LUNAS
LUMUT NAVAL SHIPYARD

199001007732 (199302-K)

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LUNAS/CVM/5542 – (46)

21 Mei 2026

Semua Vendor LUNAS

Tuan/Puan,

PEMAKLUMAN PEMATUHAN KESELAMATAN, PERLINDUNGAN MAKLUMAT SYARIKAT DAN LARANGAN PENGAMBILAN GAMBAR / RAKAMAN

1. Dengan segala hormatnya perkara di atas adalah dirujuk.

2. Bersama-sama ini dilampirkan memorandum berikut untuk perhatian dan pematuhan pihak Tuan/Puan:

   i. **Pematuhan Akta Kawasan Larangan dan Tempat Larangan 1959, Akta Rahsia Rasmi 1972 serta Keselamatan Maklumat Syarikat**; dan

   ii. **Pematuhan Terhadap Larangan Pengambilan Gambar, Rakaman Video dan/atau Penyebaran Maklumat Syarikat**.

3. Sehubungan itu, semua vendor dan subkontraktor yang berurusan dengan LUNAS adalah dikehendaki untuk membaca, memahami dan memastikan semua kakitangan, wakil, pekerja serta pihak berkaitan di bawah seliaan masing-masing mematuhi sepenuhnya segala arahan, peraturan keselamatan dan keperluan perlindungan maklumat yang telah ditetapkan oleh pihak Syarikat serta perundangan berkaitan.

4. Untuk perhatian pihak Tuan/Puan, sebarang aktiviti pengambilan gambar, rakaman video, penyebaran dokumen, data, maklumat operasi, aset pertahanan, kawasan fasiliti, sistem, dokumen rasmi atau apa-apa maklumat berkaitan Syarikat tanpa kelulusan dan kebenaran bertulis daripada pihak LUNAS adalah dilarang sama sekali.

5. Sebarang ketidakpatuhan atau pelanggaran terhadap keperluan keselamatan dan perlindungan maklumat tersebut boleh mengakibatkan tindakan tatatertib, penggantungan atau penamatan kerja/kontrak serta tindakan perundangan selaras dengan peraturan dan undang-undang yang berkuat kuasa.

6. Pihak vendor dan subkontraktor juga hendaklah memastikan kawalan keselamatan dalaman sentiasa dipatuhi sepanjang menjalankan kerja di premis LUNAS.

7. Kerjasama dan komitmen penuh pihak Tuan/Puan dalam memastikan pematuhan segera terhadap keperluan keselamatan dan perlindungan maklumat Syarikat adalah mandatori dan amatlah dihargai.

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Sekian, terima kasih.

Bagi pihak **LUMUT NAVAL SHIPYARD SDN. BHD.**

Ir. AZMAN BIN SHAARI
Ketua Pegawai Operasi

Disertakan:

1. Memo Pematuhan Akta Kawasan Larangan dan Tempat Larangan 1959, Akta Rahsia Rasmi 1972 serta Keselamatan Maklumat Syarikat bertarikh 26 Februari 2026.

2. Memo Pematuhan Terhadap Larangan Pengambilan Gambar, Rakaman Video dan/atau Penyebaran Maklumat Syarikat bertarikh 7 April 2026.

LAMPIRAN 1

LUNAS
LUMUT NAVAL SHIPYARD

199001007732 (199302-K)

HCMA/Inter Office Memo/2025- Mar

MEMO ANTARA BAHAGIAN

RUJUKAN	:	LUNAS/RICD/6400 - (07)
TARIKH	:	26 Feb 2026
KEPADA	:	Semua Kakitangan
DARIPADA	:	Ketua Pegawai Eksekutif
MELALUI	:	Ketua Jabatan Risiko, Integriti dan Pematuhan
SALINAN KEPADA	:	Ketua Pegawai Kewangan, Ketua Pegawai Hal Ehwal Korporat, Ketua Pegawai Operasi Ketua Limbungan LUNAS Langkawi
PERKARA	:	**PEMATUHAN AKTA KAWASAN LARANGAN DAN TEMPAT LARANGAN 1959, AKTA RAHSIA RASMI 1972 SERTA MAKLUMAT SYARIKAT**

1. Lumut Naval Shipyard Sdn. Bhd. (LUNAS) adalah tertakluk kepada **Akta Kawasan Larangan dan Tempat Larangan 1959 (Akta 298)** serta undang-undang keselamatan lain yang berkuat kuasa dari semasa ke semasa.

