



# DAWN RAID POLICY

Page 1 of 20

## CONTROL PAGE

REVISION/VERSION	DESCRIPTION OF REVISION	REVISION DATE
0	Original Issue	23 November 2018
1	Revision	August 2020
2	Revision	January 2022
3	Revision(s): (a) change of policy name from Raid Primer to Dawn Raid Policy; and (b) revision to content	27 November 2024

**Important:** This Policy is a Restricted document. Neither the whole nor part of this Policy may be disclosed to any third party/external parties without the prior written consent of the Company.

© Hengyuan Refining Company Berhad (Company No.: 196000100259 (3926-U))

Key Focal Point:	Sponsor:
<i>Diana Tan</i>	<i>Yeo Bee Hwan</i>
<b>Diana Tan Legal Manager</b>	<b>Yeo Bee Hwan Chief Financial Officer</b>

Revision: 3

Revision Date:  
27 November 2024



**TABLE OF CONTENTS**

<b>ITEM</b>	<b>SUBJECT</b>	<b>Page</b>
<b>Chapter 1</b>	<b>INTRODUCTION</b>	
1.1	Purpose and scope	3
1.2	Definitions	3
<b>Chapter 2</b>	<b>RAID</b>	
2.1	What is a raid	4
2.2	List of possible raids	4
2.3	Raids arising from enforcement of court orders	5
<b>Chapter 3</b>	<b>LEGAL PRIVILEGED DOCUMENTS</b>	
3.1	What are legally privileged documents	7
3.2	Legal Professional Privilege DOs and DONT's	8
3.3	Confidential Documents	8
<b>Chapter 4</b>	<b>ACTION PLAN</b>	
4.1	Checklist when a Raid occurs	9
4.1.1	Checklist for receptionist / security/ Government Relations upon arrival of Government Officials	9
4.1.2	Checklist For Senior Management / Legal Department / Security / Government Relations Upon Arrival of Government Officials	10
4.1.3	Checklist for investigation team during conduct of investigation	12
4.1.4	Checklist for Senior Management and Investigation Team after the investigation	14
4.2	Parties to be kept in the loop	15
<b>Chapter 5</b>	<b>APPENDICES</b>	
	Appendix A – Focal Point and Contact Numbers	17
	Appendix B – Frequently Asked Questions (FAQ's)	20



**CHAPTER 1: INTRODUCTION**

**1.1 Purpose and scope**

The current climate in which businesses operate is one of increasing regulatory supervision and intervention. More and more unannounced inspections, called “dawn-raids” are becoming a regular feature of Malaysian businesses.

The aim of this Policy is to:

- a. prepare Company’s employees for the sudden appearance of Government Official at Company premises demanding to inspect and obtain Company’s Books and Records and interview employees;
- b. provide clear guidelines and checklist for employees to follow in the event of a Raid;
- c. minimise any physical, financial and reputation damage to the Company as a result of poor handling of these Raids.

There may be times when the Government Official chooses to make advance appointment to meet with key personnel from the Company pursuant to an investigation which they are conducting. They may or may not make known the purpose of the appointment. In such situations, where the Government Official arrives at the Company’s premises following a prior appointment made with staff, such visit should still be considered a “Raid” and the procedures specified in this Policy should equally apply.

**1.2 Definitions**

- “Books and Records”** refers to means books, accounts, contracts, records and documentation related to the Company (both financial and non-financial), in electronic format or otherwise.
- “Company”** refers to Hengyuan Refining Company Berhad (Company no: 196001000259) (3926-U)
- “External Lawyer”** refers to external lawyers from private law firm appointed to represent or provide advice to the Company.
- “Government Official”** refers to any regulatory body or any official or employee of, any government or any agency, ministry or department of any government (at any level), acting in an official capacity, authorised to conduct the Raid.
- “Investigating Team Lead”** refers to individual or team in charge of investigation internally.



