



**PETRONAS**

**PETRONAS  
CODE OF  
CONDUCT AND  
BUSINESS  
ETHICS GUIDE**

The PETRONAS Code of Conduct and Business Ethics Guide is intended as a more in-depth explanation of the provisions of the Code, with examples, as applied in all the countries in which PETRONAS conducts operations. It does not describe all applicable laws or PETRONAS 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. PETRONAS 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 PETRONAS to adapt them to local laws and conditions.

# Contents

What Is This Guide About?.....	4
How Do You Use The Code?.....	5
Our Responsibilities As Petronas Employees And Directors .....	6
Core Values And Culture.....	7
Conflict Of Interest .....	9
Fighting Corruption And Unethical Practices .....	13
International And National Trade.....	27
Assets Of PETRONAS.....	32
Financial Integrity.....	34
Confidentiality Obligations/ Personal Data Protection/ Third Intellectual Property/ Public Communications.....	38
Conduct Contrary To Duty To Serve Diligently.....	46
Disclosure Duties .....	49
Workplace Culture And Environment .....	52
Misconduct.....	57

# WHAT IS THIS GUIDE ABOUT?

This guide provides a brief and easy-to-understand introduction to the PETRONAS Code of Conduct and Business Ethics (the "Code" or "CoBE"). It is not a substitute for reading and complying with the Code and other policies of the PETRONAS Group that apply to employees and directors in the performance of their duties, or to Third Parties engaged by PETRONAS as agents; intermediaries; to provide goods and/or services for, jointly with or on behalf of PETRONAS or a counterparty in a business transaction with PETRONAS; or as part of a contingent workforce such as interns, temporary employees, apprentices, proteges, gig workers and volunteers.

You are responsible for reading, understanding and complying with the Code, other Group policies and procedures, and all applicable laws and regulations. Make sure you know the rules that apply to you. You are expected to seek guidance when needed.

Joint venture companies in which PETRONAS is a non-controlling stakeholder and associated companies are encouraged to adopt the Code or similar principles and standards.

The Code, together with country supplements that adapt it to local conditions in particular jurisdictions, can be found online at [www.petronas.com](http://www.petronas.com).

Certain other PETRONAS Group guidelines and policies are available online on the PETRONAS website or the respective companies' websites. Employees may also access these documents via the PETRONAS employee intranet or obtain them from their Human Resource Department.

The standards set out in the Code, as adapted in some cases to local conditions through country supplements, are intended

to apply in all countries in which the PETRONAS Group conducts business.

All PETRONAS employees, directors, contingent workforce members and Third Parties are subject to the laws and regulations of the country where they work.

Please be sure to contact your Head of Department (HoD), Human Resource Department (HR Department), the Legal Compliance Department (LCD) or other PETRONAS contact person if you are unclear about which laws and regulations apply to your activities, and how they interact with the Code and other PETRONAS Group policies.

# HOW DO YOU USE THE CODE?

The Code does not address every possible workplace situation or list all of the PETRONAS Group's policies. Common sense and attention to the Group's core values and its commitment to legal and ethical behaviour should guide everything we do, whether or not a situation is addressed specifically in the Code.

To use the Code, you should:

- Read through the entire Code. This guide is a useful introduction, but there are details set out in the Code that are not covered here.
- Consider how the Code applies to you, and how it would apply to situations you have come across in the past or may encounter in the future.
- Consider the questions and answers in this guide and use them as a starting point for exploring other questions you might have about the Code.
- Don't assume that management knows about or accepts behaviour that is inconsistent with the Code. Be alert and ask questions.
- For purposes of the Code, any reference to approval by the Head of Department (HoD) refers to the head of department holding a position of General Manager or higher.
- Raise your uncertainties to your HoD or your Human Resource Department, the Legal Compliance Department (LCD) or your PETRONAS contact person. A key goal of the Code is to allow you to manage legal and ethical risks by informing yourself about the laws and policies relevant to your work.

# OUR RESPONSIBILITIES AS PETRONAS EMPLOYEES AND DIRECTORS

All PETRONAS Group employees and directors (executive and non-executive) are responsible for upholding the highest standards of conduct when acting on PETRONAS' behalf. As PETRONAS sets out to deliver on its purpose to be “a *progressive energy and solutions partner enriching lives for a sustainable future*,” the CoBE will become even more important as an essential reference on how we deliver excellence in this organisation. Given our expansive global footprint across more than 100 countries, PETRONAS expects all members of the PETRONAS team worldwide to act with integrity in everything they do.

Beyond conducting yourself with integrity, you are responsible for helping protect the Group from legal and ethical risks, including misconduct by other PETRONAS employees, directors, or Third Parties with whom we engage. The Group benefits when risks are identified early, before they become more significant. If you believe that a colleague, a director or a third party has violated, or may be about to violate, the Code, any other PETRONAS policy or procedure, or any applicable laws relevant to your work, you have a duty to report your concerns to PETRONAS.

In principle, employees should feel comfortable discussing any matter with their immediate superiors, but in some cases that might not be practical or appropriate. In those cases, you may raise your concern through the accessible channels for reporting concerns and grievances as provided by the Company. Please refer to the PETRONAS and/or other Group member websites for the relevant reporting channels.

To further empower individuals to speak up, PETRONAS has introduced an enhanced whistleblowing platform, WhistleNOW, which provides secure and accessible reporting channels. The platform enables individuals to raise potential compliance or ethical concerns to management in a structured manner, while ensuring protection against retaliation for reports made in good faith and without malicious intent.

Local laws may affect how whistleblowing procedures operate. For example, you may be required to use locally mandated reporting channels in accordance with local legislation.

For further information, please refer to the PETRONAS Whistleblowing Policy available on the PETRONAS website. You may also visit the PETRONAS Whistleblowing page for details on the available whistleblowing channels at <https://www.petronas.com/whistleblowing>.

# CORE VALUES AND CULTURE

Adherence to the PETRONAS Shared Values of professionalism, loyalty, integrity and cohesiveness is critical to the success and well-being of the PETRONAS Group. In this regard, PETRONAS is committed to the highest standards of integrity, openness and accountability in the conduct of the Group's business and operations. Our General Business Principles reflect this commitment.

All PETRONAS Group employees and directors have the duty to act with good faith, fidelity, diligence and integrity. More particularly, PETRONAS expects that you will:

- Strive towards a high level of professionalism.
- Devote your time and attention to the fulfillment of your duties as an employee.
- Serve with honesty and integrity, courtesy and goodwill.
- Display Group cohesiveness based on unity of purpose along with a caring attitude toward each individual.
- Uphold the duty of care for PETRONAS' interests and reputation.
- Display a high sense of discipline, cooperativeness and diligence in carrying out your duties.
- Act consistently to maintain PETRONAS' confidence and trust in you.
- Promote creativity and new approaches in the course of carrying out your work.
- Comply with applicable laws and regulations as well as PETRONAS policies and procedures.

It is contrary to PETRONAS' objectives and its approach for you to feel encouraged or pressured to violate a law or policy, even if a violation would improve financial or operational results, obtain business opportunities or help achieve a key performance indicator. If you are being asked by someone at PETRONAS to do

something that you think is wrong or inappropriate, or that you would be afraid or ashamed to see appear in tomorrow's newspaper, you should take steps to address the situation by speaking directly with your immediate superior or someone else within the organisation who can provide you with appropriate guidance.

The following pages of this guide provide practical examples of how to best adopt PETRONAS' values and culture.

## QUESTIONS AND ANSWERS

- We use a contractor for some PETRONAS work. I heard from one of the contractor's competitors that the contractor is violating some local legal requirements. I have the impression that the relevant requirements are not enforced, and that the contractor is probably saving us some money if it is violating the requirements. Should I be concerned?

**RESPONSE:** Yes, you should. PETRONAS expects contractors and other parties acting on PETRONAS' behalf to respect the law, and generally to adhere to the principles set out in the Code. In some cases, PETRONAS could be held liable for violations by its contractors, but setting that aside, PETRONAS expects the people who perform work for the Group to act with propriety and integrity. You should make a report to your immediate superior or to another relevant point of contact within the Group. You may also choose to direct your concerns via the available PETRONAS whistleblowing channels.

- One of our consultants tells me that we should ignore a legal requirement in a country in which we do business because that requirement is never enforced. Can I rely upon his advice?

**RESPONSE:** No. PETRONAS' policy is to comply with applicable law in the

*jurisdiction in which the Group operates. You should consult with your local Legal Department or other personnel responsible for compliance matters for guidance.*

- Our supplier is upset that their payment is delayed and they are threatening to stop supplying us the goods if we do not expedite payment. My superior told me to request the supplier to split the claim into a few invoices so the amount is within my boss' approval threshold. I am not sure if this is right but my boss convinces me that we should be creative in coming up with solutions to ensure business is not disrupted.

**RESPONSE:** *Fragmentation of claims is a breach of CoBE and may have the effect or result of circumventing or frustrating PETRONAS' controls, policies or procedures. Creativity and new approaches must be exercised strictly within PETRONAS' established policies and procedures.*

# CONFLICT OF INTEREST

A conflict of interest generally arises when you are in a position to take advantage of your role at PETRONAS for your personal benefit, including the benefit of your family/household and friends, by placing your personal, social, financial or political interests before the interests of PETRONAS. You are expected to avoid conflicts of interest, and situations that have the potential to create conflicts of interest. Even the appearance of a conflict of interest can be damaging to you or PETRONAS. In particular, the use of a PETRONAS office position, confidential information, assets or other resources for personal gain or benefit, or for the advantage of others with whom you are related or associated, is prohibited.

In some limited situations, a conflict of interest that has been fully disclosed to PETRONAS may be tolerated. Any potential 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 PETRONAS contact person (in the case of Third Parties).

Failure to fully disclose the nature and scope of a conflict of interest as soon as you are aware may result in disciplinary action or consequence management against you, whether or not such potential or actual conflict results in tangible or intangible damage to PETRONAS. When in doubt, you should disclose your potential conflict and consult with your superior or someone in the Legal Compliance Department (LCD) about the issue.

What are some common examples of conflicts of interest?

Conflicts of interest may include:

- Having a financial or other business interest in a supplier, contractor, competitor or customer at the same time that you are involved in

PETRONAS' decision-making process relating to, or of relevance, to them.

- Having a financial or other business interest in a transaction in which you know PETRONAS is involved or plans to be involved.
- Giving a third party confidential PETRONAS information in order to give them an advantage in their dealing with PETRONAS.
- Transacting for your own account with PETRONAS clients, suppliers, contractors or vendors on terms other than those freely available to the general public.
- Personally receiving fees, commissions or other items of value from a supplier, contractor, competitor or customer (other than in very limited circumstances).
- Using your position or influence in the hiring, supervising, managing, or career planning of any of your relatives at PETRONAS or at entities providing services to PETRONAS.
- A third party recommending or influencing PETRONAS to award work to a company in which the third party's employee, director, or their family member has a financial or ownership interest, without previously disclosing the relationship to PETRONAS.
- A third party's representative participating in a PETRONAS project, evaluation, or negotiation while simultaneously holding a role (formal or informal) in another organisation that stands to benefit from PETRONAS' decisions, without previously declaring this dual role.

A conflict of interest situation can arise out of your interests and dealings, or out of the interests and dealings of your family members, associates or anyone else with whom you have a personal or business relationship.

While it is impossible to list every situation that might create a conflict of interest, you are encouraged to apply the general principles and use good judgment to guide your actions. When in doubt, ask your superior or someone in the Legal Compliance Department (LCD) about how best to address a potential conflict of interest.

All employees are required to declare any actual or potential conflict of interest by completing the IR02 Declaration Form, or any other applicable declaration as required by your Human Resources Department or local policies.

## QUESTIONS AND ANSWERS

- My first cousin is a director and part owner of a small paper company that supplies paper to PETRONAS. Should I report that?

**RESPONSE:** Yes. You should disclose any situations where you become aware of your family members having interests in companies conducting business with PETRONAS, as this may be perceived as a conflict of interest. Please contact your Human Resource Department for the appropriate platform for disclosure.

- My brother owns a business that markets lubricants and he is interested in exploring a potential business opportunity with PETRONAS. I am currently working in the department that handles the marketing activities of PETRONAS. Can my brother pursue his interest in becoming a PETRONAS dealer?

**RESPONSE:** Yes, your brother may pursue his interest to have a business relationship with PETRONAS. However, you must disclose this familial relationship to your immediate superior. Any instances of conflict shall be endorsed by the HoD in consultation with the HR Department. Furthermore, to maintain transparency and uphold ethical standards, you are required to abstain from participating in any evaluation and decision-making processes related to your brother's potential business dealings with PETRONAS.

- My close friend has recently been appointed as the CEO of a company that, coincidentally, happens to be one of our customers. I am responsible for conducting negotiations with that company. Is there any issue with me continuing to negotiate with them?

**RESPONSE:** You must disclose the relationship to your immediate superior for an assessment of any potential conflict of interest. Based on this evaluation, a decision can then be made regarding whether you are permitted to continue with the negotiation, whether certain controls should guide your engagement going forward, or whether it would be more appropriate for you to recuse yourself from engagement with that company or individual. Any instances of conflict shall be endorsed by the HoD in consultation with the HR Department.

- I would like to help my niece get a job at PETRONAS. Is that a problem?

**RESPONSE:** You may direct your niece to the relevant hiring office at PETRONAS, and you should fully disclose to your Human Resource Department that the applicant is your niece. You must also refrain from taking part in the hiring process or influencing the decision to hire your niece.

- I have no way of knowing what business deals my uncles and cousins may be entering into, and whether they are going to have ownership interests with a privately held entity that does business with PETRONAS. Am I in trouble?

**RESPONSE:** PETRONAS expects its employees to inform themselves of situations in which a conflict of interest arises or may arise because of the business dealings of their close relatives. If you become aware of such situations, you should report them promptly.

- I prefer working with a certain contractor because they do good work and are easy to deal with. I think PETRONAS would benefit from hiring them. To help them, can I give them tips on how to prepare their bid so they have an advantage, even if I do

not receive any payment, as I believe it will benefit PETRONAS. This should be fine without declaring it, right?

**RESPONSE:** No. You may not give any undue advantage to an external party in its dealings with PETRONAS. It does not matter that you will not benefit personally. It also does not matter if, on balance, PETRONAS is not harmed. PETRONAS policies and procedures with regard to procurement must be followed in order to maintain the integrity and transparency of the PETRONAS procurement programme.

- I have been asked to serve on the board of directors of a company outside PETRONAS that has no business dealings with PETRONAS. I know of no business between the company and PETRONAS. Am I permitted to accept this position?

**RESPONSE:** The appointment of an employee as a board member in an external company is strictly limited to nominations made by the Company. Involvement as a board member in a family-owned company is permitted for only one entity and is subject to prior written approval from your Head of Department (HoD). For further information on the approval process, please contact your Human Resource Department.

- I am currently supervising a vendor responsible for event management for PETRONAS events, and they have consistently delivered excellent results. As my daughter is getting married, I intend to engage the same vendor, who has offered me a significant discount for their services. I know I will not be able to get the same favourable terms elsewhere. May I engage this vendor in my personal capacity?

**RESPONSE:** No, you cannot directly or indirectly enter into personal transaction with a vendor of the company with whom you had, currently have or may potentially have official dealings on behalf of PETRONAS.

If such situation is unavoidable, you must obtain written approval from your Head of Department (HoD) in consultation with

your Human Resource Department. You must not proceed until such permission is granted. The Human Resources Department must evaluate, among other issues, whether your discount is related to your position as a PETRONAS employee, and whether such a discount is offered more generally to individuals not affiliated with PETRONAS.

- My husband runs a small family business selling second-hand cars. I am not involved in the day-to-day operations of the business, but I do have 40% shares/equity in the company.

Am I required to declare my shareholding even though the business does not directly compete with PETRONAS or have any business dealings with the Group?

**RESPONSE:** You are encouraged to declare to PETRONAS through the appropriate platform your interests in other commercial enterprise including in privately held entities to avoid any potential conflict of interest situation even though the likelihood of any dealings with PETRONAS or its Group of Companies may be remote.

- My uncle is a PETRONAS dealer, and members of my family are involved in the day-to-day operations of the petrol station. Do I need to make a declaration in this situation even though I have nothing to do with the dealership?

