moving energy

CODE OF CONDUCT & BUSINESS ETHICS

Version 2026

The MISC Code of Conduct and Business Ethics is a general reference for use in all the countries in which MISC conducts operations. It does not describe all applicable laws or MISC policies or give full details on any particular law or policy. It does not constitute legal advice. It does not constitute or create a contract of employment. MISC reserves the right to modify, revise, cancel or waive any policy, procedure or condition without notice and without revision of the Code. Moreover, the provisions of the Code may be modified by MISC to adapt them to local laws and conditions.

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Foreword by the President and Group CEO

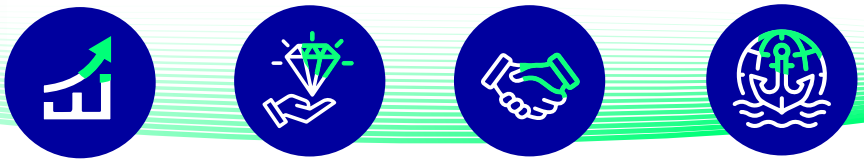
DATUK ZAHID OSMAN

President and Group Chief Executive Officer

Dear Colleagues,

In today's complex and highly regulated global maritime environment, expectations of how we conduct our business extend beyond financial performance. They encompass governance and compliance, social and environmental responsibility, as well as innovation and technology.

In this environment, integrity and compliance form the foundation of our



sustainable growth | guiding how we create value | earn trust | collaborate across our global maritime ecosystem

This is why CoBE has long been the cornerstone in guiding our conduct, at sea, in our offices, yards, and in every business decision we make.

This year, we have enhanced CoBE to keep it robust and relevant, aligned with evolving laws, industry best practices, technological developments, and global ESG expectations.

Major revisions include the introduction of new sections on Tax, Social Media, Responsible Artificial Intelligence, and Non Retaliation: strengthening protections for those who speak up in good faith.

As a matter of good governance, I expect all employees to speak up if something does not seem right and to use our established reporting channels responsibly.

Given our international footprint, some provisions of the CoBE have been adapted through Country Supplements to address the requirements of the local jurisdictions where MISC Group operates. The CoBE will continue to have separate Country Supplements to cater to local jurisdictions' applicable legislation and social conventions.

Foreword by the President and Group CEO

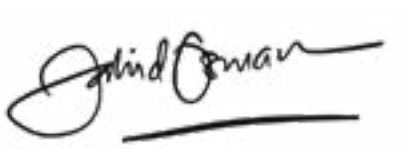
As you know, the CoBE applies to all employees and directors within the MISC Group worldwide, and extends to our contractors, sub-contractors, consultants, agents, representatives, and all others performing work or services for or on behalf of MISC.

Always remember that each of you plays an important role in upholding integrity and professionalism, by speaking up when concerns arise and carrying out our work with Accountability, Transparency, and Efficiency.

I encourage you to take the time to internalise the CoBE, seek guidance whenever you are unsure, and support one another in choosing what is right, even when it is not easy.

Together, these everyday actions build a culture of trust and integrity that strengthens our resilience and enables the MISC Group to create lasting, sustainable value in #deliveringProgress.

Thank you.



DATUK ZAHID OSMAN
President and Group Chief Executive Officer

General Business Principles

MISC Berhad (MISC), was incorporated in 1968 and is a global leader in delivering international energy-related maritime solutions and services. We are among the world's leading shipping conglomerates with strong credit ratings in the maritime transport sector.

Our principal businesses comprise energy shipping and its related activities, owning and operating offshore floating solutions, marine repair and conversion, engineering and construction works, integrated marine services, port management and maritime services as well as maritime education and training.

We are a proud constituent of the DJSI Emerging Markets Index and FTSE4Good Bursa Malaysia Index, a testament to our sustainability performance and strong Environmental, Social and Governance (ESG) practices. MISC Berhad is listed on the Main Board of Bursa Malaysia.

Operating a modern and diversified fleet of more than 100 owned and in-chartered vessels, powered by a multi-national workforce, MISC is firmly committed to creating value for our stakeholders and contributing to the sustainable development of the maritime industry.

Our long track record as a global energy-related maritime solutions and services provider

Since 1968, our sterling track record spans over 50 years in delivering energy-related maritime solutions and services with a long-term value creation across global maritime value chain.

Extensive global reach

MISC and its Group of Companies have established a strong international presence across the five continents and move energy across the seven seas.

Powered by passionate and dedicated people

Our people are the foundation of everything we do. Our employees worldwide are committed to meeting the maritime needs of the world in energy transition and decarbonisation agenda now and into the future. So we remain focused on improving our employee value proposition, while maintaining equitability among our diverse talent population across our global portfolio.

General Business Principles

Responsible governance, good business ethics and conduct

Throughout the Group, we strive to achieve the highest standards of integrity in the conduct of our business and operations. We have robust policies, systems and protocols in place to ensure good governance and ethical business practices.

Beyond sustainability – Driving a sustainable future

Through MISC 2030 we are addressing climate-related risks and opportunities which are shaping the journey towards a net-zero future by the year 2050. Implementing this strategy alongside our short-term business plan is enabling the Group to future proof our business by venturing into areas of opportunity and income stream that exist in the maritime decarbonisation and energy transition space to become a thriving business in a net-zero and circular economy.

Introduction

At MISC, integrity is the foundation of how we do business. Our success is measured not only by performance and results but also by the trust we earn from our stakeholders.

The Code of Conduct and Business Ethics ("CoBE" or "Code") defines the standards of behaviour and ethical conduct expected of everyone to whom it applies. It embodies our Shared Values of Professionalism, Loyalty, Integrity, and Cohesiveness — values that continue to underpin our success. The CoBE serves as the foundation for integrity and ethical decision-making, the cornerstone of the trust we have built over the years.

Adopting a principles-based approach, each section of the CoBE outlines key principles, practical guidance, decision-making prompts, and references to related policies, standards, guidelines, and procedures that provide further guidance on specific subject matters. The Code translates our values into action, helping us make the right choices, especially in complex or uncertain situations.

Recognising our international presence, certain provisions are adapted through CoBE Country Supplements to reflect local laws and regulations. Together, the CoBE and its relevant Country Supplement form a single, comprehensive document.

The CoBE Guide complements the CoBE by offering practical examples, decision-making tips, and direction on where to seek further advice. It is designed as a user-friendly resource to help all of us understand how to apply the Code in our daily work.

Each subject matter makes reference to policies, standards, guidelines or procedures. You are required to also read and understand these reference documents to gain a more comprehensive understanding.

You are expected to familiarise yourself with the CoBE and its accompanying documents. Your commitment to upholding both the letter and spirit of the Code is vital to MISC's continued success. Every action we take reflects not only on us as individuals, but also on MISC as a whole.

If you have any doubts or questions about the application or interpretation of the CoBE and its related documents, please seek advice from your Head of Department, Human Resource Department, Legal Department, or the Compliance Department.

PART I

CORE VALUES & CULTURE

Part I : Core Values & Culture

1. Application

1.1. This Code is intended to apply to every employee of every MISC group company worldwide. It is also intended to apply to every director (executive and non-executive) for those companies, except as otherwise stated in this Code. Your failure to comply may have severe consequences to MISC and may result in disciplinary action against you, or even your dismissal from MISC, subject to the requirements of applicable laws.

1.2. This Code applies to you in your capacity as a third-party conducting business with MISC. We require the same level of integrity and business conduct from you, whether you are engaged as an agent, an intermediary, engaged to provide goods and/or services for, jointly with or on behalf of MISC or a counterparty in a business transaction with MISC. The Code also applies to the contingent workforce, such as interns, apprentices, proteges, gig workers and volunteers. “Third Parties” refer to both individuals and corporate entities including but not limited to director, officer, employee, agent, consultant, nominee, representative, licensee, adviser, sub-contractors, or any service provider. Your failure to comply may have severe consequences for both MISC and yourself, and may result in MISC requesting you to take remedial steps to remedy a breach, or even suspending or terminating the business relationship with you, and seeking to enforce any other contractual rights we may have against you for breaching this Code.

1.3. Joint venture companies in which MISC is a non-controlling stakeholder and associated companies are encouraged to adopt these or similar principles and standards.

1.4. If you have any concerns, you may raise your concern through the accessible channels for reporting concerns and grievances as provided by the Company. Please refer to the MISC and/or other subsidiaries’ website for the relevant reporting channels.

Please also refer to our Whistleblowing Policy available on MISC website for further information.

1.5. This Code is prepared in both English and Bahasa Malaysia and may appear in other languages. In the event of any conflict, the English version will prevail.

Part I : Core Values & Culture

1.6. This Code is implemented (with certain local adaptations) worldwide in a phased roll out, commencing with its entry into effect for Malaysian group of companies on 1 April 2026 ("Effective Date"). In that regard, it replaces the previous MISC Code of Conduct and Business Ethics. Any misconduct committed before the Effective Date of this Code will be dealt with under the previous MISC Code of Conduct and Business Ethics (or other applicable policies and terms and conditions of service) in effect for your company at the time of the misconduct.

1.7. If there is any conflict between the law and the rule or policy set out in this Code, you should comply with the law. However, if there is any conflict between the local custom or policy with this Code, you are called upon to comply with this Code. If you perceive that a provision of this Code conflicts with the law in your jurisdiction, you should consult with your HoD, HR Department, the Compliance Department, or your MISC contact person (as the case may be) rather than disregard this Code without consultation.

1.8. The provisions of this Code may be amended or waived by MISC from time-to-time at MISC's sole discretion. MISC expects that waivers would only be granted in exceptional circumstances and then only in keeping with applicable law and MISC's policies and procedures. The provisions of this Code may be supplemented or modified for your jurisdiction through your respective CoBE Country Supplement that have been approved through the Compliance Department. In particular, provisions concerning disciplinary procedures and actions for your jurisdiction may be set out in a CoBE Country Supplement for your jurisdiction. If no such provisions are set out, the standard disciplinary rules, and practices for dealing with violations of company policy will apply, in every instance subject to the requirements of applicable law in your jurisdiction. This Code may be implemented through a handbook or contract terms and conditions, or similar manual or document, which may address additional matters beyond the scope of this Code. Please seek advice from Compliance Department for information about the CoBE Country Supplement in effect for your jurisdiction (if any). Any such CoBE Country Supplement will be considered part of this Code for your jurisdiction.

1.9. This Code does not identify or set out every law, policy or procedure that may apply to you in the performance of your role. You are responsible for familiarising yourself with the relevant laws and other MISC policies and procedures that apply to you in connection with your role with MISC. This Code does not constitute legal advice.

Part I : Core Values & Culture

1.10. To help you understand and interpret this Code, a user-friendly guide to the Code titled "The MISC CoBE Guide", is made available and linked as reference document within this Code. In the event of any conflict between the MISC CoBE Guide and this Code, this Code (as supplemented or modified for your jurisdiction) shall prevail.

1.11. In addition to the above, certain sections under this Code are linked to the corresponding policies and guidelines relevant to each subject matter. MISC, at its sole discretion reserves the right to modify, revise or cancel any policy or guidelines from time to time.

1.12. This Code does not seek to address every situation you may encounter in the course of your employment and in conducting business with MISC. Explanatory statements or examples set out under this Code may or may not be applicable to your situation / relationship / arrangement with MISC and act to serve as guidance only. This Code is not a substitute of your own duty, responsibility, and accountability to comply with all laws applicable to you or your business, nor a substitute for exercising your good judgment and discretion in making business decisions.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Privacy Policy
- MISC Human Rights Policy
- MISC Whistleblowing Policy
- MISC Non-Retaliation Policy
- MISC Competition Law Policy
- MISC Anti-Money Laundering Policy
- MISC Anti-Bribery and Corruption Policy
- MISC Sanctions and Export Control Policy
- MISC Privacy Standard
- MISC Competition Law Standard
- MISC Sanctions and Export Control Standard
- MISC Anti-Bribery and Corruption Standard

Part I : Core Values & Culture

2. Corporate Values and Culture

2.1. MISC is committed to the highest standards of integrity, openness, and accountability in the conduct of the Group's business and operations. MISC seeks to conduct its affairs in an ethical, responsible, and transparent manner.

2.2. As an employee and director of MISC, you have a duty to serve MISC with good faith, fidelity, diligence, and integrity. You are required to act in the best interests of MISC and to refrain from engaging in conduct or activities which may adversely affect the best interests of MISC. You are at all times required to:

- conscientiously maintain the highest degree of integrity.
- always exercise proper care and judgment.
- avoid conflict of interest.
- refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of MISC.