2. Sebagai Syarikat yang terlibat secara langsung dalam pembinaan kapal dan penyelenggaraan aset pertahanan bagi pihak Tentera Laut Diraja Malaysia (TLDM), premis dan operasi LUNAS adalah dikawal selia sebagai kawasan larangan dan tempat larangan.

3. Sehubungan itu, semua maklumat berkaitan projek pertahanan termasuk tetapi tidak terhad kepada spesifikasi teknikal, lukisan kejuruteraan, prosedur ujian, susun atur keselamatan limbungan, data penyelenggaraan serta apa-apa dokumen berkaitan pertahanan adalah tertakluk kepada peruntukan **Akta Rahsia Rasmi 1972**.

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Certificate No: 44 100 21 92 0011

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4. Untuk makluman semua, perlindungan di bawah Akta Rahsia Rasmi 1972 terpakai secara automatik ke atas maklumat berkaitan pertahanan dan ketenteraan walaupun dokumen tersebut tidak ditandakan sebagai "Rahsia", "Sulit" atau seumpamanya.

5. Adalah dengan ini ditegaskan bahawa:

5.1. **Status Kawasan Larangan**

Akses, pergerakan, rakaman gambar atau video, penyimpanan maklumat serta sebarang bentuk perkongsian maklumat berkaitan operasi limbungan adalah tertakluk kepada kawalan keselamatan yang ketat selaras dengan Akta 298 dan peraturan keselamatan yang berkuat kuasa.

5.2. **Larangan Pendedahan Tanpa Kebenaran**

Sebarang pendedahan, penyampaian, penggunaan, penyimpanan atau penyebaran maklumat rasmi tanpa kelulusan yang sah adalah dilarang sama sekali.

5.3. **Kewajipan Pematuhan dan Kawalan Maklumat**

Semua kakitangan adalah diwajibkan untuk:

a. Tidak mendedahkan sebarang maklumat berkaitan projek pertahanan kepada mana-mana pihak luar tanpa kelulusan bertulis yang sah serta memastikan kontraktor atau pihak ketiga di bawah seliaan masing-masing tidak berbuat demikian;

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b. Tidak berkongsi dokumen melalui emel peribadi, aplikasi pesanan segera atau peranti yang tidak dibenarkan;
c. Memastikan akses kepada dokumen adalah berdasarkan prinsip keperluan kerja sahaja;
d. Mematuhi sepenuhnya Polisi Pengurusan Maklumat, Polisi Keselamatan serta mana-mana prosedur dalaman yang berkaitan; dan
e. Melaporkan dengan segera sebarang insiden pendedahan atau kebocoran maklumat kepada pihak Pengurusan atau Unit Integriti.

6. Di bawah Seksyen 8 Akta Rahsia Rasmi 1972, mana-mana perbuatan mendedahkan atau menyalurkan maklumat rasmi kepada pihak luar tanpa kelulusan yang sah adalah merupakan suatu kesalahan jenayah. Perbuatan tersebut juga adalah melanggar Polisi Syarikat. Sehubungan itu, sebarang ketidakpatuhan boleh mengakibatkan tindakan tatatertib termasuk penamatan serta merta perkhidmatan atau kontrak, serta implikasi undang-undang terhadap individu yang terlibat. Pihak Syarikat tidak akan berkompromi dalam mengambil tindakan yang sewajarnya, termasuk melaporkan perkara tersebut kepada pihak berkuasa. Pihak Pengurusan memandang serius perkara ini kerana ia melibatkan kepentingan keselamatan negara, reputasi syarikat serta kelangsungan perniagaan LUNAS.

7. Pematuhan penuh adalah mandatori.

Terima Kasih,

Ir. AZHAR JUMAAT
Ketua Pegawai Eksekutif

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LUNAS
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199001007732 (199302-K)

MEMO ANTARA BAHAGIAN

RUJUK	:	LUNAS/HCM/1100 – (202)
TARIKH	:	07 April 2026
KEPADA	:	Semua Pekerja Syarikat
DARIPADA	:	Ketua Jabatan Pengurusan Modal Insan & Pentadbiran
SALINAN KEPADA	:	**Ir. Azhar Jumaat**, Ketua Pegawai Eksekutif **Hjh. Puti Mazura Mashudi**, Ketua Pegawai Hal Ehwal Korporat **Ir. Azman Shaari**, Ketua Pegawai Operasi **Ketua-Ketua Jabatan**
PERKARA	:	**PEMATUHAN TERHADAP LARANGAN PENGAMBILAN GAMBAR, RAKAMAN VIDEO DAN/ATAU PENYEBARAN MAKLUMAT SYARIKAT**

Rujuk:

A. Memo Pematuhan Akta Kawasan Larangan dan Tempat Larangan 1959, Akta Rahsia Rasmi 1972 Serta Maklumat Syarikat bertarikh 26 Februari 2026.

