ORKIM SDN BHD

**COMPLIANCE
POLICY AND PROCEDURES**

DOCUMENT TITLE	COMPLIANCE POLICY AND PROCEDURES		
DOCUMENT REF	ORKIM/COMPLIANCE/P&P/01/00/25		
OWNER	RISK, AUDIT AND COMPLIANCE DEPARTMENT		
ISSUE	1	ISSUE DATE	15 MAY 2025
REVISION	0	REVISION DATE	NIL
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TABLE OF CONTENTS

SECTION 1 – POLICY STATEMENT AND OBJECTIVE

The Compliance Policy and Procedures is developed to ensure its business operation is in accordance with the laws and rules and regulations. By applying appropriate compliance management processes, the company will safeguard its integrity and avoid/ minimize non-compliance to the relevant statutory and industry regulations.

Orkim Sdn Bhd and its Group of Companies ("Orkim" or "the Group") is committed to inculcating a positive culture of compliance, considering that effective and sound management of compliance-related risks will safeguard the confidence of all stakeholders in the company's reputation and credibility, its ongoing capacity in sustaining the business and its related future business opportunities.

SECTION 2 - CIRCULATION AND REVIEW

The Policy and Procedures shall be reviewed annually by the Risk, Audit and Compliance ("RAC") Department. RAC Department shall be responsible for the administration, interpretation and application of this Policy and Procedures. This Policy and Procedures shall be made available to all employees.

SECTION 3 - APPLICATION

The Policy and Procedures apply to all directors, management, employees and contractors employed or working on board Orkim's vessels and in Orkim's offices ashore, also requiring the same standards to be followed by our suppliers, outsourcing companies, contractors, customers and other value chain partners.

The Policy and Procedures shall be read in conjunction with the Orkim approved Limits of Authority ("LOA") and the associated provision in the Orkim Management Procedure Manual ("MPM")- Mandatory Regulation and Laws. In the event of a conflict between this Policy and Procedures and the MPM, this Policy and Procedures shall govern.

SECTION 4 - ROLES AND RESPONSIBILITIES

Specific roles and responsibilities for compliance management are as follows:

Roles	Responsibilities
Board of Directors ("Board")	▪ Approve the Compliance Policy. ▪ Represent shareholders' interest in managing Orkim's Compliance Management. ▪ Promote appropriate "tone-at-the-top" to drive an effective compliance culture throughout Orkim. ▪ Monitor the overall compliance program effectiveness at Orkim.
Board Risk and Audit Committee ("BRAC")	▪ Review and recommend changes in compliance policies. ▪ Report regularly to the Board about compliance-related issues. ▪ Ensure significant compliance issues are deliberated and addressed appropriately. ▪ Review the status of the implementation of management action plans and ensure measures in mitigating compliance issues are effective. ▪ Advise the management from time to time about the types of resources and internal controls required in mitigating non-compliance issues.
Chief Executive Officer ("CEO")	▪ Allocate adequate and appropriate resources to establish, develop, implement, evaluate, maintain and improve the compliance management procedures. ▪ Ensure that all personnel within their control are complying with the organization's compliance obligations, policies and procedures. ▪ Integrate compliance obligations into existing business practices and decision making. ▪ Encourage the compliance culture and their personnel to raise compliance concerns and preclude any form of retaliation. ▪ Ensure that, once the need for corrective action is identified, appropriate corrective action is recommended and implemented.

