



PETRONAS

PETRONAS

Code of Conduct and Business Ethics

Country Supplement:
UNITED ARAB EMIRATES

The PETRONAS Code of Conduct and Business Ethics is a general reference for use 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.

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A - Variations to the PETRONAS Code of Conduct and Business Ethics

Part I: Core Values and Culture

1. Application

- 1.1** The PETRONAS Code of Conduct and Business Ethics (the “**CoBE**”) as supplemented by this Country Supplement for PETRONAS companies (“**PETRONAS**”) in the United Arab Emirates (“**UAE**”), or any provision thereof shall form an integral part of your contract of employment. Unless otherwise expressly stated, this Country Supplement is intended to supplement and be read in conjunction with the CoBE and the CoBE Guide. 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

- 1.2** For the purpose of Part I Paragraph 1.2 of the CoBE, the CoBE, the Country Supplement and CoBE Guide (collectively “**CoBE Documents**”) are applicable to those employed by PETRONAS in the UAE, as well as PETRONAS’ directors, contractors, sub-contractors, consultants, agents, representatives and others performing work or services on behalf of PETRONAS in the UAE (collectively “**Covered Person**” or “**Covered Persons**”).

- 1.3** Each Covered Person is expected to read, understand and become familiar with the CoBE Documents and, in particular, to comply with it in the relevant parts.

1.4 Any Covered Person who does not comply with the CoBE Documents is acting outside the scope of his or her employment or authority and will be subject to disciplinary action, up to and including termination subject always to the applicable laws in the UAE. Covered Persons will comply with the CoBE Documents in the relevant parts when performing such work or services. Failure by a Covered Person to comply with the principles and standards set out in the CoBE Documents may result in the termination of the non-complying party's relationship with PETRONAS and other adverse consequences subject always to the applicable laws in the UAE.

1.5 Part I Paragraph 1.4 of the CoBE shall be deleted and replaced with the following:

"This Code is prepared in English language. In the event of a conflict of interpretation with Arabic language or any other version, the Arabic language version will govern."

1.6 For the avoidance of doubt, in the event of a conflict between the CoBE Documents 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.

1.7 In the event that any of the policies in this Country Supplement and the CoBE shall be inconsistent, ambiguous and contradict with one another, the policies of this Country Supplement shall prevail.

2. Definitions

- 2.1** Paragraph 3.4 Part I: Core Values and Culture of the CoBE shall be deleted and replaced with the following:

“For purposes of this Code, the term “employee” means any person who is in the employment of PETRONAS including but not limited to executives, non-executives, secretaries, secondees and individuals on direct hire or employment relationship in the context of employment under UAE applicable laws and in line with the UAE applicable laws as well as any person who, receives remuneration of any kind for work performed thereby in the services, and management or control of PETRONAS in the context of employment under the UAE applicable laws. This shall also apply to officials and employees who are in the service of PETRONAS and is subject to the provisions hereof.”

- 2.2** The following definitions are hereby added as Paragraph 3.7 Part I: Core Values and Culture of the CoBE:

“Smart Casual attire” means neat and professional-looking but casual attire.

“Cross-dressing” means when a male employee dresses or makes himself up as a female or when a female employee dresses or makes up herself as a male.

“Neat and appropriate attire” means decent, suitable, smart and professional attire.

“Provocative or Improper attire” means inappropriate and unsuitable office attire. This includes transparent or tight kebaya/ baju kurung, body hugging shirts/ blouses/ knitted blouses, low cut collar/necklines, bareback dresses, tight skirts/slacks/pants, high slit skirts/sarongs that reveal the thighs and short skirts above the knee.

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- 2.3** "Disciplinary Committee" shall refer to the officer of PETRONAS who has been given the authority to mete out punishment against an employee as provided by the Human Resource Management Limits of Authority.
- 2.4** "Appeal Committee" means the officer of PETRONAS who has been given the authority to consider and decide on appeal as provided by the Human Resource Management Limits of Authority.
- 2.5** "Domestic Inquiry" means the internal hearing and investigation performed by PETRONAS against an employee to ascertain the facts of an alleged misconduct.

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

Part II G: Conduct Contrary to Duty to Serve Diligently

1. Outside Employment or Business Activities

1.1 Paragraph 27.1 of the CoBE shall be deleted and replaced with the following:

- a) As a PETRONAS employee, you must devote your time and attention to the fulfillment of your employment obligations to PETRONAS. PETRONAS employees should refrain from take up other employment or gainful activity, whether part-time or full-time, or be involved in any outside business activities, in whatever capacity (including being involved in the management, direction or conduct of another enterprise).
- b) In relation to an employee whose contract of employment is governed by the Federal Decree Law No. 33 of 2021 (UAE Labour Law), such an employee if employed by PETRONAS on full-time basis is not allowed to work at any other places or with any other employers on full or part-time basis including during annual leave or sick leave. If you are already engaged in any other gainful activity or involved, either directly or indirectly, in the management or business activities of any other company or companies, firms, corporations or other business activities, you should come forward and disclose your activity to PETRONAS through your Head of Department or your Human Resource Department."

