



BUMI ARMADA

Code of Business Conduct and Ethics



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Message from the CEO



Our Code-The way in which we work

Welcome to Bumi Armada's new Code of Business Conduct and Ethics, which shall be our guide to doing business and in the way we work. The Code is built on our Core Values and, therefore, is at the very core of our organisation.

In the following pages you will find practical information about what is expected of you and what we expect of those working with us. We work globally with a wide variety of business challenges. It is important that you are aware of the challenges that are linked to business ethics as they do carry exposure to you and the Company. This Code has been designed to help by highlighting your responsibilities in working within this diverse landscape so you can identify risks relevant to your role in the organisation. It also includes references to relevant policies and procedures which can provide you information and guidance specific to issues that you may face.

I request you to read and encourage you to make use of the Code as we work towards building and sustaining a strong culture in the organisation that secures and protects the future of Bumi Armada.

Lastly, together with this Code, we are launching our Speak Up Policy which has been designed to encourage and support the raising of any concerns related to the Code and the conduct of our business via a safe, independent and confidential reporting channel.

If you have any questions or require a better understanding of the Code, please get in contact with the referenced function as set out in the Code or contact the Compliance Department for assistance.



Leon Harland
Chief Executive Officer





OUR VISION

To be the preferred provider of offshore production and support services to our clients

OUR MISSION

- To operate and deliver on our commitments to the satisfaction of our stakeholders, safely, on time and within budget.
- To add value by effectively managing risks through a hands-on approach.
- To continuously improve our capabilities and to apply the lessons learnt to the way we work.
- To ensure good governance in all our practices, reduce our environmental footprint, support our local communities and promote social sustainability awareness wherever we operate.

OUR CORE VALUES

			
SAFE	UNITED	RESPONSIBLE	EXCELLENT
<p>We care for the safety of each other and lead by example.</p> <p>We aim to take a proactive approach in protecting the environment, maintaining our assets and safeguarding information.</p>	<p>We place a high importance on working as one team and want to pursue and achieve results together.</p> <p>We seek the participation of others in resolving problems, encourage mutual respect and always welcome feedback.</p>	<p>We take responsibility in always delivering on our promises and we commit ourselves personally in adding value to our stakeholders.</p> <p>We want to conduct our business with good governance and a strong moral compass.</p>	<p>We are driven by our ambition to continuously improve.</p> <p>We seek to learn from others, challenge others constructively and have the discipline to make the extra effort each time.</p>



Section 1: You and the Code

1.1 Who does it apply to?

1.2 Employees Responsibilities

1.3 Managers Responsibilities

1.4 Directors Responsibilities

1.5 Reporting breaches of the Code

1.6 Consequences of breach or non-compliance with the Code

Section 1: You and the Code

1.1 Who does it apply to?

- All directors, officers, and employees of Bumi Armada Berhad, its subsidiaries, and majority-owned or controlled affiliates (collectively Bumi Armada or the Company).
- The Company also encourages its non-controlled affiliates to adopt and follow the Code or similarly strong standards.
- Business partners such as agents, consultants, contractors and suppliers in connection with their work for the Company.
- All new joint ventures, which shall either adopt the Code or establish a Code of Business Conduct and Ethics which shall be similar in substance and approved by the Board of Directors and CEO of Bumi Armada Berhad.

1.5 Reporting Breaches of the Code

- If you know or suspect there has been a violation of the Code, and/or any policies or procedures of the Company, you have a duty to report it.
- To make a report, you may use the Reporting Hotline established pursuant to the Company's Speak Up Policy.
- The Reporting Hotline can receive reports in over 50 languages and is available 24 hours a day, seven days a week via a toll-free number.
- The Reporting Hotline also allows for reports to be made via a secure website.
- Any report will be treated confidentiality and you may choose to remain anonymous.
- Any form of retaliation against a person making a report in good faith will not be tolerated and is in itself a violation of the Code.

1.6 Consequences of breach of or non-compliance with the Code

- The consequences of breach of or non-compliance with the Code include disciplinary action up to and including termination.
- In some cases, the Company may report a breach or non-compliance to the relevant authorities, which could also lead to prosecution.

