



BINTULU PORT HOLDINGS BERHAD
(Company No: 199601008454/380802-T)

INTEGRATED CONDUCT OF BUSINESS ETHICS (i-COBE)

VOLUME 2



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1.0 MESSAGE FROM GCEO

Dear Warga BPHB Group and Our Valued Stakeholders,

As a group that aspire to become '**An Integrated Service and Solution Provider, Connecting Passion in Delivering Value Responsibly**'. We play an utmost crucial role in connecting Suppliers and the Customers who are both passionate of their own respective business and it is our job to deliver. It is a great responsibility and Amanah for us all to carry.

With the increased emphasis on good governance in today's business landscape, every employee and stakeholders dealing with us have an important role in ensuring that we maintain an ethical and law-abiding culture. This Code of Conduct and Business Ethics serves as a guide to all employees on how to conduct ourselves with the highest standards of ethics and integrity. Not only does this Code intend to promote legal and procedural compliance, but to further provide a moral compass to ensure that we all behave in line with BPHB Group's principles. BPHB Group also expects that stakeholders dealing with us to comply with the relevant parts of this Code when engaging with or rendering services to us.

When faced with difficult business choices, do remember that we are not alone in the decision-making process. It is our responsibility to seek guidance from our superiors, peers and other internal sources in identifying the appropriate solutions. Further, this Code is accompanied with Frequently Asked Questions to serve as a guide for readers.

I expect all of us to internalise the principles enunciated in this Code of Conduct and Business Ethics and to practice the values herein in our daily work.

Thank you.

An Honour to Deliver



RUSLAN BIN ABDUL GHANI

Group Chief Executive Officer
Bintulu Port Holdings Berhad
Date: 18th September 2024

2.0 INTRODUCTION

2.1 Purpose and Scope

- 2.1.1 This Code is known as the Code of Conduct and Business Ethics of Bintulu Port Holdings Berhad Group (“COBE”) and it covers all employees at all levels of the Group and, where applicable, stakeholders who have business dealings with the Group including, but not limited to customers, port users, agents and its representatives, consultants, contractors, sub-contractors, vendors and suppliers.
- 2.1.2 This COBE provides explanatory statements and/or critical questions to help challenge employees’ and stakeholders’ understanding of the standards required of them in various situations. These explanatory statements and/or critical questions serve to develop critical thinking, enabling them to make the right decisions.

2.2 Compliance with the COBE

Employees

- 2.2.1 Employees are required to understand and comply with the provisions of this COBE and to:-
- a. Ensure that those reporting to them understand and comply with the COBE;
 - b. Promote integrity and ethical behaviour via leadership by example; and
 - c. Provide guidance and advice to those who have raised concerns or queries in relation to the COBE.
- 2.2.2 Failure to comply with this COBE will be considered as misconduct and BPHB Group may take disciplinary action, including dismissal from the Group, in accordance with applicable laws.

Stakeholders

- 2.2.3 This Code applies to stakeholders who have business dealings with BPHB Group and BPHB Group requires and expects the stakeholder to provide the same level of integrity and ethical behaviour as that of BPHB Group’s employees. BPHB Group

reserves the right to request stakeholders to take any necessary remedial action it deems appropriate to remedy a breach, or even suspend or terminate its business relationship with the stakeholder and seek to enforce any other contractual rights that BPHB Group may have against the stakeholder for breaching this COBE.

2.3 Administration of COBE

- 2.3.1 The Group Human Resource Management will be the custodian to this COBE and its related processes.
- 2.3.2 If there is any conflict between the law and the provisions set out in this COBE, the law prevails. However, if there is any conflict between this COBE and any of BPHB Group's policies and procedures, employees and stakeholders are required to adhere to this COBE. If there are any conflicts or questions of interpretation between the law, BPHB Group's policies and procedures and this COBE, the Group Integrity & Compliance may be consulted at compliance@bintuluport.com.my.
- 2.3.3 BPHB Group may unilaterally amend and/or waive the provisions of the COBE at any time at the sole discretion of the BPHB Group's Leadership Team. BPHB Group expects that waivers are granted only in exceptional circumstances and in accordance with applicable laws and BPHB Group's policies and procedures.

2.4 Notice

- 2.4.1 This COBE does not identify or set out every law, policy or procedure that may be applicable to employees and stakeholders in the performance of their role and responsibilities. They are responsible for informing themselves about relevant laws and BPHB Group's policies and procedures that are applicable to them as a result of their role and responsibilities to BPHB Group. Further, this COBE does not constitute legal advice.
- 2.4.2 This COBE does not seek to address every situation or circumstance that employees and stakeholders may encounter in the course of their employment or while conducting business with BPHB Group.
- 2.4.3 This COBE is not a substitute for employees' and stakeholders' duty, role, responsibility, or accountability to comply with all applicable and relevant laws, policies, and procedures.

Additionally, employees and stakeholders are required to exercise sound and ethical judgment when making decisions.