You may not conduct yourself in a manner that might undermine or that is likely to destroy or damage MISC's confidence and trust in you. These duties are without limitation on duties imposed on you by law.

In the event that you are being asked to do something that you think is doubtful, wrong or inappropriate, you should take steps to address the situation by speaking directly to your HoD, HR Department or Compliance Department who can provide you with appropriate guidance.

2.3. MISC expects that, throughout your time of service as an MISC employee and director, you will:

a) strive towards a high standard of professionalism.
b) always give your undivided loyalty and devotion to MISC and on all occasions.
c) serve with honesty and integrity, goodwill, and courtesy.
d) display group cohesiveness based on oneness of purpose together with a caring attitude for individual.
e) uphold the duty of care for the interests and reputation of MISC.
f) display a high sense of discipline, cooperativeness, and diligence in carrying out your duties.
g) act consistently to maintain MISC's confidence and trust in you.
h) promote creativity and new approaches in the course of carrying out your work.
i) comply with applicable laws, regulations and MISC policies and procedures.

3. Definitions

3.1. Where the context or construction requires, all words applied in plural will be deemed to include the singular, and vice versa; the masculine will include the feminine and neuter, and vice versa; and the present tense will include the past and the future tense, and vice versa.

3.2. References to "you" in this Code refer to any person to whom this Code applies. Where more specific references are used (such as "employee"), the more specific reference is intended.

3.3. For purposes of this Code, the term "family/household" includes your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.

3.4. For purposes of this Code, the term "employee" means any person who is in the employment of MISC including but not limited to executives, non-executives, secretaries, secondees and individuals on direct hire.

3.5. For purposes of this Code, any reference to approval by the "Head of Department" or "HoD" refers to the head of a department holding a position of General Manager or higher.

3.6. For purposes of this Code, the term "MISC contact person" means MISC's focal that can be contacted by any third-party having business dealing with MISC.

3.7. The term "MISC" or "Company" means MISC BERHAD (MISC) and its subsidiaries and controlled companies. The expression "MISC" is used for convenience where references are made to MISC companies in general. The companies in which MISC BERHAD (MISC) has direct or indirect shareholding are distinct legal entities.

PART II

DUTIES OF GOOD FAITH, FIDELITY, DILIGENCE & INTEGRITY

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

Part II A: Conflict of Interest

1. Duty Regarding Avoidance of Conflict of Interest

1.1. Conflict of interest

a) A conflict of interest can exist when an individual is in a position to take advantage of his or her role at MISC for his or her personal benefit, including the benefit of his or her family and friends, in which his or her interest may conflict/ potentially conflict with MISC's interest.

b) A conflict of interest can make it difficult for an individual to fulfil his or her duties impartially and correctly.

c) A conflict of interest can exist even if it results in no unethical or improper acts. Even the appearance of improper influence in your decision making may be an issue.

d) A conflict of interest will undermine the values of good faith, fidelity, diligence, and integrity in the performance of your duties and obligations as expected by MISC.

You must therefore avoid conflicts of interest between your personal dealings and your duties and responsibilities in the conduct of MISC's business. In particular, the use of MISC office position, confidential information, assets, and other MISC resources for personal gain, or for the advantage of others with whom you are associated, is prohibited.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

1.2. The situations under which conflicts of interest may arise include, but are not limited to:

a) When you, in the exercise of your authority, give preference to your interests or the interests of your family/household members, associates, or friends rather than to the interests of MISC.

b) When you are in a position to influence decisions that are to be made by MISC with respect to dealings with a business, enterprise or entity owned or partially owned by you, your family/ household members, associates, or friends.

c) When you compete with or against MISC. You must therefore avoid conflicts of interest between your personal dealings and your duties and responsibilities in the conduct of MISC's business. In particular, the use of MISC office position, confidential information, assets, and other MISC resources for personal gain, or for the advantage of others with whom you are associated, is prohibited.

d) When you have a financial interest in a supplier, contractor, competitor or customer and you are involved in MISC's decision-making process relating to, or of relevance, to them.

e) When you have a financial interest in a transaction in which you know MISC is involved or plans to be involved.

f) When you receive fees, commissions or other benefits from a supplier, contractor, competitor, or customer.

1.3. Any instances of conflict shall be endorsed by the HoD in consultation with the HR Department, the relevant company secretary (in the case of directors) or your MISC contact person. Failure to fully disclose the nature and scope of the conflict of interest as soon as you are aware, may result in disciplinary action or consequence management being taken against you, whether or not such potential or actual conflict results in tangible or intangible damage to MISC.

Reference Documents

- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**
- **MISC Anti-Bribery and Corruption Policy**
- **MISC Anti-Bribery and Corruption Standard**
- **MISC Competition Law Standard**

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

2. Involvement in Business Where You or Your Family/ Household Have a Direct or Indirect Interest

2.1. You are deemed to have a conflict of interest when you, the members of your family/ household and your or their nominees and trustees, and any account or entity over which you or they have influence or control, promote the formation of any business, enterprise, firm, corporation, or company and/or own, either directly or indirectly, shares or other forms of beneficial interest (hereinafter referred to as "Equity") including but not limited to:

a) Privately held entities which derive any income or receive any payment from contractual or other business arrangements with MISC;

b) Privately held entities listed in MISC's lists of registered contractors, even if the entities concerned do not derive any income or receive any payment from contractual or other business arrangements with MISC; and/or

c) Publicly held entities in which you or a member of your family/ household holds a greater than 1% ownership interest and with respect to which you have the authority to make decisions in the course of your work at MISC.

2.2. Should a situation arise (for example as a result of inheritance or marriage) whereby you (or a member of your family/household) become, directly or indirectly, the owner of Equity in any entities identified above, you will be considered to be in a potential conflict of interest situation and you shall be under a duty, as soon as you become aware of the situation, to disclose to your HoD, HR Department, the relevant company secretary (in the case of directors) or your MISC contact person, in writing of the circumstances. Any conflict of interest shall be endorsed by the HoD, in consultation with the HR Department, the relevant company secretary (in the case of directors) or your MISC contact person and such consultation must include suggestions and/ or recommendations on the most appropriate way of preventing or overcoming the conflict of interest.

Your failure to inform MISC when a conflict of interest (or potential conflict of interest situation as described above) becomes known to you and/or failure to comply with the requirements of MISC will be deemed to be in position of conflict for which appropriate disciplinary action may be taken against you.

Conflicts of interest and potential conflicts of interest which have been fully disclosed and which are formally endorsed and permitted by MISC will not be deemed as a violation of this Code.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

2.3. You are encouraged to declare your interests in certain circumstances, including but not limited to the following:

In the event you, the members of your family / household and your or their nominees and trustees, and any account or entity over which you or they have influence or control, are involved in the promotion and formation of any business, firm, corporation or company and/or own, either directly or indirectly, shares or other forms of beneficial interest in:

a) Privately held entities;

b) Publicly held entities; and/or

c) Trusts, foundations, charitable organisations, not-for profit entities.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

3. Conflict of Interest that Arises When You Are a Party to Decision-Making

3.1. You will be in a conflict of interest situation when you, a member of your family/household and/or your associates has an interest (whether in the form of directorships, partnerships, shareholdings or through agencies) in entities which are on MISC's lists of registered contractors or which have contractual or supply arrangements with MISC, and you are involved in any decision-making by MISC relating to, or have dealings (whether directly or indirectly) with, such entities in the course of your duties with MISC.

3.2. You will also be in a conflict-of-interest situation when you are involved or expect to be involved in the hiring, supervision, management, or career planning in respect of any of your relatives at MISC or at entities providing services to MISC.

3.3. When such a conflict-of-interest situation becomes known to you, unless otherwise instructed by MISC, you shall abstain from participating in any MISC decision-making or deliberations involving the entity or person and avoid doing anything which could influence the decisions on such dealings and shall report such conflict of interest to the HoD, the relevant company secretary (in the case of directors) or your MISC contact person. Following such report, HoD in consultation with the HR Department, or your MISC contact person, as the case may be, will give such instructions to you as it deems appropriate, which you shall comply with.

3.4. Appointment of an employee as a board of director in an external company is strictly limited to nominations made by the Company. However, involvement as a board member in a family-owned company is limited to only one (1) entity and is subject to prior written approval from his or her HoD.

4. Disclosures Giving Undue Advantage to Third Parties

You shall not be involved with the commission or omission of any act which gives an undue advantage to an outside party in its dealings with MISC whether or not such act or omission results in you obtaining a personal gain, benefit or advantage in business transactions or dealings involving MISC. Giving an outside party confidential MISC information in order to assist that party in securing MISC business or for any other reason will be considered a violation of this restriction.

5. Personal Transactions with MISC's Clients, Suppliers, Contractors and Vendors

5.1. You shall not, directly, or indirectly, enter into transactions or dealings for the purchase or sale of any moveable or immoveable property or for the supply or purchase of any service from any of MISC's clients, suppliers, contractors or vendors (or with their agents or representatives) with whom you have or are likely to have official dealings on behalf of MISC, other than transactions or dealings on such terms as are freely available to the general public.

5.2. If you, despite efforts to avoid transactions or dealings as aforesaid, are constrained nevertheless to act contrary to this prohibition, you shall obtain written approval from your HoD in consultation with HR Department and must not proceed with them until such permission is obtained.

5.3. The granting of the aforesaid permission will be subject to you satisfying MISC that such transactions or dealings are not inconsistent with the due and proper performance of your duties or the fulfilment of your obligation to MISC.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Anti-Bribery and Corruption Policy
- MISC Anti-Bribery and Corruption Standard

Part II B: Fighting Corruption and Unethical Practices

MISC is committed to combating bribery and all forms of corruption and aims to uphold transparency and integrity throughout our business dealings, whether with governmental agencies, public sector stakeholders or private enterprises. MISC requires its employees, directors and relevant third parties to do the same, as detailed in the following sections.

6. Solicitation, Bribery and Corruption

6.1. An act of corruption by you has the effect of compromising the due and proper performance of your duties and the exercise of your authority, thereby undermining the integrity of the decision-making process and the decisions of MISC concerning its business and affairs. An act of corruption by you has the further effect of potentially incriminating MISC and its directors, officer, or partner.

6.2. A “bribe” or a “gratification” is any gift, payment, benefit or other advantage, pecuniary or otherwise, offered, given, or received in order to secure an undue or improper result, award, decision, benefit or advantage of any kind. A bribe or a gratification need not involve cash or another financial asset — it can be any kind of advantage, including the unpaid use of corporate services or property, loan guarantees or the provision of employment to the family or friends of people with whom MISC deals.

6.3. You shall not directly or indirectly solicit, accept or obtain or agree to accept or attempt to obtain, from any party for yourself or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to MISC's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to MISC's affairs or business.

6.4. You shall not directly or indirectly offer, promise, or give any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to MISC's affairs or business, or for showing favour or forbearing to show disfavour in relation to MISC's affairs or business, whether in the form of a facilitation payment, kickback, donation, fee or any other form.

6.5. You shall not provide documents such as receipts / invoices that are false or contain false details involving third party with the intention to deceive MISC.

6.6. You shall not abuse your position or authority in making decisions or taking actions that benefit yourself, your relatives, or your associates.

6.7. You shall perform due diligence to assess the ethics and integrity of any third party, such as a contractor, sub-contractor, vendor, agent, consultant, representative, service provider or any other person whom you engage to act for or on behalf of MISC, or in relation to MISC's affairs or business.

6.8. You shall ensure that the relevant third party understands and agrees to comply with MISC's policies, standards, guidelines, procedures, and applicable laws prohibiting improper solicitation, bribery and corruption. Contractors, sub-contractors, agents, consultants, representatives, service providers and others shall comply with such policies, standards, guidelines and procedures when performing work or services for or on behalf of MISC.

6.9. If MISC determines that a third party, such as a contractor, sub-contractor, vendor, agent, consultant, representative, service provider or any other person engaged to act for or on behalf of MISC or in relation to MISC's affairs or business, has been involved in any unethical or illegal activity, or has failed to adhere to applicable laws, MISC may terminate the relationship or take other disciplinary or remedial measures in respect of such third party, in accordance with applicable laws and the terms and conditions that govern the relationship of the parties.

6.10. Even the appearance of conduct prohibited by this Section 6, or any other measure that is unethical or that may tarnish MISC's reputation for honesty and integrity, must be avoided. If you are unsure whether an action is permitted, seek guidance from the HoD, the Compliance Department or your MISC contact person before acting.