1.2 Employees Responsibilities

- Read, understand and comply with the Code.
- Complete any training pertaining to the Code required or assigned to you by the Company.
- When in doubt, seek advice and guidance from the Compliance Department.

1.3 Managers Responsibilities

- Demonstrate leadership by example in complying with the Code.
- Communicate the importance of conducting business in an ethical manner with integrity at all times.
- Escalate as appropriate any concerns or alleged breaches of the Code brought to your attention.
- Incorporate adherence to the Code as part of employees' evaluation process.

1.4 Directors Responsibilities

- This Code sets out the general responsibilities of directors, officers and employees of the Company. Directors of Bumi Armada Berhad ("BAB") have specific responsibilities as directors and these are set out in Code of Business Conduct and Ethics for BAB Directors ("Directors' Code"). The Directors' Code has been duly approved by the Board of Directors of BAB.

Report any concerns:

⇒ [Speak Up Policy](#)

⇒ [Reporting Hotline](#)



Section 2: Workplace Culture & Environment

2.1 Health Safety Security Environment and Quality

2.2 Use of IT and Electronic Communication

2.3 Workplace Harassment

2.4 Unlawful Discrimination

2.5 Fair Employment Practice

Section 2: Workplace Culture & Environment

2.1 Health Safety Security Environment and Quality (HSSEQ)

The Company is committed to operating its business with the objective of zero harm to its people, the public and the environment. This principle underpins how we work with our clients, partners, suppliers, the public and regulators.

In addition to the potential loss of life, damage to property and/or destruction of the environment, breach of HSSEQ rules and regulations may lead to civil action and/or criminal prosecution against the Company and those personnel who are responsible for causing or failing to prevent the said loss, damage or destruction.

Your responsibilities:

- Comply with applicable laws, standards and procedures.
- Do not undertake any activity that you are not qualified to perform.
- Speak up or if necessary, stop the work or activity if you observe any unsafe conditions, actual or real risk of pollution, misbehaviour or mismanagement.
- Report any incident, injury or accident.
- Know the emergency procedures that apply in your workplace or worksite.

Resources:

The Company HSSEQ policies are available [here](#).

2.2 Use of Information Technology and Electronic Communication

The Company has made available access to and use of its Information Technology ("IT") systems (hardware, software and networks) to employees to enable them to perform their work.

The use of network based communication exposes both the Company and the user (individual employee) to the applicable laws governing such communication.

Breach of such laws can expose the Company and/or the employee to both civil and criminal penalties.

Your responsibilities:

- Use Company IT systems solely for Company related work only and in accordance with Company policies and guidelines. Limited personal use is permissible provided all Company IT security guidelines are adhered to.
- Strictly comply with all IT policies and procedures of the Company.
- Do not upload, download, send, transmit or otherwise access defamatory, false, offensive, obscene, racist, seditious or inappropriate materials.
- Do not use a personal e-mail address or service to conduct Company business.
- Ensure proper use and care of any Company IT hardware issued or made available to you.

Resources:

The following guidelines are available on the Company Intranet:

⇒ [Computing Device Guideline](#).

⇒ [Company Network and Communication Guideline](#).

Section 2: Workplace Culture & Environment (cont.)

2.3 Workplace Harassment

The Company is committed to providing a conducive work environment free of any kind of harassment, intimidation or abuse.

2.4 Unlawful Discrimination

The Company treats each employee with fairness and dignity.

The Company will not tolerate unlawful discrimination at the work place or on the job.

2.5 Fair Employment Practice

The Company offers equal opportunities to everyone to ensure that it can draw on the widest talent pool and attract the best people.

Employment is based solely on individual merit and qualifications directly related to professional competence.

Your responsibilities:

- Treat others with respect at all times.
- Help create a conducive working environment.
- Avoid any language or behaviour that intimidates or offends others in any dealings with them.

Your responsibilities:

- Ensure that all your business decisions for the Company are based strictly on merit, not on origin, race, religion, gender, sexual orientation, personal relationships or any other characteristic protected by applicable laws.
- Comply with all laws applicable in the jurisdiction of your workplace that prohibit workplace discrimination.

