

# Integrated Audit Policy

## Whistleblowing Policy

Policy ID:		Effective Date:	06 Nov 2023
Owner:	Seatrium Integrated Audit	Last Revised Date:	NA
Reviewed By:	Compliance Committee	Next Review Date:	06 Nov 2025
Approved By:	Audit & Risk Committee	Page	1 of 7

- **Policy**

- Purpose

- The objective of this policy is to ensure any person may in confidence raise concerns about possible fraud, financial and/or non-financial improprieties/irregularities, and any such other misconduct that may adversely affect any Seatrium group company.
- To the extent that is reasonable and practicable, all reported concerns under this policy are confidential.
- Provide protection against reprisal for whistleblowers who report in good faith.
- Ensure that arrangements are in place to facilitate independent investigation of the reported concern and for appropriate follow up actions to be taken.
- Effective implementation of this policy is overseen by the Audit and Risk Committee (“ARC”).

- **Scope**

- This Policy applies to:

- Seatrium Limited (“the Company”), its subsidiaries and associated companies where the Company or its subsidiaries have management control; and
- All persons, including employees (i.e. directors, officers, full-time/ part-time/ permanent/ contract employees) in any Seatrium group company.

- **Definition**

“ARC” refers to the Seatrium Audit and Risk Committee.

“Company” means Seatrium Limited.

“Seatrium Group Company” means the Company, its subsidiaries and associated companies where the Company or its subsidiaries have management control.

“Employees” means all directors, officers and employees (including those of its subsidiaries and associated companies where the Company or its

subsidiaries have management control, wherever located.

“Investigation Team” refers to an independent investigation team appointed to conduct an investigation into the reported concern. Depending on the nature of the reported concern and subject matter expertise required, the Investigation Team should be staffed with individuals from relevant functions or external consultants (e.g. legal specialists, forensic professionals, expert witnesses) to assist with certain elements of the investigation or the whole investigation process.

“WAC” refers to the Whistleblowing Advisory Committee, which comprises the Chief People Officer, Chief Risk Officer, General Counsel, Head of Compliance and Head of Integrated Audit, and/or their designated representative. The WAC provides a well-rounded and balanced organisational structure in managing reported concerns, assessing the merits and implications of the reported concern and providing inputs to conducting investigations and any follow up actions.

“Whistleblower” refers to any person who makes a report under this policy and shall include those who wish to remain anonymous.

“Third Party” or “Third Parties” means any individual(s) not an employee of any Seatrium group company.

- **Scope**

- This policy shall be communicated as follows:
  - Referenced in the Supplier Code of Conduct for Third Parties;
  - To all new Employees during onboarding; and
  - As and when requested by the ARC.
- At any time, Employees are invited to seek clarification or advice from the Policy Owner / Integrated Audit when in doubt.
- All Employees have a duty to report a concern as soon as he/she becomes aware of a situation that may involve a potential wrongdoing. Doing so may help the Company prevent illegal or unethical misconduct, or may prevent a situation from escalating.
- The Company treats all reported concerns seriously and will direct resources to review each complaint. Reported concerns whether made anonymously or where the whistleblowers have identified themselves, shall be considered and investigated on the basis of their merit. If a complaint is deemed to contain inadequate detail and the necessary supporting information cannot be obtained from the Whistleblower(s)

then an investigation may not necessarily be carried out.

- The identity of the Whistleblower will be kept confidential, with disclosure on a need to know basis.
- Whistleblowers who report concerns under this policy shall be protected against any reprisal which includes:
  - demotion;
  - suspension;
  - termination of employment; or
  - any form of discrimination, harassment, intimidation or victimisation.
- If it is determined that the Whistleblower who is an Employee experienced any reprisal as a consequence of the reported concern, the retaliatory action shall be received, reviewed and investigated by the Company in the same manner as any complaint alleging possible improprieties. Appropriate remedial actions will be taken in the event that the reprisal was substantiated.
- The Company does not condone frivolous and/or malicious reporting. If the results of the investigation show that the Employee has acted maliciously in reporting his/her concern, he/she will be subjected to disciplinary action up to and including termination of employment.
- **Responsibility**
  - The ARC provides an oversight role to ensure that arrangements are in place for the lodging of whistleblowing complaints, independent investigation and the appropriate follow up actions to be taken.
  - The Whistleblowing Advisory Committee (“WAC”) supports the ARC in assessing the merits of each reported concern (where there is no concern regarding independence).
  - Any reported concerns received outside of the established reporting channels are required to be re-directed to the Head of Integrated Audit for appropriate action.
  - Employees who are interviewed or asked to provide information have a duty to fully cooperate with the appointed Investigation Team.
- **Procedures**