**RESPONSE:** Yes, you should disclose any situations where you become aware of your family members having interests in, for example, companies conducting business with PETRONAS, as this may be perceived as a conflict of interest. Please contact your Human Resource Department for the appropriate platform for disclosure.

- Can I buy a used car from the owner of a registered PETRONAS' contractor with whom I currently have no official dealings with?

**RESPONSE:** You must obtain written approval from your Head of Department (HoD) in consultation with the HR Department, and must not proceed with the transaction until such permission is

obtained. Furthermore, the car must be purchased at market value, under terms that are readily available to the general public.

- My friend works for a contractor company registered with PETRONAS but I have no official dealings with him. Can I go on holiday with him on a personal capacity?

**RESPONSE:** You must disclose your intention to go on holiday with your friend to your Head of Department (HoD) through the appropriate platform, as this situation may be perceived as a Conflict of Interest. Employees are responsible for avoiding any perceived, potential or actual Conflict of Interest situations. Any instances of conflict shall be endorsed by the HoD in consultation with the HR Department.

- I am aware that a law firm advising PETRONAS on regulatory matters has now been approached by a competitor to represent them in a litigation case against PETRONAS. Is this a conflict of interest situation?

**RESPONSE:** Maybe. This situation presents a potential conflict of interest. In its regulatory capacity, the law firm may have access to confidential and sensitive information about PETRONAS that could compromise PETRONAS' position in the litigation. Even if the teams advising each party are different, the risk of information leakage or perceived bias remains, and the law firm must conduct a thorough analysis of its ability to represent both parties at the same time, including through a firewall between teams. PETRONAS expects its external advisors to act with integrity and avoid any engagement that could create a conflict of interest. The matter should be escalated to your Legal Department or Group Legal immediately to address the issue with the law firm and determine appropriate next steps.

- A contractor bidding for a PETRONAS project is partially owned by the spouse of a PETRONAS non-executive director. The relationship was not declared. Is this acceptable?

**RESPONSE:** No. This is a potential conflict of interest that should have been declared.

Even though the director is a non-executive, the spouse's ownership in a bidding contractor may give rise to perceived or actual bias in PETRONAS' decision-making process. PETRONAS expects all directors (executive or non-executive directors) to proactively disclose any actual, potential, or perceived conflicts of interest, including those involving their family members. This matter should be promptly reported to the Company Secretary for further review and appropriate action, including possible recusal of the director from any related deliberations.

# FIGHTING CORRUPTION AND UNETHICAL PRACTICES

## SOLICITATION, BRIBERY AND CORRUPTION

PETRONAS has zero tolerance for corruption in all of its forms. PETRONAS is fully committed to fighting corruption and unethical practices in the course of conducting its business. As a result, the Code prohibits PETRONAS employees, directors, contingent workforce, and their family/household members from directly or indirectly soliciting, accepting or offering bribes to or from public officials or private individuals, even if it means lost business opportunities.

PETRONAS' Third Parties including its contractors, sub-contractors, consultants, agents, representatives and others acting for or on behalf of PETRONAS are expected to comply strictly with PETRONAS' policies prohibiting improper solicitation, bribery and corruption, including making facilitation payments.

Corruption is the abuse of entrusted power for private gain. This includes, but is not limited to offering, promising, authorizing, giving, receiving, accepting or soliciting of any item of value, any undue advantage, gratification, financial or otherwise, in order to influence the actions of a person in a position of authority or trust. Examples of corruption include bribery, nepotism, conflicts of interest and other conduct that undermines integrity, transparency and fair competition.

Under certain anti-bribery and corruption laws in some jurisdictions, PETRONAS directors and employees may be considered public officials because PETRONAS is state-owned.

Even the appearance of conduct constituting corrupt activity may be very damaging to the PETRONAS Group and must be avoided.

In this regard, the Code and the PETRONAS Anti-Bribery and Corruption Standard ("ABC Standard") sets out guidance concerning the giving and acceptance of gifts and entertainment.

## GIFTS AND ENTERTAINMENT

PETRONAS has adopted a "No Gift" Policy whereby, subject to certain exceptions as provided in the PETRONAS ABC Standard, PETRONAS employees and directors, their family/household members or agents acting for or on behalf of PETRONAS are prohibited from, directly or indirectly, receiving or providing gifts.

In situations where you are genuinely unable to decline a gift or entertainment, you shall comply with PETRONAS' procedures governing the receipt of gifts and entertainment.

You may be directed to turn a gift over to PETRONAS, donate it to charity, or return it. As a general matter, the situations in which you will be permitted to accept and retain a gift are extremely limited.

PETRONAS employees, directors, contingent workforce, and their family/household members are not permitted to solicit gifts or personal favours from PETRONAS' contractors, sub-contractors, suppliers, consultants, bankers, dealers, customers or other parties having business dealings with PETRONAS, whether actual or potential. You should never accept gifts or entertainment in exchange for the exercise or non-exercise of your authority or otherwise to PETRONAS' detriment.

PETRONAS' Third Parties are strictly prohibited from providing, or offering to provide, any gift, entertainment, or anything of value to public officials or any other persons on behalf of PETRONAS for the purpose of obtaining or retaining business,

or securing any improper advantage. This same prohibition applies to the receipt of any gift, entertainment, or anything of value. Nor may PETRONAS directors and employees take any action indirectly (through a third party) that would be prohibited if performed directly.

If you have questions about gifts or entertainment, please consult your Head of Department (HoD), Human Resource Department, the Legal Compliance Department (LCD) or your PETRONAS Contact Person for guidance.

If you, in your capacity as an employee or director, are authorised under PETRONAS policy to provide gifts or entertainment, you may do so only if it serves a legitimate business purpose, and only in accordance with PETRONAS policies and procedures on gifts and entertainment that are applicable to your jurisdiction.

You have an obligation to inform yourself of the relevant policies and procedures. You shall not, in any case, provide gifts or entertainment that are illegal, unduly dangerous or indecent, sexually oriented or inconsistent with PETRONAS' commitment to mutual respect or for the purpose of improperly influencing someone to act in PETRONAS' interest. No gifts of cash or cash-equivalents (e.g., gift cards) may be given, and you should not pay for entertainment or a gift personally in order to avoid having to seek pre-approval or to circumvent company policies and procedures.

The Code and PETRONAS ABC Standard provides additional guidance for any gifts or entertainment to be provided to public officials.

Generally, even if you are authorised to provide gifts and entertainment, you may not offer gifts or hospitality, including travel related expenses, to public officials and/or their family members without PETRONAS' specific approval. You may not pay for any non-business related travel and hospitality for any public official or his or her family.

Except where expressly approved by PETRONAS, you must also not offer or provide gifts or anything of value to any

person if you know or suspect that a public official or his or her family may be the indirect beneficiary or recipient. Under no circumstances may gifts or hospitality be offered to a public official as an inducement or reward for taking, or refraining from taking, any act in relation to PETRONAS' affairs of business. Again, you have the responsibility to inform yourself of the PETRONAS' policies and practices on gifts and entertainment applicable to you.

PETRONAS strongly opposes money laundering, terrorism financing, and the misuse of the financial system to disguise the origins of illicit funds and any other activities that involve dealing in the proceeds of criminal activities.

## EXCEPTION TO MAKING FACILITATION PAYMENTS

There may be situations or circumstances where you are faced with having to make facilitation payments in order to protect your life, limb or liberty. If faced with this kind of extortion, and if there is no alternative, a payment may be made. In such event, you must immediately report it to your Head of Department (HoD)/Corporate Division/ Business Division/OPU and the Legal Department as soon as possible. The payment must be recorded accurately in PETRONAS' books and records.

## SPONSORSHIP AND DONATIONS

PETRONAS is committed to conducting its affairs in an ethical, responsible, and transparent manner, and sponsorships and donations must never be used to disguise bribery or circumvent the provisions of the CoBE.

As a PETRONAS Group employee or director, you have a duty to serve PETRONAS in good faith, with fidelity, diligence, and integrity, and act in the best interests of the Group.

When assessing any sponsorship or donation request, you are expected to:

- Exercise proper care and judgment, as well as conduct third party due diligence in evaluating requests to

## Internal Use - Authorized for External distribution

- make a donation or sponsorship payment or in-kind transfer.
- Ensure the recipient organisation, charity, or beneficiary is legitimate and not a conduit for illegal payments or illegal activities, particularly to public officials.
- Confirm that the sponsorship or donation complies with all applicable laws.
- Avoid any conflict of interest.

When in doubt, please seek guidance from your Head of Department (HoD), Human Resource Department or your Legal Department, who may decide to escalate the matter to Group Strategic Relations and Communications to verify the legitimacy of the request.

### ANTI-MONEY LAUNDERING AND COUNTERPARTY DUE DILIGENCE

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

PETRONAS 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 financing related to the proliferation of weapons.

All PETRONAS Group employees, directors, contingent workforce and Third Parties acting on behalf of PETRONAS are expected to conduct appropriate counterparty due diligence, report any red flags or unusual transactions, and cooperate with relevant authorities as required.

When engaging with Third Parties, you are expected to:

- Conduct appropriate counterparty due diligence to understand the background, legitimacy, and business practices of the third party, including (where relevant) the origin and destination of funds, properties, and services.
- Be alert to suspicious or unusual transactions, including those that appear inconsistent with normal business practices or raise concerns about potential bribery, corruption, or any other criminal activities.
- Avoid dealing with any party whom you know or suspect to be involved in criminal activities or the proceeds of crime.

Generally, however, two clear warning signals of possible issues are:

- Irregularities in the way payments are arranged and effected, such as:
  - Requests for payments to be made to other parties with no clear connection to the transaction;
  - Payments made from or to accounts in unrelated jurisdictions;
  - Overpayments followed by requests for refunds;
  - Payments made using complex or opaque structures with no clear business rationale; or
  - Use of multiple small transactions (structuring) to avoid reporting thresholds.
- Customers who appear to lack integrity in their dealings or who are linked to illicit operations, such as:
  - Providing incomplete, inconsistent, or suspicious information during Know Your Customer ("KYC") due diligence;
  - Refusing to provide beneficial ownership details;
  - Having connections to known criminal activities or entities; or
  - Exhibiting unusual concern about reporting or regulatory requirements.

We continuously enhance our policies, controls, and training to align with all applicable laws and regulations on anti-money laundering, counter-terrorism financing, and counter-proliferation financing.

If you are ever uncertain whether a transaction or third-party behaviour appears suspicious, seek guidance immediately from your HoD, your Legal Department or the *Legal Compliance Department* (LCD). Acting early and responsibly is essential to protecting PETRONAS from legal, financial, and reputational risks.

## QUESTIONS AND ANSWERS

### SOLICITATION, BRIBERY AND CORRUPTION

- We are bidding on a major public contract in a foreign country. We have been led to believe that our bid will be accepted if we engage for our local transportation services a company that is owned by the brother of the head of the ministry in charge of reviewing our bid. May we engage that company?

**RESPONSE:** *Sometimes countries impose conditions concerning the use of local contractors to solicitations for bids. This is sometimes acceptable and appropriate, but in a situation where a close family member of a public official would appear to be directly benefiting, and the success of our bid turns on our agreement to benefit that family member, the arrangement has marks of a corrupt arrangement that would be contrary to PETRONAS' policies.*

*Approval from your Head of Department (HoD) is required and, where necessary, the matter may need to be escalated to higher management in consultation with your Legal Department or the Legal Compliance Department (LCD), including to conduct additional diligence on the transaction. If the transportation company is state-owned, there is generally no issue, provided there are no indications of bribery or corruption.*

- The son of a vendor of services to PETRONAS owns a car dealership.

Upon learning that I am looking to purchase a new car, the vendor offers to have his son provide me with a significant discount on a new car. I would not be able to find nearly as good a price at any other dealership. May I accept the offer?

**RESPONSE:** *No. This is an improper personal benefit prohibited by the Code. Accepting the discount could give rise to the appearance of bribery and would also run contrary to the PETRONAS conflicts of interest policies.*

- A consultant has offered to “make some problems go away” in a foreign licensing proceeding if we pay him four million Euro for consultancy services. There are rumours that the consultant has paid bribes in the past. We would really like to overcome the licensing problems. Can we hire the consultant?

**RESPONSE:** *You should consult your Head of Department, your Legal Department or the Legal Compliance Department (LCD) with a view to confirming that the consultant's contacts and methods are aligned with PETRONAS' policies and applicable law. There are “red flags” here that strongly suggest this engagement may need to be avoided.*

*Consultancy services can be legitimate and valuable, but a vague description of services, the offer of a “fix” and the rumours are all warning signals that corrupt practices may be involved.*

*Consultants, agents and other Third Parties should never be engaged for the purpose of indirectly effecting bribes or otherwise circumventing applicable laws or PETRONAS' policies and procedures. PETRONAS may be liable under national and international anticorruption laws for actions taken by Third Parties on its behalf.*

- A junior-level bureaucrat in a foreign country is holding up the release of some equipment that we need in our operations. He says that if we pay him a special processing fee in cash he will issue a permit to release the equipment. The amount of the fee is trivial compared to the value of the

equipment to our operations. May we pay the fee?

**RESPONSE:** No. PETRONAS' policy is that bribes are prohibited irrespective of the value. The request for the facilitation payment should be reported to your Head of Department (HoD), your Legal Department or the Legal Compliance Department (LCD). If the fee were imposed by the foreign country as a governmental charge, that would potentially be different, but care should be taken to pay governmental fees through appropriate channels and to ensure that they are properly documented (e.g., with official receipts).

- What does it mean to provide documents that are false or contain false details?

**RESPONSE:** It means submitting receipts, invoices, or other documents, including travel and entertainment expense reports, that are inaccurate, altered, insufficiently descriptive, or fabricated with the intention to mislead or deceive PETRONAS or conceal the true nature of a transaction, such as in the preparation of books and records, including financial statements.

- Can I submit a corrected invoice if there was a genuine mistake in a third-party document?

**RESPONSE:** Yes, but you must immediately notify your Head of Department (HoD) and the relevant PETRONAS department processing the invoice. Correcting genuine mistakes is acceptable; deliberately altering documents to deceive is not.

- A colleague carpooled with you to an outstation meeting. Later, he asks you for copies of your toll receipts so he can also claim travel reimbursement for the meeting. What should you do?

**RESPONSE:** You must not provide duplicate or false receipts for reimbursement purposes. Each employee should only claim expenses they actually incurred and in accordance with the applicable Company policy on business travel. Since your colleague carpooled with you and did not incur any travel costs, he is not entitled to claim travel reimbursement. You should explain this to him, as he may

not be aware of the policy, and remind him that knowingly submitting or requesting false claims would constitute a breach of the CoBE, which may result in disciplinary action.

- What constitutes abuse of position or authority?

**RESPONSE:** Using your role, influence, or decision-making power for personal gain or to benefit relatives, friends, or associates, rather than in the interest of PETRONAS.

- What if I unintentionally benefit a friend or family member in a decision I make? I cannot keep track of all the business activities of my relatives and whether they provide goods or services to PETRONAS.

**RESPONSE:** PETRONAS recognises that employees cannot be expected to have full visibility over the private business dealings of their family members at all times. However, once you become aware that a decision you are involved in could potentially benefit a relative, friend, or associate, you must take immediate steps to avoid a potential or actual conflict of interest.

This includes disclosing the situation promptly to your Head of Department (HoD) in consultation with your Human Resource Department and recusing yourself from decision-making where necessary.

Early disclosure ensures transparency, protects your integrity, and allows PETRONAS to implement appropriate safeguards and controls to manage the situation. Even unintentional conflicts must be handled proactively to maintain trust and compliance with the CoBE.

## GIFTS AND ENTERTAINMENT

- Knowing that I love football, a contractor with whom I do business has offered me four tickets to see the World Cup finals. Each ticket has a face value of \$250, but they are selling online for over \$1,500. May I accept the tickets, or at least purchase them at face value?

**RESPONSE:** PETRONAS has adopted a "No Gift" policy. Consequently, accepting tickets for free from a contractor is not permissible. With regard to purchasing tickets, they must be acquired at their market value, under terms that are readily available to the general public. Before entering any such transaction, you must obtain written approval from your Head of Department (HoD) in consultation with your Human Resource Department.

- A customer has presented me with a very expensive gift. In his home country, it is considered extremely impolite to reject a gift and doing so might irreparably harm our business relationship. What should I do?