Your responsibilities:

- Base your employment decisions, e.g. hiring, promotions, assignments on objective criteria and ensure your personal feelings, prejudices and preferences are not influencing your employment decisions.

Report any concerns:

⇒ [Speak Up Policy](#)

⇒ [Reporting Hotline](#)



Section 3: Business Partners

3.1 Anti-Bribery and Corruption

3.2 Facilitation Payments

3.3 Political Contributions

3.4 Charitable Contributions

3.5 Trade Compliance

3.6 Anti-money Laundering

3.7 Anti-Trust and Competition

3.8 Conflicts of Interest

3.9 Supply Chain Management

3.10 Gifts and Hospitality

Section 3: Business Partners

3.1 Anti-Bribery and Corruption

The Company strictly prohibits bribery and corruption in all of its business dealings.

To ensure Bumi Armada works only with ethical business partners, the Company has implemented a Know Your Counter-Party process as part of its Supplier Quality Management Procedure to detect and address risk relating to its third-party relationships.

3.3 Political Contributions

Bumi Armada is apolitical. Bumi Armada does not make political contributions.

Employees may make personal political contributions to the extent that such contributions comply with legal limits and do not in any way appear to be an endorsement or contribution by the Company.

3.2 Facilitation Payments

The Company prohibits facilitation payments to expedite routine governmental actions. For the avoidance of doubt, official “fast-track” facilities offered by government agencies to expedite routine applications, e.g. fast track visa applications are not facilitation payments and are permissible. As with any expenditure, these expenses must be properly recorded in the Company’s books and records.

If an employee faces an imminent threat to personal health, safety or freedom, the employee may make a payment and must promptly report the issue to the Compliance Department.

3.4 Charitable Contributions

The Company may periodically make reasonable contributions to support local charities and the communities in which the Company has operations, and as part of its overall sustainability initiatives. However, as payments for charity could be in substance bribery or political contributions, the Company must ensure that the charitable payments are not for political mileage or an indirect bribe.

To ensure that all proposed or requests for charitable contributions are properly vetted, all proposals for charitable contributions shall be sent to the Sustainability Committee for review and approval, and the activities of the charities must be in accordance to the environment, society or governance (ESG) areas of the Corporate Sustainability Policy.

Your responsibilities:

- Do not give, promise, or offer, either directly or indirectly through a third-party intermediary, any payment or benefit of any kind to anyone, including any Government Official, to obtain or retain business improperly.
- You must also never accept a bribe in connection with your duties and responsibilities to the Company. In the event you are offered any bribe in relation to your duties and responsibilities to the Company, you must immediately inform the Compliance Department.
- If you know or suspect that Company funds will be used to bribe or otherwise improperly influence someone, refuse to make the payment and immediately contact the Compliance Department.
- Clearly and accurately record all transactions in the Company’s books and records.
- Ensure that the Company’s policies and procedures, in particular the Company’s Supplier Quality Management Procedure and Gifts & Hospitality Policy, are strictly adhered to in the course of conducting business.
- Prior to proposing any joint venture, notify and consult the Compliance Department on the appropriate due diligence to be performed on the proposed joint venture partner.

Resources:

- ⇒ [Bumi Armada Supply Chain Management intranet.](#)
- ⇒ [For more information on our Gifts and Hospitality Policy go to the Ethics and Compliance section of our Bumi Armada website.](#)

Section 3: Business Partners (cont.)

3.5 Trade Compliance

The movement of money, goods, technology, software, and services across international borders is subject to the laws and regulations of the exporting country, the importing country, and any other jurisdiction which may be crossed during the execution of the transaction.

These laws and regulations may require licenses to export or import these goods and services (including certain technologies) depending on the product type, destination, end-user or end-use. They may also impose economic sanctions, including trade embargoes, to restrict transactions with certain countries, entities, and individuals.

Bumi Armada is committed to complying with all applicable import and export controls laws, customs laws, economic sanctions, and applicable trade regulations that govern cross border transactions.

