



Australian Addendum to PETRONAS Whistleblowing Policy

Application

This Addendum to the PETRONAS Whistleblowing Policy ("Addendum") applies to all Australian subsidiaries and all of PETRONAS' Australian current and past employees, directors, volunteers, officers, contractors, suppliers, consultants, business partners (including employees of suppliers, contractors, consultants and business partners) and associate companies, as well as these people's dependents (or their spouse's dependents) and their relatives.

In addition to the protections provided by PETRONAS' Whistleblowing Policy and this Addendum, the Corporations Act 2001 (Cth) (the **Act**) may entitle you to additional protections. To receive protection under the Act, disclosure must meet certain criteria. The law also protects certain disclosures made in emergency and public interest situations, in which case disclosures can be made to additional recipients.

To the extent of any inconsistency between this Australian Addendum and the balance of PETRONAS' Whistleblowing Policy, this Addendum will apply.

Protected Disclosure under the Act

A "protected disclosure" must relate to "disclosable matters" and be made to "eligible" persons or organisations. Examples of this type of information and recipients are outlined in the following table:

Information reported or disclosed	Recipient of disclosed information
Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to PETRONAS or a related body corporate	<ul style="list-style-type: none">• A person authorised by PETRONAS to receive protected disclosures under this policy.• An officer or senior manager of PETRONAS or of a related body corporate.• An auditor, or a team member of an audit team conducting an audit of PETRONAS or a related bodies corporate.• An actuary of PETRONAS or of a related body corporate.



Information reported or disclosed	Recipient of disclosed information
<p>Information that PETRONAS or any officer or employee of PETRONAS has engaged in conduct that:</p> <ul style="list-style-type: none"> • contravenes or constitutes an offence against certain legislation (e.g. the Act); • represents a danger to the public or financial system; or • constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. 	<ul style="list-style-type: none"> • Australian Securities and Investments Commission (ASIC) or Australian Prudential Regulation Authority (APRA). • A legal practitioner in some cases.

Under certain circumstances allowing emergency and public interest disclosures, the Act also protects disclosures made to journalists or parliamentarians. It is important for you to understand the criteria for making a public interest or emergency disclosure before doing so.

Note that "personal work-related grievances" are not protected disclosures under the law. For the avoidance of doubt, neither the Act nor this Addendum covers disclosures about something in relation to your current or former employment or engagement that has implications for you personally. For example, a conflict between the discloser and an employee, a decision relating to the engagement (including its terms and conditions), transfer or promotion of the discloser or a decision relating to the termination of the discloser's engagement. For such matters, you should refer to your Head of Department or your HR Department, or your PETRONAS contact person.

Protection of Identity

The priority at PETRONAS is to protect people who make a "protected disclosure", disclose potential violations of the Code of Conduct and Business Ethics (CoBE) or matters relating to the suspected wrongdoing or dangers to PETRONAS' activities. If you make a disclosure, your identity (and any information that we have because of your disclosure that someone could likely use to work out your identity) will only be disclosed if:

- you give your consent to PETRONAS to disclose that information;
- the disclosure is allowed or required by law (for example, the disclosure by PETRONAS to a lawyer in order to get legal advice, or to a Commonwealth agency such as ASIC, APRA and the Australian Federal Police); or
- in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out your identity.

Subject to your consent, measures which PETRONAS may adopt to protect your identity may include but will not be limited to some or all of the following, as appropriate in the circumstances:

- using a gender-neutral context or pseudonym in place of your name;
- redacting personal information or references to you; and
- if you choose to remain anonymous, communicating with you will be through anonymous avenues available.



If a whistleblower has concerns that their identity has been disclosed without their consent, and they (or someone else) has been subjected to detrimental conduct, they should report this to an eligible recipient. If the whistleblower's concern relates to the person to whom the initial disclosure was made, the whistleblower's concern regarding the breach of confidentiality obligations should be made to another eligible recipient.

Response by PETRONAS to a Disclosure

Disclosures made by you under this policy will be received and treated sensitively and seriously, and will be dealt with promptly and objectively while making a disclosure does not guarantee that the disclosure will be formally investigated, all reports will be assessed and considered by PETRONAS and a decision made as to whether they should be formally investigated or internally resolved. PETRONAS' response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided).