1. Merujuk kepada perkara dan rujuk di atas, pihak Syarikat ingin memberikan peringatan rasmi kepada semua individu yang berada dalam premis Syarikat tidak terhad kepada pekerja, protégé, pelatih industri, peserta program peralihan, pembekal, subkontraktor, pelawat dan klien berhubung larangan rakaman, gambar dan/atau rakaman video serta penyebaran kandungan berkaitan operasi dan hal dalaman Syarikat tanpa kebenaran rasmi dari pihak Pengurusan. Arahan ini terpakai tanpa pengecualian kepada semua individu yang dinyatakan, tanpa mengira jawatan, peranan, status perkhidmatan atau tempoh penempatan.

a. **Larangan Rakaman Gambar dan Video**

i. Sebarang rakaman gambar atau video menggunakan telefon bimbit atau apa jua peranti rakaman di dalam premis Syarikat adalah DILARANG SAMA SEKALI, kecuali dengan kelulusan rasmi daripada jabatan/unit yang berautoriti.

ii. Bagi individu yang telah diberikan kelulusan, semua bahan visual yang dirakam hendaklah digunakan khusus untuk tujuan operasi rasmi, dan dikendalikan, disimpan serta dilindungi mengikut keperluan keselamatan dan kerahsiaan Syarikat.

iii. Jabatan / Unit / Pasukan Pengurusan Projek yang berkaitan, bertanggungjawab memaklumkan, mengingatkan dan memastikan pematuhan oleh subkontraktor, pembekal, pelawat atau klien di bawah

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seliaan masing-masing terhadap larangan rakaman gambar dan/atau video dan/atau penyebaran sebarang kandungan berkaitan operasi dan hal dalaman Syarikat tanpa kebenaran rasmi.

b. **Arahan Penurunan Kandungan Media Sosial Peribadi**

i. Sehubungan itu, SEMUA INDIVIDU YANG TERLIBAT ADALAH DIARAHKAN UNTUK MENURUNKAN SEGERA sebarang hantaran, gambar atau rakaman video yang berkaitan dengan operasi Syarikat, aktiviti di dalam fasiliti Syarikat, proses kerja, peralatan ataupun apa-apa hal dalaman Syarikat, yang telah dimuat naik ke akaun media sosial peribadi atau mana-mana platform peribadi masing-masing, tanpa kebenaran rasmi daripada pihak Syarikat.

ii. Kegagalan mematuhi arahan ini akan mendedahkan individu terlibat kepada tindakan serius oleh pihak Syarikat.

c. **Tindakan Tatatertib**

Sebarang ketidakpatuhan terhadap arahan dalam memo ini boleh dikenakan tindakan tatatertib tegas, termasuk tetapi tidak terhad kepada:

i. Tindakan disiplin mengikut peraturan Syarikat,
ii. Penamatan latihan industri atau penempatan,
iii. Sekatan atau penarikan akses ke kawasan operasi, dan/atau
iv. Tindakan lanjut selaras dengan polisi dalaman dan keperluan keselamatan Syarikat.

2. Larangan rakaman gambar/video dan penyebaran maklumat tanpa kebenaran merupakan kawalan keselamatan berterusan. Sebarang pelanggaran boleh menjejaskan kerahsiaan, keselamatan operasi dan reputasi Syarikat. Kegagalan pematuhan juga boleh menyebabkan Syarikat terpaksa mempertimbangkan langkah kawalan lebih ketat, termasuk sekatan penggunaan telefon bimbit atau larangan peranti peribadi di kawasan tertentu, sekiranya perlu.

3. Kerjasama penuh dan pematuhan segera adalah WAJIB. Setiap individu bertanggungjawab untuk mengekalkan tahap disiplin dan profesionalisme semasa berada di premis Syarikat.

Terima kasih.