- “Legal Department”** refers to Legal department of the Company.
- “Policy”** refers to this Dawn Raid Policy.
- “Raid”** refers to (1) an unannounced and unplanned visit by Government Official pursuant to powers given under the law; or (2) scheduled or appointment made in advance by Government Official, to interview, request for Books and Records, search the Company’s premises and/or to seize Company’s property (including any Books and Records) for the purpose of investigating an alleged or suspected offence or to comply with orders of court.
- “Senior Management”** refers to Chief Executive Officer, Chief Financial Officer and Chief Government Relation Officer of the Company

**CHAPTER 2: RAID**

**2.1 What is a Raid?**

- 2.1.1 A Raid in the context of this Policy refers to (usually) an unannounced and unplanned inspection by Government Official on Company’s premises. As mentioned above, even though the Government Officials’ visit to the Company’s premises is pursuant to a prior appointment made, such visits by appointment should still be treated as a Raid because of the Government Officials’ wide power to request documentation and interview Company’s employees.
- 2.1.2 A Raid need not occur at dawn but the key feature of a raid is the element of surprise. It is the intention of the Government Officials when investigating certain alleged or suspected offences, not to give prior warning of a raid to the company or person under investigation to prevent any tampering of evidence.
- 2.1.3 These Government Officials are given wide powers under the relevant legislations, such as the authority to enter by force upon the Company’s premises and seize all Books and Records necessary to facilitate the investigation.

**2.2 List of possible Raids**

- 2.2.1 The right or power to raid private premises is lawful in two ways:
- a. in the course of enforcing a court order; or
  - b. pursuant to a right or power under a particular legislation.
- 2.2.2 The list below highlights the most common situations in which possible raids may occur but they are not exhaustive.



**2.3 Raids arising from enforcement of Court Orders**

2.3.1 Writ of Seizure and Sale

- a. A writ of seizure and sale is issued in accordance with Order 47 of the Rules of Court 2012 to enforce a judgment or order of the Court for the payment of money to any person or into Court, and all the property, movable or immovable, of a judgment debtor may be seized.
- b. The Government Officials who carry out the execution of the writ is the sheriff of the Court, as well as the bailiff;
- c. The writ may be executed between 9am to 4pm, although the sheriff may order otherwise. Where any movable property is seized, the sheriff or bailiff must give notice of seizure to the judgement debtor (Company). An inventory of seized property must also be given; and
- d. Where immovable property is to be seized, the Court shall make an order prohibiting the transfer, charge or lease of such property. A copy of that order is then served to the judgement debtor (Company).

2.3.2 Anton Piller Order

- a. An Anton Piller order is a court order issued against a party to permit another party's representatives to enter the premises to inspect and remove vital materials, which might be destroyed or disposed of so as to defeat the ends of justice. This order is applied for ex-parte, i.e. without the knowledge of the party whose premises are to be entered.
- b. Non-compliance with this order amounts to contempt, and the offending party is liable to contempt proceedings.
- c. The order will usually contain an address of the premises to be entered, a list of items, which are sought after, and other conditions including whether or not owners or occupiers of the premises can or must be present while the search and seizure is ongoing. These terms of the order must be strictly adhered to, and any non-compliance can result in the order being set aside and any seized items returned.

2.3.3 Injunction

- a. This is a court order which compels the Company either to carry out or refrain certain acts. Where the Court considers it necessary or expedient for the purpose of obtaining full information or evidence in any cause or matter. The Court may by order authorize any person to enter upon any immovable property in the possession of a party to the matter under trial (Order 29 Rule 2 Rules of the Court 2012), authorize the taking of any sample which is the subject matter of the court proceedings. An injunction may be permanent or temporary in nature.



- b. A preliminary injunction (or interlocutory) is a remedy granted to restrain activity on a temporary basis until the court can make a final decision after the trial; and
- c. Failure to comply with an order of injunction can result in contempt of court and the person who breached the injunction will be liable for fines and imprisonment.