Roles	Responsibilities
Risk, Audit and Compliance ("RAC") Department (Compliance Officer)	▪ Oversee the implementation of compliance policy and procedures. ▪ Oversee Orkim's Compliance & Ethics ("C&E") Program, ensuring regulatory adherence, ethical business practices and proactive risk mitigation. ▪ Facilitate and collaborate with Divisional/Departmental Heads in developing, maintaining and update compliance risk registers across all divisions/departments. ▪ Conduct compliance risk assessments, identify regulatory, operational and ESG regulatory-related risks and establish compliance risk indicators for ongoing monitoring. ▪ Ensure compliance risks are incorporated within Orkim's Enterprise Risk Management (ERM) framework. ▪ Facilitate compliance training and awareness programs, ensuring corporate-wide adherence. ▪ Align compliance risk mitigation strategies with whistleblowing/internal audit findings. ▪ Provide executive leadership briefings or engagement with key stakeholders on compliance risk trends, regulatory changes and implementation strategies. ▪ Facilitate Divisional/Departmental Heads on the implementation of a compliance dashboards to track policy violations. ▪ Submit periodic compliance reports to the management-level Risk Management Committee ("RMC") and to the BRAC on regulatory risks and adherence status. (Please refer to the approved Risk Management Policy and Procedures on roles and responsibilities of the RMC.)
Risk, Audit and Compliance ("RAC") Department (Internal Auditor)	▪ Provide independent assurance on compliance risk mitigation strategies. ▪ Ensure compliance governance structures are effective and aligned with best practices. ▪ Identify control weaknesses and recommend improvements to compliance oversight.
Divisional/Departmental Heads	▪ Identify, analyze and evaluate own division/ department compliance risks by relating its compliance obligations to its activities, services and relevant aspects of its operations. ▪ Develop risk mitigation plans to ensure relevant compliance is always in effect and to promptly address compliance breaches and to prevent a recurrence. ▪ Prepare, maintain and update Compliance Register and any other compliance dashboard summary for reporting. ▪ Perform regular compliance training and education programs to subordinates regarding the latest update on compliance matters.
All employees	▪ Adhere to compliance Policy and Procedures. ▪ Report on compliance concerns, issues and failures. ▪ Participate in compliance training, if required.

SECTION 5 – STANDARD OPERATING PROCEDURES

5.1 Statutory and Industry Requirement

All Divisional/ Departmental Heads are required to assess and monitor their compliance activities against the following statutory and industry requirements:

1. Statutory requirements (non-exhaustive):

   - Main Market Listing Requirements
   - Malaysian Code of Corporate Governance ("MCCG") 2021
   - Companies Act 2016
   - Malaysia Financial Reporting Standards ("MFRS")
   - Malaysia Anti-Corruption Commission ("MACC") Act 2009 (Amendment 2018)
   - Income Tax Act 1967
   - Income Tax (Transfer Pricing) Rules 2023
   - Personal Data Protection Act 2010
   - Industrial Coordination Act 1975
   - Fire Services Act 1988
   - Fire Services (Fire Certificate) (Amendment) Regulations 2020
   - Uniform Building By-Laws 1984
   - Occupational Safety and Health Act 1994
   - Occupational Safety and Health (Amendment) Act 2022
   - Employment Act 1955 (Amendment) 2022
   - Employment Provident Fund ("EPF") Act 1991
   - Employees Social Security ("SOCSO") Act 1969
   - Employment Insurance System ("EIS") Act 2017

2. Industry requirements (non-exhaustive):

   - Merchant Shipping Ordinance 1952 (Malaysia's primary law governing merchant shipping)
   - International Convention on Load-lines
   - International Convention for the Safety of Life at Sea ("SOLAS")
   - International Convention for the Prevention of Pollution from Ships ("MARPOL")
   - International Safety Management Code ("ISM")
   - International Convention on Standards of Training, Certification and Watchkeeping for Seafarers ("STCW")
   - Convention on the International Regulations for Preventing Collisions at Sea ("COLREG")
   - International Convention on Tonnage Measurement of Ships
   - International Labour Organization (ILO)- Maritime Labour Convention ("MLC"), 2006
   - International Code for Security of Ships and Port Facility
   - Marine Department Malaysia (covers vessel registration, crew certification and safety)
   - Occupational Safety and Health Act 1994 (OSHA – workplace safety and health regulations)

5.2 Development of Compliance Registers

1. Monitoring and reporting are the process of periodically communicating compliance related information throughout the organization and ultimately to the Board/ BRAC, whereby the RAC Department/ Compliance Officer is responsible for coordinating all compliance management related activities and reporting throughout the organization. Risk monitoring and reporting involves the following (among others):

   - New compliance matters are identified and considered as they arise
   - Existing compliance matters are monitored for changes which may impact the Group
   - Existing compliance controls are in place and working effectively (i.e. in both design and operation)
   - Compliance risk treatment plans are duly executed and are executed on a timely manner

2. The organization's monitoring and reporting process should encompass all aspects of the compliance management process for the purpose of anticipating and responding in advance to compliance matters that would impact the Group and reducing the costs/ other impacts with failing to respond to the compliance risk in a timely manner.