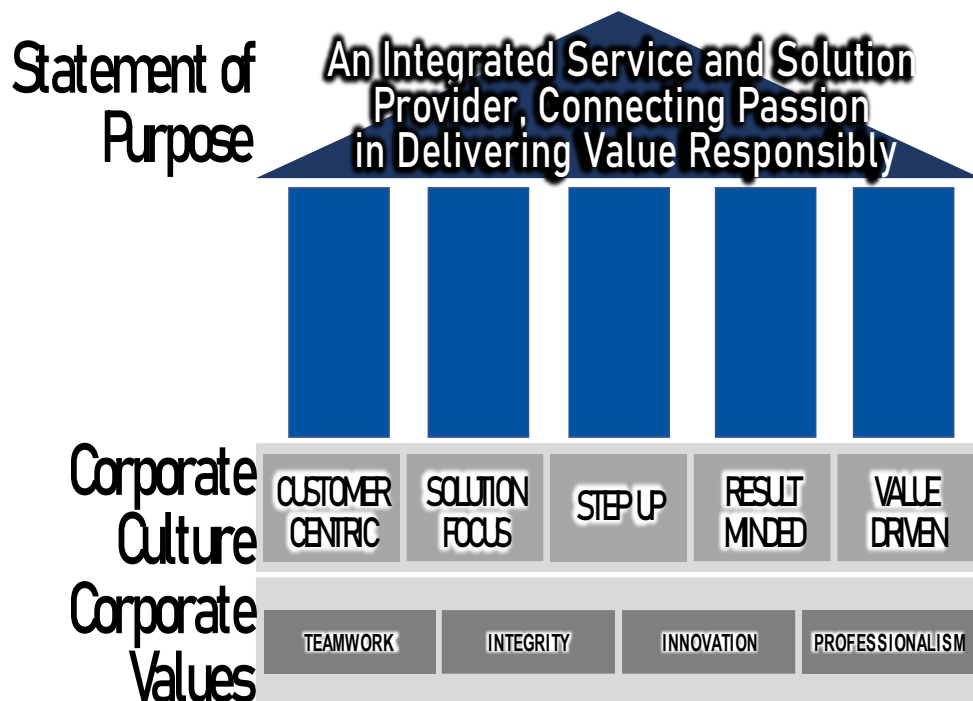
3.0 DEFINITION

BPHB Group	: means Bintulu Port Holdings Berhad and its subsidiaries, i.e. Bintulu Port Sdn. Bhd., Biport Bulkera Sdn. Bhd. and Samalaju Industrial Port Sdn. Bhd. and any other subsidiaries that may be incorporated or acquired in the future;
BPHB Group's assets and/or facilities	: include materials, equipment, appliances, computers, property, vehicles, proprietary information, trademarks, logo, designs, plans, emblems and funds owned by BPHB Group;
Competitor	: a company and/or individual who is directly or intending to directly compete with the business of BPHB Group;
Employee	: means any person, irrespective of his occupation, who has entered into a contract of service with BPHB Group;
Family	: means parents, spouses and children including stepchildren and adopted children, siblings, grandparent, aunt, uncle, cousin, niece, nephew and in-law;
Law	: includes, but is not limited to laws, regulations, by-laws, rules, directives, orders and industry codes;
Leadership Team	: means BPHB Group's Top Management who report directly to the Group Chief Executive Officer;
Misconduct	: means the improper behaviour or an act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to BPHB Group and includes a breach of discipline or violation of all applicable laws, BPHB Group's policies and procedures and this Code;
Port Premises	: includes any land and/or property either owned or leased by BPHB Group;

Private and/or confidential information : means any knowledge, data, and information, whether documented or undocumented, in digital, physical or other format, concerning BPHB Group and its stakeholders' business and affairs, which is not publicly known or ascertainable. This includes, but is not limited to, trade secrets and business strategies, financial data, customer lists and contacts and any other information pertaining to BPHB Group's operations, projects or activities; and

Stakeholders : includes but is not limited to the BPHB Group's customers, government officials, port users, agents and its representatives, consultants, contractors, sub-contractors, vendors and suppliers.

4.0 BPHB GROUP'S PRINCIPLES



4.1 Statement of Purpose

An integrated solution and service provider connecting passion, delivering value responsibly

BPHB Group is committed to connecting the passions between our customers and business owners and delivering value in the process. In doing so, we strive to uphold the highest standards of integrity, ethical behaviour in all our business dealings by acting fairly, professionally and with transparency.

4.2 Corporate Culture



CUSTOMER CENTRIC

I will give my utmost to exceed the expectations of my customer



SOLUTION FOCUSED

I will focus on finding solutions with pace to every challenges



STEP UP

I seek for every opportunity to make a positive impact and reach out to help others



RESULT MINDED

I have the energy and determination to achieve the desired result



VALUE DRIVEN

I will be driven by value in every decision I make

4.3 Corporate Values

a. **Teamwork**

Valuing team effort and the importance of working together as one Group to achieve the Group's Vision.

b. **Integrity**

Living up and conducting business to the highest ethical standards and governance.

c. **Innovation**

Delivering effective solutions to each customer's needs and continuously adopting new technology to maintain the Group's competitiveness.

d. **Professionalism**

Providing quality services in a highly professional manner with sincerity, bold as in having the confidence to go beyond the conventional, taking ownership and responsibility and proactively taking the initiative to act in advance of future needs and/or changes.

5.0 EMPLOYEE ETHICS AND DISCIPLINE

5.1 Employee Ethics

Employees of BPHB Group should always act and conduct themselves in accordance with the highest ethical standards. The following standards are designed to maintain a harmonious environment in the workplace among employees of all levels: -

5.1.1 Professional Conduct

Employees shall observe and adhere to the highest standard of professional conduct. They should, in all respects and at all times, conduct themselves with integrity, propriety and decorum and must not under any circumstances, commit any act or omission that would bring damage to the Group, its reputation, general interests, assets and/or facilities.

Employees are expected to have respect and tolerance for cultures and religions other than those of their own whether locally or overseas and shall conduct themselves following accepted standards of behaviour. Employees shall treat each individual with respect by way of recognizing every individual's role, treating each individual with dignity, listening to the ideas and opinions of others as well as recognising each individual's contribution to the Group.

5.1.2 Attendance and Punctuality

Employees are required to observe the stipulated working hours of the Group. If an employee is unable to commence work on time on any particular day, he must inform his immediate supervisor by telephone at the earliest available opportunity and in any event no later than four (4) hours after commencement of work on that day.

Late attendance by an employee will be recorded in the respective employee's attendance record maintained by the Group Human Resource Management. If any employee is late for work on more than three (3) occasions in a month without his immediate supervisor's approval, an appropriate warning letter will be issued to the said employee. If he persists in late attendance without good reason, he shall be subjected to disciplinary action. For this section, 'good reason' shall be construed as a reason that is not, in the

opinion of the Group Human Resource Management, frivolous or inconsequential.

Employees who are unable to attend work because of illness shall:-

- a. Inform their immediate supervisor by telephone at the earliest available opportunity and in any event no later than four (4) hours after commencement of work on that day; and
- b. Submit their original medical certificate to the Group Human Resource Management on the day they return to work.

Employees must not, without good reason, be continuously absent from work for more than two (2) consecutive working days without having obtained prior approval for leave from their superior. If any employee is not able to obtain such prior approval, he must inform his superior or the Group Human Resource Management of the reason for such absence at the earliest opportunity during such absence.

5.1.3 Personal Appearance

Personal appearance is a reflection of the Group's reputation, image and brand. All employees must be suitably attired, neat and always groomed at the workplace or Group events and/or functions. Their clothes and personal grooming should reflect what is appropriate to their jobs, the work environment, personal safety and in accordance with the Guidelines for Office Dress Code and Appearance issued by the Group Human Resource Management (*Garis Panduan Etika Berpakaian dan Penampilan ke Pejabat*).

5.1.4 Immoral Behaviour and/or Activities

BPHB Group does not condone or tolerate any form of immoral behaviour and/or activities being carried out by its employees. Therefore, all employees shall not engage in any immoral behaviour and/or activities. Immoral behaviour and/or activities include, but are not limited to, the delivery of obscene materials using any form of channel, whether via printed form, electronic or new media information and communication technology (ICT) or short message system (SMS) or instant messaging platforms via mobile phones, and any other actions determined by the Leadership Team from time to time.

5.1.5 Harassment at the Workplace

BPHB Group takes a firm stance against any form of harassment at the workplace. Hence, abusing, harassing or offensive behavior and/or conduct, whether sexual or not, used or displayed at work or business dealings is unacceptable whether verbally, physically or in visual form. Such behavior and/or conduct would include derogatory comments based on gender, race, ethnicity, disability, origin, religion, age, sexual orientation, economic status, political beliefs and/or unwelcome sexual advances in accordance with the guidelines (*Garis Panduan Menangani Gangguan di Tempat Kerja Kumpulan Syarikat Bintulu Port Holdings Berhad*) issued by Group Human Resource Management.

