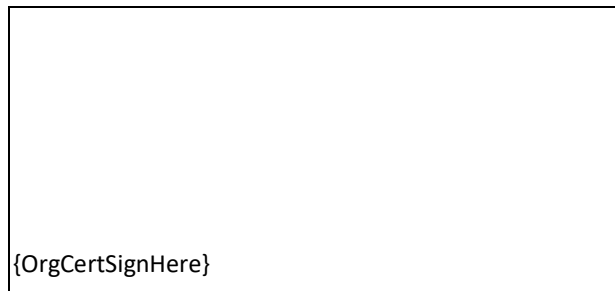




YINSON HOLDINGS BERHAD

Code of Conduct and Business Ethics

POLICY & PROCEDURE



03	23/03/2023	Amendment of content	NBMH	AGAS	Board																														
Rev No.	Date	Reason for Issue	Prepared by	Checked by	Approved by																														
<table><tr><td colspan="6">Document Classification: Proprietary</td></tr><tr><td>Document Title:</td><td colspan="5">Code of Conduct and Business Ethics Policy & Procedure</td></tr><tr><td>Document No:</td><td colspan="5">YHB-RC-CG-PP-0006</td></tr><tr><td>Process:</td><td colspan="3">Governance, Risk Management & Compliance</td><td>Applicable To:</td><td>YINSON Group of Companies</td></tr><tr><td>Revision No:</td><td colspan="3">03</td><td>Effective Date:</td><td>23 March 2023</td></tr></table>						Document Classification: Proprietary						Document Title:	Code of Conduct and Business Ethics Policy & Procedure					Document No:	YHB-RC-CG-PP-0006					Process:	Governance, Risk Management & Compliance			Applicable To:	YINSON Group of Companies	Revision No:	03			Effective Date:	23 March 2023
Document Classification: Proprietary																																			
Document Title:	Code of Conduct and Business Ethics Policy & Procedure																																		
Document No:	YHB-RC-CG-PP-0006																																		
Process:	Governance, Risk Management & Compliance			Applicable To:	YINSON Group of Companies																														
Revision No:	03			Effective Date:	23 March 2023																														



Table of Contents

1	OBJECTIVE OF THIS CODE OF CONDUCT AND BUSINESS ETHICS (“CODE”)	5
2	APPLICABILITY	5
3	DEFINITIONS	6
4	GUIDANCE AND REPORTING CONTROL	7
5	WHISTLEBLOWING & NON-RETALIATION	7
6	CONTACT US	8
7	THE WORKPLACE	8
	A. How We Treat One Another	8
	B. Promoting Diversity	8
	C. Anti-Discrimination	8
	D. Anti-Harassment	9
	E. Championing Human Rights	9
	F. Developing Human Capital	10
	G. Health and Safety Environment	10
	H. Substance Abuse and Weapons	11
	i. Substance or Alcohol Abuse	11
	ii. Weapons	11
8	OUR ETHICAL STANCE	11
	A. Anti-Bribery and Anti-Corruption	11
	i. Your Responsibilities	11
	ii. Training and Communication	11
	iii. Dealing with Business Partners, International Commercial Representatives and Third Parties	12
	iv. Hospitality, Gifts and Entertainment	12
	v. Facilitation Payment	12
	vi Conflicts of Interest	13
	vii. Corporate Social Responsibility, Sponsorships and Donations	13
	B. Anti-money Laundering	13
	i. Your Responsibilities	13
	C. Competition Laws and Regulations	14
9	OUR RESPONSIBILITIES TO OUR SHAREHOLDERS	14
	A. Dealing with Intellectual Property and Proprietary Information	14
	i. Confidential Information	14



ii. Intellectual Property.....	15
iii. Protecting Confidential Information and Intellectual property	15
iv. Accurate Business Records.....	15
v. Audits and Investigations	16
vi. Public Disclosure.....	16
B. Insider Trading	17
C. Email, Internet and Information Systems.....	18
D. Managing Internal and External Communication.....	18
E. Company Resources	19
10 ADMINISTRATION OF THE CODE	19
A. Investigating Misconduct.....	19
B. Disciplinary Actions.....	20
C. The Code is Not a Contract	20
D. Issuance and Amendment to the Code	20
E. Waivers	20



Title : Code of Conduct and Business Ethics
Policy & Procedure
Document No : YHB-RC-CG-PP-0006

Revision : 03
Date : 23-Mar-2023

Revision Details

Rev. No.	Section	Details
03	All	<ul style="list-style-type: none">• To change all “Personnel” to “Employees”• Included “International Commercial Representatives” to be consistent across all relevant policies.