NURMASITAH MOHAMAD HAMSUSAH
Ketua Jabatan

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LUNAS/CVM/5542 – (47)

May 2026

All LUNAS Vendors

Dear Sir/Madam,

NOTICE ON SECURITY COMPLIANCE, COMPANY INFORMATION PROTECTION AND PROHIBITION OF PHOTOGRAPHY / RECORDING

1. Reference is made to the above matter.

2. Attached herewith are the following memorandums for your attention and strict compliance:

   i. **Compliance with the Protected Areas and Protected Places Act 1959, the Official Secrets Act 1972 and Company Information Security;** and

   ii. **Compliance with the Prohibition on Photography, Video Recording and/or Dissemination of Company Information.**

3. In this regard, all vendors and subcontractors dealing with LUNAS are required to read, understand and ensure that all personnel, representatives, employees and related parties under their supervision fully comply with all applicable instructions, security regulations and information protection requirements imposed by the Company and relevant laws.

4. Please be reminded that any unauthorised photography, video recording, dissemination of documents, data, operational information, defence assets, facility areas, systems, official documents or any Company-related information without prior written approval from LUNAS is strictly prohibited.

5. Any non-compliance or breach of the security and information protection requirements may result in disciplinary action, suspension or termination of work/contract and/or legal action in accordance with the applicable rules and laws.

6. Vendors and subcontractors shall also ensure that internal security controls are continuously observed while carrying out work within LUNAS premises.

7. Your full cooperation and commitment in ensuring immediate compliance with the Company's security and information protection requirements are mandatory and highly appreciated.

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Thank you.

On behalf **LUMUT NAVAL SHIPYARD SDN. BHD.**

Ir. AZMAN BIN SHAARI
Chief Operation Officer

Enclosures:

1. Memorandum on Compliance with the Protected Areas and Protected Places Act 1959, the Official Secrets Act 1972 and Company Information Security dated 26 February 2026.

2. Translation version of Memorandum on Compliance with the Prohibition on Photography, Video Recording and/or Dissemination of Company Information dated 7 April 2026.

ENCLOSURE 1

HCMA/Inter Office Memo/2025-Mar

LUNAS
LUMUT NAVAL SHIPYARD

199001007732 (199302-K)

INTER OFFICE MEMO

REFERENCE	:	LUNAS/RICD/6400 – (08)
DATE	:	26 Feb 2026
TO	:	All Employees
FROM	:	Chief Executive Officer
THROUGH	:	Head Risk, Integrity and Compliance
COPY TO	:	Chief Financial Officer Chief Corporate Affairs Officer Chief Operation Officer Head LUNAS Langkawi Shipyard
SUBJECT	:	**COMPLIANCE WITH THE PROTECTED AREAS AND PROTECTED PLACES ACT 1959, THE OFFICIAL SECRETS ACT 1972 AND COMPANY INFORMATION SECURITY**

1. Lumut Naval Shipyard Sdn. Bhd. (LUNAS) is subjected to the **Protected Areas and Protected Places Act 1959 (Act 298)**, as well as other applicable security laws and regulations in force from time to time.

2. As a company directly involved in the construction and maintenance of defence assets for the Royal Malaysian Navy (RMN), LUNAS premises and operations are designated and regulated as protected areas and protected places.

3. Accordingly, all information relating to defence projects, including but not limited to technical specifications, engineering drawings, testing procedures, shipyard security layouts, maintenance data and any defence-related documentation, fall within the scope of the **Official Secrets Act 1972**.

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4. It should be noted that protection under the Official Secrets Act 1972 applies automatically to defence and military-related information, even where such documents are not expressly marked as "Secret", "Confidential", or any other classification.

5. Employees are hereby reminded of the following requirements:

5.1. **Protected Area Status**

Access to premises, movement within designated areas, photography or video recording, storage of information, and any form of information sharing relating to the shipyard operations shall be subject to strict security controls in accordance with Act 298 and applicable security regulations.

5.2. **Prohibition of Unauthorised Disclosure**

Any disclosure, transmission, use, storage, or dissemination of official information without proper authorisation is strictly prohibited.

5.3. **Compliance Obligations and Information Control**

All employees shall:

a. Refrain from disclosing any defence-related information to external parties without prior written authorisation and ensure that contractors or third parties under their supervision comply with the same requirement;
b. Not transmit or distribute documents through personal email accounts, messaging applications, or unauthorised devices;
c. Ensure that access to documents is granted strictly for work related basis;

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d. Comply fully with the Company's Information Management Policy, Security Policy, and all related internal procedures; and
e. Immediately report any incident involving unauthorised disclosure or information leakage to Management or the Integrity Unit.