**RESPONSE:** You are required to comply with the procedures of PETRONAS' Human Resource Department relating to the receipt of gifts and entertainment, whether this means filling in the IR02 Declaration Form, or applicable declaration form, once you are back at the office and consult your Head of Department (HoD) who will then decide whether to endorse the acceptance of the gift or require it to be returned. In some circumstances it may be possible to accept the gift as company property, rather than as a personal gift, and then display in a place where it could be enjoyed by everyone. If the gift is offered on condition of (or with the obvious expectation of) some concession or favour in exchange, you are required to refuse the gift and politely return it with a note of explanation about the Company's "No Gift" policy. It must be clear to the third-party and to anyone else that no individual has gained personal advantage from the gift.

- I have a meeting scheduled with a JV partner and I am aware that he is fond of smoking cigars. Am I allowed to buy cigars as a token of appreciation for taking time out of his busy schedule to meet with me?

**RESPONSE:** The general principle remains that PETRONAS employees and directors are prohibited from giving or receiving gifts to avoid a conflict of interest. However, if gifts are to be given, it must fall within the general exceptions provided under the No Gift Policy as stated above. Gifts of cigars are not permitted as it is deemed as a

personal gift and does not meet the criteria set out under the permitted exceptions.

- The head of the purchasing department at one of our major customers has asked whether we could arrange an all-expenses paid golf outing for some members of his team and some of our personnel to secure the renewal of an expiring contract. Can we accommodate this request?

**RESPONSE:** No. Arranging the all-expenses paid golf outing in this situation may be perceived as "anything of value" and could expose PETRONAS to potential corporate liability offence under Section 17A of MACC Act 2009 or other applicable anti-bribery and corruption laws. While normal business entertainment intended for the purpose of networking and relationship building is generally acceptable, it must be properly authorised and caution should be exercised to avoid any perception that it is offered in exchange for an improper favour or advantage.

You should consult your Head of Department (HoD), your Legal Department or the Legal Compliance Department for further guidance.

- I went out to dinner with a contractor who is interested in bidding on a PETRONAS project. The event was purely social; we did not discuss the project. When I came home, I found an envelope with \$2,000 in cash in my jacket pocket. I have no idea how it got there. Now what do I do?

**RESPONSE:** Contact your Legal Department or the Legal Compliance Department immediately. It seems very possible that it was an attempted bribe or an effort to compromise you. You should follow your Legal Department/LCD's instructions.

- We had a team dinner at a nice restaurant to celebrate the completion of a big project. My superior asked me to pay for the dinner using my personal credit card and to claim it under entertainment expenses (my entitlement is \$2,000 per occasion) assuring me that he would approve it.

## Internal Use - Authorized for External distribution

Would I be in breach of the CoBE and applicable company policies if I follow his instructions?

**RESPONSE:** As set out under Human Resource's Entertainment Expenses Policy, the entertainment entitlement is only for the purposes of entertaining our external clients and counterparts and shall not include other PETRONAS employees, unless the employees are part of the function to entertain the client or external counterpart.

Expenses for internal team dinners shall be claimed under company meetings and not using an employee's entertainment eligibility expenses. By claiming it under entertainment expenses, you would be in breach of the CoBE and the Company's Entertainment Expenses Policy.

- My team was invited by our contractor to attend a "buka puasa" (iftar) event during the month of Ramadan. Can we attend the event?

**RESPONSE:** PETRONAS recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by Third Parties in the normal course of business is a legitimate way to network and build good business relationships. In the month of Ramadan, such invitations would be common. However, obtaining approval from your Head of Department (HoD), in consultation with your Human Resource Department, is required. In principle, we must exercise proper care and judgement before accepting any entertainment offered by a third party.

- My department is organising a conference, and we are planning to provide tokens of appreciation to the speakers and door gifts to the participants during the event. Are we allowed to do so?

**RESPONSE:** The giving of gifts as a token of appreciation to speakers and participants during official company functions or events is permissible as it falls under exceptions to the general rule in the "No Gift" policy. However, you must ensure that the door gift is reasonable and modest in nature or value, preferably clearly branded with the PETRONAS logo. Approval from your Head

of Department (HoD) is required before proceeding with such arrangements.

- Can I accept a door gift from an external company during their official function?

**RESPONSE:** Yes, you may accept the door gift, provided it is offered to all guests attending the event, as permitted under the exceptions to the "No Gift" policy. However, the value of the door gift must be reasonable and nominal in value. If you are unsure about the appropriateness of the gift, please consult your Head of Department (HoD), your Human Resource Department or your Legal Department.

- Can I accept corporate hospitality or entertainment offered by a joint venture partner or any other key stakeholders engaged in business dealings with PETRONAS?

**RESPONSE:** Yes, PETRONAS recognises that the occasional acceptance of a reasonable and modest level of corporate hospitality or entertainment provided in the normal course of business is a legitimate way to network and build good business relationships. Proper care and judgment must be exercised by PETRONAS employees and directors before accepting.

The principles of transparency, proportionality, reasonableness, and good faith must guide your decisions. Acceptance of hospitality or entertainment must never create a perception of conflict of interest or improper influence in the performance of your duties. Please remember to complete the IR02 Declaration Form, or any other applicable declaration as required by your Human Resource Department or local policies. This self-declaration process is an important safeguard intended to protect you and PETRONAS from potential allegations of impropriety or unethical behaviour.

- I was invited to attend a conference organized and sponsored by the external party. Can I attend?

**RESPONSE:** It is a common practice for companies organizing or sponsoring conferences to provide complimentary delegate passes to their clients and key

stakeholders. Such sponsorships are recognized as corporate hospitality. PETRONAS recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for you to exercise proper care and judgement and obtain proper approval from your Head of Department (HoD) before accepting the invite. This is not only to safeguard the Company's reputation, but also to protect employees from allegations of impropriety or undue influence.

- I am responsible for purchasing office supplies for my department. A vendor has offered to give me a share of the payment PETRONAS makes to his company if I agree to over-purchase printer cartridges. What should I do?

**RESPONSE:** No, this is not acceptable. This is an example of a kickback and abuse of power—where a PETRONAS employee receives or is promised a personal benefit in exchange for using their position to influence a company decision, without disclosing it. Accepting or agreeing to such a deal is a serious breach of the CoBE. You must immediately report this incident to your Head of Department (HoD) or the PETRONAS Whistleblowing Channel.

- I heard from credible sources that a PETRONAS contractor colluded with a supplier to inflate the price of certain materials billed to PETRONAS. They allegedly agreed to secretly split the extra amount between themselves, without PETRONAS' knowledge. I have no direct evidence—should I still raise a concern?

**RESPONSE:** Yes. This is potentially an arrangement to make secret profits to the detriment of PETRONAS and is strictly prohibited. Third Parties working for or on behalf of PETRONAS must never receive undisclosed benefits—financial or otherwise—through inflated pricing or manipulation of commercial terms. Such conduct breaches PETRONAS' expectations of integrity and transparency and may constitute fraud. Even without direct evidence, you must promptly report the matter to your superior or through the

PETRONAS Whistleblowing Channel so it can be properly investigated.

- An existing supplier wants to market and introduce their new product to PETRONAS. They have offered to host and sponsor a dinner during a PETRONAS conference for PETRONAS station retailers/dealers. Can we accept their offer?

**RESPONSE:** Generally, PETRONAS strictly prohibits employees and directors from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from Third Parties.

To mitigate any potential negative perception that PETRONAS is leveraging its relationship with the supplier to host the dinner and receiving benefits from the relationship, PETRONAS should make clear that the dinner has a business purpose relating to the launch of a new product. The dinner should be pre-approved by the Legal Compliance Department ("LCD").

- Can PETRONAS' OPUs organize a buka puasa/iftar session for our stakeholders?

**RESPONSE:** Yes, PETRONAS recognises that providing corporate hospitality to its stakeholders through corporate events during holidays such as iftar is a legitimate way to network and build good business relationships.

While providing corporate hospitality is a reflection of PETRONAS' courtesy and goodwill, the respective HoD must exercise proper care to protect the Company's reputation against any allegations of impropriety or the perception of bribery, especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures. There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to the event. Reasonable due diligence should also be exercised, particularly when the arrangements involve public officials other than PETRONAS employees and directors.

## Internal Use - Authorized for External distribution

- Is it permissible to provide cash as a token of appreciation to internal staff to thank them for their contribution in participating or organising a PETRONAS event?

**RESPONSE:** Although the provision of cash to internal staff is not prohibited, consider offering vouchers, such as 'Mesra' or 'Setel,' or other gifts related to PETRONAS corporate merchandise, as a gesture of appreciation. Please ensure that the value of the gift remains reasonable and modest, and avoid any items that may be inconsistent with the Company's commitment to mutual respect and ethical conduct.

- Are there any integrity concerns if we were to incentivize our dealers and vendors by rewarding top performers with Setel Vouchers and PETRONAS t-shirts?

**RESPONSE:** Incentive schemes are common in the industry to motivate dealers and vendors for enhanced sales performance. To ensure compliance:

- Accurately record incentive transactions in the company's accounting and books and records.
  - Ensure that incentives given out, whether in cash equivalents (such as vouchers, gifts, coupons, etc.) or in kind (PETRONAS t-shirts), comply with the CoBE and ABC Standard.
  - Implement a clear guideline for the incentive process to maintain consistency and standardization, safeguarding against unethical practices.
  - Establish Limits of Authority and Approving Authority for approving such incentives.
- Can a PETRONAS staff seconded to a government department accept farewell gifts from the department, at the end of his/her secondment period?

**RESPONSE:** The staff is permitted to accept the farewell gift(s) in this situation, in view of the following considerations:

- The gifts are tokens of appreciation for the individual's services during his/her secondment.
- The value of the gift is reasonable and not extravagant.
- Refusing or returning the farewell gift might cause offence and potentially adversely impact the working relationship established between PETRONAS and the government department.

- We plan to give out Setel vouchers worth RM100 as prizes for an HSE competition involving our contractors. Would this be in violation of the PETRONAS No Gift Policy?

**RESPONSE:** Upon securing approval from the relevant Approving Authority to organise the HSE competition, the latter will be recognized as an official Company event. The distribution of RM100 Setel vouchers as prizes will fall within the exceptions permitted under Part 2A(iii) of the ABC Standard.

- We are organising an Upstream oil and gas conference, and to defray the organising cost, we are offering tiered sponsorship packages to all PETRONAS Production Sharing Contract (PSC) contractors. Is this against the CoBE?

**RESPONSE:** The CoBE and ABC Standard do not expressly prohibit seeking sponsorship from associated parties, including PSC contractors. However, any sponsorship arrangement should ensure tangible benefits and value for sponsors.

All sponsorships must comply with the following:

- the sponsorship opportunity is open to all interested contractors/vendors/Third Parties;
- the voluntary nature of the sponsorship is clearly communicated, along with the specified benefits sponsors will receive;
- obtain all the necessary internal and external authorizations;

- ensure accurate documentation in the Company’s accounting books and records; and
  - specify all necessary requirements for this sponsorship, including, but not limited to, the condition that it should have no attachment whatsoever to any award of contracts. It shall strictly be regarded as a corporate sponsorship.
- We have been instructed by the host authority to attend a meeting in London with a contractor to discuss certain matters relating to an ongoing tender. Is it permitted under the CoBE or ABC Standard to accept the contractor’s offer to pick up the cost for our travel expenses? The contract is based on single sourcing instead of competitive bidding and at the moment parties are still at the tendering stage and the contract award has yet to be issued.

**RESPONSE:** No. As a general principle, you are not permitted to accept gifts, entertainment and corporate hospitality, including travel related expenses, from parties engaged in a tender or competitive bidding exercise (e.g., contractors, vendors, suppliers, etc.). This prohibition is in place to avoid the perception of the gift, entertainment, and corporate hospitality being given in response to, in anticipation of, or to influence a favourable business decision, for instance in the award of a contract. In such situations, PETRONAS is responsible to bear the travel expenses to safeguard the Company’s reputation, and protect employees from potential allegations of impropriety or undue influence, in line with the principles set out in our CoBE and ABC Standard.

- Is it permissible for a PETRONAS Corporate Division/Business Division/OPU to provide corporate hospitality to members of the media by hosting an appreciation event?

**RESPONSE:** PETRONAS recognises that extending corporate hospitality, such as through media engagements, can be a legitimate and valuable means to foster goodwill, strengthen stakeholder relationships, and enhance the Company’s reputation.

While such hospitality is often a reflection of PETRONAS’ courtesy and goodwill, it must be managed with due care, transparency and accountability.

The respective Heads of Department/Division must exercise proper care to protect the Company’s reputation from any allegations of impropriety. This includes exercising sound judgment when considering the reasonableness of expenditures, managing complete and accurate records and documentation to support transparency and mitigate the risk of any actual or perceived impropriety.

- Is it permissible for PETRONAS to purchase a corporate club membership for the CEO of a PETRONAS Group Company?

**RESPONSE:** The purchase of a Corporate Club Membership for the CEO of a PETRONAS Group Company may be part of the benefits that come with the position. Kindly consult your Human Resource Department to advise on the relevant company policies and procedures governing the matter.

If the purchase of a Corporate Club Membership is intended for external stakeholders such as government or public officials with whom PETRONAS has dealings, this is a “red flag” and may be perceived as being given with the intention of inducing the person to perform or not perform a relevant function, e.g., when Company A is applying for a license and the corporate club membership is given to the person who has the authority to approve the application or has the authority to expedite the application process. This is strictly prohibited under the CoBE and ABC Standard.

## PUBLIC OFFICIALS

- A foreign government delegation wishes to visit one of our facilities in connection with their consideration of PETRONAS’ bid for a major project in their country. The facility is in a remote location. May I offer to have PETRONAS line up and pay for transportation and overnight accommodation?

**RESPONSE:** Any proposed provision of items or services of value to public officials needs to be closely scrutinised.

Confirmation should be obtained from the legal department that providing the transportation and overnight accommodation will not be illegal under the laws of the foreign government or prohibited by the terms of the bidding process. Your Head of Department must review and pre-approve any such offer in consultation with the legal department or the Legal Compliance Department (LCD). In no event may the offer be made in a way that suggests it is contingent upon or in exchange for favourable treatment for PETRONAS in the bidding process. If the site visit is not associated in some logical way with the project, it would be advisable to find a way to decline politely.

- I am invited to attend a dinner organized by a government agency. I represent the Company for the monthly meetings held by the agency. Can I attend this dinner?

**RESPONSE:** Yes, you may attend the dinner subject to the approval by your Head of Department.

- Is it permissible to purchase merchandise or tokens of appreciation from the PETRONAS Gift Shop, with a value of RM250 per person, to be given as gifts to attendees of PETRONAS' programmes or external speakers, including public officials?

**RESPONSE:** Gifts of nominal value bearing the PETRONAS logo, given out as door gifts or tokens of appreciation, falls under the exceptions provided under the ABC Standard. Employees are however still required to obtain permission from their Head of Department (HoD) in consultation with the Legal Department or the Legal Compliance Department.

The terms "government official" and "public official" are used interchangeably in the CoBE and ABC Standard.

A "public" or "government official" as defined in the CoBE includes, but is not limited to, candidates for any public office, officials of any political party, and officials of state-owned enterprises other than

PETRONAS. It may also include an officer or employee of a public international organization (for example, the United Nations or the World Bank).

Caution must be exercised when dealing with such officials. Employees are required to obtain permission from their Head of Department (HoD) in consultation with their Legal Department or the Legal Compliance Department. Heads of Department must also exercise proper care and judgment as well as be guided by the PETRONAS Stakeholder Management Guidelines when coming to a decision.

- Is sending "get well soon" flowers or fruit basket to a public official in violation of PETRONAS' No Gift Policy?

**RESPONSE:** While PETRONAS typically adheres to a 'No Gift' Policy, the gesture of sending 'get well soon' flowers to our stakeholders, including public officials, is not explicitly prohibited. This act can be considered a courteous expression within the context of networking. However, in doing so, you must ensure adherence to the following guidelines:

- Conscientiously maintain the highest degree of integrity;
  - Always exercise proper care and judgment;
  - Avoid conflicts of interest;
  - Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of PETRONAS;
  - Comply with applicable laws, regulations and PETRONAS policies and procedures, including to accurately record the transaction in the company's books and records.
- I was invited for an impromptu golf outing by a public official and he asked me to pay for a new golf attire as he did not pack any golf attire for his trip. Can I pay for the official's golf attire which will cost approximately RM3,000?

