the status or outcome of the investigation. However, details of the investigation, findings, deliberations and actions taken may be withheld where disclosure is not appropriate or permitted.

7.8 If the investigation confirms that improper conduct has occurred, the Group may take appropriate action against the person found to have committed the improper conduct. Such action may include disciplinary action, corrective action, reporting to regulatory or enforcement authorities, or any other action deemed necessary.

8. REVIEW

8.1 This Policy shall be reviewed periodically to ensure its effectiveness and relevance and, in any event, at least once every three (3) years.

8.2 The review shall be consistent with Paragraph 15.29 of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad and the Guidelines on Adequate Procedures issued under the Malaysian Anti-Corruption Commission Act 2009 and the outcome of the review shall be reported to the Board or the Audit Committee. Any proposed amendments to this Policy shall be recommended to the Board of Directors for approval.

APPENDIX A

WHISTLEBLOWING FORM

Please provide the following details in respect of the alleged improper conduct and submit this form to the designated whistleblowing channel. Please note that you may be called upon to assist in the investigation, if required. If you wish to remain anonymous, you are not required to complete the "Information of the Whistleblower" section and may omit your signature in the Declaration below. Please be aware that anonymous reports may limit the Group's ability to conduct a thorough investigation.

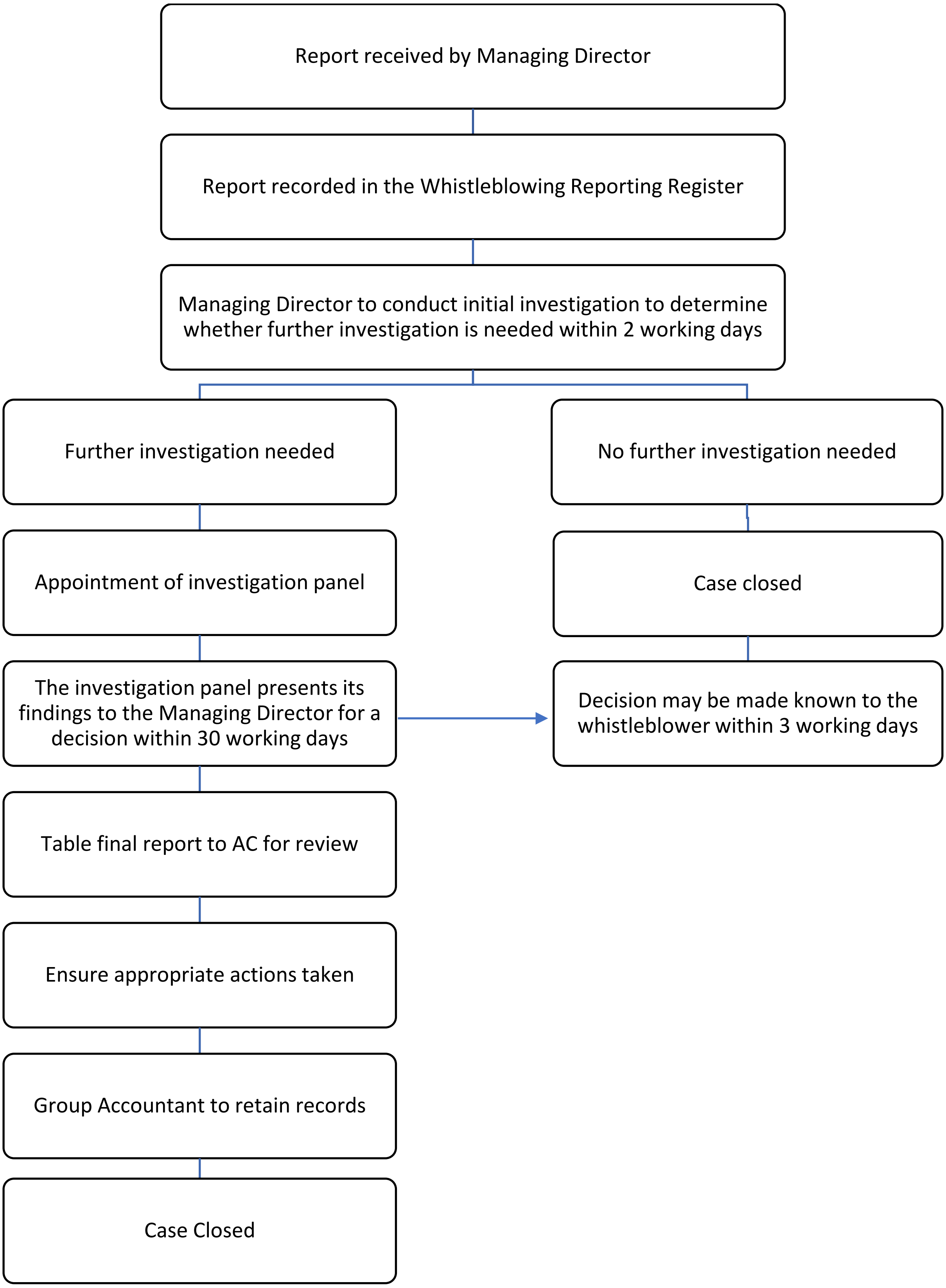
Information of the Whistleblower			
Name:			
Contact Number:		Email Address:	
Relationship with the Alleged Person:			
Information of the Person Implicated in the Report			
Name:			
Position / Job Title:			
Division / Department (where applicable):			
Contact Number:		Email Address:	
Witness(es) Information (if any)			
Name (1):			
Division & Department (where applicable):			
Contact Number:		Email Address:	
Name (2):			
Division & Department (where applicable):			
Contact Number:		Email Address:	

Report: *Briefly describe the improper conduct and how you know about it. Specify* ***What, Who, When, Where and How****. If there is more than one allegation, number each allegation and use as many pages as necessary.*
1. What Improper Conduct occurred?
2. Who is alleged to have committed or been involved in the improper conduct?
3. When did it happen and when did you notice?
4. Where did it happen?
5. Do you have any supporting evidence? If yes, please provide details or attach copies.
6. Are there any other persons involved other than the person identified above?
7. Do you have any other details or information which would assist us in the investigation?
8. Have you reported the improper conduct to any authorities? If yes, please give the details:
9. Any additional information

Declaration by Whistleblower
I declare and acknowledge the following: • I acknowledge and declare that all information provided in this form is true, correct and complete to the best of my knowledge, information and belief; • I am willing to assist in the investigation of improper conduct, if required; • Prior to this report, I have not disclosed the subject matter to the alleged person or any part thereof to any other person except to the following persons/authority: .... • Where I have provided my contact details, I shall notify any changes of my contact details to the designated whistleblowing channel as soon as possible; and • I understand that any person who knowingly provides false, frivolous, vexatious or malicious information, or who misuses the whistleblowing mechanism, may be subject to disciplinary action and/or other appropriate action, where applicable.
Signature (optional if anonymous) : Name : Date :

APPENDIX B-1

FLOW CHART FOR REPORT AGAINST EMPLOYEES



APPENDIX B-2

FLOW CHART FOR REPORT AGAINST A DIRECTOR / AUDIT COMMITTEE CHAIRMAN