3. All Divisional/Departmental Heads will develop, continuously maintain and update a standardized Compliance Register in an accessible online/digital platform, with this information:

   a) Compliance area/ description (i.e. Anti Bribery and Corruption, Tax Compliance etc.)
   b) Reference to regulatory standard/provisions (i.e. MACC Act, Malaysia Income Tax Act 1967 etc.)
   c) Affected Division/Department.
   d) Monitoring party/ Person-In-Charge ("PIC")
   e) Monitoring mechanism (i.e. monthly, quarterly, annual – review/assessment/audit).
   f) Compliance status (compliant /not compliant /in progress).
   g) Reason for non-compliance and closure strategy, where applicable.
   h) Targeted timeline/scheduling for resolution/closure (for non-compliance).

5.3 Key Differences between Compliance Registers and Risk Registers

1. A compliance register and a risk register serve distinct purposes. A compliance register ensures the company meets legal and regulatory obligations, while a risk register identifies and manages broader risks - including compliance risks as one category among many. Further differences, as follows:

	Compliance Register	**Risk Register**
Purpose	▪ To document all applicable regulatory, legal and policy compliance requirements across divisions/ departments. ▪ Tracks specific compliance requirements and measures align with laws, industry codes and internal policies.	▪ Catalogs and document enterprise risks including compliance risks, operational risks, financial risks etc. that could impact business operations, financial performance or strategic objectives. ▪ Includes details such as risk identification, impact assessment, likelihood, mitigation strategies and responsible owners.
Focus	▪ Primarily focuses on adherence to rules rather than identifying and mitigating risks. ▪ Specific to legal and regulatory mandates	▪ Cover broader risks, including compliance risks, but also operational, financial, and strategic risks. ▪ Assesses risks and mitigation strategies holistically. ▪ Serves as a tool for enterprise risk management, aligned with COSO ERM principles.

5.4 Update and Maintenance of Compliance Registers

1. All Divisional/Departmental Heads will update their respective compliance registers based on the following:

   a) Quarterly updates (minimum) – Regular reviews to capture regulatory changes, operational shifts, and policy revisions.
   b) Ad-hoc updates (as needed) – Immediate updates when significant regulatory changes or compliance incidents occur.
   c) Comprehensive review (annual) – Full assessment of compliance obligations, ensuring alignment with governance and industry standards.

5.5 Reporting to The Compliance Officer

1. All Divisional/Departmental Heads will submit compliance register reports to the RAC Department/ Compliance Officer on the following schedule:

   a) Monthly reporting – Summarized updates on compliance risks, mitigation measures and policy adherence.
   b) Quarterly detailed reports – In-depth compliance risk assessments, tracking progress on corrective actions.
   c) Immediate escalation – When a material compliance breach or urgent regulatory risk arises, respective Divisional/Departmental Heads should escalate directly to the RAC Department/ Compliance Officer.

5.6 Reporting to The Risk Management Committee ("RMC")

1. The Compliance Officer consolidates divisional/ department-level compliance data and reports to the RMC as follows:

   a) Quarterly formal reporting – A structured presentation on compliance performance, emerging risks, and mitigation strategies.
   b) Annual compliance risk summary – Comprehensive review of compliance risk trends, policy effectiveness and regulatory compliance adherence.
   c) Special reporting sessions (as required) – For urgent compliance risks or regulatory developments affecting business continuity.

   Please refer to the approved Risk Management Policy and Procedures on RMC's roles and responsibilities, chairperson, membership and frequency of reporting for further detail.