5.1.6 Equal Opportunity & Non-Discrimination

BPHB Group is committed to provide equal opportunities to all and strives to ensure that employment-related decisions are based on relevant qualifications, merits, performance and other job-related factors, in compliance with all applicable laws.

Employees shall not discriminate against another based on gender, race, ethnicity, disability, origin, religion, age, sexual orientation, economic status and political beliefs.

5.1.7 Insubordination and Inefficiency

Employees shall not commit any act of wilful refusal, insubordination, or disobedience of any lawful and reasonable instruction of his superior. This includes refusal to perform work assigned, being inefficient, and deliberately slowing down work causing the quality and/or the quantity of work to be adversely affected.

5.1.8 Publication of Materials

Employees are not allowed to publish or write any books, articles, journals, presentation materials or other works based on BPHB Group's private and/or confidential information except with the written consent of the Group.

If written consent is granted, it will be subject to the following conditions:-

- a. The proposed publication will not be published in a way that would state or suggest or imply that it has received official endorsement and support from BPHB Group; and
- b. The proposed publication will not, under any circumstances, bear the words “Bintulu Port Holdings Berhad Group approved publication” or words to a similar effect, however phrase, that could be construed to suggest that the publication has been approved by BPHB Group.

5.1.9 Social Media Usage

BPHB Group respects employees’ rights to freedom of speech. However, when using personal social media platforms such as personal blogs, Facebook, Twitter, Instagram, Snapchat, Whatsapp etc, employees are expected to consistently exercise good judgement and consider the potential impact their posts may have on the Group.

Employees when using personal social media platforms are required to:-

- a. Exercise caution and avoid disclosing private and/or confidential information about BPHB Group’s or stakeholders’ business.
- b. Refrain from making commentaries or public statements on behalf of BPHB Group, particularly those that could negatively impact the Group’s image and reputation.
- c. Adhere strictly to the prohibition against using or editing BPHB Group’s logo, pictorial images or trademarks in their personal social media accounts.

Employees assigned or mandated to operate BPHB Group’s social media accounts must uphold the same standards outlined above and ensure that only approved content is posted or updated.

5.2 Illegal Activities

5.2.1 Criminal activities

Employees are prohibited from engaging in any criminal activities as defined by the laws of Malaysia, such as theft, illegal gambling,

fraud, and the use of weapons or violence in the workplace. Furthermore, employees must refrain from using the Group's property, facilities, resources, or services to finance or support criminal activities.

5.2.2 Substance Misuse

BPHB Group strictly prohibits the processing, possession, distribution, giving, selling, trafficking, illegally consuming alcohol, drugs, and/or illegal substances by an employee and/or stakeholder on the premises or property of the Group, except in cases where an individual's medical needs require the approved usage or consumption of drugs, as prescribed by a certified medical practitioner for medication purposes.

To ensure adherence to this stance, BPHB Group may conduct unannounced testing and searches in its premises for substance misuse in accordance with any applicable laws and Group's policies and procedures.

Any employee found to have violated the aforementioned provisions is in breach of this Code, and will face disciplinary measures, including termination of employment. Stakeholders found to be in violation of this Code, will have their port access revoked and will be permanently banned from entering BPHB Group's premises.

All employees of the BPHB Group are required to affirm their commitment to the principles outlined above by signing the Substance Misuse Pledge as per **Appendix I**.

5.2.3 Anti-Money Laundering

BPHB Group strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities. Money laundering is governed under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 [Act 613] and it can be simply understood as when money or assets of criminal origin or nature are hidden in legitimate business dealings or where legitimate funds are used to support criminal activities and/or terrorism.

Money laundering is a very serious crime and the laws governing this type of crime can have extra-territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for

breaching anti-money laundering legislation are severe and can include imprisonment, fines, and extradition in foreign jurisdictions.

To avoid violating anti-money laundering laws, employees are expected to always conduct third-party due diligence to understand the business and background of the Group's prospective stakeholders and to determine the origin and/or destination of money, property and services.

Any suspicious incidents of money laundering transactions must be reported to the Group Integrity & Compliance promptly.

5.2.4 Insider Trading

During the performance of their duties and responsibilities, employees may come across material non-public information or price-sensitive information of BPHB Group or other companies.

Employees are strictly prohibited from using such information to:

- a. Trade in shares or other securities of BPHB Group; or
- b. Recommend others to do so.

Engaging in these activities constitutes insider trading, which is prohibited and considered a criminal offence under the Capital Markets and Services Act 2007 [*Act 671*].

Employees may only acquire or dispose of BPHB Group's securities if they rely exclusively on information that is publicly available.

'Material non-public information' refers to information that is not publicly available and that a reasonable investor — someone with general professional knowledge and the ability to analyse and determine the quality and prospects of the securities would consider important when deciding to acquire or dispose of securities.

'Price sensitive information' is information that, if made generally available, would or would likely to have a material effect on the price or value of the securities.

6.0 INTEGRITY

6.1 Anti-Bribery and Corruption Policy

- 6.1.1 BPHB Group adopts a zero-tolerance approach to all forms of corruption and bribery in all of its business dealings.
- 6.1.2 All employees shall be committed to conduct all of the Group's business in an honest, fair and ethical manner with transparency and professionalism.
- 6.1.3 Employees shall not, whether directly or indirectly, offer, give, solicit or receive any gifts including money, privileges, special facilities, souvenirs, valuables or assistance or receive any kind of special treatment, for the purpose of inducing, obtaining, retaining or directing any business dealing as it would attract corporate liability against the Group and may tarnish the reputation, image and brand of the Group.
- 6.1.4 Employees shall uphold all applicable and relevant laws where the Group operates.
- 6.1.5 All employees of the BPHB Group are required to affirm their commitment to the principles outlined above by signing the Employee's Integrity Pledge as per **Appendix II**.

6.2 No-Gift Policy

- 6.2.1 BPHB Group realises that the giving and the acceptance of gifts in the course of doing business may be considered or perceived as bribery that could possibly influence business decisions or outcomes and can seriously tarnish its reputation.
- 6.2.2 BPHB Group is committed to:-
 - a. Not accepting or giving any form of gift or reward;
 - b. Complying with rules and regulations related to the No-Gift Policy; and
 - c. Ensuring all parties dealing with BPHB Group comply with the No-Gift Policy.
- 6.2.3 Gifts such as merchandise, products, services or personal assistance, shall not be accepted unless the type and amount are reasonable and are customary under certain circumstances and have no effect on the recipient's decision.

