

COUNTRY SUPPLEMENT:  
**UNITED KINGDOM**



**PETRONAS**

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

The PETRONAS Code of Conduct and Business Ethics Country Supplement: United Kingdom is a specific reference for use in United Kingdom. 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

## COUNTRY SUPPLEMENT: UNITED KINGDOM

1. Application .....	2
2. Definitions .....	2
3. Duties Of Good Faith, Fidelity, Diligence and Integrity .....	3
4. Confidentiality Obligations.....	3
5. Inventions and Computer Programmes .....	3
6. Outside Employment or Business Activities .....	3
7. Equal Opportunities, Non-Discrimination and Anti-Harassment Policy .....	3
8. Dress Code .....	4
9. Substance Misuse (Drug and Alcohol Abuse) .....	5
10. Smoke Free Policy.....	5
11. Disciplinary Policy, Disciplinary Procedures and Grievance Procedure .....	6

# COUNTRY SUPPLEMENT: UNITED KINGDOM

---

## 1. APPLICATION

Save as required by law, the Code of Conduct and Business Ethics (the "Code" or "CoBE") (as supplemented by this Country Supplement for PETRONAS subsidiaries in the UK) does not form part of your contract of employment, letter of appointment, statement of work or equivalent document.

In the event of a conflict between the Code (as supplemented by this Country Supplement) and your contract of employment, letter of appointment, statement of work or equivalent document, your contract of employment, letter of appointment, statement of work or equivalent document shall prevail.

## 2. DEFINITIONS

### 2.1

For the avoidance of doubt, the definition of "family/household" contained in Part I paragraph 3.3 of the Code shall include civil partners.

### 2.2

Part I paragraph 3.4 of the Code shall in the UK be deleted and replaced with the following:

"For the purposes of the Code, the term "employee" shall include any

person who has entered into or works under a contract of employment with PETRONAS (whether express, implied, oral or in writing), including executive directors and temporary, permanent, part-time and fixed-term employees, in each case, working at all levels and grades and including any such person whilst they are on secondment elsewhere. In addition, for the purposes of this Country Supplement, the term "worker" shall include any person who has entered into or works under any other contract (whether express, implied, oral or in writing) whereby he or she undertakes to do or perform personally any work or services for PETRONAS."

### 2.3

For the avoidance of doubt, whenever the term "PETRONAS" is used throughout this Staff Handbook, it shall be interpreted to mean the relevant PETRONAS group company or companies with which you have a contract of employment, letter of appointment, statement of work or equivalent document (as such documents may be amended or supplemented during periods of secondment). Nothing in this Staff Handbook is intended to, or shall be deemed to, establish any direct relationship of employment, appointment, engagement or service between you and any other PETRONAS group company.

---

### **3. DUTIES OF GOOD FAITH, FIDELITY, DILIGENCE AND INTEGRITY**

In the case of any director of any of PETRONAS' UK subsidiaries, the duties set out in Part I paragraph 2.2 and Part II A of the Code are without prejudice to the general duties of directors set out in Part 10 Chapter 2 of the Companies Act 2006.

### **4. CONFIDENTIALITY OBLIGATIONS**

For the purposes of Part II F paragraph 18.4 of the Code, post-termination restrictive covenants (if any) that are applicable to you will be set out in your contract of employment, letter of appointment, statement of work or other similar document with PETRONAS.

### **5. INVENTIONS AND COMPUTER PROGRAMMES**

For the purposes of Part II F section 21 of the Code, the terms governing the ownership of intellectual property rights created by you in the course of your employment, appointment or engagement (as the case may be) will be set out in your contract of employment, letter of appointment, statement of work or other similar document.

### **6. OUTSIDE EMPLOYMENT OR BUSINESS ACTIVITIES**

For the purposes of Part II G paragraph 27.3 of the Code, PETRONAS may in its discretion as a condition to the granting of permission to take up other employment or gainful activity during the continuance of employment with PETRONAS, require that PETRONAS employees in the UK indemnify PETRONAS in writing for any loss that may be suffered by PETRONAS as a result of PETRONAS subsequently withdrawing that permission.

### **7. EQUAL OPPORTUNITIES, NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

The definition of "sexual harassment" contained in Part III paragraph 5.3 shall in the UK be deleted and replaced with the following:

"sexual harassment" means unwanted conduct of a sexual nature which has the purpose or effect of:

- (a) violating a person's dignity; or
- (b) creating an intimidating, hostile, degrading, humiliating or offensive environment for them."