5.7 Reporting to The Board Risk and Audit Committee ("BRAC")

1. The Head of RAC/ Compliance Officer will report to the BRAC on a quarterly basis (every three months) at a minimum. However, additional reporting may be required in cases of high-impact compliance risks, regulatory changes, or material breaches, as follows:

   a) Quarterly reporting – Standard compliance updates and risk reporting.
   b) Ad-hoc Reports – When a material compliance breach or urgent regulatory risk arises.
   c) Annual Compliance Performance Review – A comprehensive report assessing the effectiveness of compliance risk management.

5.8 Definition of Material Compliance Breach

1. Definition of a material compliance breach i.e. any significant violation of regulatory requirements, internal policies or ethical standards that may result in:

   a) Regulatory penalties or fines.
   b) Legal liabilities or investigations.
   c) Reputational damage.
   d) Operational disruptions.
   e) Financial loss above a predefined threshold.

2. Examples may include:

   a) Failure to comply with anti-corruption laws.
   b) Non-compliance with tax regulations leading to financial penalties.
   c) ESG violations affecting sustainability reporting.
   d) Whistleblower allegations with legal implications.

5.9 Material Compliance Breach Escalation Protocol

Escalation Process Flow, as follows:

Step 1: Immediate Identification & Documentation by Divisional/Department Head	1. The Divisional/Departmental Head detects a material compliance breach and documents the incident, including: a) Nature of the breach (e.g., AML violation, ESG non-compliance) b) Impact analysis (financial, legal, operational consequences) c) Initial corrective actions taken
Step 2: Notification to RAC Department/ Compliance Officer	1. The Divisional/Departmental Head immediately notifies the RAC Department/ Compliance Officer, providing: a) Incident report with key details b) Root cause analysis c) Current mitigation status
Step 3: RAC Department/ Compliance Officer's Assessment & CEO Notification	1. The RAC Department/ Compliance Officer: a) Validates the severity of the breach. b) Determines regulatory reporting obligations. c) Aligns response with governance frameworks. 2. The RAC Department/ Compliance Officer escalates critical compliance risks to the CEO, ensuring executive visibility and leadership intervention where required.

Step 4: Reporting to Management-Level Risk Committee ("RMC")	1. The Compliance Officer consolidates findings and recommendations into an official report. 2. The RMC evaluates the compliance breach and assesses strategic response actions. 3. The CEO reviews critical cases, particularly those with financial or reputational consequences.
Step 5: Board Risk and Audit Committee ("BRAC") Notification (If required)	1. If the breach poses significant business impact, the CEO and RAC Department/ Compliance Officer jointly present the findings to the BRAC. 2. The BRAC reviews risk implications and strategic mitigation plans.
Step 6: Implementation of Corrective Actions & Monitoring	1. The Divisional/ Departmental Heads remains responsible for corrective actions, with oversight from the RAC Department/ Compliance Officer. 2. The CEO ensures organizational alignment regarding policy improvements and executive decision-making. 3. The RAC Department/ Compliance Officer monitors mitigation effectiveness, ensuring adherence to resolution protocols.