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

2.1 Paragraph 28.3 of the CoBE shall be deleted and replaced with the following:

"PETRONAS is cognizant of the fact that any type of labour union is prohibited in the UAE including, but not limited to establish, join, participate and become a member of any labour union."

3. Political Activities

3.1 Paragraph 29.1 of the CoBE shall be deleted and replaced with the following:

- a) PETRONAS recognises that employees, in their capacity as citizens, may wish to involve themselves in legitimate political activities. While PETRONAS does not wish to discourage employees from doing so, in order that PETRONAS can avoid involvement or identification with any political party, employees are required to use their off-duty time, or annual leave entitlement, subject to prior approval, for such matters. In the event an employee is appointed an office holder at the Branch, Division, State or National level of a political party, the employee is to inform PETRONAS of such appointment.
- b) In relation to UAE citizens, PETRONAS recognises that employees, in their capacity as citizens, may wish to involve themselves in legitimate political activities. While PETRONAS does not wish to discourage employees from doing so, in order that PETRONAS can avoid involvement or identification with any political party, employees are required to use their off-duty time, or annual leave entitlement, subject to prior approval of PETRONAS, for such matters.

3.2 Paragraph 29.2 of the CoBE shall be deleted and replaced with the following:

“Notwithstanding the notification under Paragraph 29.1, in order not to compromise the interests of PETRONAS:

- b) In relation to UAE citizens, an employee who is appointed as a member of Federal National Council is encouraged to resign from PETRONAS, subject to the requirements of applicable law.”

Part III: Workplace Culture and Environment

1. Dress Code

- 1.1** Paragraph 4 of the CoBE should be read together with the following:
- a) All employees should be neatly, appropriately and decently attired during office working hours. Provocative or Improper attire is not allowed.
 - b) All employees are permitted to wear Smart Casual attire to work every day unless otherwise provided by PETRONAS pursuant to the "Smart Casual Attire Guideline".
 - c) All employees must at all times comply with PETRONAS policies and guidelines relating to the Dress Code in effect from time-to-time.
- 1.2 Male Employees**
- a) Male executives are no longer required to wear neck ties to work except when required to do so for official business meeting and/or functions.
 - b) 'Baju Melayu' attire, complete with 'samping' and 'songkok' is allowed on the day as identified by PETRONAS.
 - c) UAE nationals' employees may wear their national dress with suitable sandals and/or shoes to work.
 - d) Casual printed shirts, sweatpants, exercise pants, track bottom, all types of shorts, and any spandex or form fitting pants, such as cycling shorts, are not allowed.
 - e) Collared shirts, plain-collared shirts, PETRONAS corporate shirts and T-shirts are allowed. Jeans, khakis and chino pants are allowed provided it is not ripped, distressed or faded.

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- f) Footwear must be appropriate and suitable. Sneakers, sports shoes and loafers are allowed. Slippers, flat sandals/slip-ons (except for UAE nationals wearing their national dress), thongs, flip-flops, athletic shoes, rubber boots or clogs are not allowed. Exemption to wear slippers, sandals, slip-ons, flip-flops is given for those with medical reasons.
 - g) Hair should be neat, smart and looks professional.

1.3 Female Employees

- a) Female employees must wear attire which is appropriate and suitable for an office working environment. The length of skirts must not be above the knee.
- b) Female UAE nationals' employees may wear their national dress with suitable shoes to work.
- c) Female employees are allowed to wear office-appropriate pant suits. Jeans, khakis and chino pants are allowed whereas shorts are not allowed.
- d) Footwear must be appropriate and suitable. Sneakers, sports shoes and loafers are allowed. Slippers and flat sandals are not allowed. Exemption to wear flat sandals is given to pregnant employees and for those with medical reasons.

1.4 Uniformed Employees

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

1.5 Other Forms of Attire

Attire, other than those specified above, including the specified types of shoes, may be worn during office hours if it is a requirement of the job and said attire is approved by your Head of Department.

1.6 Cross-Dressing

Cross-dressing is not allowed.

1.7 Dress Code for Official Functions

Employees must be appropriately attired in accordance with the dress code requirements for a particular function. In the absence of any specific requirement, the employee must follow the PETRONAS Dress Code.

2. Absence Without Leave or Without Reasonable Cause

2.1 An employee who is absent will, at the earliest opportunity, inform the officer of PETRONAS to whom he/she reports of his/her absence and the cause for his/her absence.

2.2 In the event an employee whose contract of employment is governed by the Federal Decree Law No. 33 of 2021 (UAE Labour Law), where the absence without leave and without reasonable excuse is for more than twenty (20) non-consecutive working days during a single year or more than seven (7) consecutive working days without a legitimate reason or a justification that is acceptable to PETRONAS, as the case may be, the employee will be deemed to have breached his/her contract of service with PETRONAS, and may be dismissed without notice.