Trade and customs compliance violations may assign personal liability to the directors of the legal entity involved and the employees who approved and performed the violation. The liability may include confiscation of the goods and penalties for the company based on its value, and detention of the employees involved

Your responsibilities:

- Obtain the required permissions before exporting or importing money, goods, technology, software, or services across national borders.
- Make accurate, honest and complete declarations in connection with all exports and imports.
- Where a potential transaction involves a jurisdiction or entity from a jurisdiction which is subject to United Nations (UN) sanctions, consult with the Compliance Department in advance of any interaction with any party involved or potentially involved in the proposed transaction.
- Never hand-carry a commercial item across international borders without prior review and coordination with the Logistics Section of Supply Chain Management. Transporting commercial material as a "hand carry" is allowed and legislated in some countries, and the logistics personnel will review and advise on the feasibility on a case by case basis. If approved, and required, the carrier must declare the item through the customs red channel, pay duties and receive support from the assigned customs broker at destination.
- Ensure that imported goods are classified accurately and assigned the correct tariff number in order to determine the appropriate duty owed. Misclassification represents fraudulent misrepresentation and is against the law in most jurisdictions.
- Never undervalue goods on commercial documents in an attempt to reduce the applicable duty.
- Ensure you are up to date on the changing export and import rules in the region where you work by checking with the Logistics Section of Supply Chain Management.

Resources:

- ⇒ [Bumi Armada Supply Chain Management Intranet.](#)
- ⇒ For a list of countries under UN sanctions, please refer to the [Legal Department Intranet.](#)

Section 3: Business Partners (cont.)

3.6 Anti-Money Laundering

The Company is fully committed to complying with all laws and regulations prohibiting money laundering and the financing of terrorism (“AML”).

AML laws prohibit activities that seek to conceal the proceeds of illegal activities, try to make the source of illegal funds look legitimate, or use otherwise legitimate funds to support criminal activities, including terrorism.

To reduce and mitigate the risks of being exposed to AML activities, the Company will conduct appropriate due diligence on all new/unknown customers.

Your responsibilities:

- Strictly abide by the Company's Supplier Prequalification Procedure before a supplier is engaged.
- Ensure that relevant Legal, Finance and Tax personnel are consulted before dealing with new customers or customer with whom the Company has no prior established relationship.
- Watch for irregular payments and other “red flags,” such as payments made in currencies other than those specified in the invoice or contract, requests for overpayments, attempts to make payments in cash or cash equivalents, unapproved payments to an individual or entity not named in the contract, and use of an irregular account for the business relationship.
- If you have any suspicions on the legitimacy of the source of funds or the activities for which the funds are used for, immediately notify the Compliance Department.

Resources:

⇒ [Bumi Armada Supply Chain Management Intranet.](#)

3.7 Anti-Trust and Competition

Antitrust and competition laws prohibit behaviour that unlawfully limits trade or restricts fair competition, such as agreements between competitors that serve to fix prices, divide markets, limit production, bid-rig or otherwise interfere with the competitive operation of a free marketplace. The Company fully supports free enterprise and fair competition and is committed to complying with anti-trust and competition laws in all jurisdictions in which it operates.

Your responsibilities:

- Do not enter into any agreement or understanding with any competitor about any aspect of competition between the Company and a competitor, including agreements on pricing, bidding, terms and conditions or allocation of markets or customers.
- Select business partners based on merit and make clear to all third parties that we expect them to compete for our business in a fair and honest manner.
- Be honest and open when discussing our products and services, and never comment on a competitor's products and services without an objective basis for doing so.
- Be careful not to participate in any activity, e.g. conversations or meetings with competitors, that could amount to or even be seen as an inappropriate collaboration or collusion.
- Actively disassociate yourself from any situation in which improper agreements or information sharing between competitors occurs and promptly inform the Compliance Department.
- As anti-trust and competition laws are complex and often fact specific, consult the Compliance Department if you have a doubt or questions on whether any conduct or proposed course of action is prohibited.

Section 3: Business Partners (cont.)

3.8 Conflicts of Interest

The Company expects you to always act in the best interest of the Company when making any business decision for the Company.

A conflict of interest arises when an officer, director or employee's personal relationships, participation, interest or ownership in ventures outside the Company may influence or be seen to influence the performance of the individual's duties as an officer, director or employee of the Company.

