



WHISTLEBLOWING POLICY AND PROCEDURES

JAN 2025

“SABAH MAJU JAYA”

TABLE OF CONTENT

1.0	INTRODUCTION
1.1	Overview
1.2	Objectives
2.0	TERMINOLOGY AND ABBREVIATION
2.1	Terminology
2.2	Abbreviations and Acronyms
3.0	APPLICATION AND REFERENCE
4.0	GENERAL PRINCIPLES AND COMMITMENTS
5.0	POLICY OWNER
6.0	REPORTING PROCEDURES
7.0	PROCEDURE FOR DEALING WITH WHISTLEBLOWING REPORT
7.1	Preliminary Screening
7.2	Initial Assessment
7.3	Full Investigation
7.4	Report Closure
8.0	PROTECTION TO WHISTLEBLOWER AND REVOCAION OF PROTECTION
9.0	ADHERENCE TO WHISTLEBLOWING POLICY

1.0 INTRODUCTION

1.1 Overview

SMJ Energy Sdn Bhd ("**Company**" or "**SMJE**") is committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business affairs and in its workplace.

All employees of SMJE Group are expected to act with the highest standard of professional integrity and to comply with all applicable laws, regulations, codes, internal policies and guidance.

1.2 Objectives

- 1.2.1 This Whistleblowing Policy and Procedures ("**Policy**") serves to enhance corporate governance where integrity and ethical behavior is maintained within corporate environment.
- 1.2.2 The aim of Policy is to encourage employees and others who have serious concerns about any aspect of the improper conduct, unethical behaviour, malpractices, illegal acts or criminal offence ("**Wrongdoings**") which could adversely impact SMJE or its subsidiaries, its employees, shareholders, investors, or the public at large, to come forward and voice those concerns.
- 1.2.3 The Policy provides the procedures and mechanisms to facilitate –
 - (i) reports by Whistleblowers with serious concerns of any suspected or actual Wrongdoings through a formal and confidential channel;
 - (ii) investigation of such reports by the Prescribed Officer (as defined below); and
 - (iii) protection against reprisal to Whistleblowers who reported in good faith without fear of being subject to Detrimental Action (as defined below).
- 1.2.4 The Policy also act as an early warning system and may enable the company to remedy any Wrongdoings before serious damage is caused.
- 1.2.5 The Policy complement other existing policies, procedures and guidelines mainly to combat fraud, malpractices, bribery and corruption in the corporate environment.

2.0 TERMINOLOGY AND ABBREVIATION

2.1 Terminology

Term	Definition
Detrimental Action :	(a) action causing injury, loss or damage; (b) intimidation or harassment; (c) exploitation or discrimination; (d) any action that harms the lawful employment, livelihood, or well-being of any person; (e) a threat to take any of the above actions
Employee(s)	Any employee of SMJE Group and shall include contract staff, consultants, temporary employees and interns
Investigation & Disciplinary Committee :	A committee consist of competent management of SMJE elected by Chief Executive Officer charged with responsibilities to oversee investigations into allegations of misconduct or breaches of profession ethics in the organisation within SMJE Group.
Policy :	This Whistleblowing Policy and Procedures including any subsequent revisions and supplemental Guidelines
Prescribed Officer(s) :	Any individual or team of members (form as investigation committee) as may be appointed by Investigation and Disciplinary Committee who is/are competent to conduct investigations under this Policy
Whistleblower(s) :	(a) any Employee who has knowledge of Wrongdoings committed by another Employee / Director; and (b) any external party i.e. contractors, vendors, suppliers, advisers, members of public that has knowledge of Wrongdoings committed by an Employee / Director, who makes a report of Wrongdoings under this Policy.