- 6.2.4 Participation in business entertainments such as lunches, dinners, theatres, and sports events in the course of work is acceptable if the entertainment aims to foster and strengthen business relations, which do not become a practice and/or norm and are not lavish.
- 6.2.5 Employees shall exercise proper care and judgment in giving and receiving gifts and avoid any conflict of interest or a kickback in return for a business favour and advantage.
- 6.2.6 To the extent able, stakeholders dealing with the Group should also adhere to the standard stated above.
- 6.2.7 For additional guidance, kindly reach out to the Group Integrity & Compliance.

6.3 Conflict of Interest

- 6.3.1 Employees must always act in the best interests of BPHB Group. Employees are strictly prohibited from using their position or knowledge gained directly or indirectly in the course of their employment for private or personal advantage or for any unauthorised purpose.
- 6.3.2 Employees shall make a voluntary declaration to their respective Head of Division and/or Department or Supervisor if there is a conflict of interest when carrying out their roles, duties and/or responsibilities at the workplace. A copy of the Declaration Form can be obtained from the Group Integrity & Compliance.

6.4 Outside Employment or Business Activities

- 6.4.1 Employees must devote their time and attention to the fulfilment of their employment obligations to BPHB Group. Employees shall not take up dual employment, in whatever capacity without written approval from the Group Human Resource Management.
- 6.4.2 “Dual employment” is where an employee holds a full-time position and payroll with one employer and takes on an additional employment with another employer either full-time or part-time.
- 6.4.3 Employees may take up other gainful activities or be involved in outside business activities provided written approval has been obtained from the Group Human Resource Management.
- 6.4.4 “Gainful Activity” means any activity that is conducted outside an employee’s full-time working hours with BPHB Group in exchange for or provides monetary gain for the employee.
- 6.4.5 The granting of approval will be subject to the employee satisfying the Group that such dual employment and/or gainful activity will not

interfere with or compromise the proper performance of the employee's duties or fulfilment of obligations to BPHB Group.

- 6.4.6 Any approval granted may be withdrawn at any time at the sole discretion of the Group without the need for assigning any reasons thereof. In such an event, BPHB Group will be deemed fully indemnified and will not be held liable for any repercussion arising from such decision to withdraw the approval so granted before.

6.5 Board Membership

- 6.5.1 Notwithstanding any provisions in this COBE, employees of BPHB Group are allowed to serve on boards of government agencies/bodies, companies and/or unincorporated entities outside BPHB Group subject to the requirements stipulated under 6.5.2 and 6.5.3.
- 6.5.2 For employees with Grade 20 and above, a written application must be submitted to Group Human Resources Management. The application will then be reviewed by the Board of Directors for approval or otherwise.
- 6.5.3 For employees with Grade 19 and below, a written application must be submitted to Group Human Resources Management. The application will then be reviewed by the Talent Committee of BPHB Group and subsequently endorsed by the Group Chief Executive Officer for approval or otherwise.
- 6.5.4 No employees are allowed to serve on boards of government agencies/bodies, companies and/or unincorporated entities outside BPHB Group without written approval from the Board of Directors or Group Chief Executive Officer as stipulated under 6.5.2 and 6.5.3, as the case may be.

6.6 Employees' Involvement in the Group's Business Affairs

- 6.6.1 Employees who have a vested interest in businesses that have dealings with BPHB Group, whether directly or indirectly, and are involved in any decision-making process regarding such matters during the course of their duties, must disclose this information to the Leadership Team. Subsequently, they are required to abstain from any participation in the aforementioned business dealings, including decision-making processes.

6.7 Employees' Family's Involvement in the Group's Business Affairs

- 6.7.1 Employees whose families have an interest in businesses related to BPHB Group, whether directly or indirectly, shall declare to the Leadership Team and subsequently refrain from any involvement in the said business dealings including its decision-making.

6.8 Political Activity and Contribution

- 6.8.1 BPHB Group is politically neutral. Employees who wish to engage in any political activities such as campaigning for political purposes must obtain approval from their respective Heads of Division and use their non-working time or annual leave for that purpose.
- 6.8.2 Before accepting any portfolio in any political party, approval must first be obtained from the Group Chief Executive Officer. Employees who wish to contest as State and/or Federal level election candidates are required to resign from the Group.
- 6.8.3 BPHB Group does not make any contributions and/or donations whether in the form of monetary or in kind to political parties, political party officials, political candidates or public officials except in accordance with the laws and with the written authorisation of the Group Chief Executive Officer as stated in the Anti-Bribery and Corruption Policy and No-Gift General Procedure. Any employee who contributes without the appropriate authorisation or approval shall be deemed to be acting in his/her own capacity and not on behalf of BPHB Group.

7.0 RELATIONS MANAGEMENT AND PUBLIC COMMUNICATION

7.1 Corporate Identity

7.1.1 Employees who wish to use the BPHB Group's name, logo and colours when communicating with the stakeholders in the Group's business dealings or briefing the Public, must adhere to the guidelines below.

Employees are not allowed to:-

- Make any changes to the Group's logo;
- Use logo, symbols, design or other emblems to replace Group's logo; and
- Use the Group's logo for any purpose other than the Group's business.

7.2 Stakeholders Relations

7.2.1 BPHB Group continuously strives to build and strengthen its relationship with its customers, shareholders and the community in which it operates in.

a. Customer

Employees must provide quality customer service and treat customers professionally, respectfully, fairly, politely and act promptly to meet their needs.

b. Shareholders

Employees must always professionally conduct themselves when dealing with our shareholders. The Group is committed to creating value and protecting shareholders' investment. This end is achieved via maintaining clear and active dialogue and engagement with our shareholders.

c. Community

BPHB Group values the importance of the community and the Public in which the Group operates in and understands the need to provide continual assistance and support to the community via its corporate social responsibility programs. As

such, employees are reminded to always act with integrity and the highest regard to good corporate governance and transparency when serving the community at large.

7.3 Competition Law

7.3.1 BPHB Group is committed to competing fairly, ethically, and honestly in the marketplace in which it operates to preserve its reputation and integrity. Hence, employees are required to fully comply with all applicable competition laws.

7.3.2 Do take note that the breaching of competition laws can result in any or all of the following consequences: -

- a. Serious financial penalties;
- b. Joint and/or several liability of directors, secretary and key management personnel;
- c. Competition law related dispute resolution and additional costs;
- d. Reputational damage; and
- e. Contractual implications (e.g. nullity of the whole agreement or certain provisions which contravene competition laws).

7.3.3 Employees have a duty to seek advice from the Group Legal Counsel or the Group Integrity & Compliance as soon as they identify any situation that may put BPHB Group in breach of competition law.