3.9 Supply Chain Management

The Company is committed to work with its suppliers in a socially responsible and ethical manner, and continuously seeks to improve the way in which business is conducted with suppliers.

To ensure effective, fair and transparent management of the supply chain process, the Company's Supply Chain Management ("SCM") is the only organization authorized to solicit pricing and award business on behalf of the Company.

The acceptance of any Gifts and Hospitality from suppliers shall be strictly subject to the policies and procedures of the SCM organization and the Gifts and Hospitality Policy.

Resources:

- ⇒ [Bumi Armada Supply Chain Management Intranet.](#)
- ⇒ [Gifts and Hospitality Policy.](#)
- ⇒ [Gifts and Hospitality Disclosure Form.](#)

Your responsibilities:

- Always act in the best interest of the Company when making any business decision for the Company.
- Avoid any relationship or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job.
- Immediately notify your superior as soon as you become aware that there is actual, potential or perceived conflict of interest.
- Declare any directorship outside Bumi Armada and any shareholding of 5% and above to your line manager, Human Resource Department or the Company Secretary.
- Recuse yourself from any discussion and/or decision making pertaining to any transaction where there may be an actual, potential or perceived conflict of interest.
- If you have any doubt on whether a conflict of interest situation exists or may arise, please consult with the Compliance Department.

Your responsibilities:

- Avoid putting yourself in a position whereas you may be accused of a conflict of interest, as it may happen when a non-Procurement employee engages in selecting and negotiating commercial terms with suppliers.
- Do not accept any Gifts and Hospitality from a supplier or potential supplier without consulting the SCM policies and procedures and the Gifts and Hospitality Policy.

Section 3: Business Partners (cont.)

3.10 Gifts and Hospitality

The Company is committed to competing solely on the merits of our products and services. We must avoid any actions that may create a perception that the Company sought, received or provided favorable treatment in exchange for any Gifts and Hospitality.

Therefore giving or receiving any Gifts and Hospitality is permissible only to the extent it meets the Company's policy and procedures, complies with laws and regulations of the jurisdiction where it is offered/received and does not create any actual or perceived conflict of interest.

Cash or cash equivalents are prohibited.

Heightened attention shall be given to Gifts and Hospitality offered to Government Officials.

Any Gifts and Hospitality to Government Officials are subject to notification and/or management pre-approval in accordance with the Gifts and Hospitality Policy.

The principles set out in Section 3.10 herein shall apply to suppliers and contractors in relation to the provision of Gifts and Hospitality to Bumi Armada personnel.

Resources:

⇒ [Gifts and Hospitality Policy.](#)

⇒ [Gifts and Hospitality Disclosure Form.](#)

Your responsibilities:

- Never give or receive any gift or other benefit that could inappropriately influence a business decision.
- Exercise good judgement as host or invitee when providing or receiving any gift or hospitality to ensure no implied business obligation is provided or received.
- All Gifts and Hospitality, including any travel and entertainment, provided to any outside party must be reasonable, infrequent, have a clear and legitimate business purpose, and be customary (not lavish or excessive) within the geographical region and within the context of the business relationship.
- Ensure that all Gifts and Hospitality comply with the approval and reporting requirements set forth in the Company's Gifts and Hospitality Policy.
- Ensure that all Gifts and Hospitality provided to third parties are accurately recorded as such in the relevant company's books and records and duly supported by receipt(s).



Section 4: Assets & Financial Integrity

- 4.1 Accounting and Financial Records**
- 4.2 Company Assets**
- 4.3 Signing Contracts and Committing the Company**

Section 4: Assets & Financial Integrity

4.1 Accounting and Financial Records

Accurate and reliable records of many kinds are necessary to meet the Company's legal and financial obligations and to effectively manage the affairs of the Company.

The Company is committed to ensure proper record keeping and accounting in accordance with accounting principles, standards and regulations applicable to the Company.

Any misrepresentation of facts, falsification or tampering with or destroying records (where the Company is under an obligation to retain them) is strictly prohibited.