*RESPONSE: By exercising good judgment, you are more likely to make the right decision. In this scenario, it should be immediately clear that golf attire worth RM3,000 would be considered a lavish gift and does not meet the criteria for permitted exceptions under the PETRONAS No Gift Policy.*

*Additionally, employees are prohibited from using their entertainment expense entitlements to purchase gifts, as this would constitute a breach of company policy. Similarly, providing a gift using personal funds to avoid seeking pre-approval or circumvent PETRONAS policies is strictly not allowed.*

*In such situations, the employee should politely decline and explain to the official that making the purchase would be a violation of the CoBE and ABC Standard.*

- A government official whom we frequently liaise with has asked whether we could arrange for a golf outing for some members of his team and some of our personnel? Can we accommodate him?

*RESPONSE: Organising golf games is recognised as a legitimate way to network and build goodwill in business relationships and is generally unobjectionable, but it must be appropriately authorized and conducted with care and transparency to avoid any perception that the hospitality is being offered in exchange for an improper favour or advantage.*

*Where the hospitality involves public officials, additional caution is required. You must first obtain confirmation from the legal department or Legal and Compliance Department (LCD) that such hospitality is permitted under applicable anti-bribery and corruption laws, and that it complies with PETRONAS' internal policies and procedures. Proper documentation, a clear business justification, and prudent judgment are essential to safeguard both PETRONAS and its employees from the risk of reputational or legal exposure.*

- Given the recent arrival of the new Ambassador to the Malaysian Embassy here, we are considering organizing a meeting, potentially over lunch, to

facilitate introductions. We would like to host lunch for networking purposes with no intention of seeking business advantage or personal gain. Our objective is to continue to foster good relations with the Malaysian Embassy, a key stakeholder in the country. Is this permitted under the CoBE and ABC Standard, in relation to dealings with public officials?

*RESPONSE: If approved to host the lunch by the legal department or Legal Compliance Department (LCD), you must ensure that the hospitality provided is reasonable, modest in value, not excessive, and proportionate to the official designation of the public official and not his/her personal capacity. Proper care and judgment must be exercised to avoid any perception that the hospitality is offered in exchange for a future benefit or outcome. All related documentation (including invoices and receipts) must be properly recorded and stored.*

## SPONSORSHIPS AND DONATIONS

- A local charitable organization in an overseas operation requests a \$20,000 sponsorship from PETRONAS for a community event. You learn that the chairperson of the organisation is also a senior public official who oversees regulatory and licensing matters involving PETRONAS. The event is legitimate, but the public official hints that supporting the event would "strengthen the relationship." What should you do?

*RESPONSE: You must not proceed with the sponsorship. Even if the event is legitimate, the involvement of a public official who has regulatory authority over PETRONAS—and the suggestion that the contribution would "strengthen the relationship"—creates a clear risk of the sponsorship being perceived as a disguised bribe or an attempt to gain favour.*

*In such cases, you should:*

- Immediately escalate the request to your HoD, your Legal Department, or Group Strategic Relations and Communications (GSRC).

## Internal Use - Authorized for External distribution

- *Ensure PETRONAS maintains compliance with all applicable anti-bribery, anti-corruption, and anti-money laundering laws.*

*Under the CoBE, sponsorships and donations must never be used as a means to influence public officials or to circumvent PETRONAS' policies and procedures concerning sponsorships and donations. Proceeding with this sponsorship could breach the CoBE, applicable laws, and PETRONAS' own integrity standards.*

- PETRONAS receives a request from an NGO for a donation to support disaster relief efforts. The NGO is not well known, and you cannot find reliable information on its management team and purpose. They ask for the funds to be transferred urgently to a personal bank account "to speed up distribution." How should you respond?

*RESPONSE: All donation recipients must be legitimate organisations—not individuals—and must not act as conduits for illegal activities. As part of PETRONAS' requirements, appropriate due diligence must be conducted to verify the authenticity, legitimacy, and purpose of the organisation and the request.*

*In this scenario, escalate the request to Group Strategic Relations and Communications for verification and further assessment. Highlight the concerns, including the lack of transparency, incomplete information, and any request for payment to a personal bank account.*

*Proceeding without conducting proper due diligence would be non-compliant with PETRONAS' Third Party Risk Management requirements. Disbursements to unverifiable entities or personal accounts pose significant AML, fraud, and reputational risks and may also breach applicable anti-bribery, anti-corruption, and anti-money laundering laws.*

### ANTI-MONEY LAUNDERING AND COUNTERPARTY DUE DILIGENCE

- A customer wants to use cash to pay for a \$25,000 purchase from

PETRONAS. Should I report this within PETRONAS?

*RESPONSE: Yes. Such a large cash payment seems suspicious. It may be a sign of money laundering activity.*

- A customer has advised us that it intends to overpay us on an invoice, and then wants to have the excess money wired back to a different account. Should we respect this request?

*RESPONSE: It should be reported to your Head of Department. (or, if that is not practicable, your Legal Department or the Legal Compliance Department). At the very least, it should be flagged because it may be money laundering, embezzlement or some other improper activity.*

- A supplier has asked us to divide a payment into two payments, with one payment going to a company we have never heard of and that is not mentioned on the invoice. Is that OK?

*RESPONSE: Confer with your Head of Department. This request might be a sign of an effort to illegally evade taxes, embezzle funds, circumvent exchange controls or engage in other illegitimate activity.*

- A customer overpaid an invoice and now wants the money wired back to an account different from the account from which the payment came. Can we do that?

*RESPONSE: Confer with your Head of Department. This request might be part of an effort to launder money. The request should be appropriately investigated before any transfer of funds is made.*

- We have learned that one of our third-party agents has been buying oriental carpets from a company controlled by an important government official and reselling them. The governmental official has authority over our business. We are not involved in the transactions. Should we be concerned?

*RESPONSE: Transactions with a government official in merchandise that is difficult to value (such as carpets and*

artwork) can be a corruption “red flag”. One method for effecting bribes or laundering money is to buy collectibles from a government official at an inflated price and reselling them at a loss. You should report the situation to your Head of Department for further investigation. One possible response would be to remind the agent of PETRONAS’ policies concerning bribery and corruption, and to enquire into the commercial logic of the transactions.

structure, end-use of the product, and whether the transaction complies with export control laws, among other potential considerations. If such checks cannot be completed satisfactorily, the transaction should not proceed.

- A new overseas supplier offers a competitive price and promises fast delivery of chemical substances used in PETRONAS operations. However, due diligence reveals that the company is located in a jurisdiction under UN sanctions, and its ultimate beneficial owner is linked to a blacklisted entity suspected of financing militant groups. Should we proceed?

*RESPONSE: No. PETRONAS must not engage with any party linked, directly or indirectly, to terrorism or entities subject to sanctions. Proceeding with such a transaction may expose PETRONAS to terrorism financing risk and severe regulatory, financial, and reputational consequences. All employees, directors, contingent workforce and Third Parties must ensure robust due diligence is carried out and must escalate to the relevant authorities if red flags emerge. When in doubt, consult your Legal Department, or the Legal Compliance Department.*

- A PETRONAS joint venture partner proposes a deal with a buyer in another country for the sale of dual-use goods (i.e., materials with both civilian and military applications). The buyer is not on any sanction list, but little is known about its end-use or final destination of the products. Can we proceed based on the JV partner’s assurance?

*RESPONSE: No, not without first conducting appropriate due diligence. This situation could give risk to proliferation financing risk. PETRONAS has an obligation to assess and prevent the misuse of its products, technologies, or resources in contributing to the development of weapons of mass destruction. Merely relying on a joint venture partner’s assurance is insufficient. It is critical to verify the buyer’s identity, ownership*

# INTERNATIONAL AND NATIONAL TRADE

## COMPETITION LAW

PETRONAS is committed in conducting its business activities in full compliance with applicable competition laws and to compete vigorously and independently at all times. Therefore, as a PETRONAS employee, you must individually ensure that your actions towards business partners (e.g., customers and suppliers), competitors, and enforcement authorities reflect fair and proper business practices and are in compliance with competition laws. PETRONAS will not tolerate violation of competition laws. In case of doubts/uncertainties concerning the compliance of your activity with competition law rules, you must contact your Legal Department or the Legal Compliance Department.

## SANCTIONS AND EXPORT CONTROLS

Many countries restrict or prohibit the import or export of certain products and technologies. You must comply with PETRONAS' policies and procedures relating to them, including the PETRONAS Sanctions and Export Control Policy and PETRONAS Sanctions and Export Control Standard.

Specifically, when faced with any issues relating to export and import control, as well as economic sanctions, you must ensure that you conduct the necessary due diligences to mitigate any associated risks relating to the same. You may refer to the basic checklists as encapsulated in the PETRONAS Sanctions and Export Control Guidelines for reference.

Questions or concerns in this regard should be raised with your Head of Department, your Legal Department or the Legal Compliance Department.

## QUESTIONS AND ANSWERS

### COMPETITION LAW

Please note that the following questions and answers are based on general competition law principles that tend to apply globally, and do not address specific exceptions that may arise from PETRONAS' special position in Malaysia, or in places that have not enacted competition laws. Furthermore, competition laws may differ in some respects from jurisdiction to jurisdiction.

- A trade association is organising a survey among several oil companies regarding their prices, margins, product launches, etc. The document summarising the survey is distributed to the association's members. What are the possible consequences?

**RESPONSE:** *The exchange of sensitive information among competitors is prohibited regardless of whether information is exchanged bilaterally or through a third party. However, surveys that only concern historical data and provide the results in an aggregated non-identifiable form are allowed. The kind of information that may be exchanged in the context of such surveys needs to be assessed on a case-by-case basis. Be aware that you may be considered to have "participated" in the illegal collection of data/information not only if you have actively provided such data, but also even if you merely received the results of such surveys and even if you were not aware that exchanging such information constituted a violation of competition law.*

- Assume there is a trade association meeting among representatives of some oil companies. During the meeting, the participants started discussing and agreeing on future prices of LPG and market conduct, and

exchanging commercially sensitive information. If I were at such a meeting and sat silent the entire time, without revealing any information about my company and without endorsing any agreements reached between the other participants, would I be in trouble? What are the possible consequences?

**RESPONSE:** *You are at significant risk. This may be sufficient for you to be considered to be participating in an agreement in breach of competition law (silence can constitute "tacit assent/approval"), even if you participate in just a single meeting and even if confidential information is exchanged only once. In this kind of situation, you must clearly express your disagreement and immediately leave the meeting (and then inform your Legal Department and Legal Compliance Department promptly). Be aware that, from a competition law perspective, an anti-competitive agreement may be concluded by individuals who do not have the power to represent and bind their respective companies.*

- Two competitors discuss their recent relationships with certain customers, e.g., status of the negotiations, demands raised in annual negotiations, customers' needs and willingness to pay, etc. What are the possible consequences?

**RESPONSE:** *Even if participants either (i) do not reach a common understanding, or (ii) do not effectively implement any potential agreements, such an exchange of information may be illegal, as each competitor could (in theory) carry out its own strategy in the relationships with the customers having in mind the commercial intentions/strategies of the other competitor.*

- I have been asked to gather information on competitors' prices for lubricants, to help PETRONAS maintain its price leadership position. I asked a distributor to provide me with copies of the other companies' prices as soon as it receives them. The distributor agreed, but is asking me for extra copies of PETRONAS' prices and discount terms, since it has received

the same requests from other companies. What should I do?

**RESPONSE:** *Generally, you should not request a competitor's price list from your distributor. Obtaining a competitor's price list from your distributor does not necessarily constitute a competition law violation. However, if the information shared by a distributor reflects confidential, future, or non-public pricing, competition authorities may infer an intent to collude. Moreover, the facts described here provide strong evidence of a price information exchange system, which may constitute an infringement of competition law and even lead to price-fixing charges. You should consult with your Legal Department and Legal Compliance Department for further guidance.*

- Every December, Company A and its fellow competitors share amongst themselves their price lists for each category of product for the whole of the following year. Is this anti-competitive?

**RESPONSE:** *Yes. Competitors exchanging non-public information on current and especially future pricing is prohibited under competition laws. Such sharing reduces uncertainty in the market and must be avoided.*

- PETRONAS supplies petroleum products through its distributors for resale to the distributors' customers. In order to maintain the premium position of its products, it publishes a "Recommended Price List" which sets out prices for each of its products together with the applicable discount rates if certain volumes are purchased. Does PETRONAS' Recommended Price List comply with competition law?

**RESPONSE:** *On the face of it, the Recommended Price List is not anti-competitive. However, if the suggested pricing in the Recommended Price List is not a genuine suggestion or recommendation because PETRONAS will impose penalties or take any other action against a distributor that does not comply with the resale prices stated in the "Recommended Price List", then the Recommended Price List could raise competition concerns.*

- A group of distributors approach PETRONAS and notify PETRONAS that they are unhappy with PETRONAS' discount to customers to whom PETRONAS sells directly. The distributors suggest that everyone would be more profitable if everyone sells closer to PETRONAS' recommended resale price, and PETRONAS should lead the way. Should PETRONAS go along with its distributors' suggestion?

*RESPONSE: No, PETRONAS should not. If PETRONAS goes along with its distributors' suggestion, the recommended resale price will no longer be a genuine recommendation, and this will raise competition concerns.*

- Let's assume that PETRONAS is dominant in the market for sale of Product A, the sale price of which is 100. It decides to enter the market for sale of Product B, which is characterised by fierce competition. The sale price of Product B is 1. Subsequently, PETRONAS plans to start selling both Products A and B exclusively in a bundle at the price of 110—a customer has to buy both in order to get either Product A or B from PETRONAS. Could this practice represent an abuse of its dominant position?

*RESPONSE: Yes. Through this kind of practice, called "bundling" or "tying", the dominant company abusively exploits its dominant position in the market for sale of Product A to enhance its position in the market for sale of Product B, with a detrimental effect on competition. In other words, through this leveraging practice, the company "transfers" its dominant position from the market for sale of Product A to the market for sale of Product B. Furthermore, by setting a sale price of 110, the company is forcing customers that need Product A to buy both Products A and B at a higher price than they would have paid if they had the chance to buy each product separately.*

- Assume that PETRONAS holds a dominant position in the market for Product X and decides to implement a rebate scheme, whereby, if its

independent distributors annually purchase a significant amount of Product X (equal at least to 80% of their total purchases in the previous year), they will receive a rebate on all purchases made during such year (i.e., retroactive rebates). Is PETRONAS allowed to grant this kind of rebates under competition law?

*RESPONSE: This practice may constitute an abuse of dominant position, as it creates a decisive incentive for customers to satisfy most of (if not all) their needs of that product from the dominant company.*

*In a nutshell, all the rebates that have the effect of inducing customers from satisfying their needs almost exclusively from the dominant companies may constitute an abusive practice. You should consult with your Legal Department and Legal Compliance Department for further guidance before implementing this type of rebate program.*

- PETRONAS is in the market for the supply of fertilizers and, as a condition of supplying such fertilizers to plant nurseries at a discounted price, it requires the plant nurseries to agree only to buy all of its fertilizers from PETRONAS. Is this permitted under competition law?

*RESPONSE: Further assessment is needed. In Malaysia and in other jurisdictions where PETRONAS operates, whether this is prohibited under competition law depends on various factors. Please seek advice from Group Legal before finalising these agreements.*

- PETRONAS is dominant in the upstream market for the supply of Chemical X, which is essential for the manufacture of a downstream Product Y. PETRONAS has a subsidiary ("P-Sub") which participates in this downstream market for the manufacture of Product Y. PETRONAS supplies Chemical X to P-Sub subsidiary but refuses to supply Chemical X to P-Sub's sole competitor, CoCo. Is this anti-competitive?

What if PETRONAS refuses to supply chemical X to CoCo because CoCo

has failed to pay for the last shipment of chemical X from PETRONAS?

*RESPONSE: Yes, it may be anti-competitive for a dominant entity to take advantage of its vertically integrated structure to foreclose competitors in a separate market. PETRONAS may, however, refuse to supply to CoCo if CoCo has failed to settle its debts to PETRONAS, as this could be a reasonable commercial justification for the refusal to supply.*

- PETRONAS and its competitor, MCo who are both suppliers of Product Z decide to close their current (old) facilities and build a larger and more efficient production plant run by their 50-50 new joint venture company, JVC. Would this raise competition concerns?