Whistleblowing :	Deliberate, voluntary disclosure or reporting of individual or organisational Wrongdoings by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated Wrongdoings within the organisation or by an organisation that is within its ability to control
Wrongdoings	<p>Any conduct which is of disciplinary offence or criminal offence, improper conduct, malpractice, unethical behaviour.</p> <p>Wrongdoings may include but not limited to any of the following examples:</p> <ul style="list-style-type: none"> • corruption, accepting or giving bribes, taking or giving favours, kickbacks and privileges • misstatements or fraudulent financial reporting including intentional omissions or false disclosures to deceive financial performance • misappropriation / misuse of funds or assets • false or misleading records / documents to conceal missing assets / mistakes • entering transaction or document execution without proper authorisation • fraud, forgery, theft or embezzlement • gross mismanagement / negligence • abuse of power by any director or officer for personal gain • serious financial irregularity or impropriety • breach of Company's Code of Conduct • omission, misrepresentation or concealment of information which lead to danger to the lives, health or safety of the employees, the public or the environment • unauthorised disclosure of confidential information • Non-disclosure of conflict of interest situation • Disregards compliance with provisions of laws, regulations and directives intentionally • deliberate concealment of information concerning any of the matters listed above • knowingly directing or advising a person to commit any of the above Wrongdoing <p>Wrongdoing excludes matters which are trivial or frivolous in nature and motivated by malice.</p>

2.2 Abbreviations and Acronyms

Abbreviations	Definition
Board :	Board of Directors of SMJE and the Group
CEO :	Chief Executive Officer
IDC :	Investigation and Disciplinary Committee
SMJE / the Company :	SMJ Energy Sdn Bhd
SMJE Group / the Group :	SMJE and its subsidiary companies

3.0 APPLICATION AND REFERENCE

This Policy is applicable to all Employees and Directors of SMJE Group. It does not replace or affect the Company's Code of Conduct or other policies and procedures established or to be established by the Company from time to time.

This Policy shall apply in conjunction with the following and any other applicable laws and regulatory standards including all the subsequent revisions -

- (i) Whistleblower Protection Act 2010;
- (ii) Malaysian Anti-Corruption Commission Act 2009;
- (iii) Malaysian Code on Corporate Governance 2021;
- (iv) Policy Document issued by Bank Negara Malaysia on Anti-Money Laundering, Countering Financing of Terrorism and Targeted Financial Sanctions for Designated Non-Financial Businesses and Professions & Non-Bank Financial Institutions which sets out:
 - obligations of reporting institutions (legal entities, institutions and persons) with respect to the requirements imposed under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
 - implementation of a comprehensive risk-based approach in managing money laundering and terrorism financing risks; and
 - requirements on targeted financial sanctions.
- (v) Internal Policies and Procedures, Code of Conduct, Employment Terms and Conditions of Service.

4.0 GENERAL PRINCIPLES AND COMMITMENTS

The principles underpinning the Policy are as follows, the Company will ensure:

- all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- confidentiality is maintained;
- not to tolerate harassment or victimization of anyone raising a genuine concern;
- any employee making a disclosure will retain anonymity unless he/she agrees otherwise;
- no one with conflict of interest situation shall be involved in the conduct of investigation that would compromise their objectivity, impartiality and independence;
- any employee raising a concern is aware of who is handling the matter; and
- no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the employee is mistaken. However, this assurance does not extend to someone who maliciously raises a matter he/she knows is untrue or could reasonably have known is untrue.

5.0 POLICY OWNER

- 5.1 The Board of SMJE has overall responsibility for this Policy and shall oversee the implementation of this Policy. The Board may delegate the day to day responsibility for the administration and implementation of the Policy to the CEO.
- 5.2 The use and effectiveness of this Policy shall be regularly monitored and periodically reviewed as part of internal audit process to ensure it remains relevant with the Group's changing business environment, administrative or operational needs as well as changes to legislations. Any amendment that may be required shall be recommended to the Board for consideration and approval.
- 5.3 The Secretary of the Company shall be responsible for the formalization of this Policy and any revision thereof to reflect actual practice and ensure it remains relevant with the changing business environment. The Company Secretary will be responsible for obtaining approval from the Board for implementations, incorporating any amendments and updates into this Policy.
- 5.4 The Policy including any revisions and amendments to this Policy will be communicated by the Vice President, People and Organisation to all employees of SMJE Group for adherence.