7.4 International Business

7.4.1 BPHB Group operates and conducts business in multiple countries across the world and is subjected to different governing laws in each jurisdiction. Employees assigned to work overseas shall, in addition to the obligations listed in this Code:-

- a. Be sensitive to and observe the local customs and culture;
- b. Respect the government of the day;
- c. Abide by the laws of the country;

- d. Keep abreast with the development of the local political and business environment;
- e. Use good judgments in business dealings;
- f. Report the development of the business to the Group regularly;
- g. Report situation that may endanger lives, the Group's business, assets and/or facilities to the Leadership Team; and
- h. Not be involved in any illegal activities including boycotting or picketing, corruption, bribery or anti-government and relationship and/or actions that may potentially have adverse effect on the Group's business.

7.5 Media and Broadcasting of Information to the Public

- 7.5.1 Employees shall not either orally, in writing or in any other form make public statements on behalf of BPHB Group in relation to policies, decisions, measures, works, or any other issue, nor shall employees cause such statements to be circulated.
- 7.5.2 Employees should immediately channel inquiries from the media to the relevant division and/or department. Employees must ensure that all forms of communication to the Public adhere to the Guidelines on Media Management of Bintulu Port Holdings Berhad Group (*Garis Panduan Pengurusan Media Kumpulan Syarikat Bintulu Port Holdings Berhad*) issued by the Group Corporate Services.

8.0 SUSTAINABLE PRACTICES

- 8.1 In regard to BPHB Group's dedication to sustainable practices, the Group aims to address resource scarcity and its increasing demand through responsible economic, environmental, social and governance efforts. Employees must ensure that everything they do and practice should be able to:-
- a. Generate long-term social returns;
 - b. Protect the health and safety of employees and stakeholders;
 - c. Minimise any community disruptions;
 - d. Reduce emissions;
 - e. Minimise impact on the ecosystems and biodiversity; and
 - f. Enhance the efficient use of energy, water, and other resources.
- 8.2 All individuals within BPHB Group's premises should strive to minimise waste through the principles of reduce, reuse, repair, recycle, and recover in accordance with industry good practices.
- 8.3 Employees are encouraged to continuously improve and contribute innovative ideas in enhancing BPHB Group's sustainable practices as a way to foster a culture that values and recognises sustainably conscious initiatives.

9.0 SAFEGUARDING THE GROUP'S ASSETS AND/OR FACILITIES

Employees must protect and make good use of the Group's assets and/or facilities and ensure its proper maintenance. The inventory of the Group's assets and/or facilities must be updated regularly and kept safe and secure at all times.

Employees should not:-

- a. Reproduce and/or make copies of private and confidential information for personal use;
- b. Use the Group's assets and/or facilities for personal use (including computers and office resources, equipment, appliances and other facilities) which would result in additional costs to the Group, interfere with work efficiency or which does not comply with the Group's policies, procedures and/or protocols;
- c. Allow the Group's assets and/or facilities to be used for illegal activities; and
- d. Use the Group's assets and/or facilities or information for personal gain.

9.1 Information System

- 9.1.1 Every employee must use BPHB Group's information system in a responsible and professional manner. Employees are restricted from unauthorized access to and/or usage of the Group's information systems. Employees shall not modify, relocate, install, or reconfigure the Group's systems except with the guidance of the relevant Group Information Technology personnel and are bound by the Information Security Policy.

9.2 Documents and Records

- 9.2.1 Employees must ensure that the Group's documents and records are well maintained and kept safe so that they are accurate, up-to-date, legible, accessible, readily identifiable, and retrievable. Employees must ensure that all documents and records are handled in conformity with all applicable laws, in accordance with BPHB Group's policies and procedures and according to the appropriate level of confidentiality.

9.3 Intellectual Property

- 9.3.1 It is BPHB Group's policy not to infringe upon the intellectual property rights of any other party. When using another company's names, trademarks, logos or printed materials, employees must comply with all applicable laws.

9.4 Private and/or Confidential Information

- 9.4.1 BPHB Group values and is committed to protect all private and/or confidential information. The Group recognise that any unlawful or unauthorised disclosure of private and/or confidential information may result in irreparable loss and/or damage to the Group.
- 9.4.2 Employees must keep in complete secrecy and protect the private and/or confidential information of BPHB Group and of stakeholders from unauthorized disclosure and ensure that such information are properly managed throughout the Group.
- 9.4.3 Private and/or confidential information can only be used by the relevant parties for business purposes and must be handled with care. Assisting stakeholders to gain access to such information is prohibited. Should any release of such information become necessary, the relevant authorised personnel, department and/or division shall be consulted first, and the approval from their Head of Division/Department must be obtained in writing before the release of such information.
- 9.4.4 Employees shall not misuse the Group's private and/or confidential information or any form of information derived from their respective job for personal and third-party gain.
- 9.4.5 All employees of the BPHB Group are required to affirm their commitment to the principles outlined above by signing the Secrecy Pledge as per **Appendix III**.

9.5 Personal Data Protection

- 9.5.1 BPHB Group is committed to treat all personal data in a private, confidential, and secure manner. All employees who possess and/or has control over or authorised the processing of personal data must ensure that all personal data are handled with care and in a secure manner thereby safeguarding the interests of each

individual involved. Employees shall comply with the Personal Data Protection Act 2010 [Act 709] and BPHB Group's policies and procedures when recording, managing, transferring, and storing all personal data.

- 9.5.2 "Personal data" refers to any information that relates directly or indirectly to an individual, who is identified or identifiable from that information or from other information in our employee's knowledge and/or possession. Such information may include name, address, identification card number, passport number, email address, date of birth, contact details and etc as well as any expression of opinions about that individual and any intentions of any data user in respect of that individual.

9.6 Sharing of Best Practices

- 9.6.1 BPHB Group allows and encourages sharing of best practices through documents, information and knowledge sharing sessions with another company or organisation provided that the information and knowledge shared are not regarded as proprietary information, not detrimental to or adversely affecting the Group's business and in violation of any competition laws.

10.0 HEALTH, SAFETY AND ENVIRONMENT

10.1 Occupational Safety and Health

- 10.1.1 Employees and stakeholders share with BPHB Group the common responsibility of ensuring the safety and health of all employees, stakeholders, and the assets and/or facilities of the Group as enshrined in Section 15 of the Occupational Safety and Health Act 1994 [Act 514] (“OSHA”). Employees and stakeholders are reminded to create and maintain a good working environment to prevent workplace injuries and shall use all required equipment provided for their protection, especially when working in the Port Premises. It is the responsibility of all employees and stakeholders to ensure that the protective equipment is in good working condition and shall report any unsafe acts and hazardous conditions, equipment, and appliances, that may cause accidents.
- 10.1.2 All work (herein referred to engineering works, construction and renovation works, surveys and inspections) must be authorised with a written Permit-to-Work (PTW) Certificate. Hence, all stakeholders are reminded to ensure that they have valid and complete PTW Certificate before commencing work.
- 10.1.3 Every employee and stakeholder are responsible for safeguarding their own safety and health, the safety and health of their co-workers and the Public, and strictly adhere to the OSHA 1994, the requirements of the Integrated Management System Manual and Policy, Zero Fatality and Accident Rules and the safety and health requirements issued by the Group. If there is any doubt, employees and stakeholders should seek clarification from their respective Supervisor before starting work.