*RESPONSE: It needs to be further assessed. This agreement may lead to PETRONAS and MCo sharing tremendous efficiency gains; for example, the replacement of two smaller and older production plants by a larger and more efficient one may lead to increased output at lower prices to the benefits of consumers. When creating the joint venture company, parties must also, however, be mindful that the JVC is not used as a medium for price or market-sharing collusion.*

*Please seek advice from Legal Department and Legal Compliance Department before reaching any such agreement, and in particular please ensure that an M&A global assessment is conducted before the incorporation of the JVC to ensure that merger clearance is timely obtained.*

- PETRONAS is in the midst of acquiring one of its main competitors in the LNG markets in the ASEAN region.

Pending the merger control clearance from the relevant competition authorities, PETRONAS and the competitor have exchanged their respective competitively sensitive information and initiated discussions on the alignment of their business strategy.

Would PETRONAS and the competitor be subject to any violations under the

Competition Law when they proceed to implement the M&A transaction?

*RESPONSE: In general, PETRONAS and the competitor are to abide with a "standstill obligation" in which they are required not to complete the M&A transaction until a formal approval or clearance is given or upon the expiry of the review deadline by the relevant competition authorities.*

*However, it is expected that the parties are to exchange certain competitively sensitive information on matters if the nature and purpose of such exchanges are directly related particularly for PETRONAS to assess the value of the business for the purposes of due diligence and integration planning.*

*While this exercise is a normal part of the M&A process, the parties must be cautious about the kind and manner of the information exchanged, as well as the individuals with whom the information is shared.*

*Where PETRONAS is able to obtain "control" or have an influence over the strategic business decisions of the competitor while waiting for the merger clearance by the competition authorities, this poses a competition risk to PETRONAS.*

*Additionally, certain information, such as information reflecting current prices, customer data, and detailed costs, should be restricted, aggregated, and, if necessary, shared only between a "clean team" of individuals who do not possess decision-making authority with respect to that competitively sensitive information. The Legal Department and Legal Compliance Department should be consulted to determine if a clean team is needed.*

*In line with the PETRONAS Competition Law Compliance Protocol on Merger and Acquisition Transaction, please seek advice from Legal Department and Legal Compliance Department regarding any M&A exercises.*

## **SANCTIONS AND EXPORT CONTROLS**

- Can PETRONAS enter into transactions with comprehensively sanctioned

countries or territories (i.e., North Korea, Iran, Cuba, and the Crimea, Donetsk, and Luhansk regions of Ukraine)?

*RESPONSE: Pursuant to PETRONAS Group Position on Sanctions, transactions or activities with comprehensively sanctioned countries or territories i.e., North Korea, Iran, Cuba, and the Crimea, Donetsk, and Luhansk regions of Ukraine) shall be avoided. Should there be any compelling reason to pursue the transaction with any of the comprehensively sanctioned countries, it should only be undertaken with prior discussion with Group Risk, Group Treasury and Group Legal, consultation with ELT and after obtaining the required approval from the respective approving authority.*

- The PETRONAS Group Position on Sanctions prohibits any dealings or transaction with comprehensively sanctioned countries or territories. Pursuant to that, can foreign nationals from North Korea, Iran, Cuba or the Crimea, Donetsk, and Luhansk regions of Ukraine be hired as an employee in any of PETRONAS Group of Companies?

*RESPONSE: The hiring of foreign nationals from sanctioned countries or territories as an employee in any of PETRONAS Group of Companies may be subject to certain sanctions and export control restrictions. The hiring may be permissible depending on a variety of factors, e.g. the actual scope of work to be undertaken, the country of residency, the actual work location, and the currency for salary payment. Please consult Legal Compliance from Group Legal for further assessment.*

- I have received a request to process a payment for the purchase of an equipment from a counterparty. When processing the payment, it has come to my attention that the counterparty was just recently sanctioned. What should I do? Do I continue to process the amount due and payable to the sanctioned counterparty?

*RESPONSE: No, you should suspend the processing of payment and contact your legal representative as soon as possible.*

*As per PETRONAS Group Position on Sanctions, transactions or activities with a sanctioned entity shall be avoided. Should there be any compelling reason to pursue the transaction with the sanctioned entity, it should only be undertaken with prior discussion with Group Risk, Group Treasury, and Group Legal, consultation with ELT and after obtaining the required approval from the respective approving authority.*

- What are the steps to be taken to ensure compliance with export controls?

*RESPONSE: To ensure compliance with export controls, the following steps needs to be taken:*

- (a) The first step is to identify the product that you are importing or exporting. You need to consider whether the products are subject to export controls, which in some cases may require technical analysis.*
- (b) The second step is to identify the destination country of the product.*
- (c) The third step is to ascertain the recipient of the product as well as the end user of the product.*
- (d) The fourth step is to determine whether the product requires authorisations from any governmental authority under the relevant export control laws and regulations, based on the product, destination country and the end user,*
- (e) The last step is to check for any red flags indicators when screening the counterparties.*

*Please consult your Legal Department or Legal Compliance Department if you require any further assistance.*

# ASSETS OF PETRONAS

As a PETRONAS employee, you have access to and control over facilities and resources belonging to PETRONAS. Those facilities and resources are provided to you on the basis that they will be used to further the interests of the businesses of PETRONAS. It is your responsibility to safeguard those assets, taking all necessary steps to prevent loss, damage, misuse or theft. PETRONAS assets may not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes, except in accordance with appropriate authorisation from PETRONAS.

## QUESTIONS AND ANSWERS

- One of our contractors is, I think, taking home boxes of PETRONAS office supplies after hours. I have to work closely with that contractor, and if I say something there could be major upset. What should I do?

**RESPONSE:** *Taking PETRONAS office supplies (or any other PETRONAS resources) for personal use without proper authorisation is theft, pure and simple. You should report your suspicions to your immediate superior. PETRONAS will deal with any consequences that result from your report. If you fail to report thefts, you will be violating the Code, and may yourself become subject to disciplinary action.*

- One of my colleagues is using his office computer to surf the Internet all day. Should I do something?

**RESPONSE:** *PETRONAS computer and telecommunications systems are for business use only. Occasional personal use is tolerable as long as it is limited, does not detract from work performance, and is otherwise consistent with PETRONAS policies of acceptable behaviour. From the question, it sounds as if your colleague may be misusing company facilities and also not doing his job. Although one of our objectives is to have a collegial work environment, we expect our employees to*

*spend their time working. If you do not feel comfortable addressing the issue with your colleague directly, you should raise your concern with your immediate superior or your Human Resource Department.*

- My son is moving to a new apartment this weekend. He needs a van to help move his things. I have access to a PETRONAS fleet van that will just be sitting idle in the parking lot over the weekend. There would be no harm to lending the van to him, would there? He'll pay for the gas, and if he damages the vehicle, he will see that it is repaired.

**RESPONSE:** *As a general matter, company property is for the company's legitimate business uses only, and not for personal use. There can be insurance and liability complications, among other things, with the use of company property for private purposes. Any use of company property for private purposes is subject to prior approval with the respective unit responsible or your Human Resource Department.*

- I saw some metal scrap in the Company's yard. After 2 weeks, it is still there and I think that it is intended to be disposed of. Can I take the metal scrap and sell it to a scrap dealer or recycling centre? I am planning to donate the proceeds from the sale to the Company's Musolla fund.

**RESPONSE:** *Regardless of your intent, taking out Company assets without appropriate authorisation from the Company is a breach of CoBE. Disposal of Company assets must comply with asset disposal guideline.*

- There are a few old computers and monitors in my department which are no longer in use and kept in the filing room for quite some time. I saw an advertisement by a local library requesting for donations of computers.

Can I donate the unused Company computers and monitors to them?

**RESPONSE:** *PETRONAS assets regardless of the condition cannot be given away or donated without appropriate authorisation from the Company. If you have any questions in this regard, please consult your Head of Department, and your Legal Department.*

- My former colleague is now working in a new Company and has requested to borrow chemical from our laboratory due to delay in getting their supplies. We have more than sufficient inventory and she has promised to return it when her company get their supplies. Is there a problem if I lend her the chemical?

**RESPONSE:** *The use of your position in PETRONAS and PETRONAS' assets and resources for personal gain or for the advantage of others with whom you are related to or associated with is prohibited.*

*PETRONAS assets cannot be lent or given away without appropriate authorisation from the Company. Please consult your Head of Department or your Legal Department.*

# FINANCIAL INTEGRITY

PETRONAS' books and records must be prepared accurately and honestly. Fair and accurate books and records are essential to managing the group's businesses correctly and to maintaining the integrity of the group's financial reporting and disclosure.

You are required to comply with all laws, policies and procedures established from time to time to safeguard and support the integrity and accuracy of PETRONAS' financial reports and records, financial resilience, capital efficiency, reputable credit rating, strong financial discipline, and related governance, as mandated by the PETRONAS Financial Policy.

You must provide accurate and complete information to personnel responsible for financial reporting, financial forecasting, or audits. This requirement bars any inaccurate records, including cheating on travel or entertainment expense reports, job logs, or time sheets, or making other dishonest or misleading entries.

In particular, the Code specifies that you may not:

- Conceal, alter, destroy, or otherwise modify PETRONAS 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);
- Intentionally make a false, misleading or insufficiently detailed entry in a record, report, file, or claim (including travel and entertainment expenses reports);
- Establish accounts, companies, or arrangements that may have the effect or result of circumventing or frustrating PETRONAS' internal controls, policies, or procedures;
- Fail to cooperate fully and truthfully with internal and external audits authorised by PETRONAS; or

- Engage in any scheme to defraud anyone of money, property, or services, or undertake any action that would harm PETRONAS' reputation.

## TAX

PETRONAS is a responsible taxpayer who complies in good faith all applicable tax laws and regulation.

This commitment reflects our integrity, accountability, and respect for the rule of law—values that are core to our business conduct. PETRONAS employees, directors, contingent workforce, and Third Parties acting on our behalf must understand and comply with local tax obligations and ensure that all tax-related matters are handled with transparency, accuracy, and in compliance with applicable laws.

Depending on the jurisdiction, PETRONAS and its Group of Companies may be subject to various forms of taxation that fall under direct or indirect tax, and also disclosure and reporting requirements enacted under taxation laws and regulations, including, but not limited to:

- (a) Direct Tax: Taxes levied/ imposed directly on individuals, corporations or legal entities by the government or relevant tax authorities based on income, profit, wealth, or property in accordance with tax laws, legislations or regulations of a jurisdiction. This includes, but is not limited to, Corporate Income Tax (CIT), Petroleum Income Tax (PIT), Labuan Income Tax, Global Minimum Tax (GMT), Real Property Gains Tax (RPGT), Capital Gains Tax (CGT), and Personal Income Tax (PIT).
- (b) Indirect Tax: Taxes/ Charges/ Duties/ Levies on goods and services in accordance with tax legislation or regulations of a certain jurisdiction, including but not limited to Goods and Services Tax (GST), Value Added Tax (VAT), Sales Tax, Service Tax,

Sabah State Sales Tax, and Sarawak States Sales Tax.

Non-compliance with tax laws can expose PETRONAS and its personnel to serious legal and financial consequences, including:

- Fines and penalties;
- Loss of business licenses or permits;
- Reputational damage;
- Regulatory sanctions or criminal liability; and
- Disqualification from tenders or public projects.

Moreover, accurate and timely tax reporting and payment are essential for maintaining trust with governments, host communities, and our stakeholders. This trust is fundamental to securing and sustaining PETRONAS' license to operate.

As a PETRONAS employee or director, you are responsible for the following:

- Ensure that all tax filings and payments under your purview are timely, complete, and accurate.
- Maintain and retain clear and accurate documentation and records that support all tax filings and calculations.
- Seek guidance from your Tax, Legal department or PETRONAS Group Tax when in doubt about tax implications of any transaction.
- Never engage in deliberate misreporting, tax evasion, or fraudulent structuring of transactions to avoid tax obligations.

PETRONAS expects all Third Parties, including joint venture (JV) partners, contractors, agents, consultants, suppliers, and other Third Parties working for or on behalf of PETRONAS, to comply with all applicable tax laws and regulations in the countries where they operate on our behalf or in partnership with us.

## QUESTIONS AND ANSWERS

- A logistical problem has made it impossible to deliver some goods on schedule in this financial reporting period, which means we will undershoot our KPI in this period and overshoot it in the next. Since this is just a timing problem, no one will be hurt if we smooth things out by booking the shipment in this period rather than in the next. Right?

**RESPONSE:** *No. PETRONAS must maintain adequate books and records, which includes accuracy with respect to the timing of transactions. Even if the intent is arguably benign, creating false entries is a violation of the Code and other policies, and can have serious negative consequences.*

- We have learned that a foreign prosecutor plans to raid our offices in a few hours. Although we think that the raid is politically motivated and that we have done nothing illegal, there are some documents in the office that might prove embarrassing if they fell into the wrong hands, since they say unkind things about local officials. May we destroy or hide them?

**RESPONSE:** *No. Destroying or hiding documents sought in a government investigation is a violation of the Code, and may have very serious negative repercussions, including potential criminal legal exposure, for the group. Among other things, the investigators may assume that destroyed documents were incriminating, even if they were innocuous. The right way to deal with this kind of situation is to avoid creating potentially embarrassing documents in the first place.*

- A month ago, I was asked by a colleague to input some accounting entries. They seemed unusual to me, so I asked some questions that no one could answer. I asked my immediate superior, but he told me to just be quiet and make the entries, so I did. Obeying my immediate superior was the right thing to do, wasn't it?

**RESPONSE:** *You did the right thing by asking your immediate superior, but if you have unresolved questions relating to the*

*integrity of the transaction and the accuracy of the entries, you should take them up with a higher level manager, your audit department or legal department. Every employee who has a role in recording entries in our business and accounting systems has a responsibility to see that those entries are complete and correct.*

- We're in a JV with other energy players in Country A. The host government claims the JV owes several million dollars in unpaid taxes, with a 200% fine if payment isn't made within four weeks. A consultant offers to "facilitate" payment via informal channels—charging a small fee but cannot guarantee an official receipt. Should I be concerned with this proposed arrangement, and should I seek advice from my Legal and Finance department?

**RESPONSE:** *Always be cautious when Third Parties offer to make unofficial payments on your behalf, especially if documentation is unclear. This may expose PETRONAS to corruption or tax evasion risks. Seek advice from your Tax, Finance, and Legal Department to validate the legality of the arrangements before proceeding.*

- A colleague suggests that we classify certain personal travel expenses as "business development" costs in our reporting for Country B. He claims this will help reduce the team's taxable profit and avoid unnecessary tax payments. When I raise concerns, he brushes them off, saying, "Everyone does it—it's standard practice here." Can I take his word for it just because it's commonly done? What are the risks of misclassifying expenses for tax purposes, and what steps should I take if I'm unsure whether this practice is ethical or legal?

**RESPONSE:** *No, you should not take your colleague's "word" simply because they say that a practice is common. Misclassifying personal travel expenses as "business development" to reduce taxable profit may constitute tax evasion, misrepresentation of financial records, and a breach of the CoBE.*

*Such actions could expose both you and the company to legal and reputational risks, regardless of local norms. If you are unsure whether the classification is appropriate, you should seek clarification from your Finance or Tax Department and refrain from proceeding until you receive clear guidance. Upholding integrity means doing the right thing—even when others choose not to.*

- You are representing PETRONAS in a joint venture (JV) with a local partner in Country C. During a routine financial review, the local partner presents a tax declaration that significantly under-reports the JV's actual revenue. When you raise concerns, the partner insists that this is a common and accepted practice in the country, explaining that most companies do this to avoid excessive local tax burdens and to "stay competitive." The partner pressures you to sign the declaration on behalf of PETRONAS, stating that failure to do so may result in delays, financial strain on the JV, or reputational issues with local stakeholders. How would you handle this situation?