2.3 Where an employee is absent for more than twenty (20) non-consecutive working days during a single year or more than seven (7) consecutive working days without a legitimate reason or a justification that is acceptable to PETRONAS, as the case may be, without reasonable excuse, as soon as possible thereafter a registered letter will be sent to the employee's last known address requiring him/her to provide explanation for his/her absence. Upon a lapse of seven (7) working days after posting of the said registered letter, if nothing is heard of him/her or no satisfactory explanation is given by him/her, then the said employee is deemed to have broken his/her contract of service and in such circumstances PETRONAS will have the right to terminate his/her service. In addition, PETRONAS will be entitled to recover from the former employee concerned all sums due from the employee to PETRONAS in accordance with the applicable laws.

3. Borrowing Money

- 3.1** You may borrow from banks, financial institutions or borrowing companies licensed under the Union Law No. 10 of 1980 regarding the Central Bank, the Monetary System and the Organisation of Banking, or incur debt through acquiring goods by means of hire purchase agreements or other arrangements, provided that:
- a) such banks, financial institutions or borrowing companies from which you borrow are not directly or indirectly subject to your official authority;
 - b) such borrowings do not lead to public scandal or be subject to construal that you have abused your position for your private advantage; or
 - c) the aggregate of your debts does not or is not likely to cause you serious pecuniary indebtedness as defined under Paragraph 1 above.
- 3.2** You may not borrow from any other person engaged in the business of money lending.
- 3.3** You must comply with the limitations on borrowing as set out in the CoBE.

4. Living Beyond Official Emoluments and Legitimate Private Means

4.1 Where in the opinion of PETRONAS an employee is or appears to be:-

- a) maintaining a standard of living which is beyond his/her official emoluments and other legitimate private means, if any; or
- b) in control of or in possession of pecuniary resources or property, movable or immovable, the value of which is disproportionate to, or which could not reasonably be expected to have been acquired by the employee with his/her official emoluments and any legitimate private means, subject to the requirements of applicable law, PETRONAS may call upon the employee to explain in writing how he/she is able to maintain the said standard of living or how he/she acquired his/her pecuniary resources or property and also may be required to make declaration of his/her assets which may include assets belonging to his/her family/household. Such declarations as aforesaid should be made to your Human Resource Department.

4.2 Failure to make the asset declaration as required under Paragraph 5.1 is viewed by PETRONAS as a lack of commitment on the part of the employee to uphold PETRONAS's policy on maintaining the highest standard of integrity, openness and transparency.

4.3 For the purpose of this Section, “assets” includes property of any description, whether movable or immovable, as may be prescribed by PETRONAS from time-to-time. In respect of immovable property, assets include:-

- i. land, including land occupied under temporary occupation licence;
- ii. all types of residence such as houses, flats, apartments and condominiums; and
- iii. building, including a shop or portion of a shop, office space or stall.

In respect of movable property, assets include: -

- i. any form of cash wherever deposited or retained;
- ii. shares, stocks, debentures, bonds or other securities;
- iii. any form of trade, business or commercial license permits; and
- iv. any other movable property, including all types of motor vehicles, jewellery, club memberships, household furniture and sports equipment.

Part IV: Information Security

You must comply with the PETRONAS Information Security Policy in effect from time-to-time which may be obtained from PETRONAS’ Chief Digital Officer.

Part V: Disciplinary Process and Sanctions

1. Disciplinary Process

- 1.1** Where the circumstances warrant in accordance with UAE Labour Law, PETRONAS may suspend an employee on half pay pending the investigation and/or inquiry into alleged acts of misconduct committed by the employee.
- 1.2** If the investigations reveal concrete and cogent evidence in support of the alleged misconduct, PETRONAS may institute disciplinary action against the said employee.

2. Disciplinary Punishments

- 2.1** In relation to employee whose contract of employment is governed by UAE Labour Law, the Punishing Committee shall conduct its investigation and may mete out punishments against the employee in accordance with UAE applicable laws. The following punishments may be imposed against an employee in accordance with UAE Labour Law:
- i. a written warning;
 - ii. non-disciplinary written notice [letter of reprimand] ;
 - iii. deducting no more than five (5) days per month from an employee's wage;
 - iv. suspension from work with reduced pay for a period not exceeding fourteen (14) days along with deducting the wage of those days of suspension;
 - v. forfeiture or deferment of periodic bonus for a period not exceeding (1) one year, if this is applicable;
 - vi. forfeiture or deferment of promotion, for a maximum period of two (2) years, if any; termination of service while preserving the employees; right to end of service benefits.

3. Appeal Procedure

- 3.1** An employee who is aggrieved by the decision of a disciplinary action has the right to appeal in writing within thirty (30) days from the date of service or posting of the letter communicating the decision of the Punishing Authority.
- 3.2** The Appeal Committee is to consider the grounds of appeal set out in the letter of appeal and is required to conclude whether to dismiss the appeal or to allow the appeal by either:
- a) reversing the finding of guilt; or
 - b) reducing the punishment.
- 3.3** The Appeal Committee shall consider the appeal on the basis of the written submissions by the aggrieved employee and also after considering the report of the Domestic Inquiry and the grounds for the decision as made by the panel of the Domestic Inquiry.

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