1 OBJECTIVE OF THIS CODE OF CONDUCT AND BUSINESS ETHICS (“CODE”)

At YINSON, we are committed to conducting our business responsibly and in accordance with the law of the countries in which we operate. This Code defines the foundation and expectations as they relate to YINSON’s ethical standards and personal conduct.

The Code aims to guide YINSON’s employees on the approach to resolve ethical dilemmas at work. It forms the basic rules, standards and behaviours necessary to achieve these objectives. The Code also includes other references such as YINSON’s ABAC Policy & Procedure and ABAC Manual, the Anti-money Laundering Policy, the Whistleblowing Policy and Procedure as well as our contact information that provides more information on specific areas. YINSON relies on you to make good judgement and to seek help when required.

2 APPLICABILITY

The Code is applicable to:

- All YINSON employees;
- All Board of Directors of Yinson Holdings Berhad (executive and non-executive);
- All Board of Directors of YINSON subsidiaries;
- Joint venture companies of YINSON over which YINSON has management control, and to every employee, officer and director of such joint ventures.

Business Partners, Third Parties and International Commercial Representatives should act consistently with the Code as well as ABAC-related provisions when representing YINSON or in collaboration with us.

YINSON’s GRC Department is responsible for promoting, monitoring and enforcing the Code. However, the ultimate responsibility for adhering to the Code lies in each member of YINSON as listed above and for maintaining our culture of ethical excellence in our business.

We also encourage everyone working on YINSON’s behalf, including consultants, agents, suppliers, contractors and business partners, to adhere to our ethical standards, as set out in this Code.

Leaders as Role Models

We expect each of our employees, especially our Leaders and managers, to act with integrity and inspire others to embrace the Code by:

- Upholding the highest ethical standards of business conduct;
- Encouraging ethical decision-making and rewarding integrity;
- Being a role model and leading by example;
- Ensuring that all employees are given the opportunity and guidance to understand the ABAC Policy and other applicable policies;



- Creating a positive and transparent environment where employees are comfortable raising questions and concerns; and
- Ensuring those who raise genuine concerns do not suffer retaliation.

All employees must immediately report any known or suspected Code violation, ethical or legal misconduct and never retaliate or ignore acts of retaliation against others. Managers who fail to report violations that they are aware of – or should be aware of – may be subject to disciplinary actions, including termination.

Our Executive Officers must uphold their managerial responsibilities to the highest ethical standards and adhere to the principles set forth in the Code and ABAC Policy & Procedure and ABAC Manual.

3 DEFINITIONS

“ABAC” refers to Anti-Bribery and Anti-Corruption;

“ABAC Policy” refers to the Anti-Bribery and Anti-Corruption Policy;

“Board” refers to the Board of Directors (executives and non-executives);

“Business Partners” refers to joint venture partners or associate companies;

“Code” refers to YINSON’s Code of Conduct and Business Ethics;

“International Commercial Representatives” refers to agents, sponsors, advisors and others including a person or entity that has been designated as International Commercial Representative by the Governance, Risk Management & Compliance Department or its designee;

“Leaders” refers to members of the Board, top management and those in supervisory roles;

“Management Committee” refers to Group Chief Executive Officer, Group Chief Strategy Officer, YINSON Production Chief Executive Officer, YINSON Production Chief Operating Officer, General Counsel, Marine Segment Chief Executive Officer and any member approved by the Board from time-to-time;

“Employees” refers to all employees of YINSON (permanent, temporary and interns) and members of the Board;



“Public Official” refers to persons who hold a legislative, administrative or judicial office (either appointed or elected), any person exercising a public function, including for a public agency or a public enterprise (e.g. a state-owned enterprise), any official or agent of a public international organisation;

“GRC” refers to YINSON Governance, Risk Management and Compliance Department;

“Third Parties” refers to any person or entity that is independent from YINSON, which includes suppliers, contractors, vendors or sub-contractors and other parties engaged by or on behalf of YINSON; and

“YINSON” refers to Yinson Holdings Berhad and its subsidiaries.