10.2 Environment

- 10.2.1 BPHB Group is committed to preserving the environment and holds firmly to operating its businesses in ways that meet statutory and regulatory requirements on environmental impact such as the Environmental Quality Act 1974 [Act 127] and its regulations & directives. The Group strives to achieve a sustainable long-term balance between meeting its business goals and preserving the environment. Every employee and stakeholder share with the Group the common responsibility of preserving the environment.

10.3 Emergency

10.3.1 Incident and/or Accident Notification, Reporting and Investigation

- a. BPHB Group is committed to ensure the safety of all employees and stakeholders within its premises at all times. Hence, the Group through Group Health, Safety and Environment has issued the Notification of Incident/Accident and Incident/Accident Reporting and Investigations procedures which:-
 - i. established the procedure for incident and/or accident reporting; and
 - ii. defined the management of incident and/or accident which occurs to prevent reoccurrence.
- b. Employees are to comply with the above procedures and follow them in the event of an occurrence of an incident and/or accident. Employees and stakeholders may notify and/or report any incident and/or accident to Group Health, Safety and Environment's hotlines:-

For Bintulu Port Sdn Bhd

- i. 086-291555
- ii. 086-291666
- iii. 086-291565

For Biport Bulkiers Sdn Bhd

- i. 086-255101

For Samalaju Industrial Port Sdn Bhd

- i. 086-296899
- ii. 086-296815
- iii. 086-296866

- c. For any incident and/or accident at sea, employees and stakeholders may contact Marine Channel VHF 16

10.3.2 Emergency Response Plan

In the event that the Ports of Bintulu and/or Samalaju are declared to be under a state of emergency, all operations of the Ports shall be governed, controlled and operated as per the Emergency Response Plan issued by Group Health, Safety and Environment until the situation renders it fit for operations. The state of emergency can either be minor, serious or major and can be activated by the Group. While under a state of emergency, all employees and stakeholders shall provide any assistance requested by the Group.

11.0 SECURITY

11.1 Security Co-operation

11.1.1 BPHB Group is a certified International Ship and Port Facility Security Code (“ISPS Code”) and it has to comply with the ISPS Code, the Merchant Shipping Ordinance 1952 and the Protected Areas and Protected Places Act 1959 [Act 298]. Hence, all employees and stakeholders are advised to adhere and comply with the Security Policy as issued by the Group Security and provide co-operation to personnel of the Group Security for security checks, identity verification and any other security requirements.

11.1.2 Further, all employees and stakeholders shall immediately report any suspicious acts and/or activities or any security incidents to the Group Security via its hotlines at 086-291444 for Bintulu Port and Biport Bulkiers and 086-296884 for Samalaju Industrial Port. If there is any doubt, employees and stakeholders should seek clarification from their respective Heads of Division and/or Departments or Supervisors or from the Group Security.

11.2 Admission into the Port Premises

11.2.1 Only employees and stakeholders who have valid passes issued by the Group Security are allowed to enter the Port Premises. Employees and stakeholders are reminded and shall adhere to the following when within the Port Premises:-

- a. no person or vehicle shall enter or remain in any part of the Port Premises without a valid pass issued by the Group Security. They must produce their valid passes when required to do so by personnel of the Group Security or any authorised personnel of the Group.
- b. no visitor or person shall be allowed to enter, inspect, or take photographs of the Port Premises or any other area within the Port without permission of the Group Security or any authorised personnel of the Group.
- c. any person who is in the Port Premises shall comply with all such directions regulating his movement and conduct

as may be given by personnel of the Group Security or any authorised personnel of the Group.

- 11.2.2 Any encroachment by an unauthorized person, including the Public must be reported to the Supervisor or the Group Security immediately.

12.0 COMPLIANCE

- 12.1 Employees and stakeholders must be familiar with, understand and comply with all applicable laws, BPHB Group's policies and procedures and this Code. If employees and stakeholders are unclear about the applicable laws, BPHB Group's policies and procedures or this Code, they may seek clarification from the Head of Division and/or Department or Supervisor or the Group Integrity & Compliance before any action is taken.

- 12.2 If the employees and stakeholders become aware of an actual or potential violation of any applicable laws, BPHB Group's policies and procedures or this Code, the employees and stakeholders must immediately report the same to the Group Integrity & Compliance. The employees and stakeholders may also disclose any alleged or suspected improper conduct using the procedures provided for in BPHB Group's Whistleblower Policy and Procedure.

13.0 DISCIPLINE, DISCIPLINARY PROCESS AND SANCTIONS

- 13.1 BPHB Group is equally committed in ensuring fair treatment to the employees in instances where disciplinary action must be taken due to the employee's failure to meet performance standards or have committed any misconduct.
- 13.2 The following acts may be treated as misconduct for which an employee covered by this Code may be liable for disciplinary action, subject to the requirements of applicable laws and are not to be treated as exhaustive:-
- a. violate of all applicable laws, BPHB Group's policies and procedures and this Code;
 - b. wilful insubordination or disobedience whether alone or in concert with others, to any lawful and reasonable order of a superior;
 - c. tardiness;
 - d. absenteeism for more than two (2) consecutive days without reasonable excuse or without informing or attempting to inform the relevant superior at the earliest opportunity;
 - e. leaving the workplace during working hours without permission;
 - f. harassment (including sexual, gender, racial, skin colour, religion, cultural, age, disability, origin, sexual orientation, economic status and political beliefs);
 - g. carrying out duties negligently;
 - h. engaging in private work or trade within the Group's premises;
 - i. violent behaviour or threats of violent behaviour (including assaults and fighting whether with employees or stakeholders dealing with the Group);
 - j. possession of any illegal or dangerous weapon in the Group's premises;
 - k. theft;
 - l. fraud;
 - m. misappropriation;

- n. deliberately damaging, tampering, destroying or disposing of the Group's and/or other parties assets and/or facilities;
- o. unauthorised or abusive use of the Group's assets and/or facilities;
- p. drugs, alcohol and/or illegal substance misuse on the job or that affects performance;
- q. obstructing other employees from performing their duties;
- r. repeated failure (at a maximum of three times) to perform one's duties as per the standard requested;
- s. engaging in any illegal or unethical practices such as taking or giving bribes or receiving any illegal gratification whether in monetary terms or otherwise, abusing one's position, submitting false claims;
- t. gambling within the Group's premises;
- u. non-observance of safety precautions, policies, procedures and/or rules;
- v. launch a strike, picket or industrial action or incite other members to do so except where allowed under any written law;
- w. participate in anti-government or anti-company activities;
- x. conviction by a court of law;
- y. any other action deemed to be a misconduct by the Group.