---

## 8. DRESS CODE

For the purposes of Part III section 4 of the Code, the following shall apply to PETRONAS employees in the UK:

### 8.1 INTRODUCTION

All employees should be neatly, appropriately and decently attired during office working hours. Provocative or improper attire is not allowed.

### 8.2 MALE EMPLOYEES

- (a) All male employees must either wear long or short sleeved shirts, bush jackets or company provided shirts. Shirts must be tucked in. Casual printed shirts, T-shirts, jeans and shorts are not allowed.
- (b) Male executives shall wear neck ties except for those who wear uniforms or company work clothes.
- (c) Footwear must be appropriate and suitable. Slippers, flat sandals/ slip-ons and sport shoes are not allowed.

Exemption to wear flat sandals is given for those with medical reasons.

- (d) Hair should be neat (length should be above the collar).

### 8.3 FEMALE EMPLOYEES

- (a) Female employees must wear attire which is appropriate and suitable for an office-working environment. Length of skirt must not be above the knee.
- (b) Female employees are allowed to wear smart trouser suits. Jeans and shorts are not allowed.
- (d) Footwear must be appropriate and suitable. Slippers, flat sandals and sport shoes are not allowed.

Exemption to wear flat sandals is given to pregnant employees and for those with medical reasons.

### 8.4 UNIFORMED EMPLOYEES

All uniformed employees must wear their designated uniforms at all times.

### 8.5 OTHER FORMS OF ATTIRE

Attire other than that specified above may be worn during office hours if it is a requirement of the job and the said attire is approved by the respective Head of Department.

Traditional and national dress may also be worn when appropriate.

---

The Head of Department should be advised of the days when such dress may be worn.

### **8.6 DRESS CODE FOR OFFICIAL FUNCTIONS**

Employees should be appropriately attired in accordance with the dress requirements for a particular function. In the absence of any specific requirement, the employee should follow this policy.

### **8.7 DRESS DOWN DAY**

Employees can wear smart/casual clothing to work every Friday, providing they do not have meetings or other business appointments. T-shirts, shorts and sandals are not allowed.

### **8.8 INTERPRETATION:**

- (a) "Neatly, appropriately and decently attired" means wearing decent, suitable, smart and professional attire.
- (b) "Provocative or improper attire" means inappropriate and unsuitable office attire.

This includes transparent, tight or body hugging shirts/blouses/ knitted blouses, low cut collar/ necklines, bare-back dresses, tight skirts/slacks/trousers, high slit skirts/sarongs that reveal the thighs and short skirts.

## **9. SUBSTANCE MISUSE (DRUG AND ALCOHOL ABUSE)**

For the avoidance of doubt, Part III paragraph 8.2 of the Code requires PETRONAS to seek the advance written consent of PETRONAS employees in the UK before undertaking any drug screening procedure.

## **10. SMOKE FREE POLICY**

### **10.1 INTRODUCTION**

This policy applies to you as well as to any visitors to PETRONAS' premises in the UK. It has been designed to protect such persons from exposure to second-hand smoke and to assist compliance with the Health Act 2006.

### **10.2 POLICY STATEMENT**

It is the policy of PETRONAS that all of our workplaces are smoke-free and that each of you and every visitor to PETRONAS' premises in the UK have a right to work in a smoke-free environment.

Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes company vehicles.

---

### **10.3 IMPLEMENTATION**

Overall responsibility for policy implementation and review rests with the Head of Human Resources who will liaise with the office Building Management Team for delivery of required actions for this policy.

However, each of you and every visitor to PETRONAS' premises in the UK are obliged to adhere to and support the implementation of the policy.

Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke-free vehicles.

### **10.4 NON-COMPLIANCE**

If a PETRONAS employee in the UK does not comply with this policy, he or she may be subject to disciplinary action.

If you do not comply with the smoke-free law, you may also be liable to a fixed-penalty fine and possible criminal prosecution.

### **10.5 FOR THOSE WHO NEED HELP TO STOP SMOKING**

The NHS offers a range of free services to help smokers give up. Visit

[www.gosmokefree.co.uk](http://www.gosmokefree.co.uk) or call the NHS Smoking Helpline on 0800 169 0169 for details. Alternatively, you can text 'GIVE UP' and your full postcode to 88088 to find your local NHS Stop Smoking Service.

## **11. DISCIPLINARY POLICY, DISCIPLINARY PROCEDURES AND GRIEVANCE PROCEDURE**

Please see Part D (2) of this Staff Handbook for the disciplinary policy, disciplinary procedures and grievance procedure applicable to your company.





**PETROLIAM NASIONAL BERHAD (PETRONAS)** (20076-K)

**Corporate Governance and International Compliance Unit**

Legal Division

Level 69, 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)