6. Pursuant to Section 8 of the Official Secrets Act 1972, any unauthorised disclosure or transmission of official information to external parties constitutes a criminal offence. Such actions also constitute a breach of Company policy. Non-compliance may result in disciplinary action, including immediate termination of employment or contract, as well as legal proceedings against the individuals involved. The Company will take firm and appropriate action where necessary, including reporting such matters to the relevant authorities. Management views this matter with utmost seriousness as it involves national security interests, the Company's reputation, and the continued operations of LUNAS.

7. Full compliance with this directive is mandatory.

Thank you,

Ir. Azhar Jumaat
Chief Executive Officer

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ENCLOSURE 2

LUNAS
LUMUT NAVAL SHIPYARD

HCMA/Inter Office Memo/2025-Mar

199001007732 (199302-K)

INTER OFFICE MEMO
(TRANSLATION FROM BAHASA MELAYU VERSION)

REFERENCE	:	LUNAS/HCM/1100 – (202)
DATE	:	07 April 2026
TO	:	All Employees
FROM	:	Head of Human Capital Management & Administration Department
COPY TO	:	**Ir. Azhar Jumaat,** Chief Executive Officer **Hjh. Puti Mazura Mashudi**, Chief Corporate Affairs Officer **Ir. Azman Shaari,** Chief Operating Officer **Heads of Departments**
SUBJECT	:	**COMPLIANCE WITH THE PROHIBITION ON PHOTOGRAPHY, VIDEO RECORDING AND/OR DISSEMINATION OF COMPANY INFORMATION**

Refer:

A. Memorandum on Compliance with the Protected Areas and Protected Places Act 1959, the Official Secrets Act 1972, and Company Information Security dated 26 February 2026.

1. With reference to the above subject and reference, the Company wishes to issue an official reminder to all individuals within the Company's premises, including but not limited to employees, protégés, industrial trainees, transition program participants, suppliers, subcontractors, visitors and clients, regarding the prohibition on photography, video recording and/or dissemination of content related to the Company's operations and internal matters without official approval from the Management. This directive applies without exception to all individuals mentioned above, regardless of position, role, employment status or duration of assignment.

a. **Prohibition on Photography and Video Recording**

i. Any form of photography or video recording using mobile phones or any recording devices within the Company's premises is STRICTLY PROHIBITED unless prior official approval has been obtained from the authorised department/unit.

ii. For individuals who have been granted approval, all visual materials recorded shall be used strictly for official operational purposes and must be handled, stored and protected in accordance with the Company's security and confidentiality requirements.

iii. The respective Departments / Units / Project Management Teams are responsible for informing, reminding and ensuring compliance by

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subcontractors, suppliers, visitors or clients under their supervision with regard to the prohibition on photography, video recording and/or dissemination of any content related to the Company's operations and internal matters without official authorisation.

b. **Directive for Removal of Personal Social Media Content**

i. Accordingly, ALL INDIVIDUALS CONCERNED ARE HEREBY INSTRUCTED TO IMMEDIATELY REMOVE any posts, photographs or video recordings related to the Company's operations, activities within the Company's facilities, work processes, equipment or any internal Company matters that have been uploaded onto personal social media accounts or any personal platforms without official authorisation from the Company.

ii. Failure to comply with this directive shall subject the individuals concerned to serious action by the Company.

c. **Disciplinary Action**

Any non-compliance with the instructions stated in this memorandum may result in strict disciplinary action, including but not limited to:

i. Disciplinary action in accordance with Company regulations,

ii. Termination of industrial training or placement,

iii. Restriction or revocation of access to operational areas, and/or

iv. Further action in accordance with the Company's internal policies and security requirements.

2. The prohibition on unauthorised photography/video recording and dissemination of information constitutes an ongoing security control measure. Any breach may compromise the Company's confidentiality, operational security and reputation. Failure to comply may also require the Company to impose stricter control measures, including restrictions on the use of mobile phones or prohibition of personal devices in designated areas, where necessary.

3. Full cooperation and immediate compliance are MANDATORY. Every individual is responsible for maintaining a high level of discipline and professionalism while within the Company's premises.

Thank you.

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