4.2 Company Assets

Company assets come in different forms, both tangible (physical property, buildings, equipment, documents), and intangible (Intellectual Property, Confidential Information or commercial information).

All employees are expected to exercise due care when handling the Company's assets.

4.3 Signing Contracts and Committing the Company

Each time you enter into a business transaction on the Company's behalf, there should be documentation recording that agreement, approved by the Legal Department. Never sign any contract on behalf of the Company unless all of the following are met:

- You are authorized to do so under the Company's Limit of Authority. If you are unsure whether you are authorized, ask your manager or superior.
- The contract has been approved by the Legal Department.
- Do not make changes to the Company standard form contracts without express written approval from the Legal Department.

Do not sign any contract blindly and/or on the instructions of a superior.

You are responsible for every document you sign.

Your responsibilities:

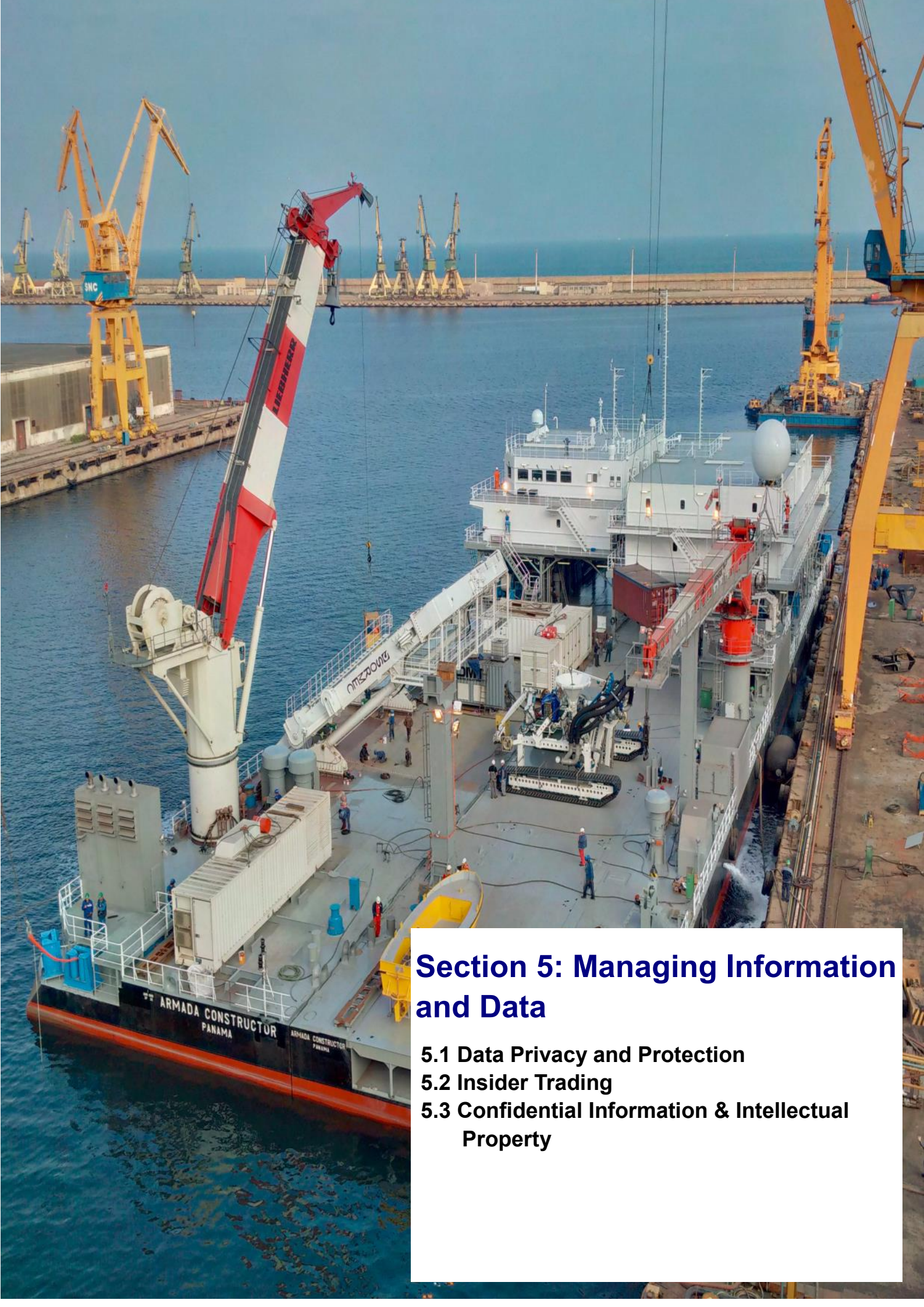
- Ensure that any records you create fully and accurately reflect the particulars of the underlying transactions.
- Never hide, alter, falsify, or disguise the true purpose of any record or transaction.
- Always adhere to the applicable Limits of Authority policy.
- Fully cooperate with any external or internal audits or investigations.
- Immediately report any accounting irregularities, incidents of fraud, or other issues that could result in inaccurate books and records to Accounting management or the Reporting Hotline.