13.4 For further information on this matter, kindly reach out to the Group Human Resource Management and refer to the Domestic Inquiry Standard Operating Procedure.

14.0 WHISTLEBLOWER

- 14.1 An ethics mover (whistleblower) is a person who informs the authorities in the Group of any wrongdoing, misconduct or violation of laws that occur within the Group.
- 14.2 BPHB Group has established a Whistleblower Policy and Procedure that provides a confidential and covert channel of communication for employees and stakeholders to voice out their concerns and/or report any misconduct and/or wrongdoing which may be accessible at:-
- a. <http://www.bintuluport.com.my/Contact/Whistleblower/>;
 - b. via email at whistle@bintuluport.com.my; or
 - c. via phone call at 086-291362.
- 14.3 Employees and stakeholders are encouraged to familiarised themselves and use the Whistle-Blower channel for proper disclosure of any misconduct and/or wrongdoing. Any employee or stakeholder who wishes to report improper conduct may remain anonymous. However, stern action will be taken against any party who misuses the channel.
- 14.4 BPHB Group takes all reports and incidents of violation (actual or potential) seriously and shall investigate them thoroughly in accordance with the relevant internal investigation procedures. All reports made shall be treated as private and confidential. Disclosure of report to anyone not related to the investigation shall be viewed as a serious misconduct and may result in disciplinary action including termination of employment.
- 14.5 BPHB Group is committed to non-retaliation wherein it shall not retaliate, impose, or permit retribution against any employee or stakeholders dealing with BPHB Group who promptly reports actual or potential violation in good faith and without malicious intent, even if it is shown after investigation that the employee or stakeholder was mistaken.
- 14.6 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, is forbidden and will itself be regarded as serious misconduct rendering the person engaged in the retaliation liable to disciplinary actions.
- 14.7 Retaliation includes blatant actions, such as firing, transferring, demoting or publicly attacking a person, and more subtle retaliation, such as avoiding a person, leaving him or her out of professional or social activities, etc.

15.0 EXPLANATORY STATEMENTS AND/OR CRITICAL QUESTIONS

15.1 Question 1: You recently attended an exclusive stakeholders' meeting where upcoming projects were discussed. Excited about the insights gained, you posted details about these projects on your personal Instagram account. A colleague, having seen your post, alerted you that the information shared constitutes private and/or confidential information about BPHB Group's or stakeholders' business. What steps should you take now?

Firstly, you need to delete the post containing sensitive information immediately to prevent further dissemination. Secondly, inform the relevant department or your supervisor about the unintentional disclosure.

15.2 Question 2: You recently disagreed with your colleague and are contemplating venting about it on your Instagram to express your dissatisfaction. Is this an appropriate way to handle the situation, and what would be the recommended approach?

You should refrain from discussing work conflicts on social media. Instead, address the issue privately with your colleague or seek guidance from your supervisor or Group Human Resources Management. Publicly venting on social media can risk violating confidentiality and may not contribute to a constructive resolution.

15.3 Question 3: You've noticed a negative comment about the BPHB Group on social media; should you respond?

As an employee, you should refrain from making impulsive responses that could escalate the situation or reflect poorly on the BPHB Group. Instead, consider reporting the comment to the Group Corporate Services or social media management team to address it professionally. Always prioritize actions that contribute positively to the Group's image and reputation.

15.4 Question 4: You had attended BPHB Group's Family Day, and you wanted to post pictures of the event on your Instagram. Should you, do it?

Yes, sharing highlights from the BPHB Group's event is encouraged. However, be mindful of the content and ensure it reflects the Group's culture positively.

15.5 Question 5: You, being excited about being part of BPHB Group, decide to update your personal social media profile with a post celebrating your association with the Group. In doing so, you use

BPHB Group's logo as your profile picture and continue to post as usual. Is this conduct appropriate?

It's great that you're excited about being part of the BPHB Group! However, it's important to be mindful of the Group's policy. When updating your personal social media profile, refrain from using the BPHB Group's logo as your profile picture, as this is strictly prohibited. This measure helps maintain the integrity of the Group's branding.

15.6 Question 6: You arrive at work and see a co-worker swallowing several pills together with a canned drink. You noticed a slight smell of alcohol on his breath when you talked to him. When you asked if he has had an alcoholic drink, he tells you that he has not. He then proceeds to go about his work (at the port operation) without proper PPE. What should you do?

Stop and remind him to put on his PPE, then proceed to raise your concern with your supervisor or the Group Human Resource Management immediately.

15.7 Question 7: It's your birthday, and one of our customers found out and decided to host a birthday party for you and gave you a substantial gift. Should you accept the invitation and gift?

BPHB Group realises that the giving and the acceptance of gifts in the course of doing business may be considered or perceived as bribery that could possibly influence business decisions or outcomes and can seriously tarnish its reputation. BPHB Group is committed to not accept or give any form of gift or reward and this commitment is also extended to all its employees. Therefore, you should not accept the invitation and gift.

However, in certain circumstances, it might be difficult to reject without offending the customer. In such situations, you are required to declare the invitation and gift via our Gift Activity Reporting Form (GARF) which can be obtained from the Group Integrity & Compliance.

15.8 Question 8: You are part of the Technical and Evaluation Committees in BPHB Group's procurement process, and one of the bidders being considered is a company owned by your family. What actions should you take?

It would be a conflict of interest if you were to remain in the committees. Therefore, you should immediately declare your conflict and recuse yourself from any involvement.

15.9 Question 9: Should you open an email that appears suspicious, with the sender's name being familiar within the organisation but the email address is incorrect?

No. It could be a phishing email that hackers use to try to gain access to our information system. Immediately notify the Group Information Technology.

15.10 Question 10: At work you notice colleagues misusing the company cars, such as using it as a personal car or for private lunch. What should you do?

Report the matter to the Group Integrity & Compliance directly or via our Whistleblower Channel, as it amounts to abuse of position and misuse of Group's assets and/or facilities.

15.11 Question 11: What are some examples of behaviour that are deemed unacceptable among employees?

Prohibited conduct includes the use of disparaging, abusive and/or sexual words, phrases, or materials; slurs, negative stereotyping; threatening, intimidating, or hostile acts, including jokes or pranks that might reasonably be perceived as hostile or demeaning; unwelcome touching; written or graphics material or objects that are sexually oriented, obscene or criticize or show hostility or aversion toward an individual or group.

15.12 Question 12: You habitually come late to work and do not perform to the standards required of you. What do you think will happen?

Habitual tardiness and continuous poor performance are considered misconduct within this COBE, and disciplinary actions will be taken against you in accordance with the relevant procedures and applicable laws.