## **2.4 Raid by Government Officials**

- 2.4.1 Many Government Officials are authorized to conduct raids on business premises for the purpose of enforcing the law for which they are given responsibility, and each Government Official has its own specific powers. For example, the Ministry of Domestic Trade, Co-operatives and Consumerism is responsible for the enforcement of the Control of Supplies Act 1961 and the Trade Descriptions Act 2011.
- 2.4.2 No other Government Official may assume powers which are solely granted to another. Thus, officers from, for example, the Ministry of Human Resources cannot conduct a raid based on the two abovementioned laws as it is not empowered to do so.
- 2.4.3 It is important to check the identification of the Government Official conducting the raid to determine their powers and the limits of those powers. Some raids require a warrant, which must be issued by the Court. Others merely require reasonable cause by the raiding authority to believe that by reason of delay in obtaining that warrant, the subsequent raid may be adversely affected. A raid conducted without proper authority will render it unlawful.
- 2.4.4 The identification and determination of the Government Official's powers ensures that the Raid can be conducted in accordance with the applicable legislation or pursuant to an order of the Court. Although non-exhaustive, the following are several government authorities that may conduct a raid.
  - a. Malaysian Anti-Corruption Commission (MACC)
  - b. Communications and Multimedia Commission (CMC)
  - c. Companies Commission Malaysia (CCM)
  - d. Department of Environment (DOE)
  - e. Department of Occupational Safety and Health (DOSH)
  - f. Inland Revenue Board (IRB)
  - g. Ministry of Domestic Trade Co-operatives and Consumer Affairs (MDTC)
  - h. Ministry of Human Resources
  - i. Royal Malaysian Customs
  - j. Securities Commission (SC)
  - k. Personal Data Protection Commissioner
  - l. Director General of Immigration
  - m. National Wages Consultative Council
  - n. Ministry of Plantation Industries and Commodities
  - o. Labuan Financial Services Authority
  - p. Employees Provident Fund Board (EPF)
  - q. Social Security Organisation Board (SOCSO)
  - r. Malaysia Competition Commission (MCC)
  - s. Police Powers



**CHAPTER 3: LEGALLY PRIVILEGED DOCUMENTS**

**3.1 What is legally privileged document**

Equally important in being prepared for a Raid, is understanding the term "Legal professional privilege". Creating staff awareness that certain documents are legally privileged will help the lawyers tremendously in managing the flow of sensitive information during Raid. Below are common queries relating to legal professional privilege, which resemble a basic guide to key principles governing this concept.

**3.1.1 What is the concept of privilege?**

In litigation or other adversarial proceedings, a party is entitled to refuse to produce for inspection 'privileged' documents in its power, possession and control.

**3.1.2 What do you mean by a document?**

A 'document' is anything that is recorded: letters; agreements; computer documents; telephone tapes; e-mails; voicemails; text messages; diary entries etc.

**3.1.3 Are there many types of legal professional privilege?**

There are two types of legal professional privilege, namely, legal advice privilege and litigation privilege.

**3.1.4 What is legal advice privilege?**

Legal advice privilege protects communication between an external counsel in his professional capacity and his client, provided they are confidential and are for the purposes of seeking or giving legal advice. Documents sent to or from an independent third party (even if created with the dominant purpose of obtaining legal advice) are not covered by this privilege.

**3.1.5 What is litigation privilege?**

Litigation privilege arises when litigation or other adversarial proceedings are commenced or reasonably contemplated. It is wider than legal advice privilege and protects all documents produced for the sole or dominant purpose of the litigation, including all communications between:

- a. an external counsel and his client;
- b. an external counsel and his non -professional agent; or
- c. an external counsel and a third party.

**3.1.6 Is legal professional privilege important to the Company?**

Yes, maintaining legal professional privilege is an important issue for the Company.

**3.1.7 Why is it important here?**

Essentially, if a document is 'privileged', it does not have to be disclosed to the Government Official during a Raid.



**3.2 Legal Professional Privilege DO's and DONT's**

**DO'S:**

- ✓ Ensure requests for legal advice are made in writing.
- ✓ Ensure all communications to the External Lawyer are marked "confidential" and communications from External Lawyer will be marked "privileged and confidential."
- ✓ Remember that communications containing or relating to legal advice should never be copied or forwarded to anyone outside of the Company without first seeking the consent of the Legal Department.
- ✓ Remember that all communications with External Lawyer must go through the Legal Department. If you have to show privileged documents to another company or entity, do make clear that privilege is not being waived.