If you receive a request for a bribe or if you are offered a bribe, you shall reject the offer and immediately report it to the MISC Whistleblowing channel, your HoD, the Compliance Department or your MISC contact person, as the case may be.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

7. Receiving Facilitation Payments

7.1. You are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for yourself or for any other person subject to this Code.

7.2. In this part, the term "facilitation payments" generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function in MISC.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Anti-Bribery and Corruption Policy
- MISC Anti-Bribery and Corruption Standard
- MISC Whistleblowing Policy
- MISC Non-Retaliation Policy

8. Prohibition on Commissions, Discounts and Secret Profits

You shall not directly or indirectly, receive or obtain, in respect of any goods or services sold or purchased or other business transacted (whether or not by you) by or on behalf of MISC, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by MISC's rules, policies or guidelines.

9. Disclosure of Secret Profits or Gains

A person subject to this Code who, directly or indirectly, obtains any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind), by virtue of his/her position in or acting with authority on behalf of MISC, must immediately disclose such receipt to the HoD (for employees of MISC) or his/her MISC contact person (for non-employees, e.g.: contractors). All amounts received may be required to be surrendered to MISC, subject to the requirements of applicable laws.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

10. Gifts and Entertainment

10.1. MISC has adopted a “No Gift” Policy whereby, subject to certain exceptions as provided in the MISC Anti-Bribery and Corruption Standard (“ABC Standard”), MISC employees and directors, their family/household members or agents acting for or on behalf of MISC are prohibited from, directly or indirectly, receiving or providing gifts.

10.2. You shall abide by the “No Gift” Policy to avoid conflicts of interest or the appearance of a conflict of interest. Gifts and entertainment provided during on-going or potential business dealings between MISC and external parties can be perceived as creating a conflict of interest, or even potentially a bribe. This may tarnish MISC’s reputation or be in violation of anti-bribery and corruption laws.

10.3. You are responsible to inform external parties involved in any business dealings with MISC of the “No Gift” Policy.

11. Receiving Gifts and Entertainment

11.1. You shall comply with procedures of MISC’s HR Department relating to the receipt of gifts and entertainment.

11.2. You, or any of your family/household members shall not accept gifts or entertainment in exchange for an exercise or non-exercise of your MISC authority, information or any other matter to the detriment of MISC.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

12. Providing Gifts and Entertainment

12.1. You shall comply with MISC's policies, standards, guidelines and procedures relating to the giving of gifts and entertainment.

12.2. MISC prohibits the giving of gifts and entertainment that are illegal or unduly dangerous, or indecent, sexually oriented or inconsistent with MISC's commitment to mutual respect, or that are intended to improperly influence someone to take action in favour of MISC or to refrain from taking adverse action against MISC. Gifts of cash are strictly prohibited. You shall not pay for a gift or entertainment personally in order to avoid obtaining prior approval or to otherwise circumvent MISC policies.

Reference Documents

- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**
- **MISC Anti-Bribery and Corruption Policy**
- **MISC Anti-Bribery and Corruption Standard**

13. Public Officials

13.1. You shall not offer or provide gifts and entertainment to public officials other than in accordance with the policies and procedures of MISC's HR Department relating to the giving of gifts and entertainment.

13.2. You shall not offer or provide travel related expenses, to public officials and/or their family/household members in connection with any transactions directly or indirectly relating to MISC without permission from your HoD or your MISC contact person, in consultation with the Compliance Department.

13.3. You shall not pay or offer to pay for non-business travel and hospitality to or for any public official and/or his/ her family/household members in connection with any transactions directly or indirectly relating to MISC without permission from your HoD or your MISC contact person, in consultation with the Compliance Department.

13.4. You shall comply with local laws concerning lobbying in any jurisdiction in which MISC engages in lobbying activity. Prior to engaging in lobbying activities, you should obtain guidance from your HoD in consultation with the Compliance Department or your MISC contact person.

13.5. You shall not offer or provide gifts, entertainment or any benefits to any person, such as an agent, consultant or contractor, if you know or suspect that a public official or his/her family/household member will be the indirect beneficiary or recipient, other than as approved by your HoD in consultation with the Compliance Department or your MISC contact person.

13.6. Any contractors, sub-contractors, consultants, vendor, agents, representatives, or other service providers dealing with public officials on MISC's behalf shall be evaluated and must be informed of the provisions of this Code relating to restrictions on gifts and entertainment to public officials.

13.7. You shall not circumvent the prohibitions in this Section 13. You shall in every instance comply with the rules concerning solicitation, bribery and corruption set out in other sections of the Part II of the CoBE, as well as with applicable laws concerning bribery and corruption.

13.8. For purposes of this Code, the term "public official" includes, without limitation, public or government official, any person having public official functions or acting in a public official capacity, candidates for public office, officials of any political party, and officials of state-owned enterprises other than MISC.

14. Sponsorships and Donations

14.1. You must ensure that all sponsorships and donations are not used as a disguise for bribery or used to circumvent or avoid any of the provisions of the CoBE, including in particular, the prohibition on bribery.

14.2. MISC needs to be certain that all sponsorships and donations to any organisation, charity, or beneficiary are not disguised illegal payments to Public Officials, and must ensure that the organisation, charity or beneficiary does not act as a conduit to fund illegal activities in violation of anti-money laundering, anti-terrorism and other applicable laws.

14.3. You are required to use good judgment and common sense in assessing the requests. When in doubt, you should seek further advice from your Legal Department, the Compliance Department or your MISC contact person to escalate the matter to Group Strategic Relations and Communications to determine the authenticity of such requests.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Anti-Bribery and Corruption Policy
- MISC Anti-Bribery and Corruption Standard

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

15. Anti-money Laundering and Counterparty Due Diligence

15.1. If in the course of your duty, you deal with third parties who have entered or will enter into any dealings or transactions with MISC, you shall conduct appropriate counterparty due diligence to understand the business and background of such third parties and to determine the origin and destination of money, property, and services. You must report to your HoD or, the Compliance Department, or your MISC contact person, any suspicious transactions or suspected incidents of money laundering or bribery. You should not try to investigate a case of anti-money laundering or bribery yourself. Your HoD generally will be responsible for decisions in this regard.

15.2. In this part, "money laundering" is generally defined as occurring when the criminal origin or nature of money or assets is disguised or made to appear legitimate or when legitimate funds are used to support criminal activities, including the financing of terrorism or development of weapons of mass destruction. Offences covered by anti-money laundering legislation include prejudicing or obstructing an investigation and failing to report suspicious activity.

15.3. You must not deal with criminals or the proceeds of a crime.

15.4. Any amount, nature, purpose, and provider or recipient of any payment or transfer of funds to or from the MISC group of companies must be accurately reflected in its books and records.

15.5. You shall not establish bank, securities trading or similar accounts in the name of MISC companies or for the benefit of MISC without proper authorisation from the Finance Department, in accordance with the applicable internal policies, standards, guidelines and procedures.

15.6. In the event there is any requirement by regulator for any MISC Group of Companies to establish a guideline on anti-money laundering, such requirement shall be complied accordingly.

Reference Documents

- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**
- **MISC Anti-Money Laundering Policy**
- **MISC Anti-Bribery and Corruption Standard**

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

Part II C: International and National Trade

16. Competition Law

16.1. MISC is committed to conducting its business activities in full compliance with applicable global competition laws.

16.2. In this context, MISC requires you to observe and comply with competition laws of all countries in which MISC operates and/or has business dealings with.

16.3. You shall ensure that your dealings with business partners (e.g., customers and suppliers), contractors, sub-contractors, competitors, vendors, agents, representatives and governmental authorities at all times reflect fair and proper business practices and are in compliance with the laws and regulations governing free and fair competition. In furtherance of this requirement, employees are obligated to comply with the MISC Competition Law Standard, including other applicable internal policies, standards, guidelines, and procedures, a copy of which is available from Compliance and Ethics Portal.

16.4. You shall avoid any anticompetitive behaviour, in particular in dealing with competitors to avoid any cartel-like agreements or coordination such as price-fixing, market sharing, bid-rigging etc. You should also be cautious when dealing with market-sensitive information, when participating in trade associations, when collaborating with competitors, and when entering into agreements with distributors. You should also ensure that all merger control requirements, including the necessary notification requirements are considered when you undertake any merger and acquisition transactions.

16.5. It is MISC's policy that if any directors, employees or third party acting on behalf of MISC engage in, participate in or suggest any conduct which is not in compliance with competition laws, the person is deemed to be in breach of this Code, and will be subject to appropriate consequences, including potential removal from directorship, termination of employment or termination of contractual relationship. If you are unsure about compliance of your activities with competition rules, you must contact Compliance Department or your MISC contact person.

16.6. Basic Principles

16.6.1. As a general rule, a country's competition law applies to all companies operating within its jurisdiction, irrespective of whether the companies are domestically established or based abroad.

16.6.2. Competition laws generally prohibit anti-competitive behaviour, in particular cartel-like agreements or coordination between competitors. Not only formal but also informal agreements fall within such prohibition.

16.6.3. Competition laws also prohibit abusive conduct by dominant companies. A company is generally considered to have a dominant position if it is able to exercise a significant degree of market power over its customers or suppliers.

16.6.4. Prior merger control notification and clearance of the competent competition law authorities may also be required for mergers and acquisitions transactions.

16.7. Consequences of Non-Compliance with Competition Laws

Depending on a particular jurisdiction, breaching competition laws can result in any or all of the following consequences:

a) Extremely serious financial penalty for MISC (for instance, Malaysia and the EU's competition laws provide for a financial penalty of up to 10% of the annual worldwide turnover of the entire group);
b) Damages claims brought by customers, competitors, and/or consumers who were harmed by the anticompetitive conduct;
c) Imprisonment and disqualification of directors in some jurisdictions;
d) Impact on business continuity and contractual implications (e.g., nullity of the contracts or the provisions that infringe competition laws);
e) Adverse publicity (reputation), waste of internal resources, and additional costs (e.g., legal fees);
f) Competition law dispute resolution.

Please remember that you have a duty to seek the advice from Compliance Department or your MISC contact person as soon as you identify a situation which you believe may put MISC in a non-compliance of competition laws.

16.8. Other Considerations

Any mergers and acquisitions undertaken by MISC may also be subject to foreign direct investment and foreign subsidies screening regulations in applicable jurisdictions, particularly where such investments involve certain sensitive sectors or strategic assets which relate to national security. In this regard, you should ensure that assessments be conducted to confirm compliance with these regulations.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Competition Law Standard
- MISC Competition Law Policy

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

17. Sanctions and Export Control

17.1. Being a global player, MISC is committed to conducting its business activities in compliance with the relevant laws relating to sanctions and export control.

17.2. In this context, you are required to observe and comply with applicable sanctions and export control laws in countries where MISC has operations in and/or business dealings with. This is imperative as any breach to these laws could have severe consequences to MISC.

17.3. Sanctions laws are constantly changing and evolving, with different jurisdictions having different restrictions. The employees must keep themselves informed of the sanctions regime, the restrictions and the nature of transactions that are applicable to their entity.

17.4. With respect to export control, certain items that MISC procure or manufacture may be subject to export control laws. If the employee is involved in the import or export of controlled goods, technology, software or services, the employee shall ensure that the required authorisation is obtained prior to the said import or export. Further, if the goods, technology, software or services are of U.S. origin, any transfer within a country could also trigger U.S. export control laws. As such, special care must be made to verify whether the goods, technology, software or services would be deemed to be of U.S. origin.

17.5. If the employee is unsure how sanctions and export control laws apply in the performance of their work, the employee may consult the Compliance Department.

17.6. The employee must comply with the applicable internal policies, standards, guidelines and procedures, including MISC Sanctions and Export Control Policy and Standards in effect from time-to-time.

Reference Documents

- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**
- **MISC Sanctions and Export Control Policy**
- **MISC Sanctions and Export Control Standard**

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

Part II D: Assets of MISC

18. Responsibility for Assets, Facilities, Resources and Records

18.1. Access and possession of assets, facilities, resources or records belonging to MISC are provided on the basis of trust and confidence that they are to be used for the MISC's business purposes. These assets may be tangible—for example, equipment, including computer hardware, or cash—or they may be intangible, such as intellectual property and computer software.

18.2. You are responsible for the safekeeping of all assets, facilities, resources and records belonging to MISC that are provided to you for the performance of your duties. You shall adhere to and comply with all MISC policies and procedures as amended and updated from time-to-time on the use of all assets, facilities, resources, and records.

18.3. You must take all necessary steps to prevent theft, loss, damage to, or misuse of assets, facilities, resources and records belonging to MISC, the occurrence of which should be reported immediately to MISC. Regardless of condition or value, assets, facilities, resources and records belonging to MISC may not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes, except with the appropriate specific authorisation of MISC.