16.0 APPENDIX

Appendix I – Substance Misuse Pledge



BINTULU PORT HOLDINGS BERHAD GROUP SUBSTANCE MISUSE PLEDGE

I,.....
..... NRIC No:..... and Staff
No:..... being an employee of Bintulu Port Holdings Berhad
/ Bintulu Port Sdn. Bhd. / Biport Bulkiers Sdn Bhd / Samalaju Industrial Port Sdn. Bhd.
(hereinafter referred to as “**BPHB Group**”) do hereby:

1. PLEDGES THAT:-

- (a) I have read, understood, and agree to comply with the BPHB Group Substance Misuse Policy when carrying out my duty and responsibilities as an employee for and on behalf of BPHB Group.
- (b) I am aware and understand that the inappropriate use of any alcohol, drugs and/or illegal substances can adversely impact the safety, health and well-being of myself, BPHB Group’s employees, third parties dealing with it and the public at large. Hence, I am committed to creating and fostering a safe working environment.
- (c) I shall not do the following while within the Group’s premises or on Group business:-
 - (i) consume or have in presence in the body any alcohol, drugs and/or illegal substances;
 - (ii) be in possession of any alcohol, drugs and/or illegal substances; and
 - (iii) processing, possessing, distributing, giving, selling, trafficking any alcohol, drugs and/or illegal substances.
- (d) I understand and consent that should I be suspected of consuming or having in my presence or possession any alcohol, drugs and/or illegal substances, BPHB Group and its appointed representatives are authorised

to search and seize any alcohol, drugs and/or illegal substances including conducting an alcohol, drugs and/or illegal substances test on myself.

- (e) I am aware and understand that any violation to the Substance Misuse Policy amounts to a serious misconduct and is subject to disciplinary action ranging from a letter of reprimand, to suspension from work without pay, up to and including termination of employment.

“SAY NO TO SUBSTANCE MISUSE”

Dated thisday of, 202.....

SIGNED by the said)
)
.....)
(“the Employee”))

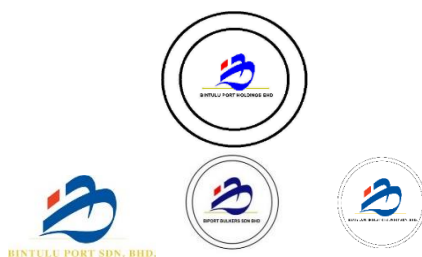
in the presence of

.....
Name :
Position :

Received & acknowledged by :-

.....
Name :
Position :
Date :

Appendix II – Employee’s Integrity Pledge



BINTULU PORT HOLDINGS BERHAD GROUP EMPLOYEE’S INTEGRITY PLEDGE

I.....
..... NRIC No: and
Staff No: being the employee of Bintulu Port Holdings
Berhad / Bintulu Port Sdn. Bhd. / Biport Bulkiers Sdn. Bhd. / Samalaju Industrial Port
Sdn. Bhd. (hereinafter referred to as “**BPHB Group**”) do hereby: -

2. PLEDGES THAT: -

- (a) I have read, understood and agree to comply with the **BPHB Group Anti-Bribery and Corruption Policy (ABC Policy) and Code of Conduct and Business Ethics (COBE)** when carrying out my duty and responsibilities as employee for and on behalf of BPHB Group;
- (b) I shall comply with the **Malaysian Anti-Corruption Commission Act 2009 [Act 694]**. Any act or attempt to corrupt by offer or give, solicit, or receive any gratification to and from any person in connection with my position as the employee of BPHB Group is a criminal offence under the Act and is a breach of the ABC Policy and COBE of BPHB Group;
- (c) I shall reject all forms of corruption and abuse of power, and shall give my full cooperation to the Malaysian Anti-Corruption Commission in preventing corruption and abuse of power;
- (d) I shall not indulge, directly or indirectly, in any form of corruption and abuse of power with any parties in dealing with BPHB Group;
- (e) I shall instantly report any form of bribery, corruption including but not limited to abuse of power within BPHB Group to the Integrity Officer; and
- (f) I shall respect the law at all times and fully abide by all applicable laws, rules, procedures and policies on bribery and corruption prevention;

2. FURTHER AGREES THAT: -

If I were to be found guilty for any breach of the provisions of ABC Policy and COBE, I may be subjected to disciplinary action including termination of my employment with the Company.

Dated this day of, 202..

SIGNED by the said)

.....)

("the Employee"))

.....
Witness

Name :

Position :

Received & acknowledge by: -

.....
Name :

Position :

Date :

Appendix III – Secrecy Pledge



BINTULU PORT HOLDINGS BERHAD GROUP SECRECY PLEDGE

I,.....
NRIC No:..... and Staff No:.....
being an employee of Bintulu Port Holdings Berhad / Bintulu Port Sdn. Bhd. / Biport Bulkers Sdn Bhd / Samalaju Industrial Port Sdn. Bhd. (hereinafter referred to as “**BPHB Group**”) do hereby:

1. PLEDGES THAT: -

- (a) I will maintain the confidentiality of all confidential information acquired during my time at BPHB Group. This includes, but is not limited to:
 - (i) Trade secrets and business strategies
 - (ii) Financial data
 - (iii) Customer lists and contacts
 - (iv) Any other information pertaining to BPHB Group’s operations, projects or activities.
- (b) I will only use the confidential information I acquired solely for official purposes and within my assigned tasks.
- (c) I will not disclose the confidential information to unauthorised individuals during or after my time with BPHB Group unless I have permission from BPHB Group.
- (d) I will refrain from making unauthorised copies of the confidential information and will not remove the information from BPHB Group premises except as authorised by BPHB Group.
- (e) I will take necessary security measures to prevent unauthorised access, loss, or disclosure of the confidential information including the use of passwords, encryption and secure storage.
- (f) I will not disclose my passwords for electronic information systems to anyone and am accountable for safeguarding them.
- (g) I will adhere to the laws, regulations and guidelines governing the handling of confidential information.

2. FURTHER AGREES THAT: -

- (a) If I am found sharing confidential information of BPHB Group, I acknowledge that I will face disciplinary measures and will be accountable for covering any

losses, costs or issues that may arise for BPHB Group due to the disclosure of such information.

- (b) The terms stated herein shall remain applicable even if my employment or association with BPHB Group ends.

“GUARDING GROUP SECRETS, SECURING SUCCESS!”

Dated thisday of, 202.....

SIGNED by the said)
)
.....)
(“the Employee”))

in the presence of

.....

Name :

Position :

Received & acknowledged by :-

.....

Name :

Position :

Date :

CONTACT US

BPHB GROUP

Group Human Resource Management

Lot 15, Block 20, Kemena Land District,
12th Mile, Tg. Kidurong Road,
P.O. Box 996,
97008 Bintulu,
Sarawak.

For any queries, please contact the COBE Hotline at:

General Manager Group Human Resource Management
086-251560/200

Employee Relations Department
086-291216/ industrialrelations@bintuluport.com.my

www.bintuluport.com.my



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