4 GUIDANCE AND REPORTING CONTROL

If you are aware of or suspect unethical or illegal conduct concerning YINSON, or a violation of the Code, you must report the issue or seek guidance. You may consider speaking to a manager with whom you feel comfortable. You may also raise concerns or questions to the following:

- Legal Department;
- GRC Department; or
- Whistleblowing Contact (Please refer to YINSON’s Whistleblowing Policy and Procedure).

5 WHISTLEBLOWING & NON-RETALIATION

YINSON is committed to protecting the rights of individuals who report issues or concerns in good faith either through one of the reporting means described in the Code or YINSON’s Whistleblowing Policy and Procedure.

YINSON will not retaliate or permit retaliation against a person, who in good faith:

- Reports without malicious intent(s);
- Reports what he/she suspects a violation of our Code, ABAC Policy & Procedure and ABAC Manual, Employee Handbook and other applicable policies or the law;
- Raises a compliance question or seeks advice about a particular business practice, decision, or action; or
- Cooperates in an investigation of a potential violation.

You can report possible concerns in confidence without the fear of retaliation of any kind. YINSON will protect its employees against retaliation who in good faith, makes a genuine attempt to provide honest and accurate information. However, anyone who files a report in bad faith where there is an intent of spreading falsehoods or damaging any fellow employee’s reputation, will be subjected to disciplinary actions.



6 CONTACT US

For questions or suggestions, you may contact GRC Department:

Email	:	whistleblow@yinson.com
Correspondence address	:	Governance, Risk Management and Compliance Department Yinson Holdings Berhad Level 16, Menara South Point, Mid Valley City, Medan Syed Putra Selatan, 59200 Kuala Lumpur

7 THE WORKPLACE

A. How We Treat One Another

In YINSON, we should treat each other with respect and dignity. All employees are entitled to work in an environment that is free of harassment, bullying and discrimination in order to achieve continuous performance management.

B. Promoting Diversity

As a multinational organization, our workplace consists of employees from various cultures, nationalities, genders, religions, ages, and sexual orientations. We cherish the diversity found in YINSON and therefore, we do not tolerate any divisive and discriminatory practices in our workplace.

We are committed to promoting an inclusive workplace based on mutual respect. We embrace diversity as our strength and a key advantage for YINSON.

C. Anti-Discrimination

We should never discriminate or deny equal opportunity in YINSON. All employees deserve the opportunity to reach our full potential and contribute to YINSON's success. Therefore, you should never discriminate or treat any employee or job applicant unfairly in matters involving recruitment, hiring, training, promotion, compensation or any other term or condition of employment.

We are committed to recruiting, promoting and remunerating our employees solely based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as (non-exhaustive):

- Race, colour, ethnicity, or national origin;
- Gender or gender identity;
- Sexual orientation;
- Age;
- Religion;
- Disability;



- Marital status; or
- Any other legally protected status.

We must always act fairly and professionally by giving qualified individuals the chance to develop their abilities and advance within YINSON. Inappropriate bias will not be tolerated.

D. Anti-Harassment

YINSON seeks to provide a workplace that is harassment-free to promote the confidence to perform. YINSON will comply with all applicable laws and local regulations which protect persons from a range of harassing behaviours. We do not tolerate any harassment in the workplace and will take immediate action upon awareness of such cases.

Harassment can occur in different forms and can range in severity. Harassing behaviour includes unwelcome and inappropriate verbal, visual, physical, or other conduct which creates an intimidating, offensive or hostile work environment. We consider the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment or stalking (include cyber-stalking);
- Offensive language or jokes, including emails;
- Racial, ethnic, gender or religious slurs;
- Degrading comments or excessive use of profanity;
- Intimidating or threatening behaviour (i.e., bullying threats); or
- Showing hostility towards others because of individual characteristics.