18.4. Subject to applicable laws, you may be liable for any loss of or damage to assets, facilities, resources and records arising from your willful misconduct or negligence or careless action or as a result of action taken without MISC's approval, and any financial loss suffered by MISC may be recovered from you by way of deduction from your salary or other means. Within the limits of applicable law, MISC may at its discretion take any other action against you considered appropriate by MISC, including reporting you to the public authorities.

Part II E: Financial Integrity

19. Internal Controls and Procedures

19.1. You shall comply with all laws, policies, standards, guidelines and procedures established from time-to-time to safeguard and support the integrity and accuracy of MISC's financial reports and records. In this regard, you shall not do (including but not limited to) the following:

a) conceal, alter, destroy or otherwise modify MISC's records or documents other than in accordance with established, ordinary course procedures or in accordance with internal procedures on document retention (and in no case impede or frustrate an investigation or audit or conceal or misstate information).

b) Intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports).

c) establish accounts, companies or arrangements that may have the effect or result of circumventing or frustrating MISC's controls, policies or procedures.

d) fail to cooperate fully and truthfully with internal and external audits authorised by MISC.

e) engage in any scheme to defraud anyone of money, property, or services.

19.2. You shall also comply with all laws, policies, standards, guidelines and procedures established from time-to-time concerning the preparation, maintenance and disposal of MISC financial reports and records.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

20. Tax

20.1. MISC is a responsible taxpayer that complies in good faith to all applicable tax laws and regulation.

20.2. MISC and its employees are also guided by relevant framework, guidelines and code of ethics issued by relevant tax authorities, local and international bodies that advocate tax compliance, tax transparency, model legislation, tax risk management, tax best practices as well as upholding professional conduct and ethics when dealing with tax related matters.

20.3. You shall always uphold a high standard of honesty, transparency and ethical behaviour in ensuring compliance with tax requirements according to but not limited to the following principles:

- Ensure the confidentiality, correctness and integrity of tax-relevant information and data gathered, sourced and applied when performing tax processes which include tax compliance and tax advisory.
- Disclosure of tax information and data to third parties shall be authorised by the relevant approving authority.
- Tax-related information shall be presented fairly and complying with tax laws and regulations. Any recommendations must be based on sound interpretation of the law and factual evidence.
- Maintain cooperative working relationship with tax authorities and provide full and accurate disclosures as required by them.
- Refrain from undertaking tax positions that are speculative or unsanctioned by the management that could expose the organisation to unidentified or unassessed tax risks.
- Avoid making decisions and engaging in activities that could directly or indirectly facilitate tax evasion or avoidance of taxation obligations, and report improper conduct related to tax that may lead to non-compliance.
- Maintain sufficient skills and knowledge to carry out duties efficiently and stay updated with changes in tax legislation.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

Part II F: Confidentiality Obligations/ Intellectual Property/ Public Communications

21. Confidentiality Obligations

21.1. The business affairs, information and records of MISC comprising business, commercial, technical, financial, legal, personnel and contractual records, data and documents comprising e-mails, letters, maps, reports, drawings, calculations, specifications, formulae, forms, licenses, agreements and/or other documents or computer/digital software/technology or files of whatever nature and information as to formulae, processes and manufacturing methods are all confidential information belonging to MISC. Such confidential information is strictly private and confidential and may not be utilised, discussed with, divulged to or disclosed to persons inside or outside MISC, except by persons authorised to do so. All necessary precautions are to be taken by you with respect to the confidentiality of such confidential information.

21.2. You may not, either during or after your employment or engagement, disclose, divulge or utilise without appropriate authorisation any such confidential information which may have come to your knowledge during your employment or engagement under any previous contract of service with MISC and you must, both during and after your employment or engagement, take all reasonable precautions to keep all such confidential information secret.

21.3. Except so far as may be necessary for the purpose of performing your duties you may not, without the consent of MISC, retain or make originals or copies of such confidential information or notices thereof, nor retain samples of specimens in which MISC may be or may have been interested and which have come into your possession by reason of your employment or engagement. If on termination of your employment or engagement you are in possession of any confidential information or any such samples or specimens as aforesaid, you will deliver forthwith the same on or before the date of cessation of your employment/ engagement to MISC without being asked, except insofar as consent to retain them has been given to you by MISC.

21.4. In the course of your relationship with MISC, you may have established contacts and relationships with MISC's vendors, suppliers, contractors, principals and other business partners. You will not at any time during your relationship with MISC, or for a period of two years (or for whatever other period of time as may be specified in the terms of your engagement or CoBE Country Supplement applicable to you) after the cessation of your relationship with MISC, whether by resignation or otherwise, make use of business opportunities arising from your relationship with MISC or cause or attempt to cause the diversion of such business opportunity from being exploited by MISC or cause or attempt to cause the termination of contracts, agencies or other business relationships of MISC without first obtaining the prior consent of MISC.

21.5. You will not at any time, after the cessation of your tenure with MISC, whether by resignation or otherwise, use MISC's confidential information in breach of your post-tenure obligations to maintain the confidence of such confidential information.

21.6. While MISC may hire persons who have knowledge and experience in various technical areas, you must not on behalf or for the benefit of MISC employ people as a means of gaining access to the trade secrets and other sensitive proprietary information of others.

Reference Documents

- **MISC Privacy Policy**
- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**

22. Personal Data Protection

22.1. MISC is committed to complying with applicable privacy and personal data protection laws, and to ensuring that our collection, use, processing and storage of personal data relating to our employees, contractors and directors, and the third parties with whom we work, is consistent with our high standards.

22.2. To the extent your position and role result in your dealing with personal data, you shall also comply with applicable laws and regulations governing personal data protection of the relevant jurisdictions.

22.3. You shall also ensure that your handling of personal data of any party from whom you collect personal data e.g. personal data of customers, employees, shareholders, business partners, vendors, suppliers, service providers, governmental authorities, are at all times in compliance with MISC Privacy Policy, MISC Privacy Standard and other applicable internal policies, standards, guidelines, and procedures governing personal data protection.

22.4. Consequences of Non-Compliance with Personal Data Protection Laws

Depending on a particular jurisdiction, breaching personal data protection laws can result in any or all of the following consequences:

a) Significant financial penalties for MISC;

b) Damages claims brought by individuals for any wrongful or unlawful processing of their personal data or by individuals who suffered significant harm due to personal data breaches;

c) Imprisonment of the company's officers and/or employees;

d) Impact on business continuity and contractual implications (e.g. impact on business operations due to restrictions on personal data processing activities that infringes personal data protection laws);

e) Adverse publicity (reputation), waste of internal resources and additional costs (e.g. legal fees);

f) Personal data protection related dispute resolution.

22.5. If you are uncertain about whether your personal data processing activities comply with the applicable laws and regulations governing personal data protection and/or the relevant internal policies, standards, guidelines and procedures, or if you become aware of a situation that may place MISC at risk of non-compliance, please contact the Compliance Department or your MISC contact person.

Reference Documents

MISC Privacy Policy

MISC CoBE Guide

MISC Privacy Standard & relevant Country Supplement (for MISC employees only)

23. Insider Dealing

23.1. You must protect the confidential business information of MISC and its counterparties, and never use it for your own benefit or the benefit of other persons for the purpose of trading in shares or other securities or to recommend or cause a third-party to do so.

23.2. You are required to abide by all applicable laws on insider dealing, which generally is when you trade in shares or other securities while in possession of material non-public information or when you share such information with someone else who then trades in those shares or other securities. In particular, you must not deal in the securities of MISC group companies (or in other speculative dealings with regard to those securities) while in the possession of material non-public information. We expect all directors, employees, their respective families/ households and others whose relationships with MISC give them access to such information to comply with these principles, along with other laws, regulations and policies concerning the handling of confidential information. “Material non-public information” is generally non-public information which on becoming generally available, a reasonable person would expect it to have a material effect on the price of the value of securities, such that a reasonable investor would consider it important in making a decision whether to buy or sell those securities. The restrictions described here also apply to “price sensitive information” or other similar types of information in jurisdictions where the applicable insider dealing laws make reference to those types of information.

23.3. You are also required to abide by all applicable laws on securities market abuse, including but not limited to spreading false information or engaging in activities designed to manipulate the market for publicly traded securities.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

24. Inventions and Computer Programmes

24.1. MISC encourages you to be inventive and innovative. Such inventiveness and innovation are part of the normal duties owed by you to MISC.

24.2. Subject to the requirements of applicable law, the ownership of intellectual property created by you or to which you have contributed whilst working for MISC or in the course of discharging your duties or employing MISC resources, data and/or time, will be vested in MISC. Nevertheless, subject to the requirements of applicable law, MISC may reward you as it may deem appropriate, in its discretion.

24.3. Further to Section 24.2 above, you may not file for any trademarks, patents or registered designs or claim copyright in your own name for or in such intellectual property.

24.4. You may not, without the written consent of MISC, disclose such intellectual property or any information relating thereto to any person or third party whomsoever except to MISC and its duly authorised counsels/agents.

24.5. Without prejudice to its rights under this Section, MISC is prepared, in special cases, to consider requests from you for permission to publish original papers, in an appropriate form, whenever in the opinion of MISC the subject matter thereof is considered to be of benefit to the community and its disclosure will not be disadvantageous to MISC.

24.6. In this Section, the term “intellectual property” means any patent, know-how, copyright, industrial design, lay-out designs of integrated circuit, trade name, trade secret, inventions, trademark or service mark, confidential information, data sets, know-how, right of confidence, whether registered or unregistered (includes any application for registration of the aforementioned rights) in relation to any materials (including inventions, computer programmes, or results of technological research) and any other intellectual property or industrial property right of any nature whatsoever subsisting under the law at any time, in any part of the world.

24.7. Further, the term “computer programme” includes any computer programmes, software, digital solutions, scripts, or other computer instructions or digital technology that relate to any business and processes of MISC. “Data sets” refer to collections of data or information that are owned, controlled, or provided by MISC, its affiliates, or any third party designated by MISC.

24.8. In the event that you develop any invention in the course of your employment or during your engagement with MISC, you must keep details of the invention confidential and not disclose information regarding invention to any third party outside of MISC. You must notify your HoD or other designated personnel of the invention as soon as practicable.

24.9. Further to the Section 24.8 above, at MISC’s request, you will execute any forms or agreement where necessary or required under law to assign interest in such intellectual property to MISC.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

25. Third Party Intellectual Property

25.1. You must comply with all laws, regulations and contractual obligations regarding the valid intellectual property rights of other parties, including patents, copyrights, trade secrets and other proprietary information. You must not infringe on the protected intellectual property rights of other parties. You must take reasonable steps to ascertain that information, data, materials or technology (including digital software/solutions) that you use or reproduce in the course of your work, employment or engagement does not infringe any intellectual property rights of any third parties.

26. Publication of Materials

26.1. Except with the written permission of MISC, you will not publish or write any papers, books or other works which are based on MISC's confidential information as described in Section 21.1.

26.2. If permission is granted, it will be subject to the following conditions:

a) The proposed publication will not be published in such a way as to state or imply that it has received official support or backing or sponsorship from MISC; and

b) The proposed publication will not, under any circumstances, bear the words "MISC approved publication" or words to that effect, however phrased, that could be construed to suggest that the publication has been agreed to or approved by MISC.

26.3. Certain categories of employees (e.g., certain engineers and technologists) in the MISC specialist programme are not subject to the conditions described in Section 26.2, but the publication of books, articles, journals, presentation material or other works based on MISC's information and data shall require prior review and proper authorisation by MISC. Questions in this regard may be directed to your HoD, Group Strategic Relations and Communications, or your MISC contact person.

27. Making of Public Statements

27.1. Irrespective of whether in your personal or official capacity, you will not either orally or in writing or in any form on any platform (including on social media websites) make or circulate any public statement on the policies or decisions of MISC or discuss publicly any measure taken by MISC or any official matter taken or carried out by you, unless you are duly appointed or authorised to make such statement on behalf of MISC.

27.2. You will not, either orally or in writing or in any other form (unless you are appointed or authorised as aforesaid), make any public statement or comment on any matter relating to the work of the department or organisation in which you are or were employed, or relating to any organisation with which MISC has dealings:

a) Where such statement or comment may reasonably be regarded as indicative of the policy of MISC;

b) Where such statement or comment may embarrass or is likely to embarrass MISC;

c) Where such statement or comment may compromise the interests and reputation of MISC; and/or

d) Where such statement or comment may impact operational, financial, or cause legal harm to MISC.