The party receiving the disclosure will keep in contact with disclosers until the matter is resolved by PETRONAS. If appropriate, disclosers may be advised how PETRONAS has decided to respond to their disclosure, including whether an investigation will be conducted. This may not occur until after an investigation has been concluded. However, it may not always be appropriate to provide disclosers with this information, and may not be possible unless contact details are provided when a disclosure is made.

Any investigations commenced will be conducted in a timely manner (as appropriate in the circumstances) and will be independent from any persons to whom the disclosure relates. Investigations will generally be overseen by PETRONAS. Other people, including employees or external advisers, may also be asked to assist or run the investigation.

All employees and contractors must cooperate fully with any investigations.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the allegation at an appropriate time, and will be given a chance to respond to the allegations made against them.

If a disclosure is formally investigated, the results of any investigation will be recorded in writing in a formal internal report that will be confidential and is the property of PETRONAS. The outcome of any investigation will be reported to the PETRONAS Management, or a committee thereof.

If appropriate, disclosers may be informed of the investigation outcome. However, it may not always be appropriate to provide disclosers with this information. If appropriate, the persons to whom the disclosure relates may also be informed of the findings of any investigation. However, the formal report recording the results of an investigation will not be provided to a discloser or any other person subject to investigation.

Specific Protections and Remedies

If you make a "protected disclosure", the law provides:

- you are not subject to any civil, criminal or administrative liability for making the disclosure;
- no contractual or other remedy may be enforced or exercised against you on the basis of the disclosure; and
- in some circumstances (e.g. if the disclosure has been made to a regulator), the information you provide is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information.

Additional legislative protections and remedies may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effect of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;



- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position; and
- any other order the Court thinks appropriate.

In addition to the above and the protections set out under the policy, below are further protections which are provided to disclosers who make a "protected disclosure", a disclosure about potential violations of the CoBE or matters relating to the suspected wrongdoing or dangers to PETRONAS' activities made pursuant to this policy.

No person may victimise or cause detriment to someone (or threaten to do so) because of a suspicion that any person has, will or could make a disclosure. For example, victimisation could include doing or threatening to do something that creates:

- discrimination, detriment or damage to a person's reputation, property or financial position;
- harassment, intimidation or retaliation or harm including psychological harm; or
- a demotion or dismissal.

PETRONAS is also committed to making sure that you are treated fairly and do not suffer detriment because you have made a "protected disclosure", a disclosure about potential violations of the CoBE or matters relating to the suspected wrongdoing or dangers to PETRONAS' activities. The protections offered will be determined by PETRONAS and depend on things such as the matter reported and people involved. Protections may include the following, in PETRONAS' discretion:

- relocating individuals (which may include the people alleged to have been involved in the "malpractice") to a different division, group or office;
- offering you a leave of absence or flexible workplace arrangements while a matter is investigated; or
- rectifying any detriment that you have suffered.

PETRONAS will look for ways to support all people who make a disclosure, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where aspects of this policy cannot be applied to non-employees (for example, because PETRONAS cannot itself offer flexible workplace arrangements to a supplier, contractor, contractor, consultant and business partner), PETRONAS will still seek to offer as much support as practicable.

For the avoidance of doubt, PETRONAS will at all times be able to raise and address with the discloser, matters that arise in the ordinary course of their employment or engagement with PETRONAS (for example, any separate performance or misconduct concerns or managing unsatisfactory work performance of a discloser).

Availability of Policy

PETRONAS will seek to ensure that employees (including new employees) are informed about and understand PETRONAS Whistleblowing Policy and this Addendum.

For the avoidance of doubt, this policy does not form part of any terms of employment or engagement and PETRONAS may amend, apply or withdraw this policy in its discretion.

A copy of the PETRONAS Whistleblowing Policy will be available on PETRONAS' website and intranet. If you have any questions in relation to the application of this PETRONAS Whistleblowing Policy and this Addendum or require additional information about the content of this policy (even if you choose to remain anonymous), you can contact a member of the Group Integrity team or the Legal Compliance Department team.