You are reminded to treat others respectfully and not to act in a harassing manner which may cause your co-workers to feel uncomfortable in their work environment. It is important to remember that any form of harassment is determined by your actions and how these actions impact others, regardless of your intentions. If you are subjected to any harassment, please speak up and report it to your superiors or the Human Resource Department.

Any individual who is found guilty of acts of harassment and any instances of such behaviour upon a full investigation, shall be subject to corrective or disciplinary action, which may include termination of employment/service.

E. Championing Human Rights

YINSON recognises the importance of maintaining and promoting fundamental human rights in all of our business operations and throughout our supply chain. We operate under programmes and policies that:

Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws;

- Recognize employee's rights to freedom of association;
- Provide humane and safe working conditions; and



- Prohibit forced or child labour.

We expect our Business Partners and Third Parties to also uphold these principles.

Always check your actions to ensure that they do not violate or contradict any of the basic human rights principles mentioned above. If you suspect the occurrence of human right abuse within our operations or supply chain, please speak up and report it to the Human Resource Department.

F. Developing Human Capital

YINSON is committed to being a Model Employer and to nurture talents in our workplace. We aim to attract, develop, and retain talents that may contribute to and share in YINSON's success.

We are committed to fostering a workplace based on transparency, where all employees are free to engage in open and constructive dialogue with their respective superiors and members of the senior management team. Individuals will be selected for career advancement based on merits and performance.

For more information, please refer to our Employee Handbook or speak with the Human Resource Department.

G. Health and Safety Environment

The wellbeing and safety of the people who work for and with us are of utmost importance. We are committed to our principle of "zero harm to people and the environment" in our workplace.

All YINSON employees, Business Partners and Third Parties are expected to commit to all safety rules and practices, cooperate with the authorities who enforce these rules and regulations, take necessary steps to protect themselves and others, attend required safety training and report immediately all accidents, injuries and unsafe practices or conditions.

In line with our commitment to excellence in our workplace safety and security, safety and environmental performance are key factors in evaluating Business Parties and Third Parties. YINSON's employees should understand their responsibilities to comply with any work safety standards. Participating in all mandatory health and safety trainings provided is the responsibility of all employees.

You must only perform work for which you are qualified and deem to be safe. Always wear required safety equipment and never work while you are under the influence of alcohol, drugs (including prescription or over the counter medication) and/or sleep deprived.

For more information or if in doubt regarding health and safety matters, please contact our Health, Safety, Security, Environmental & Quality Control ("HSSEQ") Department and report all concerns immediately.



H. Substance Abuse and Weapons

i. Substance or Alcohol Abuse

Substance abuse occurs when you take illegal drugs, or misuse-controlled substances or prescription medications. Alcohol abuse refers to the excessive consumption of alcohol.

All YINSON employees must not work under the influence of drugs and alcohol. You are expected to perform your job and duties free from the influence of any substance that could impair your job performance. Therefore, YINSON prohibits:

- Working under the influence of alcohol, illegal drugs and controlled substances on or off YINSON's premises;
- Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances; and
- Working while impaired by a lawful prescription medication or over-the-counter drugs.

If you have any drug or alcohol related issues, you are encouraged to seek consultation and assistance. Contact the Human Resource Department for further assistance in this regard.

ii. Weapons

All employees are strictly prohibited from possessing any weapons while in YINSON's premises. YINSON regards its principles in workplace health, safety, and security very seriously. YINSON expects all employees to understand and abide by our health and safety policy.

If in doubt, please contact the HSSEQ Department for more clarification.

8 OUR ETHICAL STANCE

We are strongly committed to conducting business ethically and responsibly. We believe that any participation in bribery and corrupt practices will severely damage YINSON's reputation. For this reason, YINSON has adopted zero tolerance stance towards bribery and corruption.