27.3. In this Section, "public statement" or "discuss publicly" includes the making of any statement or comment to the press, magazines, periodicals or the public or in the course of any lecture or speech or the broadcasting thereof by sound, vision or electronic means. It also applies to every kind of correspondence including mail, electronic documents, instant messages, websites, social media tools, blogs, paper documents, facsimile, podcast, voice, and voicemail recordings.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

28. Social Media

28.1. You must comply with all applicable MISC policies, standards, guidelines and procedures governing the use of social media and public messaging systems.

28.2. You are required to exercise good judgment and act responsibly when engaging on social media platforms and public messaging systems, whether in an official or personal capacity while respecting the rights and dignity of others.

28.3. Misuse of social media platforms and public messaging systems may expose MISC to reputational, operational, legal, and regulatory risks and may also result in serious cybersecurity breaches. Such misuse may also infringe upon the rights or wellbeing of others, including through acts such as online harassment, discrimination, or unauthorised disclosure of personal information.

28.4. Only employees, directors and third parties authorised under the relevant Limits of Authority may act on behalf of MISC on MISC owned social media accounts, and solely within the areas of expertise for which such approval has been granted.

28.5. Authorised individuals posting on MISC owned social media accounts on behalf of MISC, you shall comply with the following requirements:

a) Observe principles of integrity and professionalism by ensuring that information is accurate and conforms to relevant policies.

b) Any unauthorised sharing, posting, or distribution of MISC information, images or content that could threaten security, compromise operations, or disclose proprietary or personal information, is strictly prohibited.

c) Behave in a respectful, ethical, culturally and situationally sensitive manner. This includes avoiding content that may be discriminatory or disrespectful toward individuals or communities based on race, gender, religion, nationality, or other protected characteristics.

d) Respect and protect MISC's employees, business partners and stakeholders.

e) Respect the copyright, trademark and intellectual property rights of MISC and third parties.

f) Refrain from using personal accounts to conduct MISC business or share MISC information.

g) Use only MISC-approved or contracted/licensed systems and platforms to communicate, transmit, or store MISC information.

h) Always treat MISC information in accordance with its appropriate data classification level.

28.6. When posting on or communication via social media in your personal capacity, you shall comply with the following requirements:

a) Ensure, any content, comments, or activities that reference MISC in any way must comply with Section 28.5.

b) Clearly distinguish your personal opinions from MISC's corporate position, using disclaimers where appropriate.

c) Refrain from posting or sharing any content that is or may be perceived as threatening abusive or insulting, including hate speech, misinformation, cyberbullying, identity information of any person (doxing), or any other harmful or offensive material, regardless of whether harm was intended to be caused by any means whatsoever.

28.7. The term "social media" includes all forms of social networking platforms and public messaging systems, including instant messaging apps, blogs, forums, and unauthorised email services.

28.8. MISC reserves the right to monitor all activities conducted on its computing systems, including use of social media and public messaging platforms, as well as any communications transmitted through company networks.

28.9. Your failure to comply may have severe consequences on MISC. Should any of your social media activities be found or deemed to breach this Section 28 or have any negative impact to MISC's image and reputation, MISC has the right to take the necessary disciplinary action against you, subject to the requirements of applicable law.

Reference Document

- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**
- **MISC Privacy Policy**
- **MISC Privacy Standard**

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

29. Giving of Reference

29.1. You are strictly permitted to only provide reference, if any, in a non-MISC capacity, and without any use of MISC's name or stationery with MISC's logo or any corporate identifier, except for matters as required in the normal course of business, or expressly authorised by the Company to support applications under Company-sponsored or endorsed programmes.

In providing such reference as aforesaid on a non-MISC basis, you are duty bound to inform the party who seeks your reference that your reference is given strictly in that non-MISC capacity.

30. Information Technology and Systems

30.1. You shall not upload, download, access, store or send pornography or other indecent or offensive material using MISC premises, equipment or systems. Sending or forwarding obscene, libellous, defamatory, offensive, racist remarks or any material which amounts to workplace bullying and harassment is strictly prohibited. If you receive materials of this nature, you must promptly notify MISC management.

30.2. You shall not upload, download, access, store or send material that is likely to cause annoyance, inconvenience, or offense to your colleagues, including inappropriate jokes.

30.3. The MISC IT and communications systems are to be used for MISC work and business purposes only.

30.4. You shall not send personal e-mails using MISC official e-mail or displaying MISC headers or footers, or otherwise suggesting that such communications are authorised by MISC.

30.5. You shall not use personal e-mail addresses and services to send or receive MISC confidential information. Similarly, you must not allow automatic forwarding of electronic mail to external mail addresses.

30.6. You shall not disable or circumvent MISC IT security measures.

30.7. When using MISC IT and communications systems, conducting MISC's business or acting for MISC's benefit, you shall not deliberately conceal or misrepresent your identity.

30.8. You should not send email messages using another person's e-mail account unless you have proper authorisation from the owner of the e-mail account.

30.9. You shall not forge or attempt to forge e-mail messages.

30.10. You should not send or forward unsolicited e-mail messages.

30.11. You must avoid sending confidential information via electronic messaging (e.g., SMS) or other unsecure messaging channels, and, if this is unavoidable, the information must be secured (e.g., with encryption, password).

30.12. The installation of third-party software in or connection with hardware to MISC IT systems or equipment without the prior approval of your HoD or MISC contact person, is prohibited.

30.13. You shall not use MISC IT and communications systems to:

a) Conduct fraud;

b) Run your own business;

c) View, download, copy, illegally share, process or post information in a way that infringes the relevant content provider's intellectual property rights;

d) Send chain letters, make solicitations for money or gifts, or make personal offers to sell products, for charitable fundraising campaigns, political advocacy efforts, religious efforts, or private non-MISC commercial purposes;

e) Commit "cybercrimes", such as spam attacks, hacking, IT sabotage, spying, and creating or sending viruses;

f) Send malicious rumours or transmit derogatory or indecent materials; and/ or

g) Otherwise engage in activities that could damage MISC's business or reputation.

30.14. If you discover or suspect any actual or potential incident that could compromise the security, integrity, confidentiality, operation or availability of MISC hardware, systems or data, or any disclosure of confidential information, you must immediately contact the ICT Service Desk or your MISC contact person. You are not allowed to attempt to prove a security weakness by engaging in unauthorised activity.

30.15. You must use MISC IT and communications systems in a responsible and professional manner consistent with this Code and other MISC IT policies and procedures in effect from time-to-time, including the MISC Cybersecurity Control Standards, which sets out more detailed and comprehensive guidelines for the preservation of information security and the use of the systems, and any relevant social media policies.

30.16. MISC may search and monitor your e-mails and internet usage conducted through MISC IT or communications systems and equipment, subject to the requirements of local laws and regulations. You should not assume that any use of MISC's communications devices or systems is private.

30.17. You must safeguard passwords and other means of shielding MISC's information systems from unauthorised access, including by following the password protection protocols established by MISC from time-to-time.

30.18. You must comply with MISC policies and procedures regarding records retention, whether with regard to electronic or hard copy records, in effect from time-to-time.

30.19. Contractors and other parties authorised by MISC to use MISC computer systems must comply with MISC's IT policies and ICT security baseline procedures in effect from time-to-time.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

31. Responsible Artificial Intelligence (AI)

31.1. You shall ensure the development, implementation and use of AI systems are ethical, responsible, transparent and is in compliance with applicable laws and MISC's internal policies, standards, guidelines, and procedures.

31.2. You shall ensure that any development, implementation and use of AI systems is aligned with business objectives, and societal impact considerations. Any misuse or unethical application of AI should be reported immediately in accordance with this Code.

31.3. You must not, under any circumstances, use AI for unethical purposes that compromise, including but not limited to, MISC's reputation, human rights, safety, fairness, and societal well-being.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

MISC Privacy Policy

MISC Human Rights Policy

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

Part II G: Conduct Contrary to Duty to Serve Diligently

32. Outside Employment or Gainful Activities

32.1. As an MISC employee, you are expected to demonstrate a high level of commitment and focus on your work responsibilities and ensure that your employment obligations to MISC are met including avoiding any activities which may conflict with MISC's interest.

32.2. MISC employees shall not take up dual employment, in whatever capacity (including being involved in the management, direction or conduct of another enterprise) without the express written permission from your HoD or your HR Department.

Dual employment is where an employee holds a full-time position and payroll with one employer and takes on an additional employment with another employer either full-time or part-time.

32.3. The granting of permission under Section 32.2 will be subject to you satisfying MISC that such dual employment will not interfere with or compromise the proper performance of your duties or the fulfillment of your obligations to MISC.

32.4. Any permission granted may be withdrawn at any time at the sole discretion of MISC without the need for assigning any reason thereof.

32.5. MISC employees may take up other gainful activity or be involved in any outside business activities. If you are already engaged in any other activity or involved, either directly or indirectly, in the management or business activities of any other company or companies, firms, corporations or other business activities, you should disclose your activity to MISC through your HoD or your HR Department.

Gainful activity means any activity that is conducted outside employee's full-time working hours with MISC, and in exchange, provides monetary gain for the employee.

32.6. If your gainful activity impacts your ability to serve MISC with good faith, fidelity, diligence and integrity, MISC reserves the right to take action or give appropriate instructions to you in relation to your gainful activity, which you will comply with.

32.7. In such an event, MISC will be deemed fully indemnified by you and will not be held liable for any repercussion arising from such decision to withdraw the permission so granted before or from any instructions issued thereafter in relation to your gainful activity.

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

33. Public Service, Recreational, Sports, Union and Community Activities

33.1. Generally, MISC allows you to participate in unpaid voluntary public service, recreational activities, sports and other community activities outside working hours. Whilst such activities outside working hours are encouraged, such activities must not be permitted to interfere with your duties and responsibilities during normal working hours.

33.2. The general rule is that if an MISC employee is invited to serve on local bodies, or as an appointed or elected club official, the employee is required to disclose his or her activity to MISC immediately upon being so appointed or elected and must be able to balance the outside activities with his or her full-time MISC employment. The employee must be able to discharge his or her dual responsibilities satisfactorily, both in respect of the time taken up by the outside activity and the nature of his or her full-time duties. At all relevant times, the employee must ensure that his or her duties and obligations to MISC, as well as the interests of MISC, are not compromised.

33.3. MISC recognises the role of employees who are elected officials of a labour union which has been duly accorded recognition by MISC and their participation in union activities which are in compliance with the relevant labour legislation.

33.4. Any activities related to your appointment should not make use of MISC assets and resources.

34. Political Activities

34.1. MISC does not support political parties or individual politicians and does not take part in political activities or party politics.

However, MISC recognises that employees, in their capacity as citizens, may wish to involve themselves in legitimate political activities. While MISC does not wish to discourage employees from doing so, in order that MISC can avoid involvement or identification with any political party, employees are required to use their off-duty time, or annual leave entitlement, subject to prior approval of such leave application, for such matters and they are not to make any representations that their involvement is on behalf or with the support of MISC. In any event, an employee shall not accept any appointment of as an office holder at the Branch, Division, State or National level of a political party, and the employee is to reject such appointment.

34.2. In order not to compromise the interests of MISC, employees who wish to stand for State, Federal and/or material elections are required to resign from MISC, subject to the requirements of applicable law.

34.3. You must not use your position with MISC to try to influence any other person (whether or not employed by MISC) to make political contributions or to support politicians or their parties in any country.

34.4. You shall not make any contribution or incur any expenditure using MISC assets and resources to benefit any political campaign, party or politician in any country.

34.5. MISC facilities, equipment, assets and resources may not be used for any political campaigns or party functions.

34.6. Charitable donations may not be used as a substitute for prohibited political payments or to camouflage bribery.

35. Prohibition of Action as Editor of Newspapers or Any Form of Publication

An employee will not act as the editor, or take part directly or indirectly in the management of any printed or online publication, including newspapers, magazines, journals, or blogs except for the following:

a) Department or staff publications.
b) Professional publications.
c) Publications of non-political or voluntary organisations.

Approval shall be obtained from HoD in consultation with HR Department.

36. Participation in Media

36.1. Employees may participate in any form of advertisement or broadcasting whether in the newspapers, magazines, radio or television or any other media, with proper approval from MISC.

36.2. MISC further encourages employees to contribute literary or academic articles to any publications (for example newspapers, magazines or journals), provided that prior written permission from your HoD is obtained.

