



BUMI ARMADA

## Speak Up Policy

Bumi Armada Berhad (“Company”) is fully committed to conducting business ethically and in full compliance with applicable laws and regulations in all jurisdictions it operates. In order to achieve this, the Company relies on each of its directors, officers, managers and employees (“Employees”), customers, partners, suppliers and agents (“Stakeholders”) to adhere to applicable laws, regulations, Company policies and Code of Business Conduct and Ethics (“Code”).

### *Objective of the Policy*

This policy is intended to encourage Employees and Stakeholders to report actual or perceived unethical or illegal conduct of employees, management, directors and other stakeholders across the Company to appropriate channels in a strictly confidential manner without any fear of harassment, intimidation, victimisation or reprisal for raising concern(s) under this Policy. Specific objectives of the Policy are:

- To ensure all Employees and Stakeholders feel supported in speaking up in confidence and reporting matters they suspect may involve transgressions of applicable laws, regulations and the Code To proactively prevent and deter misconduct which could impact the financial performance and damage the Group`s reputation;
- To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- To help promote and develop a culture of openness, accountability and integrity

### *Who May Report*

Employees, Stakeholders or any other concerned parties.

### *Reporting Hotline*

Reports shall be made to an independent third-party hotline (“Reporting Hotline”). The Reporting Hotline is provided by an independent company, Expolink. When contacting the Reporting Hotline, a party will be assisted in their own language and the Hotline is available 24 hours a day, 7 days a week. The Hotline also provides for reports to be made via a secure website. The particulars of the toll-free number and website are available here: <https://wrs.expolink.co.uk/bumiarmada>



## BUMIARMADA

Should a reporter prefer to lodge a report directly with the Company, he/she may use the following channels:

Reports pertaining to Employees or Company business:  
Ethics Committee at [ethics@bumiarmada.com](mailto:ethics@bumiarmada.com)

Reports pertaining to senior management of the Company:  
Audit Committee at [ac@bumiarmada.com](mailto:ac@bumiarmada.com)

Reports pertaining to the CEO or Company Directors  
Senior Independent Director at [sid@bumiarmada.com](mailto:sid@bumiarmada.com)

Reports should be as detailed as possible and relevant to guide investigators to conduct investigations expeditiously.

### *Confidentiality*

The Company will treat all reports received pursuant to the Speak Up Policy confidentially. In addition, person(s) reporting may choose to remain anonymous when submitting their report to the Reporting Hotline appointed by the Company for the purposes of receiving reports. Where the reporter has indicated his wish to remain anonymous, the Reporting Hotline will only pass on the content of the report to the Company and the anonymity of the reporter will be guaranteed by the Reporting Hotline.

### *Investigation*

Save for reports addressed to the Audit Committee (AC) or Senior Independent Director (SID), all reports are evaluated by the Ethics Committee (EC). The Ethics Committee comprises of the following: (1) Head - Internal Audit (HIA); (2) Chief Human Resource Officer (CHRO); and (3) a third member co-opted from BAB management. The third member co-opted into the Ethics Committee will be selected based on the nature of the allegation and the relevant expertise the co-opted member can bring to the investigation. Upon evaluation and if so deemed necessary, the EC will investigate the matters alleged in a report. The EC will oversee any corrective actions, if such are required. In respect of reports addressed directly to the AC or SID, the AC or SID (as the case may be) will carry out its own review and decide on the appropriate course of action. The person raising the report will be notified by the EC of the receipt of the report by the EC and again upon conclusion of the matter.



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### *Protection / Non-retaliation against a Reporter*

The Group prohibits and will not tolerate any form of discrimination, harassment or retaliation of any kind against a person who has, in good faith reported a potential violation. If a Reporter believes that he/she is being subjected to discrimination, harassment or retaliation for having made a report under this policy, he/she should immediately report these facts to the Chairman of the Audit Committee at [ac@bumiarmada.com](mailto:ac@bumiarmada.com). Allegations of retaliation will be investigated and appropriate action taken.

### *Misuse of the Speak Up Mechanism*

Reports should be formulated in an objective and relevant manner providing as much detail and be as specific as possible. Reports should include details of the parties involved, dates or period of time, the nature of the concern, evidence substantiating the complaint, if possible and contact details, in case further information is required. No value judgment or subjective comments on the behaviour of individuals should be made. Abuse of the reporting mechanism is in itself a breach of the Code and any person who submits a report making false or inaccurate information on purpose or with malicious intent is liable for disciplinary action. Any report made in good faith, even if unfounded, will not result in disciplinary action against the reporter.

**LEON HARLAND**

Executive Director / Chief Executive Officer

Date: 1 March 2018