**DONT'S:**

- ✗ Do not assume that all communications with External lawyer will always be privileged, it depends on what they are about and why they are created.
- ✗ Do not assume that privilege cannot be challenged.
- ✗ Do not engage in email 'chit-chat' on sensitive or confidential matters.
- ✗ Do not circulate privileged documents without first checking with the Legal Department .
- ✗ Do not destroy relevant documents if there is prospect of proceedings or investigation: If in any doubt or there is any sensitivity, consult with Legal Department.

**3.3 Confidential Documents**

3.3.1 The Company has a standard classification on Books and Records (both softcopy and hardcopy) which are divided into four (4) categories: (a) unrestricted, (b) restricted, (c) confidential; and (d) highly confidential:

<b>Highly Confidential</b>	refers to highly sensitive information involving business. Unauthorised disclosure/leakage of highly confidential information may have potential significant and high impact to Company's business continuity (only selected individuals in the Company management shall have access to the information, subject to signing of non-disclosure agreement and obtaining prior written approval of Senior Management.
<b>Confidential</b>	refers to information that is confidential and created or received in the course of doing business. Unauthorized disclosure/leakage of confidential information may have moderate impact on a segment of business/stakeholders. Limit access to specific person or within section/department use only, and subject to obtaining prior written approval of Chief Executive Officer or Chief Financial Officer.





# DAWN RAID POLICY

<b>Restricted</b>	refers to information that includes information created or received in the course of business and mainly used internally. Unauthorized disclosure/leakage of restricted information may have impact to Company’s financial exposure. Limit access to Company’s internal use only (all departments) and subject to the discretion of head of departments, provided that Legal department is notified in writing, of such disclosure.
<b>Unrestricted</b>	refers to information that is usually non-sensitive and can be obtained freely by anyone (public). Unauthorised disclosure/leakage of unrestricted information may have little or no impact to Company’s financial exposure.

## CHAPTER 4: ACTION PLAN

### 4.1 CHECKLIST WHEN A RAID OCCURS

#### 4.1.1 CHECKLIST FOR RECEPTIONIST/SECURITY/GOVERNMENT RELATIONS UPON ARRIVAL OF GOVERNMENT OFFICIALS

1.	<p>Upon arrival of the Government Officials at the Company’s premise, they will usually approach the front desk or security and ask to see a person in charge. They may or may not give further details.</p> <p>The following actions must be taken by the receptionist or security:</p> <ul style="list-style-type: none"> <li>a. ask each of the Government Officials to show their ID cards.</li> <li>b. immediately inform and call the Government Relations, Legal Department and Senior Management.</li> <li>c. make a photocopy of each Officials’ ID card whilst waiting for Government Relations.</li> </ul>	
2.	<p>If the Government Officials ask the receptionist or security personnel to sign any document (e.g. acknowledgement of meeting, etc), politely inform the Government Officials to liaise with Legal Department and/or Government Relations.</p> <p>Only a Senior Management and/or the Legal Department may sign any documentation before it is provided to the Government Officials.</p>	



## DAWN RAID POLICY

3.	Politely inform the Government Officials that someone from Government Relations will be with them shortly. Offer them refreshments while they wait. Never leave the Government Officials unattended at any time. The Government Officials should always be escorted by Government Relations, even to the toilet, and must not be allowed to wander or conduct questioning unless accompanied. The front desk should not allow the Government Officials through the barrier until they can be escorted by personnel from the Government Relations department.	
4.	If the Government Officials ask any questions, politely inform them to wait for Government Relations. Do not volunteer any information prior to the arrival of Government Relations.	
5.	Once Government Relations arrives and upon confirmation that the Government Officials' identification documents and the authorisation papers (search warrant) are in order, issue the security passes to the Government Officials. Government Relations shall escort the Government Officials through the barrier to a private meeting room.	
6.	Receptionist to arrange for suitable meeting room to house the Government Officials for the rest of the day.	
7.	Do not discuss the Government Officials' visit with anyone. Do not talk about the visit in the open (e.g. pantry, lift, toilet, reception area) where the conversation might be overheard.	
8.	Ensure the relevant approval has been obtained from the Legal Department and the Senior Management prior to any Books and Records being given to the Officials. Ensure a list is prepared for any Books and Records given to the Government Officials, including copies of the Books and Records attached to the list.	