6.0 REPORTING PROCEDURE

6.1 Who Can Report

Any Whistleblower(s) who believes reasonably and in good faith that potential Wrongdoings and/or suspected incident of Wrongdoings exists within SMJE Group or committed by Employee or Director.

Any anonymous report will be dealt with according to the investigation procedures under this Policy.

6.2 What to Report

A report can be made where it relates to any potential Wrongdoings and/or conduct which constitutes a Wrongdoings by any Employee or Director within SMJE Group by specifying -

- (i) Identity of whistleblower;
- (ii) Details of the person(s) involved;
- (iii) Details of the allegations such as nature, time and place;
- (iv) Details of witnesses;
- (v) Other relevant information;
- (vi) Contact details of Whistleblower; and
- (vii) Any supporting evidence which may help in substantiating the report, for instance documentary record, audio recording and photo.

The "***Form of Report by Whistleblower of Wrongdoings***" (attached herewith as **Appendix A**) may be used.

6.3 How to Report

A report of Wrongdoings must be in writing to the following persons by letter / prescribed Form deposited at the Registered Office or via email to whistleblower@smjenergy.com -

- (i) Chairman;
- (ii) Chairman of Audit Committee;
- (iii) Internal Auditors (if available);
- (iv) Company Secretary;
- (v) If Wrongdoing involves the Chairman, to the Independent Non-Executive Director.

The aforesaid persons shall be responsible to monitor the reporting sent to whistleblower@smjenergy.com.

6.4 When to Report

As soon as the Whistleblower becomes aware and reasonably believes in good faith that a Wrongdoing is likely to happen, is being committed or has been committed, the Whistleblower is encouraged to make a report of the Wrongdoing.

The Whistleblower needs to demonstrate that the Whistleblower has reasonable grounds for the concerns. However, the Whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure.

If the Whistleblower knows as a matter of fact that there are reasonable grounds of suspicion that a Wrongdoing is going to take place, such genuine concerns is encouraged to be raised at an early stage.

6.5 Report by External Party

A summary of this Policy together with the above Reporting Procedure shall be posted on SMJE's website for an external party to report the Wrongdoings by an Employee or Director. The Procedures shall include the "*Form of Report by Whistleblower of Wrongdoings*" (attached herewith as **Appendix A**).

Any external party intending to lodge a report of Wrongdoings by an Employee or Director may do so by sending a report in accordance with the Reporting Procedure under this Policy.

The report received from any external party will be dealt with according to the investigation procedures under this Policy.

7.0 PROCEDURE FOR DEALING WITH WHISTLEBLOWING REPORT

The process for dealing with the concerns raised by the Whistleblower involves four (4) main components as detailed out below -

- (i) preliminary screening (within one (1) week from report received)
- (ii) Initial assessment (within two (2) weeks from (i) above)
- (iii) full investigation (within three (3) weeks from (ii) above)
- (iv) report closure (within two (2) weeks from (iii) above)

It is intended that the disclosures by the Whistleblower will be acted upon in a timely manner. Depending on the nature, seriousness and complexity of the allegation made, the procedures bring to the closure for each report made shall be kept within two (2) months duration.

7.1 Preliminary Screening

- 7.1.1 The persons (under item 6.3 above) who receives the report shall hand over the report to the Chairman of IDC for IDC to assess the report to determine whether it is related to a Wrongdoing or excluded from the scope of this Policy.
- 7.1.2 The report if deemed within the scope, the IDC shall appoint Prescribed Officer(s) to appraise its authenticity and may obtain additional information or seek clarification from the Whistleblower (except on anonymous) and make general recommendations to the IDC Chairman.
- 7.1.3 The details of the whistleblowing report will be entered into a log book in electronic medium by an IDC member as assigned by IDC Chairman.
- 7.1.4 The log book together with the reports from Whistleblowers, investigation reports and the corresponding supporting documents, outcome of the investigations and decisions thereof shall be retained in People and Organisation Department for a period of at least seven (7) years under the custodian of appointed authorised personnel. It shall be treated as highly confidential documents and kept under a secured lock. The access or release of any related documents shall be at the discretion of the CEO upon request.