Your responsibilities:

- Protect the Company assets against theft, loss or misuse of Company assets.
- Report any misconduct relating the misuse or misappropriation of Company assets.

Resources:

⇒ [Limits of Authority.](#)



Section 5: Managing Information and Data

5.1 Data Privacy and Protection

5.2 Insider Trading

5.3 Confidential Information & Intellectual Property

Section 5: Managing Information and Data

5.1 Data Privacy and Protection

Data protection laws safeguard information about people and prevent abuse.

The Company will comply with applicable laws and regulations when processing personal data.

5.2 Insider Trading and Dealing with Company Shares

Price sensitive information including but not limited to financial and business information pertaining to the performance of the Company and other listed companies which are not publicly available are considered insider information.

5.3 Confidential Information & Intellectual Property

The Company's Confidential Information is meant to be kept strictly confidential and not to be divulged or disclosed to persons inside or outside the Company without proper authorization.

The Company places the utmost importance on protection of its Intellectual Property and will take all necessary legal means to protect and assert its rights in respect of its Intellectual Property.

The Company respects the Intellectual Property rights of others.

Your responsibilities:

- Comply with the Company's policies and procedures on the use of and storage of personal data.
- Only access personal data for valid business purposes.
- Do not release personal data to persons outside the Company without the proper authorization.

Your responsibilities:

- Never deal in shares or other securities of any company, included Bumi Armada Berhad, either directly or indirectly while you are in possession of insider information.
- When dealing in shares of Bumi Armada Berhad while not in possession of insider information, Principal Officers (as informed to you by the Company Secretaries) must comply with the relevant disclosure requirements.
- When in doubt, check with the Company Secretaries.

Your responsibilities:

- Ensure that that no dissemination or disclosure of Confidential Information is made without proper authorization in accordance with the Company's internal policies and procedures on dealing with Confidential Information. Confidential Information includes information from others which the Company is under an obligation to keep confidential.
- Best practice is to only discuss your work with those relevant to the particular transaction or topic.
- Identify, handle and store all Company Intellectual Property in accordance with the Company's Intellectual Property management system.
- Be aware that the Company owns all Intellectual Property created by employees in the course of their employment and employees are required to sign and execute all necessary documents and actions necessary to perfect the Company's rights over Intellectual Property so created.
- Ensure the use of Intellectual Property rights of others have been duly authorized. When in doubt, consult the Compliance Department.

Resources:

⇒ For further information on classification, labelling, distribution, storage and copying of information, employees are advised to refer to our [Information Classification Standard](#)



Section 6 :External Communications

6.1 Corporate branding

6.2 Media Relations

6.3 Social media

6.4 Publication of Materials

Section 6: External Communications

6.1 Corporate branding

- The Company' brand and image is an asset that needs to be protected.
- Employees' behaviour reflect on the Company's reputation and thus employees should behave in conformity with the principles as set out in the Code.
- The use of any element of the Company's brand, e.g. at a conference or exhibition, souvenirs, brochures etc must be vetted and approved by the Corporate Communications Department.

6.2 Media Relations

Considering that we are a public listed company and having a global presence, we have to be careful on how information about the company is disseminated to external parties.