A. Anti-Bribery and Anti-Corruption

i. Your Responsibilities

We strongly advise all employees to read and abide by YINSON's zero tolerance policy against bribery and corruption as provided in YINSON's ABAC Policy & Procedure and ABAC Manual. The ultimate responsibility to maintain our culture of ethical excellence lies in each one of us.

ii. Training and Communication

We take responsibility for fostering awareness of the ABAC Policy & Procedure through appropriate training for all employees. The relevant policies, manual and procedures are accessible through our public domain or by request from our Human Resource Department or GRC Department.



iii. Dealing with Business Partners, International Commercial Representatives and Third Parties

YINSON expects that all Business Partners, International Commercial Representatives and Third Parties act in a way that is consistent with YINSON's values and ethical standards. Therefore, we will conduct an appropriate and proper due diligence on all Business Partners, International Commercial Representatives and Third Parties who have business relations with YINSON. Any 'red flags' arising from the due diligence will be escalated immediately to the Legal Department and/or GRC Department to be resolved before entering into any arrangements or agreements with them. In doing so, we are able to ensure that YINSON's dealings with Business Partners, International Commercial Representatives and Third Parties are conducted at a high level of integrity.

Please see the YINSON's ABAC Policy & Procedure and ABAC Manual, Policy and Procedure on Dealing with Business Partners and International Commercial Representatives, and Policy and Procedure on Dealing with Third Parties for more information. If you have any questions about ABAC, please contact the GRC Department and / or the Legal Department immediately.

iv. Hospitality, Gifts and Entertainment

Business hospitality, gifts and/ or entertainment are often appropriate courtesies that build corporate goodwill between YINSON and parties that YINSON conducts business with. However, it is not within our culture to offer or receive any gift that serves to, or appears to, inappropriately influence business decisions, or gain an unfair advantage.

Giving or accepting hospitality, gifts and/ or entertainment is not prohibited as long as the nature and frequency of the occasion is deemed appropriate and reasonable and are in accordance with YINSON's policies. Therefore, we must always exercise sensible judgement to determine the appropriateness of offering and giving of hospitality, gifts and/ or entertainment.

Extra care and caution should be exercised when dealing with Government agencies and Public Officials. Under no circumstances may hospitality, gifts and/ or entertainment be offered to a Government or Public Official as an inducement for favour. The value of hospitality, gifts and/ or entertainment to Government and Public Officials should not exceed USD25 per person. However, if they are customary to the event, justification of the gifts should be accurately documented and approved by the GRC Department or one (1) member of the Management Committee before the presentation of the gift or involvement in the entertainment.

For further guidelines on hospitality, gifts and entertainment, please see YINSON's ABAC Policy & Procedure and ABAC Manual.

v. Facilitation Payment

At YINSON, we strictly prohibit any form of facilitation payments. All employees are advised that they must not offer, promise, give, request, or accept anything, which might be regarded as a facilitation payment. An exception to this prohibition may be tolerated if it is an Extortion Payment that is made in the context of an imminent threat i.e. loss of life, limb or liberty.

For more information, please refer to YINSON's ABAC Policy & Procedure and ABAC Manual.



vi Conflicts of Interest

A conflict of interest arises when our personal interests interfere, or appear to interfere, with our professional interests in YINSON. It can leave a negative impact on the reputation of YINSON and undermines the trust of others in our business and people as the conflict can impair our ability to perform in the best interest of YINSON.

You are encouraged to avoid any possible conflicts of interest by making business decisions in the best interest of YINSON. You are required to disclose any financial interests you hold that may present a conflict.

If you have knowledge about a conflict or possible conflict of interest, you should disclose it to the GRC Department and/or the Legal Department or immediately.

For more information, please see YINSON's ABAC Policy & Procedure and ABAC Manual.

vii. Corporate Social Responsibility, Sponsorships and Donations

As part of our commitment to corporate social responsibility, sponsorship, and donations, we will provide assistance to selected beneficiaries after conducting a due diligence assessment. The assessment is designed to ensure the legitimacy of the organisation/ entity and its affiliation with any sanctioned countries/ parties, and Government officials.

For more information, please see YINSON's ABAC Policy & Procedure and ABAC Manual.

B. Anti-money Laundering

Money laundering is the criminal practice of converting or filtering "*dirty money*" or "*ill-gotten gains*" through a maze of transactions, so that the funds are "*cleansed*" or "*laundered*" to hide its true identity or origin, and to give it a legitimate appearance.

i. Your Responsibilities

Money laundering and terrorism financing activities are serious crimes. YINSON is committed to mitigating the risk of money laundering and terrorism financing in our business operations. As YINSON's employee, you must be aware of your responsibilities and the need to remain vigilant in the prevention of money laundering/terrorist activities. Examples of suspicious transactions may include but are not limited to:

- Transactions where you are not able to identify the parties or location;
- Cash payments that appear high and unusual;
- Payments made to or by third parties not mentioned or related to the contract or agreement; and
- Dealing with persons who are involved in illegitimate business.

