

BASF Global Compliance Hotline [Simplified Version]

1 Introduction

BASF PETRONAS Chemicals Sdn Bhd (“BPC”) is committed to high standards of legal compliance and business ethics. Each BPC employee is personally responsible to abide by the standards set by our Code of Conduct, BPC policies as well as applicable local laws.

2 Compliance Hotline

BPC subscribes to the group global compliance hotline service, namely BASF Global Compliance Hotline, which is operated and administrated by an independent service provider. The hotline is available to all BPC employees as well as third parties.

3 Objective

The Compliance Hotline is a confidential channel through which a complainant can ask a question and/or report a concern about actual or potential misconduct, violations of regulations or laws and BPC policies and our Code of Conduct.

4 Protection

Non-Retaliation

BPC will not tolerate retaliation against anyone who reports in good faith any observed, or suspected, illegal or unethical behaviour, Code-related policy violations, or participates in an investigation, even if the allegation ultimately is not substantiated.

Any such retaliation would undermine the trust that is essential to our success, and would be treated as serious misconduct, resulting in disciplinary action.

All BPC employees and third parties are encouraged to seek advice or report concerns without fear of retaliation.

Confidentiality and Security of Information

All information and personal data reported in the hotline system will be treated in a confidential manner and is fully secured. The confidential information is only accessible by the authorised BPC Compliance Officer.

5 Reporting

When to report?

Any concerns regarding potential or actual violations of law, Code-related and BPC’s policies and guidelines must be reported. If a BPC employee or third-party feels uncomfortable speaking to the supervisor, the Legal and Compliance Team or any other internal contact person about the concerns, the Compliance Hotline allows the employee to file a report or ask a question, including doing so anonymously.

How to report?

A concern can be reported via the following options:

- a) Online via <http://basf.ethicspoint.com>
- b) Mobile via basfmobile.ethicspoint.com or QR Code



- c) Malaysia local toll-free telephone number at 1 800 81 2487 (*both English and Bahasa Malaysia language available*)

What to report?

The category of irregularity, violation and improper conduct are pre-defined and available in the Compliance Hotline as follows:

- Anti-Corruption & Bribery
- Trade Control/Compliance (Import & Exports)
- Anti-Money Laundering
- Anti-Trust and Fair Competition
- Gifts & Entertainment
- Conflicts of Interest
- Labour & Social Standards, including respect in the workplace
- Further Human Rights
- Environmental Protection, Health & Safety
- Information Protection and Insider Trading
- Protection of Personal Data
- Company Property (Fraud, Theft)
- Accurate Books and Records
- Ask a question
- Other Concerns

Report Anonymously

Anonymous reporting is one of the two options available when reporting a concern or making an inquiry to the Compliance Hotline. The service provider does not generate or maintain any internal connection logs with IP addresses, so no information linking the whistleblower's computer to the Compliance Hotline is available. However, if a whistleblower wishes to remain anonymous, the whistleblower needs to ensure that his/her report does not reveal his/her identity by accident.

The Compliance Hotline also allows anonymous "Web chats" between whistleblower and the investigation team if additional information is necessary and enables the whistleblower to receive notice upon the conclusion of an investigation. Therefore, it is important to follow up on the report regularly, using the report key and password generated.