While we cannot avoid talking about our Company to our friends and family, it is critical that we understand what can and cannot be shared publicly.

In addition, we must understand that each employee is an ambassador of the Company.

The only persons authorized to speak to the media are the

- Chairman;
- Chief Executive Officer;
- Senior Vice President, Investor Relations; and
- Any other person as authorized by the Board.

6.3 Social Media

Social media is changing the way we communicate at work. However, employees need to be mindful that anything they post about the Company can impact the Company's reputation and contract obligations. As such, social media needs to be used responsibly.

Remember to respect privacy, confidentiality and intellectual property. Your obligations to comply with the Code and Company policies and procedures apply to activities on social media.

Avoid making comments or posts that could be defamatory or offensive.

Do not post personal opinions or speculative statements regarding work related matters.

6.4 Publication of Materials

While the Company encourages employees to present at conferences, seminars and to publish academic papers, employees are required to see approval from Business Unit/Division heads before accepting any invitation to speak or present and before submitting any article or paper for publication.

What is permissible

- It is acceptable to talk about the business we are in, what you do for a living and about work in general. The best guide is to keep within what is available in the public domain, e.g. what is on our website or already announced in the media, i.e. publicly available information.
- If approached by members of media or research companies, politely inform them that you are not authorized to speak for Company. Take their particulars and pass them on to the Corporate Communications Department.
- If you are unsure of whether you should disclose any information, stop and check with the Corporate Communications Department.

Do not disclose information that is not publicly available.

In order to avoid situations of conflict, employees should not post any company information, activities or other corporate updates to social media.

Resources:

Employees are advised to our visit our [Communications Policy](#) for further information.



Section 7: Conclusion
Section 8: Glossary

Section 7: Conclusion

Thank you for taking the time to read the Code. We trust that you will refer to the Code to guide you in your decision making as an employee of the Company.

Obviously, the Code cannot cover each and every situation in the course of doing business. Ultimately, the Company relies on each person subject to this Code to use good judgment in the performance of their responsibilities. In exercising that good judgment, you should consider both the guidelines stated in the Code, as well as their intent and spirit.

Nevertheless if you have questions, please do consult with the Compliance Department.



Section 8: Glossary

Confidential Information: means information classified in accordance with the [Company's Information Classification Standard](#) or any revisions thereto.

Intellectual Property includes invention and patent rights, original works of authorship and copyrights, mask work and design rights, moral rights, trademark, service mark, trade dress, trade name, and domain name rights, trade secret rights, privacy rights, publicity rights, trade secrets, know-how and all similar intangible, proprietary or industrial property rights of the Company.

Gifts and Hospitality refers to gifts or meals, travel, accommodations, entertainment and other promotional expenditures (collectively, Hospitality) we may receive from or provide to any person in connection with the Company's business. Hospitality can include expenditures such as registrations for seminars or educational courses and green fees/competition fees.

Government Official includes

- Any employee or member of a local, regional or national government body, department or ministry, whether in the executive, legislative, administrative or judicial branches of government;
- Any political party, party official or candidate for political office;
- Any employee or official of a public international organization such as the World Bank or one of its departments or agencies;
- Any employee or official of a state-owned or controlled company or instrumentality, even if operated like a privately-owned corporation—this includes employees of state-owned oil companies;
- Anyone acting in an official capacity for or on behalf of the government (including a state-owned or controlled company);
- The members of a royal family, depending on factors such as their titles, responsibilities, legal standing, and influence; and, under certain circumstances
- The close relatives of a Government Official (such as a sibling, spouse, child or other dependent).

Principal Officer means in relation to the Company, the chief executive who is not a director, the chief financial officer or any other employee of the Company who has access or is privy to price-sensitive information in relation to the Company. If you are considered a Principal Officer, the Company Secretary will notify you accordingly.

Reporting Hotline means the independent third party reporting hotline established pursuant to the Company's Speak Up Policy. Links to the Policy and Reporting Hotline communications channel can be found here: <https://wrs.expolink.co.uk/bumiarmada>

Code of Business Conduct and Ethics



BUMI ARMADA BERHAD
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