7.2 Initial Assessment

- 7.2.1 The IDC may designate Prescribed Officers, any person from the Group or external party, to examine if it warrant further investigation or to carry out any other process pursuant to this Policy.
- 7.2.2 The following criteria shall be considered during the initial assessment –
 - (i) estimated cost and value;
 - (ii) threat to safety and security;
 - (iii) reputational impact;
 - (iv) criminal elements;
 - (v) harm to SMJE Group or public interest; etc.
- 7.2.3 The relevant personnel within SMJE Group, external legal advisers or any professional body may be consulted.
- 7.2.4 Base on the findings of the initial assessment, the IDC has the authority to make the final decisions including –
 - (i) rejection of the report and instruct the matter be closed in the event the initial assessment clearly indicate that there are no circumstances that warrant investigation or if appropriate and applicable, resolution without recourse to full investigation; or
 - (ii) directing full investigations on the report and any persons involved or implicated.

7.3 Full Investigation

- 7.3.1 If the findings of the initial assessment clearly indicate suspicious circumstance, the IDC will instruct the Prescribed Officers or any competent person to commence a full investigation in accordance with the guidelines set by IDC.
- 7.3.2 The IDC is responsible for reviewing investigation findings and make recommendations to the CEO and/or Audit Committee Chairman, including but not limited to, any of the following:
- (i) directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures,
 - (ii) directing disciplinary action be taken against any Employee wrongdoers, in accordance with the procedures for disciplinary action stipulated in the employees handbook.
 - (iii) suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee's exposure to threat or harm;
 - (iv) obtaining any other assistance (for instance, external auditors or legal advice);
 - (v) referral to the police or any other appropriate enforcement authority; and
 - (vi) instruct implementation of appropriate control.
- 7.3.3 In the event where the IDC Chairman or member is involved. The Audit Committee Chairman shall be responsible with the oversight of the investigation and review of results of the investigation.
- 7.3.4 If the Wrongdoing involves the Chairman, the report shall be made to Independent Non-Executive Director of SMJE, who shall refer this to the Board of Directors.
- 7.3.5 The Board of Directors shall then authorise a SMJE director to be responsible for the investigation and recommendation to the Board of Directors. The Board of Directors shall have the authority to make the final decisions regarding the disclosure of Wrongdoing.
- 7.3.6 The Whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out pursuant to this Policy. They may be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend the meeting. At the appropriate time, the Whistleblower making the disclosures may need to come forward as a witness.
- 7.3.7 The alleged wrongdoer will be given an opportunity to answer the allegations at the meeting.

7.3.8 If the Whistleblower is implicated or discovered to be or have been involved in any Wrongdoing, the Whistleblower may also be investigated so as to complete the fact-finding process. An investigation in this instance is not and shall not be treated as a reprisal against the Whistleblower, but to facilitate decision making.

7.3.9 The investigation team shall be given unfettered access to all books and records, and personnel of the SMJE Group to assist their investigations.

7.3.10 The findings of the investigation to be tabled for the IDC Chairman's review and decision shall include –

- (i) modus operandi of the perpetration;
- (ii) the amount involved;
- (iii) impact to the Company / public interest;
- (iv) identified wrongdoers and the extent of their involvement;
- (v) root causes contributing to the Wrongdoings;
- (vi) related internal control weaknesses;
- (vii) corrective actions to mitigate the risk or recurring; and
- (viii) recommendations for consideration.

7.3.11 The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties information regarding the Wrongdoing or any part thereof, including the status or outcome of an investigation into it, except:

- to those who are authorised under this Policy;
- by lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law;
- if required by law; and
- on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

7.3.12 The Whistleblower shall not:

- contact the suspected wrongdoers to determine facts or demand restitution; and,
- discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigations.

7.3.13 Subject to the results of the investigation, the IDC / Audit Committee Chairman may request for additional evidence or information or if deemed necessary, instruct to commence a fresh investigation by the same or new Prescribed Officers, or any competent person as appointed.

