

## WHISTLE BLOWING POLICY

### BLOW THE WHISTLE ON BAD BEHAVIOR!

#### 1.0 POLICY STATEMENT

The Steamships Group adheres to the highest standards of business ethics, conducting all its businesses with integrity, promotes fairness and respect among all employees.

#### 2.0 OBJECTIVE OF THIS POLICY

The purpose of the Steamships Whistleblowing Policy is to provide guidelines for any individual (whistleblower) who wants to raise concern on unethical conduct, fraud, perceived wrongdoings or violation to any provisions of the Steamships Code of Conduct ("Improper Conduct"). This policy is a supplement to Clause 19 of the Code of Conduct.

#### 3.0 APPLICATION OF THE POLICY

The policy applies to all employees of the Steamships Group (the Group) and related parties where Steamships has business dealings. All individuals are encouraged to be vigilant and raise a bona fide concern in good faith to the appropriate personnel without fear of losing their jobs, business dealings or becoming a victim of intimidation and harassment. The Group

will maintain strict confidentiality of the reported matters.

#### 4.0 STATEMENT OF SUPPORT TO WHISTLEBLOWERS

The Group is committed to the aims and objectives of this Policy where Whistleblowers are protected to come forward in good faith and on a proper basis to disclose unethical business conduct and other wrong doings (“improper conduct”).

#### 5.0 IMPROPER CONDUCT

For the purpose of this Policy, Improper Conduct is defined as:

- I. corrupt, fraudulent or other illegal conduct or activity;
- II. conduct that this contrary to, or a breach of, Steamships Codes and Policies;
- III. a substantial mismanagement of the Group’s resources;
- IV. conduct involving substantial risk to public health or safety; or
- V. conduct involving substantial risk to the environment that would, if proven, constitute by the Group or its employee/s a criminal offence;
- VI. reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of a Steamships employee/s who was, or is, engaged in that conduct; or
- VII. reasonable grounds for disciplinary action.

#### 6.0 WHISTLEBLOWING PROCEDURES

6.1 To report a genuine concern, the matters should be initially reported to the direct manager.

6.2 If the whistle blower is uncomfortable to report the matters through normal reporting procedures or no satisfactory actions are taken the matter must be escalated to the

Steamships Internal Audit (STCIA).

6.3 STCIA will conduct initial assessment of the case.

6.4 If the disclosures are made in good faith, STCIA will gather information and undertake an appropriate investigation.

6.5 Recommendations on the outcome will be given to the appropriate senior management authority to address the matter.

6.6 This Policy is not designed to deal with general employment grievances and complaints.

Any report treated in accordance with this Policy must be for one of the Improper Conduct as outlined above. All general employment complaints or grievances will be forwarded to the respective divisional manager or GM Human Resources to address.

#### 7.0 WHISTLEBLOWING CHANNELS

7.1 Individuals may report their concern through various channels:

- i. Via email at [stcia@steamships.com.pg](mailto:stcia@steamships.com.pg).
- ii. A text message can be sent to the dedicated Mobile Number 71004481.
- iii. Postal Address at Steamships Trading Company Limited,  
c/o Group Internal Auditor, P.O. 1, Port Moresby.

Are you aware of any unethical conduct, fraud, perceived wrongdoings, or violation of the Steamships Code of Conduct?

If so, then our Whistleblower policy, allows you to report any such incident, in the knowledge that it will be done so confidentially and that your identity will be protected at all times!

It's simple. Send a text to 71004481 or an e-mail to:

[stcia@steamships.com.pg](mailto:stcia@steamships.com.pg) and the matter will be appropriately dressed.

You can mail it to; Steamships Trading Company Limited,  
c/o Group Internal Auditor, P.O. 1, Port Moresby.