Appendix 1 - Sample Divisional/Departmental Compliance Monthly Register

Technical Department – Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Vessel Maintenance Program Compliance	Marine Department Malaysia / ISM Code	Comply	-	Ongoing maintenance as per ISM guidelines	Continuous	Technical Manager	All vessels compliant as of [date]
2	Bunker Quality and Fuel Management Compliance	MARPOL Annex VI	Due	Awaiting supplier certification	Verify fuel quality documentation from supplier	[Target Date]	Technical Superintendent	Pending supplier response
3	Dry Docking & Hull Inspection Compliance	Class Society / Marine Department Malaysia	Due	Pending dry docking schedule for [Vessel Name]	Secure dry dock slot and execute hull inspection	[Target Date]	Technical Superintendent	Dry docking scheduled
4	Ballast Water Management System (BWMS) Compliance	IMO Ballast Water Management Convention	Not comply	BWMS testing overdue	Arrange BWMS system testing and certification	[Target Date]	Environmental Superintendent	System testing scheduled
5	Air Emissions Compliance	IMO MARPOL Annex VI	Comply	-	Conduct regular fuel sample tests	Continuous	Technical Manager	No violations reported
6	Electrical System & Navigation Equipment Compliance	SOLAS / Class Society	Due	Electrical system inspection overdue	Schedule class survey for electrical system and navigational aids	[Target Date]	Electrical Superintendent	Class survey in progress
7	Firefighting Equipment and Life-Saving Appliances (LSA) Compliance	SOLAS / Flag State / Port State Control (PSC)	Due	Inspection expired for [Vessel Name]	Conduct LSA/FFA inspection and renew certification	[Target Date]	Technical Superintendent	Inspection planned
8	Engine Room & Machinery Compliance	Marine Department Malaysia / ISM Code	Not comply	Oil leak detected in [Vessel Name]	Repair and conduct machinery performance test	[Target Date]	Technical Manager	Repair works in progress
9	Waste Management & Oil Discharge Compliance	MARPOL Annex I / Flag State Regulation	Comply	-	Sludge disposal monitoring/ MARPOL record-keeping	Continuous	Environmental superintendent	Monthly waste disposal report submitted

Commercial Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Charter Party Agreement Compliance (Terms and Conditions)	Marine Department Malaysia / Contractual Obligations	Comply	-	Ongoing monitoring of charter agreement	Continuous	Head of Chartering	No reported issues
2	Freight Rate Compliance with Market Regulations	Malaysian Maritime Authorities	Not comply	Rate adjustment delayed	Review and align pricing model	[Target Date]	Head of Commercial Department	Under review
3	Vessel Deployment Compliance (Cargo Type & Destination)	IMO / Flag State Regulations	Due	Charter agreement deviation identified	Review deployment strategy & ensure contractual adherence	[Target Date]	Assistant Manager, Chartering	Investigation in progress
4	Demurrage & Laytime Compliance	Charter Agreement / Industry Best Practices	Due	Laytime calculations disputed by charterers	Review laytime calculation methodology & reconcile disputes	[Target Date]	Exec, Chartering	Negotiation ongoing
5	Cargo Claims & Insurance Compliance	P&I Clubs / Marine Insurance Guidelines	Due	Pending resolution of a cargo contamination claim	Engage insurer and legal team for claim resolution	[Target Date]	Head of Commercial Department	Claim assessment in progress
6	Client Credit Risk & Payment Terms Compliance	Financial Regulations / Internal Credit Policy	Not comply	Outstanding payments from clients exceeding 90 days	Strengthen credit risk assessments & enforce penalty clauses	[Target Date]	Assistant Manager, Commercial	Collection efforts intensified

Marine Safety & Quality Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Compliance with ISM Code (International Safety Management)	IMO / Flag State / Marine Department Malaysia	Comply	-	Regular internal audits and safety drills conducted	Continuous	Head of Safety & Quality	Last audit completed on [Date]
2	Port State Control (PSC) & Flag State Inspection Compliance	IMO / Marine Department Malaysia	Due	Last PSC inspection found minor deficiencies	Implement corrective actions and prepare vessels for re-inspection	[Target Date]	Senior Superintendent - Marine Operation	Rectification in progress
3	Compliance with ISPS Code (Ship & Port Security)	IMO / Marine Department Malaysia	Comply	-	Conduct regular security drills and updates to Ship Security Plans (SSP)	Continuous	Superintendent - Marine Operation	Security drills completed as of [Date]
4	Safety Management System (SMS) & Incident Reporting Compliance	ISM Code / Flag State / Marine Department Malaysia	Not comply	Delayed reporting of a near-miss incident	Strengthen incident reporting procedures and conduct training	[Target Date]	Senior Manager - Safety & Quality	System enhancement ongoing
5	Compliance with MARPOL (Oil Spill Prevention & Pollution Control)	IMO / MARPOL Annex I, II, V / Environmental Regulations	Due	Pending verification of vessel waste management logs	Ensure proper record-keeping & conduct environmental compliance audit	[Target Date]	Superintendent - MSQ	Audit scheduled
6	Cargo & Tanker Operations Safety Compliance	SOLAS / MARPOL / ISGOTT (International Safety Guide for Oil Tankers & Terminals)	Due	Last cargo operation report highlighted improper safety procedures	Conduct refresher training & update cargo safety manuals	[Target Date]	Superintendent - Marine Operation	Training in progress
7	Compliance with Emergency Response & Drills Requirement	SOLAS / ISM Code / Flag State	Due	Recent emergency drill identified procedural gaps	Conduct additional drills & update emergency response plans	[Target Date]	Executive - MSQ	Drill enhancement in progress