**RESPONSE:** *You should never agree to sign or support any document that you believe intentionally misrepresents financial information, including tax declarations. Falsifying revenue or under-reporting income, even if presented as a local norm, is a violation of the CoBE and may be illegal.*

*Such actions could expose PETRONAS to serious consequences, including regulatory penalties, criminal liability, loss of stakeholder trust and reputational damage. PETRONAS is committed to upholding transparency, accountability and compliance with all applicable laws in every jurisdiction in which it operates. Local business practices do not justify unethical conduct. If you are ever pressured to participate in such arrangements, escalate the matter immediately to your Tax and Legal Departments. Do not sign or act on anything until you have received proper internal guidance.*

- You are aware that a tax payment is due next week in Country D. However, due to internal delays in the payment

approval workflow, there's a real risk the payment might be made late. In the meantime, a local tax officer unofficially offers to "hold off enforcement" if you can do them a personal favour in return—something that is not formally documented. What should you do in this circumstance?

**RESPONSE:** *Even if the tax delay is unintentional, accepting or entertaining informal arrangements or favours in exchange for leniency may be a serious ethical and legal breach. These types of requests are often early warning signs of corruption or abuse of power and may constitute solicitation of a bribe under anti-bribery and corruption laws. Never accept or offer informal favours in connection with official duties. Even if made under pressure, such arrangements compromise PETRONAS' commitment to integrity and expose you and the company to legal, regulatory and reputational risks. Escalate the matter immediately to your Tax, Finance, and Legal Department so the issue can be resolved within the limits of the law.*

- Despite PETRONAS' thorough vetting process, a PETRONAS vendor recently requested a change in invoicing terms for a contract in Country E. They proposed issuing invoices through an affiliated third-party entity that is not registered for VAT, claiming it is a common local practice to "streamline payments." The vendor also asked for payment to be made to a different bank account than the one on the original contract. Is this type of arrangement acceptable?

**RESPONSE:** *Even with robust vetting of PETRONAS vendors and suppliers as part of PETRONAS' onboarding programme, changes to invoicing or payment terms, especially involving non-registered entities or different accounts, can pose significant tax and compliance risks, including potential VAT fraud, money laundering, or breach of contractual terms. Such requests must be carefully reviewed and approved by your Tax, Finance, and Legal Department before proceeding. Always ensure supplier transactions remain transparent, compliant with tax laws, and consistent with contractual agreements.*

# CONFIDENTIALITY OBLIGATIONS/ PERSONAL DATA PROTECTION/ THIRD INTELLECTUAL PROPERTY/ PUBLIC COMMUNICATIONS

You have a duty to safeguard the information assets of PETRONAS. In that regard, you have a responsibility to protect those assets from theft, misuse, infringement, unauthorised disclosure, and mishandling. Improper handling of PETRONAS information—including unauthorised viewing, copying, distributing, removing, damaging, destroying, or altering—may result in disciplinary action. The Code sets out principles concerning the protection of PETRONAS' information, both during and after your employment with the group. If you are uncertain about how to handle sensitive or confidential information, you should ask your immediate superior for guidance. You may not publish or write books, articles or other materials based on PETRONAS' confidential information without PETRONAS' written permission.

## MISUSE OF CONFIDENTIAL INFORMATION

You may never use the confidential information of PETRONAS for your own benefit or the benefit of other persons—especially not to trade in shares or other securities or to recommend or cause a third party to do so. You are required to comply with all laws on insider trading and securities market abuse.

## PERSONAL DATA PROTECTION

You shall process personal data in accordance with PETRONAS Privacy Policy, PETRONAS Privacy Standard, and any

relevant data protection laws. Individuals' personal data shall only be processed if there is a lawful basis of processing. When you are relying on consent in processing personal data, please ensure that the consent is adequately obtained and documented.

You must provide a privacy notice to the individual, stipulating the purpose for processing the individual's personal data, the lawful bases that are relied on, recipients of the personal data, and who they should contact if they have any queries on the above. The individual should be updated on any changes to the processing, including if there is any new purpose of processing that is relied on.

You must take reasonable steps to ensure the personal data is complete, accurate, and up to date, and appropriate safeguards are in place in ensuring personal data is processed securely. The personal data collected and processed should not be retained longer than required or to comply with legal obligations. It must be securely deleted when there is no longer **any** purpose for processing. Access to Personal Data that is retained due to any legal obligations should be limited on a need-to-know basis as it is unlikely for the information to be processed daily.

## INSIDER DEALING

PETRONAS requires you to abide by all applicable laws on insider dealing. In general, insider trading involves trading in shares or other securities (not just

PETRONAS Group of Companies public listed shares) 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. PETRONAS further requires you 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.

## INVENTIONS AND COMPUTER PROGRAMMES

PETRONAS encourages you to be inventive and innovative as part of your normal duties. Subject to the requirements of applicable law, PETRONAS will own inventions, computer programmes and other results of technological research that you make or to which you contribute while working for PETRONAS. The Code sets out rules concerning the ownership and use of intellectual property developed or employed at PETRONAS. With respect to third party intellectual property, you may not knowingly infringe on, and you must comply with all laws, regulations, and contractual obligations regarding, the valid intellectual property rights of other parties.

## PUBLIC STATEMENTS

Only certain individuals are authorised to make public statements either orally, in writing, or in any form on any platform (including on social media websites) on behalf of PETRONAS. If you are not so authorised, you may not make public statements on the policies or decisions of PETRONAS or discuss publicly any measure taken by PETRONAS. Similarly, unless duly authorised, you may not make public statements about matters relating to the work of the department or company in which you were employed or relating to an organisation with which PETRONAS has dealings if, among other things, such statements may compromise the interests and reputation of PETRONAS.

## SOCIAL MEDIA

Social media and public messaging platforms are powerful tools for

communication, but they also carry significant responsibilities. When engaging on these platforms—whether in an official or personal capacity—you must comply with all applicable PETRONAS policies, standards, guidelines, and procedures. This includes exercising good judgment, acting responsibly, and respecting the rights and dignity of others.

Misuse of social media can expose PETRONAS to reputational, operational, legal, and regulatory risks, and may result in serious cybersecurity breaches. It can also infringe upon the rights and wellbeing of individuals through acts such as online harassment, discrimination, or unauthorized disclosure of personal information.

Only authorised individuals may act on behalf of PETRONAS on official social media accounts, and they must adhere to strict requirements regarding accuracy, professionalism, confidentiality, and intellectual property.

When posting in your personal capacity, you must ensure that any content referencing PETRONAS complies with these standards, clearly distinguish your personal opinions from PETRONAS' corporate position, and refrain from sharing harmful or offensive material—including hate speech, misinformation, cyberbullying, doxing, or any other content that could be perceived as threatening, abusive, or insulting. PETRONAS reserves the right to monitor activities conducted on its systems and may take disciplinary action for breaches of these requirements.

## IT SYSTEMS

PETRONAS has rules governing the use of the group's information technology and communications systems. The Code sets out a number of specific prohibitions in this regard. Fundamentally, you are required to use PETRONAS information technology and communications systems in a responsible and professional manner for proper business purposes consistent with the Code and other IT protocols and rules in effect for companies in the group.

## Internal Use - Authorized for External distribution

Among other things, you may not use those systems to:

- Conduct fraud;
- Run your own business;
- Infringe intellectual property rights;
- Send chain letters, solicit money or gifts, engage in charitable fund-raising or political advocacy, pursue religious efforts, or for private non-PETRONAS commercial purposes;
- Commit cybercrimes, such as spam attacks, hacking, IT sabotage, eavesdropping, spying, and creating or sending viruses;
- Spread malicious rumours or transmit derogatory or indecent materials; or
- Otherwise engage in activities that could damage PETRONAS' business or reputation.

You are required to join in protecting the security and proper use of PETRONAS' systems. If you discover or suspect any actual or potential incident that could compromise the security, integrity, confidentiality, operation, or availability of PETRONAS' hardware, systems, or data, or any disclosure of confidential information, you are expected to contact the ICT Service Desk or other relevant authority immediately.

### RESPONSIBLE ARTIFICIAL INTELLIGENCE

PETRONAS is committed to the responsible and ethical use of Artificial Intelligence (AI) technologies by:

- Adhering to applicable laws, regulations, industry standards, and internal governance frameworks governing the AI development, deployment, and usage; and
- Ensuring transparency, accountability, and fairness in all AI-driven processes and decision-making.

This commitment reflects our core values of integrity, accountability, and respect for human rights and the rule of law. PETRONAS employees, directors, contingent workforce, and Third Parties

acting on our behalf are expected to understand ethical implications and the opportunities AI offers, recognise its potential impact, and apply it in ways that align with the company's principles of responsible innovation and proactive risk management.

AI can be applied across PETRONAS value chain to enhance efficiency, improve decision-making, streamline processes, support safety and monitoring, and foster innovation. AI applications include, but are not limited to, predictive analytics for forecasting risks and performance, process automation to reduce human error, natural language processing for communication and document analysis, computer vision for surveillance and equipment monitoring, and generative AI for creating content, simulations, or design models.

Improper or unethical use of AI can expose PETRONAS and its personnel to significant risks, including, but not limited to:

- Bias and discrimination in automated decisions;
- Data privacy breaches and unauthorized surveillance;
- Loss of stakeholder trust and reputational harm;
- Regulatory penalties or legal liabilities; and
- Operational disruptions due to flawed algorithms or misuse;

As a PETRONAS employee or director, you are responsible for:

- Ensuring that AI tools and systems under your purview are used ethically, securely, and in compliance with applicable laws and internal policies.
- Maintaining transparency in AI-driven decisions and ensuring human oversight where necessary.
- Reporting any concerns related to AI misuse, bias, or unintended consequences.
- Seeking guidance from the subject-matter experts on ethical and legal considerations upon the implementation and use of AI.

PETRONAS expects all Third Parties—including joint venture (JV) partners, contractors, agents, consultants, suppliers, and other entities working for or on behalf of PETRONAS—to uphold the same standards of ethical AI use in their operations and engagements with PETRONAS and comply with the applicable law and regulations in the countries where they operate.

## QUESTIONS AND ANSWERS

- I have collected personal data from external participants that attended a conference that we previously organized. Can I use the personal data collected to share marketing information with the participants?

*RESPONSE: You may only use personal data for a specific purpose. In this instance, you should not be sending marketing information to the participants unless you have obtained consent from the participants.*

- I need to gather dietary requirements including allergy information of participants for a physical event. When should I notify the participants of the purpose of my collection?

*RESPONSE: A Privacy Notice / Privacy Statement should be communicated to the individual at the time when their personal data is obtained. The individual should be able to read the Privacy Notice / Privacy Statement before deciding whether to provide the information. In some jurisdictions, you may communicate the notice within a reasonable period but not later than one month after personal data is obtained. Therefore, please check to ensure which local personal data protection laws are applicable.*

- The counterparty that I frequently dealt with is retiring soon. Can I keep the person's information for record purposes?

*RESPONSE: Generally, you should not keep an individual's information if it is no longer required for processing. You may only maintain minimal information about the individual and securely dispose of the remaining information.*

- A good friend works with an established conference organizer in the region. She asked if I was able to share the contact details of PETRONAS employees for her to send some marketing material on upcoming oil and gas conferences. I don't see the harm in providing her with the email address and office contact number of my colleagues as they may be interested to attend. Is it okay for me to share the information with my friend without having to check with my colleagues first?

*RESPONSE: Business contact information can be regarded as personal data. As such, you should not share the contact details of your colleagues unless you are permitted to do so.*

- I am working on a specific project which involves the assessment of employees' personal data. Can I share the access with my colleague?

*RESPONSE: You should not simply share access to personal data with other colleagues. The access to personal data shall only be limited to the individual involved in the project and on a need-to-know basis.*

- I recently learned, through my work in PETRONAS, that a listed company we are partnering with will soon announce a significant oil discovery. I was thinking of buying shares in the company before the news goes public, as the share price will likely go up. Is this allowed?

*RESPONSE: No. This is considered insider dealing and is strictly prohibited, even if it does not relate to PETRONAS shares. Using non-public, material information obtained through your work for personal gain is against the law and PETRONAS' CoBE. You must not trade, or tip others to trade, based on inside information.*

- During my employment at PETRONAS, I developed a new software tool in my free time at home, which can improve drilling data analysis. I used some PETRONAS data and systems to test it. Since I created it after working hours, can I own and sell it?

*RESPONSE: If an invention or computer programme is developed using PETRONAS resources, information, or relates to PETRONAS' business, PETRONAS may have ownership rights to it under the CoBE and applicable employment agreements, subject to applicable local laws. These rights can vary depending on the jurisdiction in which the invention is created, as local laws may impose different rules on ownership and entitlement. You should promptly report the invention to your immediate superior, who will liaise with your Legal Department to determine the applicable legal position and clarify ownership rights.*

- I think I can get some valuable information from a competitor by sending an e-mail in which I pretend to be a customer. If I succeed, will there be a bonus for me?

*RESPONSE: No, in fact, you will be violating the Code and subject to disciplinary action. It is dishonest and inappropriate to conceal or misrepresent your identity when acting on behalf of PETRONAS, even if you perceive it to be for PETRONAS' benefit.*

- I found a detailed technical diagram from a competitor's engineering manual online. Can I use it in my PETRONAS presentation if I include the competitor's name in the footnote?

*RESPONSE: No. Using third-party intellectual property without proper authorisation may infringe IP rights and violate the law. Even if you give credit, you must obtain the necessary permissions or licenses before using such materials. Always respect third-party IP and consult your Legal Department before use.*

- I have an idea for an original research paper that I would like to publish. It doesn't directly relate to my work. May I do so?

*RESPONSE: PETRONAS encourages research and scholarship. You should, however, discuss your plan with your immediate superior, to confirm that your paper will not involve the disclosure of any confidential PETRONAS information, or otherwise pose issues. Private projects should of course not be allowed to distract*

*from the performance of your duties at work, but if there is some indirect relation to your work, perhaps PETRONAS will find supporting your project to be beneficial.*

- A journalist contacted me on LinkedIn for my opinion about PETRONAS' renewable energy strategy. I have strong views and some inside knowledge, and I want to respond to her but in my personal capacity, not on behalf of PETRONAS. Is that okay?

*RESPONSE: No. You must not make public statements—whether in an official or personal capacity—about PETRONAS' business, operations, or strategies unless you are expressly authorised to do so. Even personal comments made on social media platforms can be misconstrued as representing the Company's official position and may unintentionally disclose confidential or non-public information.*

*Revealing such information could breach your confidentiality obligations under the CoBE and/or your employment contract, potentially harm PETRONAS' reputation and relationships, and undermine the Company's competitive advantage. Never share inside information, whether "off the record" or otherwise. All media or public enquiries should be referred immediately to the Group Strategic Relations and Communications.*

- A former PETRONAS colleague asked me to give him a reference for a new job application. Can I provide one using PETRONAS letterhead or my official designation?

*RESPONSE No, you should not provide a reference using PETRONAS letterhead or your official designation. Doing so may be construed as an official endorsement by PETRONAS, which is not allowed under the CoBE. You may provide a personal reference in your individual capacity, but it must clearly avoid any implication of PETRONAS' involvement or endorsement.*

- Can I upload personal photos related to my work at PETRONAS on my social media accounts?

*RESPONSE: You may share personal photos and postings on social media, but when they relate to your work at*

## Internal Use - Authorized for External distribution

PETRONAS, you must be cautious and be guided by the PETRONAS Social Media Guidelines, PETRONAS CoBE Section 28: Social Media, or other company policies and guidelines applicable in your jurisdiction.

Avoid posting images that reveal confidential company information, show security-sensitive areas, or could harm PETRONAS' reputation—such as photos of office premises, company information, or incidents involving authorities. If unsure, consult your immediate superior or Head of Department before posting.

- How do I distinguish my personal opinions from PETRONAS' corporate position?

**RESPONSE:** When posting on social media in your personal capacity, you must make it clear that your views are your own and do not represent PETRONAS. Use disclaimers such as: "The views expressed are my own and do not reflect the views of PETRONAS."

However, adding a disclaimer does **not** give you permission to share harmful or offensive content. Even with a disclaimer, you must avoid posts that could damage PETRONAS' reputation, disclose confidential information, or violate the Code. Always ensure your tone is respectful and professional, and never use your personal account to conduct PETRONAS business or share internal updates.

- What types of content should I avoid on social media?

**RESPONSE:** You must refrain from posting or sharing any content that is or may be perceived as:

- Threatening, abusive, or insulting – including aggressive language, harassment, or intimidation.
- Hate speech or discriminatory remarks – targeting race, religion, gender, nationality, or other protected characteristics.
- Misinformation – sharing unverified or false information about PETRONAS, its employees, or industry matters.