### 4.1.2 CHECKLIST FOR SENIOR MANAGEMENT/ LEGAL DEPARTMENT / GOVERNMENT RELATIONS UPON ARRIVAL OF GOVERNMENT OFFICIALS

1.	Upon receiving a call from receptionist or security that there are Government Officials at the reception area, Government Relations should immediately leave their current tasks and proceed to the reception area.	
----	---	--



## DAWN RAID POLICY

2.	<p>Upon being introduced to the Government Official by the receptionist or security, check that the receptionist or security has photocopied all the Government Officials' ID cards. Politely request to sight the ID Card of every official and verify their names and faces against the ID Cards. Confirm their individual role and purpose of visit. Ask for authorisation papers, e.g. search warrant, and verify that they are also in order, e.g. original signature, bears the signature and stamp of the Deputy Public Prosecutor or correct name of the Company. Errors in warrant or document may render inspection unlawful so a copy should be made and Legal Department to note the copy clarifying the error.</p>	
3.	<p>Acknowledgement of visit is to be done by Government Relations and/or Legal Department only.</p>	
4.	<p>The Government Officials are to be led to a meeting room which may be their base for the rest of the period of the investigation. Arrange for refreshments to be served to the Government Officials while the Government Relations, Legal Department and/or department in contact with the Government Officials prior to a scheduled visit, discusses with the Government Officials and narrows down the area of inquiry.</p>	
5.	<p>If this is not done, the Senior Management shall facilitate the formation of an Investigation Team. The Investigation Team should be led by a Senior Management (Lead Investigator) and consist of members from Government Relations, Legal Department, Internal Audit, Risk &amp; Integrity and such other members as the Senior Management may decide.</p> <p>The Investigation Team shall be the focal points for the investigation and discussion with the Government Officials. Additional people may be needed to assist with photocopying and note taking. The names and contact numbers of every Company's staff involved in the Raid must be made available.</p> <p>Make sure every member of the Investigation Team is provided with:</p> <ol style="list-style-type: none"><li>a brief update of the situation;</li><li>their exact roles and the need to be discreet and keeping all things in confidence;</li><li>each other's mobile numbers; and</li><li>a copy of the Government Officials' mandate, ID Cards, search warrant and any other documents provided by the Government Officials.</li></ol> <p>If the Government Officials are based in the meeting room for the duration of investigation, then the Investigation Team is to be based in a meeting room as near to the Government Officials as possible for the entire duration of the investigation.</p>	



## DAWN RAID POLICY

6.	Once the Raid (investigation, questioning) commences, Investigation Team to take notes of exactly what the Government Officials do including copying every document that they seize and noting all conversations that pass between the parties.	
7.	Ensure the relevant approval has been obtained from the Legal Department and the Senior Management prior to any Books and Records being given to the Officials.	

### 4.1.3 CHECKLIST FOR INVESTIGATION TEAM DURING CONDUCT OF INVESTIGATION

1.	<p>Try to agree with the lead Government Official to take only photocopies and not originals of Books and Records as well as to make two (2) copies of all Books and Records taken. This will help the Company to have a complete record of all Books and Records seized. Ensure that the Books and Records requested are within the scope of the Raid.</p> <p><u>*Important:</u> it is important during the conduct of investigation, to build rapport with the Government Officials in order to facilitate a relaxed atmosphere. It is easier to ask questions (e.g. when we want to narrow the scope of investigation) and make requests (e.g. when we ask for copies of documents or time extensions) if the mood is lighter and friendlier.</p>	
2.	<p>Where permitted, all questions and any interviews with individual staff must be done in consultation with the Legal Department. Interviewee should:</p> <ul style="list-style-type: none"><li>a. not lie.</li><li>b. keep answers short and simple where possible;</li><li>c. limit answers to 1<sup>st</sup> hand knowledge;</li><li>d. only answer questions of a factual nature. Do not offer opinions or views;</li><li>e. not speculate or guess;</li><li>f. not answer or elaborate outside the scope of the question;</li><li>g. whilst being cooperative, do not try to fill the silences between questions by volunteering information;</li><li>h. not respond to or confirm any allegations put forward by the Government Official;</li><li>i. not correct wrong questions but wrong answers should be corrected as soon as the mistake is realised; and</li><li>j. do not answer questions that are subject to privileged legal advice;</li></ul>	