All YINSON employees must ensure that all transactions entered into or to be entered into are in compliance with current applicable sanctions, laws, and regulations.



If you are aware of a violation or a potential violation of sanctions, laws and regulations, please inform the GRC Department and/ or Legal Department immediately.

For more information, please see YINSON's Anti-Money Laundering Policy.

C. Competition Laws and Regulations

In order to compete fairly in business, we are committed to complying with all applicable anti-competition and anti-trust laws. These laws are designed to preserve competition by prohibiting formal and informal agreements and practices that restrain trade.

Please note the following practices (non-exhaustive list) which are prohibited under anti-competition and anti-trust laws:

- Discussing the division or allocation of markets, territories or clients with competitors or clients;
- Discussing the prices or price-related information, such as promotional spending or terms, costs, product supply, marketing, territories, or other sensitive marketing information with competitors; and
- Discussing the boycotting of a third party with competitors or clients.

If a competitor discusses any of these topics, no matter how casually, please stop the conversation immediately. Be particularly careful at industry association meetings or events to avoid even the appearance of unfair business practices.

Anti-competition and anti-trust laws are very complex, and breaches may carry severe consequences for the individuals involved and YINSON. You are to note that certain violations of competition and anti-trust laws are criminal offences and individuals violating these laws may face prison time. Employees from the Business Development and Procurement departments or any employees that have contact with competitors, should be familiar with applicable anti-competition and anti-trust laws. If you need further guidance, please consult the Legal Department.

9 OUR RESPONSIBILITIES TO OUR SHAREHOLDERS

A. Dealing with Intellectual Property and Proprietary Information

i. Confidential Information

In general, confidential information includes, and is not limited to, any existing and future data, information, documents, and materials such as financial statements and reports, legal and unauthorised documentation, contracts, financial projections, trade secrets and technical information which are not available or made available to the public domain.

Employees are required to adhere to their duty in maintaining the confidentiality of such confidential information. This information should be used only for company purposes and should not be disclosed to anyone outside of YINSON.

Even within YINSON, such confidential information should only be disclosed to those on a need-to-know basis. All materials and information belonging to YINSON (including duplicate copies) must be returned in the event any employee resigns and leaves YINSON.



Confidential information and material should:

- Be stored in a secure place and should not be left out where others can see and have access to them;
- Be clearly marked as confidential;
- Not be sent to unattended fax machines or printers; and
- Not be discussed in public, where others may hear.

When dealing with third party information and materials, YINSON employees shall not:

- Bring any information or material from prior employers to YINSON;
- Accept or use anyone's confidential information (or agree to maintain anyone's information in confidence);
- Solicit confidential information from another company's present or former employees or suppliers; and
- Engage in espionage.

ii. Intellectual Property

Intellectual property created for and/or by YINSON belongs to YINSON. This includes, but is not limited to, designs, technical information, ideas, improvements, software programs and financial models. Such work is YINSON's property if it is created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information.

iii. Protecting Confidential Information and Intellectual property

To ensure that our confidential information and intellectual property are well-protected, it is important and appropriate for you to have a written non-disclosure agreement (or confidentiality agreement) in place prior to any release of confidential information and intellectual property to any third party, including business consultants, financial advisors, legal counsels, accountants and etc., as part of their engagement by YINSON.

This principle applies to YINSON when we use intellectual information and proprietary information from others, and we must be diligent to comply with the terms and conditions of use.

iv. Accurate Business Records

Business records, including YINSON's financial statements and business presentations, must always be accurate and reflect a forthright presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events. Likewise, all of your transactions, regardless of the value, must be properly authorised, executed and recorded.