- Cyberbullying – any form of online harassment or targeting of individuals.
- Doxing – posting identity information of any person (such as names, photos, contact details).
- Harmful or offensive material – including obscene, defamatory, or culturally insensitive content.
- Any other content that may violate the law, regulation or directives issued by the authorities.

This applies regardless of intent. Even if you did not mean harm, content that appears offensive or damaging can lead to disciplinary action and reputational risk for PETRONAS.

- One of our contractors just sent me by e-mail a really funny joke that makes fun of women. May I forward it to the guys in the department?

**RESPONSE:** No, you may not make use of PETRONAS systems to send material that is likely to cause annoyance, inconvenience or offence to your colleagues. Even though you don't intend to forward the e-mail to any women, it is still inappropriate to forward an e-mail of that kind within the workplace. You are expected to show respect to your fellow employees, regardless of their race, religion, gender or other characteristics.

- There is a great video game available for free online. I would like to download it on to my office computer, so that I can play the game during my lunch hour. That's OK, isn't it?

**RESPONSE:** No, not without the prior approval of your Head of Department, who will check with the IT group before giving any permission. The installation of third party software in, or the connection of hardware to, the IT systems or equipment of PETRONAS is prohibited without permission. The reason is clear: third party software and hardware may introduce viruses or other problems into our network.

- I assume that one of my co-workers has some pornographic material on his office laptop, or at least I saw him downloading some. What should I do?

**RESPONSE:** The downloading of pornography or other indecent or offensive materials onto PETRONAS equipment or systems is prohibited under the Code. You should report your concern to your immediate superior or to your Human Resource Department.

- A telemarketing company has offered me some free music downloads if I provide the home telephone numbers and e-mail addresses of ten friends. I consider my co-workers to be my friends, so I plan to take their numbers and e-mail addresses from the office files so that I can provide them to the telemarketer. I know that my co-workers will not mind. Their phone numbers are publicly available, after all, and I know they freely give out their personal e-mail addresses. They will probably just be sent some junk e-mail, and they might even be interested in the offers. This is harmless, right?

**RESPONSE:** As a general matter, you should not provide personal data obtained from company records to anyone other than company personnel authorised to have access to that data, and then only for legitimate company purposes. In many jurisdictions, it is illegal to disclose personal information without the prior consent of the individuals involved, and the requirements for obtaining the consent can be quite particular. Beyond that, exploiting information taken from company files for your personal benefit is against company policy. In some cases, the disclosure of personal data is permitted, but you have to be confident that you have the proper authority to do so, that you handle the information correctly and that you are in compliance with company policies and applicable law when you do. If you have any questions in this regard, please consult your Human Resource Department.

- I'm part of a team implementing an AI tool to screen job applicants. The tool seems to favour certain demographics. What should I do?

**RESPONSE:** You should pause the use of the tool immediately and seek guidance from your HoD and consult the designated Responsible AI function within PETRONAS Digital Sdn Bhd (PDSB) to review

compliance with PETRONAS policies. The use of AI tools for hiring must ensure fairness and avoid discrimination; bias in algorithms can breach company policies and laws.

- A colleague suggests using facial recognition AI to monitor employee attendance without informing them. Should I support this?

**RESPONSE:** No, you should not support this. Monitoring employees without their knowledge could breach privacy rights and violate legal and ethical standards. The use of AI must be transparent, lawful, ethical and aligned with PETRONAS' values.

- An AI chatbot we're testing occasionally gives misleading or offensive responses. Can we still launch it?

**RESPONSE:** No, you should not launch it. A chatbot that produces unreliable, inaccurate or harmful content can damage trust, harm users, and expose the company to risk. You should improve and thoroughly test the chatbot for accuracy, safety, and reliability prior deployment.

- We're considering an AI tool that's trendy but doesn't align with our business objectives. Can we proceed?

**RESPONSE:** You should not proceed. AI adoption must serve clear business objectives and deliver measurable value. Using a tool simply because it is trendy can waste resources and introduce unnecessary risks. Always assess alignment with business strategy and goals.

- I suspect a vendor is using AI in a way that violates ethical standards. What should I do?

**RESPONSE:** You should raise the concern immediately to procurement, legal, or the designated Responsible AI function within PETRONAS Digital Sdn Bhd (PDSB). Vendors are expected to comply with our ethical and governance standards, and potential violations must be addressed quickly to protect the company's reputation, legal standing, and stakeholder trust. You may use the reporting mechanisms outlined in the PETRONAS CoBE and the PETRONAS Whistleblowing Policy to escalate the issue.

## Internal Use - Authorized for External distribution

- We're using a third-party AI analytics tool. It's unclear how the tool collects and processes data. What should we do?

**RESPONSE:** *You should stop using the tool until you have clarity. Engage the provider to obtain detailed information about data collection, processing, and storage practices. Please ensure the tool complies with privacy laws, company policies, and contractual obligations before continued use.*

- We're experimenting with AI-generated videos for internal training. Can we use synthetic voices and faces?

**RESPONSE:** Yes, if it is clearly disclosed and used responsibly and transparently. Ensure that synthetic media is not misleading and that it complies with PETRONAS' communication and branding policies.

- Our team wants to use internal employee feedback data to train an AI model. Is this allowed?

**RESPONSE:** *Yes, but only if the use of employee feedback data complies with privacy laws and internal policies, employees are informed of the intended use, appropriate safeguards (such as anonymization) are applied to protect personal data, and the AI application aligns with Responsible AI principles.*

- A vendor offers an AI tool for real-time facial recognition in public spaces. Can we use it in our EU operations?

**RESPONSE:** *No. Under the EU AI Act, real-time biometric identification (including facial recognition) in public spaces is strictly prohibited except in narrowly defined legal circumstances. Such use would expose PETRONAS to significant legal and ethical risks. Please consult legal or the designated Responsible AI function for more information.*

- Our EU-based team is deploying AI tools. Are there training requirements?

**RESPONSE:** *Yes. The EU AI Act mandates AI literacy for employees involved in AI development or deployment. PETRONAS emphasizes responsible and informed use of AI. You should ensure all relevant staff*

*receive training on ethical AI use, risk awareness, and compliance obligations.*

- Can we use AI to amplify positive narratives about PETRONAS online?

**RESPONSE:** *AI may be used for legitimate corporate communications (e.g., sharing verified news or educational content), but PETRONAS prohibits any manipulative or deceptive amplification that could mislead, harm societal trust, or compromise reputation.*

# CONDUCT CONTRARY TO DUTY TO SERVE DILIGENTLY

## OUTSIDE EMPLOYMENT OR GAINFUL ACTIVITIES

PETRONAS expects you to devote your time and attention to the fulfilment of your duties as an employee. For this reason, if you want to take up any other full or part-time employment (in whatever capacity including management, direction, or conduct of another enterprise), you will need the prior written permission from PETRONAS through your Head of Department (HoD) or Human Resource Department.

The granting of such permission is conditional upon your satisfying PETRONAS that such dual employment does not interfere with or compromise the performance of your duties and fulfilment of your obligations to PETRONAS.

PETRONAS employees may take up other gainful activity or be involved in any outside business activities. If you are already engaged or involved in other gainful activity or outside business activities, you should promptly disclose these to PETRONAS via your Head of Department or Human Resource Department. However, if such gainful activity impacts your ability to serve PETRONAS with good faith, fidelity diligence, and integrity, PETRONAS reserves the rights to take action or give appropriate instructions related to that gainful activity which you shall comply with.

## PUBLIC SERVICE, RECREATIONAL SPORTS, UNION AND COMMUNITY ACTIVITIES

Generally, PETRONAS wishes to encourage you to participate in unpaid voluntary public service, recreational activities, sports, and other community activities. While such activities outside working hours are encouraged, such activities should not be permitted to interfere with your duties at

work during normal working hours. If you are invited to serve on local bodies or appointed as a club official, you must get approval from your HoD in consultation with your Human Resource Department as soon as possible. You need to ensure that you can balance these outside activities with your full-time duties at PETRONAS without compromising your responsibilities or the Company's interests.

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

## POLITICAL ACTIVITIES

PETRONAS does not support political parties or individual politicians and does not participate in political activities or party politics. However, PETRONAS recognises that employees, in their capacity as citizens, may wish to be involved in legitimate political activities. You must not use your position within PETRONAS to influence others to make political contributions or support any political party or politician. PETRONAS resources, including facilities and equipment, must not be used for political campaigns or party functions. To avoid any perception of PETRONAS' involvement or endorsement, employees must carry out such activities only during off-duty hours or annual leave, subject to prior approval for such matters. Employees must not make any representation that their political involvement is on behalf of, or with the support of, PETRONAS.

Employees must not accept appointments as office holders at any level (Branch, Division, State, or National) of a political party and should reject such appointments, except where such appointments are permitted under local laws.

Employees who intend to stand for State, Federal, or other significant elections must notify PETRONAS in advance and comply with applicable local laws regarding their employment status. Depending on the jurisdiction, this may require the employee to take an unpaid leave of absence or resign from PETRONAS before assuming public office.

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

All charitable donations of PETRONAS resources (whether monetary or in-kind) must be pre-approved by PETRONAS. Such donations must never be used as a substitute for prohibited political payments or to circumvent or avoid any provisions of the CoBE, particularly the prohibitions on bribery.

## PROHIBITION OF ACTION AS EDITOR OF NEWSPAPERS OR ANY FORM OF PUBLICATION

PETRONAS employees are restricted from acting as the editor, or taking part directly or indirectly in the management of any printed or online publications, including newspapers, magazines or journals, except for:

- Department or staff publications;
- Professional publications; and
- Publications of non-political or voluntary organisations.

Approval shall be obtained from your Head of Department in consultation with Human Resource Department.

## PARTICIPATION IN MEDIA

In order to protect PETRONAS and yourself from possible embarrassment and conflicts, you are required to obtain the prior written consent of PETRONAS before participating in any form of advertisement or broadcasting, whether in newspapers, magazines, radio, television, or any other media.

You are responsible for what you post on social media, whether about PETRONAS or

other topics. If your social media posts are found or considered to harm PETRONAS' image or reputation, PETRONAS has the right to take disciplinary action.

You are permitted to contribute literary or academic articles to any publications (for example newspapers, magazines or journals) provided that you obtain prior written permission from your Head of Department.

## QUESTIONS AND ANSWERS

- I want to take up another employment that is outside of my current office hours at PETRONAS. What should I do?

**RESPONSE:** *PETRONAS expects you to devote your time and attention to fulfilling your duties as an employee. If you wish to take up any other full-time or part-time employment—in whatever capacity, including involvement in the management, direction, or conduct of another enterprise—you must obtain prior written permission from PETRONAS through your Head of Department (HoD) or Human Resource Department.*

*This requirement applies even if the activity occurs outside PETRONAS working hours. The approval process ensures that your outside activity does not interfere with your responsibilities or create a conflict of interest. Failure to obtain permission may result in disciplinary action.*

- I have an opportunity to become co-owner of a company that will offer local directory services over the Internet. My nephew is starting it up, and needs some capital, so I am willing to provide it to him. He'll run the company. I'll be a passive investor, although I may give him some advice. Do I need to get clearance?

**RESPONSE:** *You should discuss this prospective investment in further detail with your Human Resource Department. Assuming that the company will not do business with PETRONAS, and that it will not be a distraction from your PETRONAS duties or otherwise place you in a conflict of interest, a passive investment of the kind described is likely to be acceptable.*

- What is considered as gainful activity and what do I do if I have an online business selling headscarves?

**RESPONSE:** *Gainful activity means any work or business conducted outside your full-time PETRONAS working hours and not within the Company's premises that provides monetary gain. Examples include freelance work or running an online business. If you are engaged in an online business selling headscarves, you must disclose this to PETRONAS through your Head of Department (HoD) or Human Resource Department.*

- Why am I required to disclose that I want to start a side business if the business is unrelated to PETRONAS?

**RESPONSE:** *All gainful activities must be disclosed, even if they are unrelated to PETRONAS' business. Disclosure ensures transparency, allows PETRONAS to assess whether your outside activity creates a conflict of interest or affects your ability to perform your duties with integrity and diligence, and protects you and PETRONAS from potential allegations of unethical behaviour. Failure to disclose your involvement in a side business may result in disciplinary action.*

- What happens if PETRONAS discover that my gainful activity affects my performance at work?

**RESPONSE:** *PETRONAS may instruct you to cease the gainful activity or take other appropriate action. You are required to comply with these instructions.*

- I want to stand for public office in the next election. What do I need to do?

**RESPONSE:** *Subject to the requirements of applicable law, we would expect any employees who wish to run for public office to resign from employment with PETRONAS. While the group does not wish to discourage civic engagement, PETRONAS does not wish to be involved in or associated with any political parties, or to otherwise be involved in political matters, and there is a real risk that the candidacy of an employee for public office will lead to such association in the public mind and to various conflicts of interest. There is particular sensitivity in this regard*

*due to PETRONAS' status as a state-owned company. Check with your HR or Legal Department whether the CoBE Country Supplement modifies this rule for your jurisdiction.*

- My nephew is a reporter who wants to interview me concerning the future of the petroleum industry in Malaysia. May I grant him the interview?

**RESPONSE:** *You can only give the interview if you are appointed or already authorised to speak on behalf of PETRONAS on subjects of this kind. Comments on the future of the petroleum industry necessarily relate to policies and decisions of PETRONAS, so care needs to be taken to ensure that your private views are not attributed to PETRONAS and that the interview does not embarrass or cause complications for the group. Please consult your Legal Department should you have any questions.*

- Can I participate in public service, recreational, sports, union, or other community activities while working at PETRONAS?

**RESPONSE:** *PETRONAS encourages employees to take part in unpaid public service, recreational, sports, union, and community activities outside of working hours. However, these activities must not interfere with your job responsibilities or duties at PETRONAS. If you are invited to serve as an official in local bodies or clubs, you must get approval from your Head of Department (HoD) in consultation with HR. Additionally, PETRONAS recognises employees' roles as elected union officials, provided they comply with relevant labour laws.*

# DISCLOSURE DUTIES

## YOUR DUTY TO REPORT BREACHES AND VIOLATIONS

If you find or suspect that another person subject to the Code may have committed or may be about to commit a breach of any of his or her obligations under the Code or of his or her terms of engagement, or to violate other PETRONAS policies or procedures or applicable law, whether deliberately or inadvertently, you must report your concern in writing to your Head of Department, Human Resource Department, the Legal Compliance Department (LCD), or your PETRONAS contact person, or through other accessible channels provided by the Company. For more information, please visit [Voice Your Concern](#).

You may also disclose any alleged or suspected improper conduct using the procedures provided for in the PETRONAS Whistleblowing Policy, or the Country Addendum as adopted by your jurisdiction. For more information, please visit <https://www.petronas.com/whistleblowing>.

Superiors have the responsibility of monitoring compliance with the Code and ensuring that reports of misconduct are taken seriously and handled appropriately.

## NON-RETALIATION

If you make a report or disclosure to PETRONAS, in good faith and without malicious intent, that a breach 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 proven to be unfounded. However, knowingly providing false or misleading information will not be tolerated.

In line with the PETRONAS 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, will not be tolerated. Any form

of retaliation will be regarded as serious misconduct that may result in disciplinary action.

This includes blatant acts, such as dismissing, transferring, demoting, suspending, harassing or publicly attacking someone, and more subtle retaliation, such as avoiding someone who has made a report or disclosure in good faith, and excluding him or her from professional or social activities.

Please refer to the PETRONAS Whistleblowing Policy and Non-Retaliation Policy for further information.

## DISCLOSURE OF OVERPAYMENTS

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 payments or benefits, and then return the overpayments to PETRONAS.

If PETRONAS discovers you have received overpayments of salary, allowances, expenses, claims, or other compensation, or benefits in excess of your entitlements, PETRONAS reserves the right to recover such overpayment. 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.

## QUESTIONS AND ANSWERS

- If I file a whistleblower complaint through the whistleblowing procedures, will my identity be revealed?