**DAWN RAID POLICY**

3.	<p>Obtain the consent of the Senior Management and the Legal Department before any Books and Records are provided to the Government Officials, or before access to computer data is given to Officials.</p> <p>If computer access is requested, upon the necessary approvals being obtained, immediately contact the Focal Point for IT to be present to oversee the back-up of all necessary files if any laptops or workstations are seized or being searched.</p>	
4.	<p>Try to keep the Government Officials in one meeting room only and the Investigation Team should also be situated in a meeting room near to the Government Officials. If possible, have only one person to bring the requested Books and Records to the Government Officials.</p>	
5.	<p>Set internal deadlines to allow the Investigation Team to screen through the Books and Records before handing over to the Government Officials. Compile an inventory list of documents before handing over to the Government Officials. Categorise the Books and Records into originals and photocopies.</p>	
6.	<p>Prepare a cover letter attaching the list of Books and Records that the documents are strictly confidential and not to be disclosed for any purpose outside the scope of the investigation. It is critical for Investigation Team to review each Books and Records for scope, relevance and legal privilege during the Raid. If it is not within the scope of the authorisation it should NOT be provided. For control purposes, assign a sequential numbering system to each page copied and provided. Obtain acknowledgement of receipt of the list of provided documents from the Government Officials.</p>	
7.	<p>Consider tracking and recording the source of documents. Legal Department and Investigation Team to review all Books and Records before it is provided to the Government Officials since Government Officials often use that part of the file which may be perceived as damaging.</p>	
8.	<p>Alert external stakeholders affected by the document(s), as appropriate, after consultation with Senior Management.</p>	
9.	<p>Before the Government Officials leave, agree on the minutes of the Raid and inspection (i.e. Persons questioned, offices visited, documents copied).</p>	
10.	<p>If the Government Officials want to search the Company's premises, follow the same steps outlined above.</p>	
11.	<p>Have a final wrap up meeting with the Government Officials before they leave. Check that Company has copies of every Books and Records taken and a full record of every interviews. Agree on follow up actions, if any. Do not replace files until after the debriefing meetings.</p>	



## DAWN RAID POLICY

12.	If the Government Officials indicate that there would be a prolonged investigation or further visits and interviews, consider creating a separate budget to track expenses.	
13.	Ensure the relevant approval has been obtained from the Legal Department and/or the Senior Management prior to any documents being given to the Government Officials.	

### 4.1.4 CHECKLIST FOR SENIOR MANAGEMENT AND INVESTIGATION TEAM AFTER THE INVESTIGATION

1.	Investigation Team to open a file and keep note of the following: a. official documents (search warrant, acknowledgement of receipt), b. notes of the meeting, c. email correspondence if any, d. every set of all photocopies of documents handed over to the Officials. e. All details on the Officials (ID cards, titles etc) should be recorded. f. Ensure acknowledgement of receipt of documents by Officials is also filed.	
2.	Post-mortem i.e. review the events, taking note of Books and Records removed, questions asked and all interaction with and among the Government Officials.	
3.	Rectify any incorrect information or answers given as soon as possible.	
4.	Be prepared for a follow up visit the next day or at later stage. Brief staff that this may happen.	
5.	Reassure staff.	
6.	If the Raid is a significant one, the Government Officials may issue a press statement. It is better if the Company prepares a reactive holding press statement to clarify such statement by the Government Officials. Corporate Affairs to be given a full briefing of the Raid.	
7.	Plan for next steps.	