7.4 Report Closure

- 7.4.1 Upon concluding the investigation and if the allegation involving employee is substantiated, the IDC shall recommend to the CEO and/or Audit Committee Chairman for disciplinary action to be taken in accordance with employee handbook as advised by Vice President, People & Organisation. Where applicable, appropriate controls may be instituted to prevent any further Wrongdoings or damage.
- 7.4.2 The CEO and/or Audit Committee Chairman in consultation with the legal advisors shall refer the findings of investigation to the competent authority if the allegations involved criminal offence.
- 7.4.3 The Management shall carry out the decisions of the CEO and/or Audit Committee Chairman and/or Board of Directors (as the case may be) in relation to the findings of the investigation.
- 7.4.4 The Whistleblower has the right to know the person in charge of the investigation and the processes of the investigation of his or her report.
- 7.4.5 With the consent of CEO and/or Audit Committee Chairman as permissible under the applicable laws, the Whistleblower may be notified of the outcome or action or decision taken by the Company as soon as practicable when the investigation is concluded.
- 7.4.6 The Whistleblower if unsatisfied with the outcome of investigation may provide additional evidence or information and/or institute a fresh report of the Wrongdoings.

8.0 PROTECTION TO WHISTLEBLOWER(S) AND REVOCATION OF PROTECTION

- 8.1 Upon making a report in accordance with the procedures pursuant to this Policy,
- (i) the Whistleblower shall be protected from Detrimental Action (as defined under item 2.1 above) as a direct consequence of the Whistleblower's disclosure;
 - (ii) the Whistleblower's identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings; and
 - (iii) Whistleblower who has witnessed a corruption activity will be considered as a witness and will be protected under the Witness Protection Act 2009.

- 8.2 Any report of Wrongdoings made in good faith, even if it is subsequently not confirmed by an investigation shall be eligible for protection under this Policy.
- 8.3 The grants of protection is subject to the following:
- (i) the disclosure is made in good faith;
 - (ii) the Whistleblower reasonably believes that the information, and any allegations contained in it, are substantially true; and
 - (iii) he/she is not acting for personal gain or agenda.
- 8.4 The protection accorded to a Whistleblower may be revoked if:
- (i) the Whistleblower participated in the Wrongdoings;
 - (ii) the Whistleblower wilfully discloses a false statement;
 - (iii) the disclosure is made with malicious intent;
 - (iv) the disclosure is frivolous or vexatious; or
 - (v) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.
- 8.5 The Company views seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary measures include formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment may be taken by the Company.

9.0 ADHERENCE TO WHISTLEBLOWING POLICY

If an Employee or external party wishes to make a disclosure or report of Wrongdoing pursuant to Whistleblower Protection Act 2010, then the reporting Whistleblower will have to make the said disclosure of Wrongdoings to the relevant Enforcement Agency. Any investigations and/or actions taken thereafter would be in accordance with the applicable laws and are independent of the procedures described in this Policy.

Whilst the Company respects the rights of Employees to directly make reports of Wrongdoings of an Employee or Director to an Enforcement Agency, the Company advises and urges the Employees to come forward to the Company first so that the Company can remedy any Wrongdoings at early stage to prevent any serious damage to the Company.

The whistleblowing policy is increasingly seen to be a critical element of the internal control system and corporate governance of organisations. The Company encourages employees harness on this effective platform that helping to create strong values, a culture of compliance and an ethical workplace.

-end-

FORM OF REPORT BY WHISTLEBLOWER OF WRONGDOINGS

Do you wish to identify yourself ?	: <input type="checkbox"/> Yes <input type="checkbox"/> No If yes please complete your particulars in Section A For Anonymous Reporting please complete Section B
------------------------------------	---

A. PERSONAL PARTICULARS OF WHISTLEBLOWER / REPORTER	
1.	Name : _____
2.	I/C No. / Staff No. / Passport No. (for foreigner) : _____
3.	Relationship with SMJE Group : <input type="checkbox"/> staff / employee <input type="checkbox"/> customer / supplier <input type="checkbox"/> director / shareholder <input type="checkbox"/> others: (please specify)
4.	Name / Address of Employer (if Whistleblower is not SMJE Group staff)
5.	Position / Department (for staff only) : _____
6.	Preferred Method of Communication : <input type="checkbox"/> mail (full address): <input type="checkbox"/> e-mail: <input type="checkbox"/> telephone / sms / whatsapp:

B. ANONYMOUS WHISTLEBLOWER / REPORTER	
1.	Do you wish to remain anonymous? : <input type="checkbox"/> Yes <input type="checkbox"/> No
2.	Are you willing to be a witness in any proceedings? : <input type="checkbox"/> Yes <input type="checkbox"/> No
3.	Do you have any relationship with SMJE Group : <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please specify : _____
4.	Do you wish to be contacted for further information to facilitate investigation : <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide contact method : _____

C. DETAILS OF ALLEGATIONS (please use different sheet for each person involved)									
1.	Date / Time / Location :								
2.	Category of Wrongdoings : <table style="display: inline-table; vertical-align: top; margin-left: 20px;"> <tr> <td><input type="checkbox"/> Fraudulent</td> <td><input type="checkbox"/> Corruption</td> </tr> <tr> <td><input type="checkbox"/> Harassment</td> <td><input type="checkbox"/> Discrimination</td> </tr> <tr> <td><input type="checkbox"/> Conflict of interest</td> <td><input type="checkbox"/> Abuse of Power</td> </tr> <tr> <td><input type="checkbox"/> Health and safety violation</td> <td><input type="checkbox"/> others: (please specify)</td> </tr> </table>	<input type="checkbox"/> Fraudulent	<input type="checkbox"/> Corruption	<input type="checkbox"/> Harassment	<input type="checkbox"/> Discrimination	<input type="checkbox"/> Conflict of interest	<input type="checkbox"/> Abuse of Power	<input type="checkbox"/> Health and safety violation	<input type="checkbox"/> others: (please specify)
<input type="checkbox"/> Fraudulent	<input type="checkbox"/> Corruption								
<input type="checkbox"/> Harassment	<input type="checkbox"/> Discrimination								
<input type="checkbox"/> Conflict of interest	<input type="checkbox"/> Abuse of Power								
<input type="checkbox"/> Health and safety violation	<input type="checkbox"/> others: (please specify)								
3.	Person Involved in the Allegation :								
4.	Reporter's relationship with Person involved in Allegation :								
5.	Details of Incident / Nature of Wrongdoings : Please submit supporting documents or evidence (if any) to facilitate investigation. (use additional sheets if necessary)								
6.	Name of Witness and Contact Details :								

D. REPORTING TO OTHER PARTIES	
	Have you lodged a report / complaint to the police, other government agencies or any other statutory / regulatory authority? <input type="checkbox"/> No <input type="checkbox"/> Yes (please give details and attach a copy of the report made) Report / File Reference No.: Name of Reporting Agency: Date of Report: Status of Report:

E.	DECLARATION
	<ul style="list-style-type: none">• I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge.• I fully understand that I may be subject to disciplinary actions or legal proceedings if the report found to be with malicious or defamatory intent.• I will ensure that my participation in this matter will be kept confidential.• I do understand that SMJE will use the information and material provided throughout the investigation process in accordance with the Whistleblowing Policy and Procedures of SMJE.• I further agree for SMJE to provide / disclose information provided herein to the enforcement agency for the purpose of investigation. <p>Signature:</p> <p>Name:</p> <p>Date:</p>

F.	FOR OFFICE USE ONLY
1.	Record No. :
2.	Received by :
3.	Date :
4.	Remarks :

Additional Information:

1. Your identity will be kept confidential and you will be entitled to Whistleblower protection as outlined in SMJE Whistleblowing Policy and Whistleblowers Protection Act 2010.
2. The completed form shall be delivered and/or emailed to -
 - (a) Registered Office: L2.02, Level 2 Plaza Shell, 29 Jalan Tunku Abdul Rahman, 88000 Kota Kinabalu, Sabah

Attn: (i) Chairman; or
(ii) Chairman of Audit Committee; or
(iii) Internal Auditors; or
(iv) Company Secretary; or
(v) If Wrongdoing involves the Chairman, to the Independent Director.
 - (b) Email Address: whistleblower@smjenergy.com