- Concerns may be submitted through the varied reporting channels (e.g. webform, email, telephone hotline) made available in the countries the Company operates in.
- A reported concern should, to the extent possible, include the following information:
  - Names and positions of people involved
  - Names and positions of any witnesses
  - Detailed description of the incident
  - Date, time and location of the incident(s)
  - How often the incident has happened
  - Property involved
  - Documented evidence (if any)
- The Company encourages Whistleblowers to identify themselves and provide their contact particulars. Further clarifications are often needed and helpful in facilitating investigations into the reported concerns. The ability to investigate depends on the sufficiency and quality of the information provided by the Whistleblower. Seatrium is committed to protect Whistleblowers under this policy.
- Any reported concern shall be dealt with in accordance with the process as set out in the Procedures.
- On a quarterly basis, Integrated Audit reports the following information to the ARC:
  - All reportable concerns received via whistleblowing channels;
  - Status and outcome of any preliminary assessment; and
  - Details, implementation progress and target completion date of remediation actions arising from the investigations.
- Any investigation details, reports and resulting actions are considered privileged and confidential information. Distribution and access to such information are restricted to the ARC, WAC and Integrated Audit. The ARC may grant access to such confidential information at its discretion, on a need to know basis.
- Where there are reasonable grounds to suspect any criminal conduct or regulatory violation that attracts civil or criminal sanctions, the Company will make the relevant disclosures and/or file a case with the relevant regulators and/or law enforcement authorities.

- **Review**

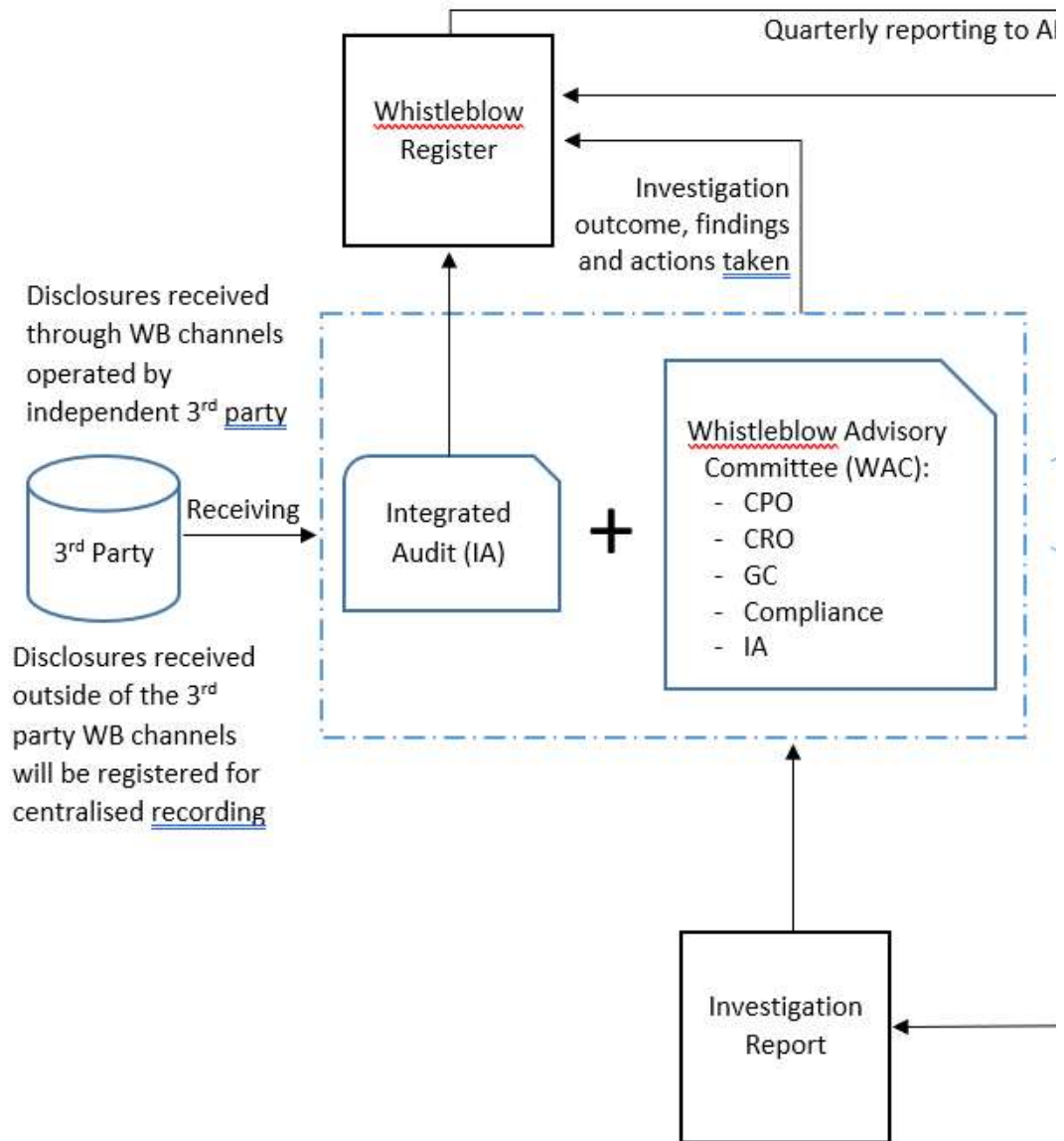
- This policy shall be subject to review once every two years or earlier as necessary.

- **Distribution List**

- All Employees.

• ANNEX A

Overview of the Whistleblowing Process



- **Linkages to Other Policies (if any):**

Supplier Code of Conduct
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- **10.Revision History:**

Version	Changes	Date	Author
1.0	Start of document control		