You are accountable for the accuracy of the business records that you handle in the normal course of business. Employees should never:

- Falsify, omit, misstate, alter, or conceal any information or otherwise misrepresent the facts on a company record; and/ or
- Encourage or allow anyone else to compromise the accuracy and integrity of our records.

v. Audits and Investigations

If you are notified that your documents are relevant to an anticipated or pending litigation, investigation or audit, follow the guidelines set forth in the notification. You must not destroy any document, covered by such notice, unless instructed to by the Legal Department that the notice has been lifted. Seek guidance with the Legal Department if you have any queries or concerns about document retention or destruction issues.

We will give our full cooperation if management, our auditors (internal or external) or government investigators request for information or documentation. We must not conceal, alter, or destroy such information.

Falsifying business records, destroying documents, or lying to auditors, investigators or government officials is a serious offence. This behavior may lead to termination of your employment with YINSON, as well as potential criminal prosecution for the individuals involved and YINSON.

If you believe that an external investigation involving YINSON may occur or is already underway, inform the Legal Department immediately.

vi. Public Disclosure

Our investors and the general public rely on us, to report accurately on our financial condition or any material information which is reasonably expected to have a material effect on our share price or an investor's decision, and the law obligates us to do the same. The disclosures made in our public communication, regulatory disclosures and reports submitted to Bursa Malaysia and to other Governmental authorities must always be complete, fair, accurate, timely and understandable.

If you are involved in any aspect of preparing our financial statements, or the certifications on which the above group of people rely on, you must always follow our financial policies, our system of internal controls and generally accepted accounting principles. Accurate financial reporting means you should never:

- Understate or overstate known or estimated liabilities or assets;
- Accelerate or defer costs in violation of generally accepted accounting principles;
- Fail to properly maintain supporting documents for business transactions;
- Inflate or deflate quarterly or annual financial results by pulling forward or delaying transactions; or
- Use "creative accounting" to gain advantage or present figures in a misleadingly favourable light.



B. Insider Trading

Many countries have enacted insider trading laws and pursuant to these laws, we may not buy or sell the stock of any company while in possession of inside or privileged information about such company. This rule applies to YINSON shares/stocks, as well as shares/stocks of our clients, suppliers and business partners listed on a public stock exchange.

In the course of performing your job, you may have in your possession or have knowledge of certain confidential information that qualifies as “material non-public information” about YINSON or other third parties with which we do business. Information is considered to be “material non-public information” when:

- It has not been publicly disseminated; and
- Such information that is likely to have significant impact on the price of YINSON’s or other third parties’ shares, if it were made public.

Examples of “material non-public information” include:

- Acquisition or loss of a material contract
- Notice of changes in senior management;
- Entry into a joint venture or merger;
- Pending or threatened litigation;
- Financial results; or
- Any change or diversification on nature of business.

You should not transact in YINSON shares or in the shares of other third party involved with YINSON while you have material non-public information about YINSON or the said third party. In addition, we must avoid trading in YINSON shares when YINSON has imposed internal trading restrictions. If you are advised that you are subject to a trading window or close period, do not trade in YINSON’s securities until the restriction has been lifted or comply with the necessary regulatory procedures while trading in YINSON’s securities during close period. This prohibition on trading applies to all transactions in YINSON securities, including purchasing or selling YINSON securities, exercising options, selling restricted share units, and increasing or decreasing your investment in YINSON securities through your Employees’ Share Scheme (“ESS”).

“Tipping” is also a violation of our Code. Tipping arises when you disclose material non-public information about a company to someone else, and that person trades a security of that company while they possess the information you provided. DO NOT disclose material non-public information about a company to anyone outside YINSON, including your family members or friends. You should also refrain from discussing material non-public information with any employees unless on a need-to-know basis.

Insider trading and tipping are not only violations of our Code, but also a serious violation of the Malaysian Capital Markets and Services Act 2007 and other applicable securities laws, which will result in immediate termination of individuals involved, as well as potential civil and criminal prosecution in the court of law.

For more information, please see YINSON’s Insider Trading Policy and Procedure.



C. Email, Internet and Information Systems

Our information technology systems are a key component of our business operation and are provided for authorised business purposes. Your use of these systems must comply with our IT Policy. You may engage in reasonable incidental personal use of phone, email, and the internet as long as such usage does not:

- Consume a large amount of time or resources;
- Interfere with your work performance or that of others;
- Involve illegal, sexually explicit, discriminatory or otherwise inappropriate material;
- Relate to outside business interests;
- Violate our Code or any YINSON policy.