36.3. Employees shall be mindful and adhere to the following at all times:

a) To not disclose MISC's confidential information on your personal social media accounts or on any other accounts i.e. via comments.
b) To be mindful of the copyright, trademark and intellectual property rights of MISC and other organisations or individuals.
c) To protect MISC's brand and reputation, and to observe principles of integrity and professionalism when publishing content on MISC.
d) To not make any statement on behalf of MISC unless you are the designated or assigned (authorised) spokesperson.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

PART II H: Disclosure Duties

37. Your Duty to Report Breaches and Violations

37.1. If you become aware of a breach or potential breach of this Code or any violation of MISC policies, standards, guidelines and procedures or other legal requirements, you shall immediately report the same, in writing, to your HoD, the Compliance Department or your MISC contact person, or through other accessible channels for raising concerns and grievances as provided by the Company.

37.2. You may also disclose any alleged or suspected improper conduct using the procedures provided for in the MISC Whistleblowing Policy as adopted in your jurisdiction.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

38. Non-retaliation

38.1. If you make a report or disclosure as prescribed in Section 37 in good faith, and without malicious intent, that a breach or violation as aforesaid may have occurred or may be about to occur, you will not be penalised or subject to any form of retaliatory action notwithstanding that, after investigation, your concern was later proved to be unfounded. Consistent with the MISC Non-Retaliation Policy, any form of retaliation by a person subject to this Code against another person who in good faith and without malicious intent has made a report or disclosure as stated above is forbidden by MISC and will itself be regarded as serious misconduct rendering the person engaged in the retaliation liable for disciplinary action.

Reference Documents

- MISC CoBE Country Supplement
- MISC CoBE Guide
- MISC Whistleblowing Policy
- MISC Non-Retaliation Policy

Part II : Duties of Good Faith, Fidelity, Diligence & Integrity

39. Disclosure of Overpayments

39.1. MISC shall recover any overpayment of salary, allowances, expenses, claims, or other compensation or benefits in excess of your entitlements to the extent permissible by law. You will be notified in advance of any such recovery and provided with the opportunity to clarify or address any concerns relating to the recovery of overpayment.

39.2. If you find that you have received overpayments of salary, allowances, expenses, claims or other compensation, or benefits in excess of your entitlements, you must immediately inform your immediate superior and the department responsible for such overpayments. Failure to disclose such overpayment may constitute misconduct and may result in disciplinary action against you.

39.3. Recovery of such overpayments may be made by deducting from your salary, subject to applicable laws and where required by such applicable laws, your consent. MISC may also pursue recovery through civil proceedings, which may include initiating legal action to reclaim any outstanding amounts.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

PART III

WORKPLACE CULTURE & ENVIRONMENT

Part III : Workplace Culture & Environment

1. Significance of Safe, Secure and Conducive Workplace Environment

1.1. MISC is committed to providing, in collaboration with you, a safe, secure and conducive workplace culture and environment, where the values of mutual and reciprocal respect, trust and confidence are upheld and actively promoted.

1.2. MISC is also committed to promoting the physical, emotional, and psychological well-being of all employees by providing a safe, healthy, and respectful working environment.

Reference Documents

- MISC Human Rights Policy
- MISC CoBE Country Supplement
- MISC CoBE Guide

2. Unlawful Discrimination and Equal Opportunity

2.1. MISC will not tolerate unlawful discrimination in the workplace or on the job.

2.2. In making employment decisions, including hiring, evaluation, training, promotion, development and compensation, you shall apply objective criteria, including qualifications, merit, performance and business considerations, with a view to providing equal opportunity for everyone.

2.3. You must comply with laws in your local jurisdiction that prohibit workplace discrimination.

2.4. You should understand the value of diversity and inclusion, and must not discriminate against any individual, including in the employment or hiring practices in accordance with the MISC Human Rights Policy.

2.5. You should report any actual or suspected discrimination that you observe or become aware of, whether the behaviour is directed towards an employee or a third party performing work or services for or on behalf of MISC, to your HoD, HR Department, your MISC contact person or other accessible avenues for raising concerns and grievances provided by the Company.

Reference Documents

- MISC Human Rights Policy
- MISC Whistleblowing Policy
- MISC CoBE Country Supplement
- MISC CoBE Guide

3. Sexual Harassment

3.1. MISC upholds your right to protection from all forms of sexual harassment, including unsolicited or unwarranted sexual overtures and advances, and is dedicated to ensuring a conducive and inclusive workplace for all.

3.2. The act of sexual harassment, unsolicited and unwarranted sexual overtures and advances will be treated as misconduct.

3.3. For the purpose of this Section 3, “sexual harassment” means:

Any unwanted or unwelcomed or unsolicited or unreciprocated conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological, or physical harassment to the recipient:

a) That might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his/her employment; and/ or

b) That might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to his/her wellbeing.

Part III : Workplace Culture & Environment

Sexual harassment in workplace includes sexual harassment occurring outside the workplace as a result of employment responsibilities or relationships. Situations in which such employment related sexual harassment may take place include, but are not limited to:

- At work related social functions.
- In the course of work assignments outside the workplace.
- At work related conferences or training sessions.
- During work related travel.
- Over the phone.
- Through electronic media.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

4. Non-business Workplace Relationships

4.1. When employees have relationships, which go beyond professional relationships and social friendships, such relationships may create conflicts of interest as well as opportunities for exploitation, favouritism or bias. Such relationships can also undermine core values, such as respect and trust amongst staff, and impact upon the reputation and integrity of MISC. These relationships create a real likelihood of disaffection, disharmony and significant difficulties for the parties concerned as well as for other co-employees of MISC.

4.2. While MISC respects employees' right to privacy and personal relationship, non-business workplace relationships are discouraged as it may result in real or perceived conflict of interest, favouritism or undue influence which is construed as misconduct. Your terms of employment may impose additional requirements with respect to non-business workplace relationships.

4.3. There is a basic conflict of interest when you manage someone with whom you have a family, romantic or intimate relationship. Even if you act properly, your relationship may be seen as influencing your judgment and creating bias. Accordingly, as an MISC employee or director, you must disclose such relationship and, for the benefit of other employees and maintaining a safe and unbiased atmosphere in the workplace, you may not supervise, directly or indirectly, any employee with whom you have such a relationship. Any information you provide to MISC in connection with the disclosure of your non-business workplace relationship will be treated as confidential and will not be disclosed to other employees or members of the company, unless required or necessary to address the situation and strictly on a need-to-know basis.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

5. Workplace Bullying and Harassment

5.1. MISC will not tolerate workplace bullying and harassment in the workplace or on the job. The workplace is not limited to a physical office or working hours. It also includes digital communication tools that can be accessed outside of working hours.

5.2. Workplace bullying is defined as offensive, abusive, intimidating, hostile or insulting behaviour, which makes the recipient feel upset, threatened, humiliated, intimidated, offended, degraded, denigrated, alienated or vulnerable. Workplace bullying and harassment can be in any form such as verbal, physical, social or psychological abuse by another person or group of people.

5.3. Workplace harassment is any systematic and/or continued unwanted physical, social, psychological, verbal or non-verbal conduct-based targeting protected characteristics, including but not limited to a recipient's marital status, gender, religion or belief, age, race or disability which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment. Behaviour that constitutes bullying and is connected to a protected characteristic is likely to be considered harassment.

5.4. Workplace bullying and harassment can take many forms such as:

a) Verbal: Slandering, ridiculing or maligning a person or his or her family; persistent name calling or using that person as a joke that is hurtful, demeaning, insulting or humiliating, abusive and offensive remarks.

b) Physical: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.

c) Gestural: Non-verbal threatening gestures, glances or expressions that can convey threatening messages or hostility.

d) Cyber: Use of digital communication tools (e.g., social media, messaging apps, emails) to harass, threaten, embarrass, or target another person repeatedly and intentionally.

e) Exclusion: Socially or physically excluding, isolating or disregarding a person in work-related activities.

f) Ill-treating others: Using one's position to ill-treat or abuse others.

g) Defaming, humiliating or discrediting others.

5.5. You should report any actual or suspected workplace bullying and harassment in the workplace or on the job that you observe or become aware of, whether the behaviour is towards an employee or a third party performing work or services for or on behalf of MISC, to your HoD, your MISC contact person, or other accessible avenues for raising concerns and grievances as provided by the Company.

Reference Document

MISC CoBE Country Supplement

MISC CoBE Guide

6. Borrowing Money

6.1. You will not, under any circumstances, borrow, request, lend money from or to your subordinate, MISC contractors, subcontractors, vendors, consultants or suppliers or any other entity that have dealings with MISC.

6.2. Subject to the foregoing and to any restrictions set out in the CoBE Country Supplement that are applicable to you, you may borrow money from any person or stand as surety or guarantor for any borrower provided that you do not in any manner place yourself under any serious obligation to any person:

a) Who is directly or indirectly, subject to your official authority.

b) With whom you have or are likely to have official dealings.

7. Dress Code

7.1. Dress code requirements may vary in different countries where MISC operates in recognition of the cultural and religious diversity within the Group.

7.2. You must comply with any specific dress code requirements applicable to your country, as set out in the CoBE Country Supplement or refer to your Human Resources Department for respective dress code policy.

7.3. Wherever you are based, you should always be dressed in a neat, professional, appropriate and decent manner during office working hours and while performing your duties, in a way that reflects the standards of the business and your role.

7.4. You must comply with any dress code requirements imposed by MISC for legitimate purposes, including health and safety and other considerations relevant to your role or the business environment. This includes mandatory use of personal protective equipment, where applicable.

8. Occupational Health, Safety and Environment

8.1. MISC is committed to providing a safe and healthy workplace for all employees, contractors and others involved in its operations, in accordance with applicable legal requirements and company standards and to undertake measures in reducing the impact of its operations on the environment.

8.2. Everyone on MISC's premises must conscientiously and diligently comply with all HSE requirements, measures, work rules and standard operating procedures set out in manuals, handbooks and documents issued by MISC as amended and updated from time-to-time and all applicable laws and regulations.

8.3. Everyone on MISC's premises must strive to reduce, reuse, recycle and recover waste by adopting industry good practice.

8.4. You must report any HSE incidents, near misses or unsafe conditions that you observe or become aware of to your HoD, your MISC contact person or other accessible avenues for raising concerns and grievances as provided by the Company.

Reference Documents

- MISC CoBE Country Supplement
- MISC Whistleblowing Policy
- MISC CoBE Guide

9. Substance Misuse (Drug and Alcohol Abuse)

9.1. The Company prohibits the use or possession of drugs or substances that may impair performance or judgement during working hours, on its premises, while operating machinery or performing work duties. This applies even if the substances are legal in certain jurisdictions, and employees must report to work free from the substances.

9.2. Substance misuse (as defined in Section 9.4) can impair performance at work and can be a threat to health, safety and the environment. Hence, it is MISC's policy that the unauthorised consumption, possession, distribution, purchase or sale of any substance of misuse within its premises or while conducting its businesses or being under the influence of any such substance while working is prohibited. In this respect, all persons covered by this Code must diligently observe and comply with the policies and procedures on substance misuse issued by MISC as amended and updated from time-to-time, copies of which are available from Group Health, Safety, Security & Environment (GHSSE). The consumption of legally prescribed psychoactive drugs is permitted for the treatment of identified illnesses, subject to prior approval by MISC management with authority over the relevant premises or activity.

9.3. To ensure adherence to this policy, MISC may conduct unannounced testing and searches for substances of misuse in accordance with its policies and subject to the requirements of applicable laws.

Any persons covered by this Code who are found to have unauthorised possession of any substance of misuse or who test positive for any substance of misuse are considered to have committed an act of misconduct which may render them liable for disciplinary action, including termination. Subject to local laws in the jurisdiction of operation, employees are required to consent to testing and searches conducted by any persons or laboratory authorised by MISC by signing relevant documents issued by MISC. Further, employees who undergo such testing must give consent to the release of the results to MISC.