Finance Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Compliance with Financial Reporting Standards (MFRS & IFRS)	Malaysian Accounting Standards Board (MASB) / Bursa Malaysia / IFRS	Due	Delayed financial statement submission	Strengthening reporting controls and timely review process	[Target Date]	CFO	Under review
2	Tax Compliance (Corporate Tax, SST)	Inland Revenue Board (LHDN) / Royal Malaysian Customs	Not Comply	Outstanding SST filing & tax payments	Immediate tax reconciliation & submission	[Target Date]	Financial Controller	Tax review in progress
3	Compliance with Public Listing Financial Disclosure Requirement	Bursa Malaysia Listing Rules / Securities Commission	Due	Incomplete financial disclosure documentation	Immediate alignment with listing disclosure requirements	[Target Date]	CFO	Compliance review in progress
4	Compliance with Anti-Money Laundering & Counter Financing of Terrorism (AML/CFT) Laws	Bank Negara Malaysia (BNM) / AMLA 2001	Due	Gaps identified in customer due diligence (CDD) procedures	Enhance AML/CFT policy & implement stronger CDD checks	[Target Date]	Account Manager	Compliance training ongoing
5	Statutory Audit & External Audit Compliance	Bursa Malaysia / Securities Commission / External Auditors	Due	External auditor flagged missing reconciliations	Conduct internal review & reconciliation updates	[Target Date]	CFO	Pending auditor clearance
6	Compliance with Debt & Loan Covenants	Financial Institutions / Bursa Malaysia	Due	Potential breach of debt covenant thresholds	Engage lenders for restructuring negotiations	[Target Date]	CFO	Bank discussions in progress
7	Internal Controls & Financial Governance Compliance	Bursa Malaysia Corporate Governance Code (MCCG)	Not comply	Weak segregation of duties in financial approvals	Strengthening internal controls & approval hierarchy	[Target Date]	Financial Controller	Revised approval matrix implemented

Human Resource and Administration Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Compliance with Malaysian Employment Act 1955 & Labour Laws	Ministry of Human Resources (MOHR) / Industrial Relations Act 1967	Due	Non-standardized contract terms for sea and shore employees	Standardize employment contracts and ensure compliance with labour laws	[Target Date]	Manager-HR & Admin	Legal review ongoing
2	Seafarers' Rights & Compliance with Maritime Labour Convention (MLC 2006)	International Labour Organization (ILO) / Marine Department of Malaysia	Not Comply	Crew contracts and benefits not aligned with MLC requirement	Review and update seafarer contracts & onboard conditions	[Target Date]	Head of Fleet Personnel	HR audit in progress
3	Payroll Compliance (Tax, EPF, SOCSO, EIS)	Inland Revenue Board (LHDN) / EPF / SOCSO / EIS	Due	Payroll deductions and contributions not fully reconciled	Conduct payroll audit and ensure correct deductions/ Payments	[Target Date]	Senior Executive - Fleet Personnel (Payroll)	System upgrade in progress
4	Crew Certification & Training Compliance	Marine Department of Malaysia / STCW 1978 Convention	Not comply	Expired or missing crew certificates	Implement strict tracking & renewal reminders for certification	[Target Date]	Executive - Fleet Recruitment & Training	Certification tracker implemented
5	Workplace Health & Safety Compliance (OSH Act 1994 & ISM Code)	Department of Occupational Safety & Health (DOSH) / IMO ISM Code	Due	Inadequate safety training & reporting	Strengthen safety training & reporting mechanisms	[Target Date]	Head of HR (Sea & Shore)	Safety workshops ongoing
6	GDPR & Data Privacy Compliance for Employee Records	Malaysia Personal Data Protection Act (PDPA) 2010 / GDPR	Due	Weak data security & unauthorized access risks	Strengthen HR data protection policies	[Target Date]	Executive - HR & Admin	System access control upgraded
7	Compliance with Disciplinary & Grievance Handling Procedures	Industrial Relations Act 1967 / MLC 2006	Not Comply	Inadequate grievance handling framework	Implement structured grievance & appeal mechanism	[Target Date]	Head of HR (Sea & Shore)	New procedure drafted