**RESPONSE:** *PETRONAS will take steps to ensure that your identity is kept confidential to the extent reasonably practicable. To the extent you have reported activity anonymously, PETRONAS respects such a*

*decision and will work to investigate all claims, including those made anonymously. If you report your own criminal behaviour, or you are found to have been personally involved in improper activity, however, PETRONAS reserves the right to take appropriate disciplinary action, including reporting illegal activity to the public authorities.*

- I know that I will not be fired if I file a whistleblowing report in good faith, but I am worried that I will be isolated or alienated by colleagues for betraying my unit. Is my concern legitimate?

**RESPONSE:** *PETRONAS' policy prohibits any form of retaliation for whistleblowing in good faith. That includes social retaliation.*

- What information should a whistleblower provide to PETRONAS?

**RESPONSE:** *The following information would expedite the communication, investigation, deliberation, and decision-making:*

- *Details of the person(s) involved;*
  - *Details of the allegation;*
  - *Nature of the allegation;*
  - *Where and when the alleged misconduct/wrongdoing took place;*
  - *Other relevant information; and*
  - *Any supporting evidence, if available.*
- If I file a whistleblower report, what is the protection that is granted to me? Am I immune from retaliation of any kind by the company?

**RESPONSE:** *You will be protected with protection of confidentiality of identity, to the extent reasonably practicable and protection against retaliation for your report, but if you yourself have broken the law or company policies, disciplinary or legal actions may still apply in such cases. Having whistleblower status will not give you a general license to violate company policies.*

- What is the possibility that a whistleblower's identity is leaked during an investigation?

**RESPONSE:** *Under the PETRONAS Whistleblowing Policy, the nature of the complaint and the identity of the whistleblower will be protected as confidential, as far as reasonably practicable.*

- Can the protection initially accorded to a whistleblower be revoked?

**RESPONSE:** *Generally, protection is accorded where a report is made in good faith and based on reasonable grounds to believe that the information disclosed indicates an actual or potential violation. This protection continues to apply even if subsequent investigations determine that the concern is ultimately unsubstantiated.*

*However, protection does not extend to circumstances where it is established that:*

- *The individual wilfully participated in the improper conduct that was the subject of disclosure or other misconduct uncovered during the course of 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.*

*These exceptions are intended to preserve the integrity of the whistleblowing framework while ensuring that individuals who raise concerns responsibly and in good faith remain fully protected.*

- You went on a long unpaid leave and notice that your monthly salary was credited during your leave, resulting in an overpayment. What should you do in this circumstance?

*RESPONSE: You must immediately notify the relevant Human Resources Department and arrange for the overpaid amount to be returned. Acting promptly demonstrates integrity and accountability.*

- You went on international secondment and after a few months, realized that the housing allowance was calculated incorrectly, giving you more than your entitlement. What should you do in this circumstance?

*RESPONSE: You must immediately notify the relevant Human Resources Department responsible for the payment of allowances and arrange for the excess amount to be returned. If PETRONAS identifies the overpayment first, you will still be given the opportunity to clarify and cooperate in the recovery process.*

# WORKPLACE CULTURE AND ENVIRONMENT

PETRONAS is committed to collaborating with you to create a safe and secure workplace culture and environment. In this regard, the Code sets out guidance in the following areas:

Significance of Safe and Secure Workplace Environment:

- PETRONAS is committed to providing a safe and secure workplace culture and environment, where the values of mutual and reciprocal respect, trust, and confidence are upheld and actively promoted.
- Unlawful Discrimination and Equal Opportunity: PETRONAS will not tolerate unlawful discrimination relating to employment. You should understand the value of inclusion, and must not discriminate against any individual, including in the employment or hiring practices. You must comply with laws in your local jurisdiction that prohibit workplace discrimination.
- Sexual Harassment: PETRONAS is committed to promoting the physical, emotional, and psychological well-being of all employees by providing a safe, healthy, and respectful working environment. All forms of sexual harassment, unsolicited and unwarranted sexual overtures and advances will be treated as misconduct both in the workplace and outside the workplace where such harassment is the result of employment responsibilities or employment relationships.
- Non-Business Workplace Relationships: There is a basic conflict of interest when you manage someone with whom you have a family, romantic or intimate relationship. As a PETRONAS employee or director, you may not supervise, directly or indirectly, influence, or participate in decisions relating to any employee with whom you have such a relationship. Any potential conflict must be disclosed in accordance with PETRONAS' policies.
- Workplace Bullying and Harassments: PETRONAS is committed to providing a safe and healthy workplace and therefore will not tolerate workplace bullying and harassment in the workplace or on the job. Workplace bullying means behaviour that is offensive, abusive, intimidating, or insulting, or that makes someone feel upset, threatened, intimidated or humiliated. It can be verbal, physical, social, or psychological. Workplace harassment means ongoing unwanted behaviour targeting someone based on marital status, gender, religion or belief, age, race or disability which harms their dignity or creates a hostile or offensive work environment. Other examples of workplace bullying and harassment include spreading malicious rumours about others, degrading or humiliating another person in front of others, repeatedly undermining and ridiculing another person's work or contribution, or deliberately excluding or isolating another person in workplace activities.
- Borrowing Money: You may not, under any circumstances borrow, request, or lend money from or to your subordinate, PETRONAS contractors, subcontractors, vendors, consultants or suppliers, or any other entity that have dealings with PETRONAS, whether directly or indirectly, subject to your official authority, or with whom you have or are likely to have official dealings.
- Dress Code: All employees 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. More specific rules concerning attire are set out in the country supplements to the Code. Please refer to your Human Resource Department for respective dress code policy.

- Occupational Health, Safety and Environment: You and all other persons subject to this Code must conscientiously and diligently observe all HSE requirements, measures, work rules and standard operating procedures set out in manuals, handbooks and documents issued by PETRONAS as amended and updated from time to time and all applicable HSE laws and regulations.
- Substance Misuse (Drug and Alcohol Abuse): PETRONAS prohibits the use or possession of drugs or substances that may impair performance or judgment during working hours, on its premises, while operating machinery, or while performing work duties. This prohibition applies even if such substances are legal in certain jurisdictions. Employees must report to work free from any substance that could affect their ability to perform safely and responsibly. Substance misuse can impair work performance and pose serious health, safety, and environmental risks. Accordingly unauthorised consumption, possession, distribution, purchase, or sale of drug and alcoholic substances within its premises or while conducting business or being under the influence of any such substance while working is prohibited. Subject to the requirements of applicable law, PETRONAS may conduct unannounced testing and searches for substances of misuse in accordance with its policies. All persons covered by the Code must diligently heed to and comply with the policies and procedures on substance misuse issued by PETRONAS as amended and updated from time to time for your jurisdiction or region. Under the Code, "substances of misuse" include 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.

- Fostering a Just Transition: PETRONAS is committed to advancing a just transition that respects human rights and ensures that stakeholders have access to equitable opportunities for socio-economic growth.
- Human Rights: You must understand and comply with PETRONAS' policies, procedures and guidelines with respect to human rights. In compliance with the PETRONAS Human Rights Policy, PETRONAS 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 the PETRONAS Contractors Code of Conduct on Human Rights.

## QUESTIONS AND ANSWERS

- My department recently experienced a very small oil spill, which we quickly brought under control. Under local law, we are required to report the incident. I do not want to make PETRONAS look bad by bringing attention to such a minor incident. Since there was virtually no environmental damage and no one was injured, do I need to report this incident?

**RESPONSE:** *Yes. If local law requires that you report the oil spill, you must do so. Not doing so would not only be illegal, it would be against PETRONAS' HSE policy of being a responsible corporate citizen. Transparency and compliance with regulatory and/or internal requirements are mandatory, regardless of the perceived scale or impact of the incident.*

- To increase production, my immediate superior has asked me to operate certain machinery without the use of an important safety procedure that is required by PETRONAS policies. What should I do?

**RESPONSE:** You should immediately report the incident to your Head of Department. Your safety and the safety of the plant operation are of paramount importance to PETRONAS. We prepare guidelines to ensure that our workplace is safe. You should always follow these procedures. You should also refer to the relevant policy and procedures relating to Occupational Health, Safety and Environment for further guidance in this regard.

- I often visit websites where users post funny jokes and images, some of which are sexually explicit. I would like to share the website with my colleagues. May I do so?

**RESPONSE:** No. Sharing sexually explicit or potentially offensive content is inappropriate and may constitute misconduct. In this case, it is very likely that some of your colleagues would find the content on this website offensive. Sharing the website could even rise to the level of sexual harassment. You should not share the website with your colleagues. Employees are expected to maintain professionalism and respect in all workplace interactions, including digital communications.

- I work in an overseas office. A colleague sometimes touches me in a way that makes me feel uncomfortable. This kind of touching is accepted in the local culture, but I consider it inappropriate. What should I do?

**RESPONSE:** Our sexual harassment policy applies uniformly to all of our offices.

If you are inappropriately touched by a colleague it could rise to the level of sexual harassment. You should highlight the discomfort by the action to your colleague or if you are uncomfortable doing so, with your Head of Department. If that is not practicable, please contact your Human Resource Department.

- The person harassing me is my immediate superior and I am afraid I will lose my job if I complain. What should I do?

**RESPONSE:** As a PETRONAS employee you are entitled to a work environment that is free from harassment. It would be a serious violation of the Code if your immediate superior takes retaliatory action against you for reporting his or her inappropriate behaviour. You should immediately report your concern to his or her immediate superior or to your Human Resource Department.

- My superior constantly badgers me in relation to my work, usually for no reasonable grounds. He also yells at me and uses profanity when he talks to me. I noticed that my other colleagues are not treated in the same way, and I feel I have been singled out. I feel humiliated and intimidated by this bullying, and my morale and confidence are low. My health and work performance are affected. I want to be transferred, but I am afraid of the consequences of asking for a transfer. What should I do?

**RESPONSE:** PETRONAS is committed to collaborating with you to foster a safe and secure workplace culture and environment, where the values of mutual and reciprocal respect, trust and confidence is upheld and actively promoted.

PETRONAS does not condone any act of harassment, bullying or intimidation. All employees are expected to treat one another with dignity and respect. As a result, employees must avoid actions or behaviours that are, or could be viewed as, harassment, bullying or intimidation. If you experience such conduct, you should report this matter to your Head of Department or to your Human Resource Department or through [Voice Your Concern](#). The consequences for an individual who harasses other personnel are serious and may include disciplinary action.

- Can I report someone if they use the company's digital communication tools (e.g., Microsoft Teams) to harass me about submitting a report during the weekend?

**RESPONSE:** Employees, including supervisors and peers, should respect one another's personal time and avoid non-urgent work communications outside of

normal working hours. Communication outside of working hours is acceptable only in genuine emergency situations, such as urgent safety issues or matters that require immediate attention. All communications, regardless of time or platform, must remain professional, respectful, and aligned with the company's policies.

- My co-worker comes to work every day smelling of alcohol. I suspect that she is drunk on the job, but I am not sure. What should I do?

**RESPONSE:** If your co-worker has an alcohol problem, it may affect her performance at work and may even threaten the safety of others. If you reasonably suspect that a co-worker has come to work under the influence of alcohol, you should make your immediate superior aware of the situation. Please consult the procedures in your local jurisdiction or region for further guidance on how to address this situation.

- What does PETRONAS mean by a "just transition"?

**RESPONSE:** PETRONAS is committed to advancing a just transition that respects human rights and ensures that our stakeholders have access to equitable opportunities for socio-economic growth. This approach aims to make the energy transition inclusive and beneficial for all.

- Can I have a personal relationship with a colleague?

**RESPONSE:** While PETRONAS does not encourage romantic relationships between employees due to potential workplace challenges, such relationships are not prohibited if they do not involve direct reporting lines. However, you should be mindful of the impact on the workplace and conduct yourselves accordingly. The relationship must not create conflict of interest, favouritism, or perception of bias. Employees must not directly or indirectly supervise, influence, or participate in employment decisions involving someone with whom they have a family, romantic or intimate relationship. Any potential conflict must be disclosed in accordance with Company policies.

- What should I do if I feel I have been discriminated against?

**RESPONSE:** PETRONAS will not tolerate unlawful discrimination of any type. If you believe you have been discriminated against, you should report the issue to your Head of Department, Human Resource Department, or through other accessible channels provided by the Company.

- How does PETRONAS uphold human rights?

**RESPONSE:** PETRONAS is committed to respecting human rights in all areas of its operations and interactions with stakeholders as set out in the PETRONAS Human Rights Policy. For more information, [Governance and Ethics](#).

- I am one of several women who have applied for a desirable position in a department that consists almost exclusively of men. None of us were accepted for the job. I feel that we have been discriminated against. What should I do?

**RESPONSE:** PETRONAS will not tolerate unlawful discrimination of any type. If you feel you have been discriminated against in violation of applicable law, you should immediately report this to your Head of Department or the head of your operating unit. If you believe that would be ineffectual, you might report to your Human Resource Department.

- I recently moved to a PETRONAS office in another country. My previous office permitted employees to dress more casually on Fridays. My current office has no such policy. May I dress casually nonetheless?

**RESPONSE:** You must follow the specific rules concerning attire in the country or region where you work. Local rules are meant to correspond to local norms, and you should act in accordance with them. In all instances, you should be sure to dress neatly and appropriately. Further guidance on dress codes may be provided in a country supplement to the Code developed for your jurisdiction.

- I am travelling on a week-long business trip to meet a key client. Due

to an oversight, I realised that I do not have sufficient cash to pay for transportation to the airport. While cashless payment methods are generally acceptable, they are not available for this particular taxi journey. A subordinate who assisted in planning the trip and understands its importance to PETRONAS has offered to lend me a small amount to cover the fare, which I would reimburse promptly upon my return. In these circumstances, would it be appropriate for me to accept the offer?

**RESPONSE:** *No. You should not borrow money from a subordinate as doing so could create a perceived conflict of interest or place undue pressure on the reporting relationship. Instead, you should make alternative arrangements to obtain the required cash independently, such as requesting the taxi driver to stop at an ATM on the way to the airport.*

- I live close to a PETRONAS refinery area. I am unhappy that sometimes the roads near my community face congestion due to the traffic going in and out of the PETRONAS refinery. How do I lodge a complaint or grievance to PETRONAS?

**RESPONSE:** *PETRONAS values feedback from the communities where we operate and is committed to addressing concerns promptly and respectfully.*

*You can share your views/feedback through [Voice Your Concern](#) or by contacting the facility's Community Relations team. Provide details such as the date, time, and nature of the issue. There are also community engagement sessions where concerns can be raised directly with PETRONAS representatives. All grievances will be acknowledged, assessed, and addressed in accordance with PETRONAS' commitment to openness, accountability, and respect for stakeholder rights.*

- How does PETRONAS ensure that its contractors comply with all applicable local laws with regard to the employment of foreign workers?

**RESPONSE:** *In compliance with PETRONAS Human Rights Policy,*

*PETRONAS seeks to work with contractors who share our values of integrity, are committed to fighting bribery and corruption, and contribute to sustainable development. We require our contractors to respect internationally recognised human rights, complying with the CoBE and all relevant legal requirements. This includes full compliance with applicable laws and regulations related to the employment of foreign workers, including proper work permits, fair employment contracts, and adherence to health and safety standards.*

*This requirement is embedded in the PETRONAS Contractors Code of Conduct on Human Rights (CoCHR). Failure by contractors to comply with the requirements set out in the CoCHR may result in actions taken by PETRONAS, including terminating the non-complying party's relationship with PETRONAS and other measures.*

*For more information on the PETRONAS Human Rights Policy and CoCHR, [Governance and Ethics](#).*

# MISCONDUCT

The Code provides a list of particular examples of misconduct for which, subject to the requirements of applicable law and local PETRONAS policies for your jurisdiction, disciplinary action may be taken.

Provisions concerning disciplinary procedures and actions for your jurisdiction or region are set out in the CoBE Country Supplement or relevant local guidelines. If no such provisions are set out in local guidelines for your jurisdiction or region, the standard disciplinary rules and practices for violations of company policy in your jurisdiction or region will apply, in every instance subject to the requirements of applicable law.

**PETROLIAM NASIONAL BERHAD (PETRONAS)**

197401002911 (20076-K)

Legal Compliance Department Group Legal  
Level 65, Tower 1, PETRONAS Twin Towers  
Kuala Lumpur City Centre  
50088 Kuala Lumpur, Malaysia

[cobe@petronas.com.my](mailto:cobe@petronas.com.my)

[www.petronas.com](http://www.petronas.com)