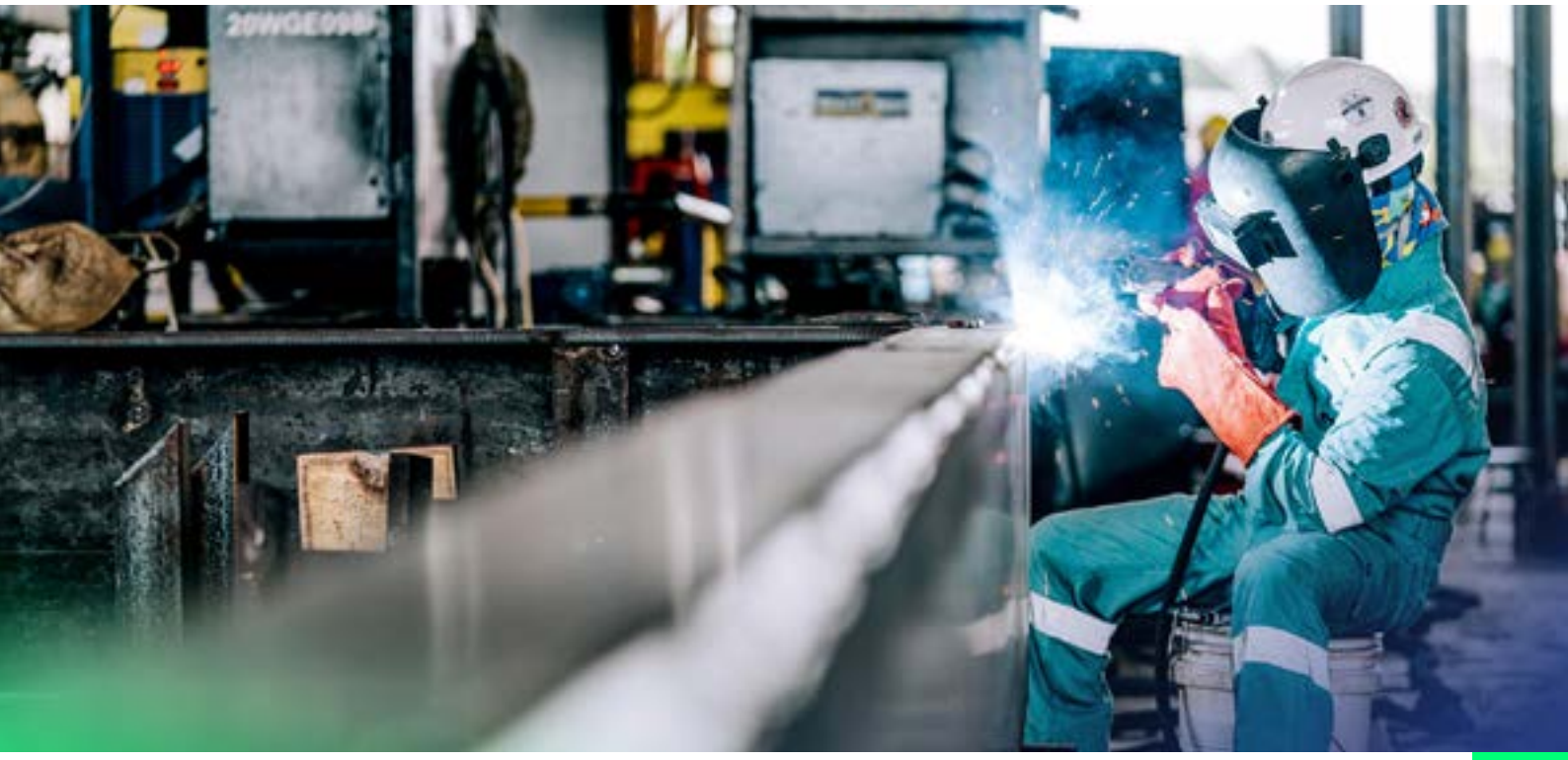
9.4. Under this Code, "substance misuse" includes any illegal drugs, alcoholic beverages containing ethanol, legal psychoactive drugs obtained or used without legal prescription, and legally prescribed psychoactive drugs consumed beyond their therapeutic or prescribed uses.

9.5. All third parties performing work for or on behalf of MISC and any other persons on MISC's premises are required to demonstrate that substance misuse control programmes are part of their HSE management to ensure that substance misuse among their employees is adequately controlled and meets MISC standards.

10. Fostering A Just Transition

10.1. MISC is committed to advancing a just transition that respects human rights and ensures that stakeholders - especially our employees, suppliers, and communities - have access to equitable opportunities for socio-economic growth.

10.2. You should aim to create lasting social benefits, safeguard the health and safety of employees, contractors and communities; minimise disruptions to the community and the environment.



Part III : Workplace Culture & Environment

11. Human Rights

11.1. You shall understand and comply with MISC's policies, standards, guidelines and procedures with respect to human rights. In compliance with MISC Human Rights Policy, MISC seeks to work with contractors who share our values of integrity, are committed to fighting bribery and corruption, and contribute to sustainable development. All contractors are required to comply with "Part IV: Human Rights" of the MISC Code of Conduct and Business Ethics for Third Parties.

11.2. MISC prohibits the use child labour in its operations and business activities. MISC commits to employ persons who meet the applicable minimum legal age requirements to work, complying with relevant ILO standards on minimum age for performing hazardous works in the countries in which it operates, subject to applicable law.

11.3. MISC shall not engage in or support human trafficking or modern slavery, including forced, bonded, or involuntary labour, and shall refuse to work with any contractors or other third parties that may be incompliant with these principles.

11.4. All contractors must sign an attestation confirming that their workforce is entirely free from forced or child labour and human trafficking, and must stay compliant with this policy.

11.5. Participation in all human rights related trainings and briefings is necessary as and when required by MISC.

Reference Documents

- **MISC Human Rights Policy**
- **MISC Code of Conduct and Business Ethics for Third Parties**
- **MISC CoBE Country Supplement**
- **MISC CoBE Guide**

PART IV

DISCIPLINE, DISCIPLINARY PROCESS & SANCTIONS

Part IV : Discipline, Disciplinary Process & Sanctions

1. Importance of Good Conduct and Discipline

1.1. The maintenance of discipline, good conduct and decorum amongst the employees of MISC is critical to the smooth running of its business or enterprise and is for the common good of MISC and its employees.

1.2. The term "misconduct" means improper behaviour or an act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to MISC and includes a breach of discipline or violation of this Code, the terms and conditions of the employment, express and implied, or the rules and regulations as set out in any handbooks, policies or procedure statements or in any documentation of MISC.

1.3. The following constitute acts of misconduct for which a person covered by this Code may be liable for disciplinary action, subject to the requirements of applicable law:

i. Insubordination.
ii. Tardiness.
iii. Malingering.
iv. Absenteeism.
v. Smoking or vaping at non-designated areas.
vi. Violation of ZeTO rules or any Company's safety rules.
vii. Carrying of any dangerous weapons into the Company's premises or assets or having in possession any dangerous weapon.
viii. Tailgating.
ix. Violent behaviour or threats of violent behaviour (includes assaults and fighting, whether with employees, clients, contractors, or visitors to MISC premises).
x. Committing theft, fraud, misappropriation or assisting others in the theft, fraud or misappropriation of MISC's property.
xi. Being dishonest or conducting oneself in such a manner as to lay oneself open to suspicion of dishonesty.
xii. Negligence, neglect or dereliction of duty.
xiii. Sleeping while on duty.
xiv. Deliberate damage to MISC's property.
xv. Leaving the workplace during working hours without approval.
xvi. Sexual impropriety at the workplace.
xvii. Unauthorised consumption, possession, distribution, purchase or sale of any substance of misuse or being under the influence of any such substance within the Company premises or while conducting business or while working.
xviii. Signing in or signing out attendance for other employees.
xix. Sexual harassment.

xx. Workplace bully and harassment.

xxi. Obstructing other employees from performing their duties.

xxii. Gambling within the premise of MISC or during working hours.

xxiii. Non-observance of safety precautions or rules or interfering or tampering with any safety devices installed in or about the premises of MISC.

xxiv. Engaging in any illegal or unethical practices such as taking or giving bribes or receiving any illegal gratification whether in monetary terms or otherwise.

xxv. Engaging in other employment/ business whilst in the service of MISC, without the permission of MISC.

xxvi. Any act which could adversely affect the image or reputation of MISC.

xxvii. Misuse of MISC's computer and telecommunications systems (e.g., excessive accessing of non-work-related internet sites (such as social networking websites), accessing of pornographic sites and deliberate tampering with or unauthorised use of computer hardware or software).

xxviii. Taking retaliatory actions against persons in situations where they are protected by the MISC Non-Retaliation Policy.

xxix. Conducting themselves in a manner that can be reasonably construed as lacking in efficiency.

xxx. Breaching any policies or prohibitions set out within this Code.

xxxi. Taking measures in circumvention of the policies and prohibitions set out in this Code.

xxxii. Failing to observe all laws and regulations applicable to MISC's business and operations.

xxxiii. Failing to comply with applicable MISC established policies, rules and procedures, including but not limited to the limits of authority (LOAs) and MISC Technical Standards.

xxxiv. Criminal conviction due to personal conduct or any act associated with MISC.

xxxv. Condonation or failure to take action against any disciplinary issues or a misconduct.

xxxvi. Falsify/ tamper/ alter any document in the course of employment or submission thereof.

xxxvii. Providing false or misleading information or declaration, including but not limited to qualification, work experience, certification or credentials, during the hiring process or at any point during employment.

xxxviii. Wilful withholding of information i.e. intentionally fails to disclose important information during an investigation by the Company.

Part IV : Discipline, Disciplinary Process & Sanctions

1.4. The above list of types of misconduct is not to be taken as exhaustive and, for the avoidance of doubt, the said list does not detract from the meaning of misconduct as set out in Section 1.2 of Part IV above.

1.5. Subject to the requirements of applicable laws, disciplinary action may be taken against any person covered by this Code for misconduct or for non-compliance with such laws, regulations, rules and procedures.

2. Disciplinary Process and Sanctions

Provisions concerning disciplinary procedures and actions relevant for your jurisdiction are set out in your CoBE Country Supplement. If no such provisions exist, the standard disciplinary rules and practices in your jurisdiction will apply in every instance, subject to the requirements of applicable laws. Further information in this regard may be obtained from your HR Department.

Reference Documents

MISC CoBE Country Supplement

MISC CoBE Guide

Annexure 1 : MISC Anti-Bribery and Corruption Policy

This policy reflects MISC's overarching commitment to upholding the highest standards of integrity and ethical behaviour, throughout our business operations.

Policy Statement

MISC is committed to combating bribery and all forms of corruption and aims to uphold transparency and integrity throughout our business dealings, whether with governmental agencies, public sector or private enterprises.

Zero-Tolerance Approach

MISC has a zero-tolerance approach to bribery and corruption. MISC strictly prohibits all forms of bribery and corruption, including facilitation payments, kickbacks and political contributions. We have adopted a strict "No Gift" policy.

Any request for a bribe or offer of a bribe shall be rejected. You shall not offer, promise, give, ask for or accept anything of value or any gratification, as a reward for any action in relation to MISC's business. You shall not authorise others to do so on your behalf.

Additionally, any appearance of bribery or corruption should be avoided to protect MISC's reputation.

Governance and Implementation

This policy is in line with the MISC Code of Conduct and Business Ethics (CoBE) and is guided by other applicable internal policies, procedures and guidelines including the MISC Anti-Bribery and Corruption Standard.

This policy applies to every employee, director and third party working for or on behalf of MISC. Joint venture companies in which MISC is not a controlling stakeholder and associate companies of MISC are encouraged to adopt this policy or similar principles and standards.

Any violation of applicable anti-bribery and corruption laws may result in administrative action, civil or criminal liabilities, impact business continuity, affect contractual obligations and cause significant reputational damage.

Anti-Bribery Management System

The Board and management are committed to implementing and enforcing effective and robust policies and procedures to prevent, monitor and eliminate bribery and corruption and to the continual improvement of MISC's Anti-Bribery Management System (ABMS). A Compliance unit is assigned with the responsibility to oversee the implementation of MISC Compliance and Ethics Programme and the ABMS, with direct access to the Board and management for issues relating to bribery and corruption.

MISC provides avenues for all employees and members of the public to make reports on any improper conduct within MISC, which is governed by the MISC Whistleblowing Policy, MISC Non-Retaliation Policy, and relevant procedures.

Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 2 : MISC Anti-Money Laundering Policy

This policy reflects MISC's overarching commitment in preventing and detecting money laundering and terrorism financing activities within MISC Group of Companies.

Policy Statement

MISC is committed to adhering to all applicable anti-money laundering laws throughout our business dealings, including preventing its operations from being used for money laundering and terrorism financing, assessing suspicious transactions and maintaining robust due diligence procedures.

MISC strictly opposes any practices related to money laundering, which involves concealing the criminal origin or nature of money or assets through legitimate business transactions, or using funds to support criminal activities, including the financing of terrorism or proliferation of financing related to weapons of mass destruction.

MISC is committed to implementing adequate measures to strengthen its anti-money laundering governance, including appropriate training, compliance programmes and conducting counterparty due diligence to understand the business and background of MISC's prospective business counterparties, including the source and destination of funds, property and services.