Therefore, you must use YINSON's email and internet accounts responsibly and protect the security of our information systems. You should not:

- Share your YINSON username and password with anyone;
- Leave your laptops or mobile devices unattended while travelling or in an exposed location where they can be stolen;
- Download unauthorised or unlicensed software on YINSON computers.

YINSON reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of an employee's activity using YINSON's email, phone, voicemail, internet and other systems, to the extent permitted by local law.

If you suspect that there is a data breach or become aware of any situation in which data has been compromised, including the loss or theft of a laptop or handheld device, immediately report the situation to your local technical support team or the IT Department.

D. Managing Internal and External Communication

YINSON reputation is highly valuable to us, and it is crucial that we protect our reputation. Furthermore, we must provide accurate information to the public regarding our business. The disclosure of certain types of information is highly regulated. Therefore, only designated persons may respond to formal external requests for information. All public statements about YINSON must be approved by appropriate persons within YINSON.

All media enquiries should be sent to the Corporate Communication Department. No information should be provided to the media without prior approval and guidance from the relevant department.

All employees must not provide information, or engage in social media activities, on behalf of YINSON. In addition, all content in published material, including brochures, advertising and all editorial support should be truthful and not disparage any competitors' products, services, or employees.



E. Company Resources

All employees are expected to use YINSON's resources honestly and efficiently. Resources include physical properties e.g. facilities, supplies, equipment, machinery, spare parts, YINSON's vehicles and YINSON's funds. They also include intangible assets e.g. working hours, confidential information, intellectual property and information systems. You should only use YINSON's resources only for legitimate business purposes and protect them from theft, loss, damage, or misuse.

Protecting YINSON's funds is especially important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts. You must always:

- Ensure the funds are properly used for the established business purpose;
- Obtain required pre-approval before incurring an expense;
- Accurately record all expenditures; and
- Verify that expenses submitted for reimbursement are business-related, properly documented and comply with YINSON policies.

10 ADMINISTRATION OF THE CODE

The GRC Department is the custodian of the Code and is also responsible for administering the Code. However, it is also the responsibility of all YINSON employees to adhere to the Code and assist the GRC Department in their administration.

A. Investigating Misconduct

All reports of suspected violations of the Code or the law will be taken seriously and promptly investigated. As appropriate, the Audit Committee/GRC Department may assign investigator(s) to review all reported instances of alleged Code violations. The investigator(s) will:

- Act objectively in determining facts through interviews or a review of documents;
- Contact the employee who may have knowledge about the alleged incidents(s); and
- Recommend corrective actions and/or disciplinary measures where appropriate.

In accordance with applicable law, YINSON strives to:

- Protect the confidentiality of the individuals involved, to the extent practical;
- Inform the employee of the accusations reported against him/her at a time when such a disclosure will not jeopardise the investigation; and
- Where permissible, allow the employee to review and correct information reported.

If asked, you must cooperate fully with an inquiry or investigation.



B. Disciplinary Actions

Employees who violate the Code, will be subjected to appropriate disciplinary action which includes termination and possible legal proceedings.

You are expected to follow the Code and comply with our policies and the law while conducting business on behalf of YINSON as a condition of your employment. Violating the Code, our policies or the law may result in:

- Disciplinary action, up to and including termination of employment, depending on the nature and severity of the Code violation; or
- In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.

C. The Code is Not a Contract

The Code is not a contract, and it does not convey any specific employment rights or guarantee employment for any specific period of time.

D. Issuance and Amendment to the Code

The Board of Yinson Holdings Berhad is responsible for approving and issuing the Code. The Code is reviewed periodically by the GRC Department and the Legal Department to determine whether revisions are required due to changes in law or regulations, or changes in our business or the business environment. The Board of Yinson Holdings Berhad must approve any changes to the Code.

E. Waivers

Any waiver of the Code requires the prior written approval of the Head of GRC Department, or under certain circumstances, the Audit Committee Chairman of Yinson Holdings Berhad. If required by applicable law, waivers will be promptly disclosed as required by applicable law.