### **DO's**

- ✓ Provide timely, factual and accurate information to the Government Officials.
- ✓ Cooperate as fully as possible with the Government Officials.



- ✓ Prevent comments or information being offered by unauthorised employees.
- ✓ Ensure all the relevant management teams are alerted as soon as possible.
- ✓ Keep track and make note of every Books and Records searched, perused and seized by the Government Officials.
- ✓ Take note of every question posed and answers given.
- ✓ Review all written statements before signing.
- ✓ Alert the external stakeholders that may have been affected by the Raid.
- ✓ If required, liaise with the respective head of department to inform their employees of the Raid.
- ✓ Build rapport with the Government Officials as it is easier to ask questions and make requests when everyone is on friendly terms.

**DONT'S**

- ✗ Do not lose control of the situation and don't let the Government Officials take over the situation. Use common sense and think in eagle-view.
- ✗ Do not take for granted of any questions posed, if in doubt, refer to Legal Department and Investigation Team Leader.
- ✗ Do not volunteer information.
- ✗ Do not admit liability or make any statement that may have effect of admitting liability or affect the Company of any liability.
- ✗ Do not make any comments that may lead to more complicated situations and further inspections by the Government Officials.
- ✗ Do not lie.

**4.2 PARTIES TO BE KEPT IN THE LOOP:**

**4.2.1 Contract Holder:**

The relevant party which is subject of the investigation needs to be quickly identified and contacted. This includes all their direct reports and line managers.



**4.2.2 Legal, Risk and Integrity, Government Relations Departments, Internal Audit:**  
These departments to be alerted at first instance.

**4.2.3 Senior Management**  
The Senior Management **MUST** be alerted at first instance. The Senior Management is to be informed due to reputational sensitivity and update them regularly as the scope of the search becomes clearer and as to the progress of investigation. They in turn will have to manage external stakeholders.

**4.2.4 Finance**  
As focal point for extraction of original financial documents (i.e. original invoices, payment certificates, supporting documents, statements, etc.)

**4.2.5 Corporate Affairs**  
This department would need to prepare “generic” reactive and proactive press statement(s) in the event the Government Officials make a press release about the Raid. The generic press statements would be tuned to reflect the actual situation at the time. Corporate Affairs also need to prepare generic Q&As to support the Senior Management in the event of questions being asked by media during corporate functions.

**4.2.6 Other Office Locations**  
If the search warrant indicates that another office location may be searched, a focal point at that location (including Legal Department) needs to be identified and appointed. Confirm if there are any documents being kept at that location, and whether any relevant personnel subject to investigation is working out of that location.



**CHAPTER 5: APPENDICES****APPENDIX A – FOCAL POINT**

## 1. SENIOR MANAGEMENT

<b>NAME</b>	<b>POSITION</b>	<b>MOBILE NO.</b>	<b>OFFICE NO.</b>
Luke Yin, Lujiang	Chief Executive Officer	010-218 9072	06-641 2005
Yeo Bee Hwan	Chief Financial Officer	016-288 6808	06-641 2003
Zulhazmi Mohamad	Chief Government Relations Officer	012-614 3324	06-641 2005

## 2. LEGAL DEPARTMENT

<b>NAME</b>	<b>POSITION</b>	<b>MOBILE NO.</b>	<b>OFFICE NO.</b>
Diana Tan	Legal Manager	012-310 8788	06-641 2047
Nur Izatul Zulkepli	Senior Executive, Legal	012- 238 1302	-

## 3. GOVERNMENT RELATIONS

<b>NAME</b>	<b>POSITION</b>	<b>MOBILE NO.</b>	<b>OFFICE NO.</b>
Ahmad Fauzi Othman	Senior Advisor, Government Relations	012-397 4542	06-641 2100
Ahmad Ammar Asyraaf	Executive, Community, Liaison and Government Relations	019-625 9006	06-641 2100