Third parties working for or with MISC, or acting on its behalf, are expected to provide all necessary information to facilitate such due diligence processes and to uphold MISC's values and commitment.

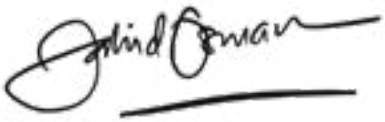
In the event there is any requirement by regulator for any MISC Group of Companies to establish a guideline on anti-money laundering, such requirement shall be complied accordingly.

Governance and Implementation

This policy is in line with the MISC Code of Conduct and Business Ethics (CoBE) and is guided by other applicable internal policies, procedures and guidelines, including the MISC Anti-Bribery and Corruption Standard.

This policy applies to every director, employee and third party working for or on behalf of MISC. Joint venture companies in which MISC is not a controlling stakeholder and associate companies of MISC are encouraged to adopt this policy or implement similar principles and standards.

Money laundering is a serious crime and any violation of applicable anti-money laundering laws may result in administrative action, civil or criminal liabilities, including forfeiture of assets, disruption of business operations, breach of contractual obligations and significant reputational damage.



Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 3 : MISC Competition Law Policy

The policy reflects MISC's overarching commitment in complying with competition laws with respect to business activities undertaken by MISC Group of Companies.

Policy Statement

MISC is committed to conducting its business activities in full compliance with applicable global competition laws.

We are committed to fostering transparent, responsible, and lawful business practices that benefit stakeholders and safeguard MISC's reputation, aligned with our zero-tolerance policy on non-compliance with competition laws. This includes prohibitions on anticompetitive behaviour such as cartels, abuse of dominance and anticompetitive mergers.

Governance and Implementation

This policy is in line with the MISC Code of Conduct and Business Ethics (CoBE) and is guided by other applicable internal policies, standard, guidelines and procedures, including the MISC Competition Law Standard.

This policy applies to every director, employee and third party working for or on behalf of MISC. Joint venture companies in which MISC is not a controlling stakeholder and associate companies of MISC are encouraged to adopt this policy or similar principles and standards.

Any violation of applicable competition laws may result in administrative action, civil or criminal liabilities, impact business continuity, affect contractual obligations and cause significant reputational damage.

Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 4 : MISC Sanctions and Export Control Policy

This policy reflects MISC's overarching commitment as a global player in observing good business practices consistent with international norms and standards relating to sanctions and export contro.

Policy Statement

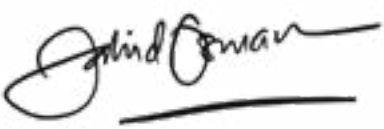
MISC is committed to comply with applicable sanctions and export control laws wherever it operates. To address sanctions and export control risks, MISC employs various measures to reinforce its compliance programme. This includes management oversight of compliance with relevant sanctions and export control laws, the implementation of risk-based third-party due diligence prior and throughout the transaction lifecycle, the development and enforcement of internal controls, and conducting appropriate training as a means to instill awareness on sanctions and export control.

Governance and Implementation

This policy is in line with the MISC Code of Conduct and Business Ethics (CoBE) and is guided by other applicable internal policies, standards, guidelines and procedures including the MISC Sanctions and Export Control Standard.

This policy applies to every employee, director and third parties working for or on behalf of MISC across all jurisdictions in which it operates and will extend to any additional jurisdictions where MISC commence operations.

Any violation of applicable sanctions and export control laws may result in administrative, civil or criminal liabilities, impact business continuity, affect contractual obligations and cause significant reputational damage.



Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 5 : MISC Privacy Policy

This policy reflects MISC's overarching commitment to ensuring that personal data is handled and managed throughout our business operations in full compliance with applicable data protection laws.

Policy Statement

MISC is committed to complying with applicable privacy and personal data protection laws, and to ensuring that our collection, use, processing and storage of personal data relating to our employees, contractors and directors, and the third parties with whom we work, is consistent with our high standards.

Our core principles require that MISC, in our collection, use, processing and storage of personal data, takes the following steps where required to do so by applicable laws:

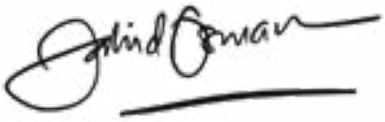
- to ensure that personal data are obtained lawfully and processed based on an appropriate legal basis, including consent, where relevant;
- to provide individuals with the required notices and information about their personal data processing and to verify that the personal data collected are relevant for the stated purposes;
- to keep collected personal data accurate, complete and up-to-date;
- to retain the personal data that has been collected only for the period necessary to fulfill the relevant purposes, unless otherwise permitted or required by applicable laws;
- to inform individuals concerned about the disclosure of their personal data to third party recipients;
- to keep personal data secure by protecting it with adequate and appropriate security safeguards; and
- to provide individuals with the ability to exercise their rights under applicable laws, including rights to access, rectify and/or request the erasure of their personal data, where applicable.

Governance and Implementation

This policy is in line with the MISC Code of Conduct and Business Ethics (CoBE) and is guided by other applicable internal policies, standards, guidelines and procedures including the MISC Privacy Standard.

This policy applies to every director, employee and third party working for or on behalf of MISC. Joint venture companies in which MISC is not a controlling stakeholder, and associate companies of MISC are encouraged to adopt this policy or similar principles and standards.

Any violation of applicable data protection laws may result in administrative action, civil, or criminal liabilities, disrupt business operations, affect contractual obligations, and cause significant reputational harm.



Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 6 : MISC Whistleblowing Policy

This policy reflects MISC's overarching commitment to provide a safe and confidential channel for all employees, directors, the contingent workforce of MISC Group of Companies worldwide and members of the public ("Whistleblowers") to report concerns about any improper conduct without fear of retaliation.

Policy Statement

MISC is committed to the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner. MISC encourages the reporting in good faith about any improper conduct within MISC as well as any non-compliance by a third party where this could affect MISC.

Scope of the Policy

This policy is designed to facilitate Whistleblowers to report any violations or potential violations (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

i. Fraud, Bribery and Corruption;
ii. Abuse of Power;
iii. Conflict of Interest;
iv. Misrepresentation or non-compliance in the preparation of books and records, including financial
v. statements;
vi. Breach of MISC's Code of Conduct and Business Ethics (CoBE), policies, standards, guidelines and
vii. procedures;
viii. Breach of applicable laws and regulations.

Secure Whistleblowing Channels

All reports are to be made via the following secured and confidential channels in accordance with the procedures as provided under this policy, subject to the requirements of applicable laws:

- Online via https://whistleblow.misc.net.my/Whistleblowing/
- Email to whistleblow@miscbhd.com
- Hotline at +603-2264 0807 from Monday to Friday during office hours (9am to 5pm)

When you report a concern, you can expect that your report will be treated seriously, fairly and promptly.

For information on the processing of your personal data in the whistleblowing channel, please refer to the Privacy Notice.

Annexure 6 : MISC Whistleblowing Policy

Protection to Whistleblower

While MISC encourages Whistleblowers to identify themselves to ensure the most efficient and comprehensive investigation and resolution of reports, Whistleblowers have the option to submit reports anonymously. MISC takes the protection of confidentiality of identity very seriously and will take all reasonable steps to ensure confidentiality as best as possible. You will not be subject to retaliation from MISC for any report of a suspected violation that is made in good faith and without malicious intent, and you have raised as a genuine concern, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

MISC strictly prohibits and will not tolerate any form of retaliation against any person who, in good faith and without malicious intent, has made a report or disclosure of violations or potential violations pursuant to this Policy.

For the avoidance of any doubt, MISC reserves all rights to inform competent authorities of any violations of the law.

For further information, please refer to the MISC Non-Retaliation Policy.

Applicability of the Policy

This Policy applies to every employee, director and third party with business dealings with MISC. Joint venture companies in which MISC is not a controlling stakeholder and associate companies of MISC are encouraged to adopt this policy whilst our contractors, agents, outsourced workers and business associates are required to always act consistently with applicable parts of this Policy when dealing with, acting on behalf of, or in the name of MISC.

MISC reserves the right to amend this policy from time to time.

Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 7 : MISC Non-Retaliation Policy

This Policy reflects MISC's overarching commitment to upholding the highest standards of integrity, ethical behaviour, transparency and accountability by ensuring that employees, directors, the contingent workforce of MISC Group of Companies worldwide and third parties with business dealings with MISC can raise concerns without any fear of retaliation.

Protection against Retaliation

MISC strictly prohibits and will not tolerate any form of retaliation against any person who, in good faith and without malicious intent, has made a report or disclosure of violations or potential violations through the relevant reporting channels. Reports are considered made in good faith when the individual has reasonable grounds to believe that the information disclosed indicates a violation or potential violation, even if the concern is later proven to be unfounded.

The types of retaliation prohibited by this Policy include blatant acts such as dismissal, demotion, suspension, harassment or public attack, as well as more subtle acts of discrimination against a reporting individual or individuals investigating any misconduct or those cooperating in an investigation.

Retaliation constitutes serious misconduct that may be subject to disciplinary action, including dismissal.

For the avoidance of any doubt, MISC reserves all rights to inform competent authorities of any violations of the law.

Subject to applicable laws, the protection is not applicable in the following circumstances, among others:

- The individual wilfully participated in the improper conduct that was the subject of disclosure or in any other misconduct uncovered during the course of the investigation.
- The individual participated in the misconduct that is in violation of applicable laws and regulations.
- The disclosure is made with malicious intent.
- The individual knowingly discloses a false statement.
- The disclosure is frivolous or vexatious.
- The disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

Disciplinary or legal actions may still apply in such cases.
Any individual who is being subject to retaliation contrary to this Policy may submit a report through the designated reporting channels.

Annexure 7 : MISC Non-Retaliation Policy

Governance and Implementation

All employees, directors and third parties working for or on behalf of MISC shall adhere to this Policy and ensure compliance with all applicable laws and regulations in their business dealings with MISC. Joint venture companies in which MISC is not a controlling stakeholder and associate companies of MISC are encouraged to adopt this Policy or similar principles and standards.
Any violation of applicable laws may result in administrative action, civil or criminal prosecution of MISC and its employees, impact business continuity, have contractual implications, and cause significant reputational damage.

Datuk Zahid Osman
President & Group CEO
1 April 2026

Annexure 8 : MISC Human Rights Policy

This policy contains our overarching commitment to respecting human rights, which is also reflected in other policies, frameworks, guidelines and processes throughout our business.

Policy Statement

MISC is committed to respecting all internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work which includes adherence to the Maritime Labour Convention (MLC), being guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, complying with all applicable laws in the countries in which we operate.

Delivery

Respect and acknowledgement of internationally recognised human rights

We are committed to respecting the human rights of all people who are impacted by our activities, as well as respecting diversity and inclusion, elimination of all forms of discrimination including recognition of the right to collective bargaining as defined by applicable laws, modern slavery, child labour and human trafficking.

Adoption of a risk-based approach to human rights due diligence

Areas of material importance include labour and working conditions, supply chain, responsible security, communities' well-being which are impacted by, among other things, climate change, environmental issues and energy transition.

We apply a risk-based due diligence approach to identify, prevent, mitigate and address actual and potential adverse human rights impacts arising from activities performed across the organisation, and resulting directly from our operations, products or services, with a focus on significant risks and priority areas, and with input from engagement with relevant stakeholders.

Access to effective grievance mechanisms and remedies

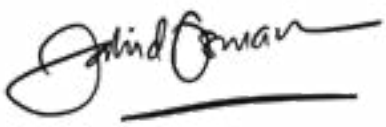
We are committed to providing for and cooperating in the remediation of adverse human rights impacts that we identify we have caused or contributed to. Our grievance mechanisms are designed to be confidential, reasonably prompt, non-retaliatory and fair. We seek to ensure that our grievance mechanisms are accessible to all stakeholders, including within and outside our organisation.

Annexure 8 : MISC Human Rights Policy

Governance & Implementation

This policy is approved by the Board of Directors, and its implementation is overseen by the Management Committee. Human rights management in MISC is guided by supporting documents, including our Code of Conduct and Business Ethics (CoBE) and our MISC Code of Conduct and Business Ethics for Third Parties (CoBE for Third Party). We will engage with key stakeholders to ensure effective communication, awareness and training on human rights matters.

This policy applies to every employee, director, and officer of MISC. Third parties that may perform works or services for or on behalf of MISC, joint venture companies (in which MISC is not a controlling stakeholder) and associate companies of MISC are encouraged to adopt this Policy or similar principles and standards.



Datuk Zahid Osman
President & Group CEO
9 September 2024

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