

Whistle-blowing Policy

Policy Statement:

NOBLE GA 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 above mentioned values, NOBLE GA provides avenue for all employees of NOBLE GA and members of the public to disclose any improper conduct within NOBLE GA.

Objective of Policy:

This policy is to provide an avenue for all employees of NOBLE GA 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.

Scope of policy:

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. 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;
- 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 NOBLE GA Code of Conduct (CoC) or any criminal offence under relevant legislations in force. This policy is 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 CoC shall be operative based on the purpose and objective of their existence.

Application of the policy:

Our Policy applies to every employee, director and officer of NOBLE GA. Joint venture companies in which NOBLE GA is not a controlling stakeholder and associate companies of NOBLE GA are encouraged to adopt this policy whilst our contractors, agents, outsourced workers and business associates are required to always act consistently with applicable parts of this policy when dealing with, action on behalf of or in the name of NOBLE GA. This policy also applies to members of the public, where relevant.

Procedure in Making a Disclosure:

All disclosures are to be reported via secured and confidential channel 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 NOBLE GA, 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 employee or member of the public who wishes to report improper conduct may remain anonymous.

Notification:

When you report a concern, you can expect that your report will be treated seriously, fairly and promptly. You may expect updates during and upon completion of our investigation, unless we take the view that disclosure may impede investigation.

NOBLE GA reserves the right to amend this policy from time to time.



Mohd Sani Akmar bin Abdul Ghafar
Managing Director
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