## 4. CORPORATE AFFAIRS

<b>NAME</b>	<b>POSITION</b>	<b>MOBILE NO.</b>	<b>OFFICE NO.</b>
Haniza Abdul Hamid	Manager Corporate Reputation and External Comms	017- 897 8120	-
Siti Jamaah Binti Mohd Mailan	Senior Executive, Corporate Reputation & External Relations	012-3130257	-



## DAWN RAID POLICY

### 5. Quality & HSSE (INCLUDING SECURITY RELATED)

NAME	POSITION	MOBILE NO.	OFFICE NO.
Chang Chuak Shin	Senior Vice President, Quality & HSSE	012- 228 1786	06- 641 2009
Mohd Fauzi Bashir	Manager, HSEMS & Environment	013-420 1245	06- 641 2037

### 6. IT

NAME	POSITION	MOBILE NO.	OFFICE NO.
Dennis Lim	Senior IT Services Delivery Manager	016- 715 9209	06-641 2017

### 7. FINANCE

NAME	POSITION	MOBILE NO.	OFFICE NO.
Kathiresan Subramaniam	Senior Supervisor, Manufacturing Finance HM	012-397 3092	06-641 2217

### 8. INTERNAL AUDIT

NAME	POSITION	MOBILE NO.	OFFICE NO.
Aaric Soo	Chief Internal Auditor	017-230 0638	-

### 9. RISK AND INTEGRITY

NAME	POSITION	MOBILE NO.	OFFICE NO.
Ho Keim Hoong	Interim Risk Integrity and Compliance	012-354 3093	-

### 10. HUMAN RESOURCE

NAME	POSITION	MOBILE NO.	OFFICE NO.
Lee Wai Loong	Acting Human Resource Manager	012- 305 1270	06-6412022

### 11. CONTRACT & PROCUREMENT

NAME	POSITION	MOBILE NO.	OFFICE NO.
------	----------	------------	------------



## DAWN RAID POLICY

Xiang Ruitao	Vice President, Contract & Procurement Manager	017-253 5956	06-6412020
--------------	---	--------------	------------

### 12. ECONOMICS & SCHEDULING

NAME	POSITION	MOBILE NO.	OFFICE NO.
Steven Zhou	Chief Commercial Officer	012-546 0526	-

### 13. TECHNOLOGY

NAME	POSITION	MOBILE NO.	OFFICE NO.
Vikas Rishi	Senior Vice President Technology	011-60680882	06-641 2317

### 14. ENGINEERING

NAME	POSITION	MOBILE NO.	OFFICE NO.
Austin Zhou Qiang	Senior Vice President Engineering	12-363 3162	-

### 15. Project

NAME	POSITION	MOBILE NO.	OFFICE NO.
Austin Zhou Qiang	Senior Vice President Engineering	012-363 3162	-
Nadzri Manan	Senior Manager Projects and Turnaround	012-608 0324	06-641 2106



**APPENDIX B: FREQUENTLY ASKED QUESTIONS (FAQ's)**

**1. What if you are raided by a non-government agency?**

Only authorised personnel from Government agencies acting within the context of their powers under the law have the right to raid a premise. A raid by a non – government agency, e.g. private citizens, NGOs and debt collection agency is illegal and we do not have to cooperate. However, we should remain polite when communicating with government agencies.

Without endangering your own security and safety, you may take all reasonable precaution to stop them from entering your premises. Please inform the Head of Security or Legal Department or the most senior person in your department in the event unauthorised persons try to raid the Company's premises.

**2. Can I share this Dawn Raid Policy with external parties/outside of the Company?**

This Dawn Raid Policy is an internal policy and sharing of the policy is subject to prior written approval of the Legal Department.

**3. What if the 'Raid' happens after office hours?**

It is unlikely that any raid will occur at such hours, however, should any situation like this occur, steps must be taken to contain the raid at the frontline level. In the event of such occurrence, please contact the Security head on duty and the instructions stated in this policy shall be applicable.

**4. What if you are unable to locate the personnel as listed in this Dawn Raid Policy, i.e. Security Head, Legal Department etc.?**

The rule of thumb in any such situation is to leave messages to the relevant personnel and contact the next most senior person in the focal point contact list or your head of department.