IT and System Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Cybersecurity Compliance	Malaysia Cyber Security Strategy (MCSS), ISO 27001	Not comply	Inadequate cybersecurity risk assessment conducted	Perform cybersecurity gap analysis and implement security patches	[Target Date]	Senior Executive	In progress, external IT security consultant engaged
2	IT Disaster Recovery & Business Continuity Plan (BCP) Compliance	BCM Standards (ISO 22301)	Not comply	No documented DRP/BCP	Develop and test DRP & BCP	[Target Date]	Senior Executive	Draft DRP in progress
3	System Access Control & Privileged Account Management	NIST SP 800-53, ISO 27002	Not comply	Lack of centralized access control	Implement Identity & Access Management (IAM) system	[Target Date]	Senior Executive	In progress
4	Endpoint Security & Anti-Malware Compliance	NIST, ISO 27001, CIS Controls	Comply	-	Automated endpoint security patching	Ongoing	Senior Executive	New anti-malware system deployed
5	Software Licensing & Intellectual Property Compliance	Malaysia Copyright Act 1987	Comply	-	Annual software license reviews	Ongoing	Senior Executive	Last audit completed in March 2025
6	Cloud Security & Data Encryption Compliance	CSA STAR, ISO 27017	Due for compliance	Weak encryption standards for cloud data	Implement end-to-end encryption and multi-factor authentication (MFA)	[Target Date]	Senior Executive	Reviewing cloud security vendors
7	Network Security & Intrusion Detection	NIST CSF, ISO 27001	Due for compliance	Firewall policies outdated	Upgrade firewall and deploy intrusion prevention system (IPS)	[Target Date]	Senior Executive	Firewall upgrade in procurement stage

Procurement Department– Sample Compliance Register for Guidance

No	Compliance Description	Regulatory Standard	Compliance Status	Non-compliance reason	Corrective Action Plan	Target Date	PIC	Status Update
1	Fair & Transparent Vendor Selection	Malaysian Anti-Corruption Commission (MACC) Act 2009	Not comply	Lack of structured vendor evaluation criteria	Implement standardized vendor selection & evaluation framework	[Target Date]	Head of Procurement	Vendor evaluation criteria under development
2	Conflict of Interest Declaration for Procurement Staff	MACC Act 2009, ISO 37001	Not comply	No formal conflict of interest (COI) declaration process	Establish mandatory COI declaration for all procurement staff	[Target Date]	Head of Procurement	COI declaration form drafted
3	Vendor Due Diligence & Risk Assessment	MACC Act 2009, ISO 27036 (Third-Party Risk)	Due for compliance	No structured due diligence process	Develop a vendor risk assessment framework & onboarding checklist	[Target Date]	Head of Procurement	Framework under review
4	Procurement Fraud Detection & Reporting	MACC Act 2009, Company Policy	Due for compliance	No fraud detection mechanism in place	Implement fraud detection & reporting system	[Target Date]	Head of Procurement	System vendor evaluation ongoing
5	Vendor Performance Monitoring & Contract Compliance	Contractual Obligations, ISO 9001	Comply	-	Periodic vendor performance reviews & scorecards	[Target Date]	Head of Procurement	Last vendor audit completed in Jan 2025
6	ESG Compliance in Procurement (Sustainability & Ethical Sourcing)	Malaysia ESG Guidelines, ISO 20400	Not comply	No ESG criteria in vendor selection	Integrate ESG criteria into procurement decision-making	[Target Date]	Head of Procurement	ESG policy in review