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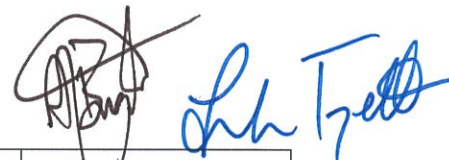


BUMIARMADA

## CODE OF BUSINESS CONDUCT & ETHICS

**BAB-GEN-COP-CME-POL-00003**

LEGACY DOCUMENT NUMBER: BAB-GEN-LEG-CME-POL-00003



| 02  | 21-May-26  | Approved for Use (AFU) | Eddie Lim   | Roger Morris Harwood | Alexander James Brigden / Luke Christopher Targett |
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| Rev | Issue Date | Description            | Prepared by | Reviewed by          | Approved by                                        |

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| Review Classification          |                                     |                       |                          |
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| Review Period 5 Years          | <input type="checkbox"/>            | Not Required          | <input type="checkbox"/> |

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# BUMI ARMADA BERHAD

## CODE OF BUSINESS CONDUCT & ETHICS

*(Effective from 21 May 2026)*

|                                                                                                        |                                                          |                                     |                                      |                                             |           |
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## OUR VISION

To be the preferred provider of offshore production and support services to our clients

## OUR MISSION

To operate and deliver on our commitments to the satisfaction of our stakeholders, safely, on time and within budget.

To add value by effectively managing risks through a hands-on approach.

To continuously improve our capabilities and to apply the lessons learnt to the way we work.

To ensure good governance in all our practices, reduce our environmental footprint, support our local communities and promote social sustainability awareness wherever we operate.

|                                                                                                        |                                                          |                                     |                                      |                                             |           |
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# OUR CORE VALUES

# SURE



**SAFE**

We care for the safety of each other and lead by example.

We aim to take a proactive approach in protecting the environment, maintaining our assets and safeguarding information.



**UNITED**

We place a high importance on working as one team and want to pursue and achieve results together.

We seek the participation of others in resolving problems, encourage mutual respect and always welcome feedback.



**RESPONSIBLE**

We take responsibility in always delivering on our promises and we commit ourselves personally in adding value to our stakeholders.

We want to conduct our business with good governance and a strong moral compass.



**EXCELLENT**

We are driven by our ambition to continuously improve.

We seek to learn from others, challenge others constructively and have the discipline to make the extra effort each time.

|                                                                                                 |                                                  |                              |                               |                                      |           |
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## Message from the CFO and COO

### *Our Code – The way in which we work*

Bumi Armada's Code of Business Conduct and Ethics ("Code") governs our business practices and provides guidance for ethical decision making. Integrity and honesty are the building blocks of our Core Values, which are the foundation of our Code.

In the following pages you will find practical information about **what is expected of you and what we expect of those working with us**. We work globally with a wide variety of business challenges. It is important that you are aware of the challenges that are linked to business ethics as they do carry exposure to you and the Company. This Code has been designed to help by highlighting your responsibilities in working within this diverse landscape so you can identify risks relevant to your role in the organisation. It also includes references to relevant policies and procedures which will provide you with the information and guidance specific to issues that you may face.

**Read the Code, understand it, and when faced with challenging situations, consult it for guidance. If you are in any doubt or have questions concerning the application or interpretation of the Code, please seek advice from your Head of Department, Human Resource and Business Partnering (HRBP), Legal or Compliance Department.**

Finally, if you have concerns in relation to conduct you see or hear about, please raise them through our many reporting channels. We take all reports and allegations seriously. We hold people accountable when we find misconduct. And we never tolerate retaliation against employees who speak up honestly and in good faith.

The Board of Directors and I expect everyone to follow our Code, exercising good judgement and common sense in actions and business dealings. Our reputation both as individuals and as a Company depends on it. Together, let's uphold our commitment to ethical behaviour by acting with uncompromising integrity and respect every day.

For and on behalf of Bumi Armada Berhad Executive Committee,

**ALEXANDER JAMES BRIGDEN**  
Chief Operating Officer  
19 May 2026

**LUKE CHRISTOPHER TARGETT**  
Chief Financial Officer  
19 May 2026

|                                                                                                        |                                                                                                                    |                                     |                                      |                                             |
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### Consulted Personnel

| Date      | Name                 | Title           |
|-----------|----------------------|-----------------|
| 21-May-26 | Roger Morris Harwood | General Counsel |

### Revision History

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## 1.0 SECTION 1: YOU AND THE CODE

### 1.1 Who does it apply to?

- o All directors, officers, and employees of Bumi Armada Berhad (collectively, “Employees”) of any entity in the Bumi Armada Berhad group of companies (“Bumi Armada” or “Company”).
- o Business partners such as agents, consultants, suppliers, contractors, subcontractors, and other third parties having business relationships with the Company (collectively, “Business Partners”)
- o All joint ventures, which shall either adopt the Code or establish a Code of Business Conduct and Ethics which shall be similar in substance and approved by the Board of Directors and CEO of Bumi Armada. Joint venture companies in which Bumi Armada is a noncontrolling co-venturer and associated companies where Bumi Armada has no management control are strongly encouraged by the Company to adopt similar principles and standards.

### 1.2 Employee’s Responsibilities

- o Read, understand and comply with the Code.
- o Complete any training pertaining to the Code required or assigned to you by the Company.
- o When in doubt, seek advice and guidance from the Compliance Department.

### 1.3 Manager’s Responsibilities

- o Demonstrate leadership by example in complying with the Code.
- o Communicate the importance of conducting business in an ethical manner with integrity at all times.
- o Escalate as appropriate any concerns or alleged breaches of the Code brought to your attention.
- o Incorporate adherence to the Code as part of employees’ evaluation process.

### 1.4 Director’s Responsibilities

- o Directors of the Company and each of its subsidiaries (collectively, “Group Company”) hold a position of trust with the public and other stakeholders as well as with each other, and with officers and Employees of the Group Company. The exercise of their powers, responsibilities, duties and functions as Directors should be governed by the highest standards of business conduct and ethical behaviour.
- o Directors of any Group Company have specific responsibilities as directors and these are set out in this Code.
- o Each Director shall:
  - have a clear understanding of the aims and purpose, capabilities and capacity of the Group Company;
  - in exercising all such powers, responsibilities, duties, functions and discretions of a Director, act within the scope of the Companies Act 2016, the Constitution of the Group Company, internal policies and procedures of the Group Company and all other applicable laws, statutory obligations and regulations and delegated authorities;

|                                                                                                        |                                                                                                                    |                                     |                                      |                                             |           |
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- be competent, exercise reasonable care, skill, diligence and act in accordance with the highest standards of honesty, integrity and fairness and exercise business judgement in good faith for a proper purpose and expect the same in their relationships with others while maintaining a work and business culture fostering such standards;
- adhere to this Code and any other applicable code of conduct on dealing in securities and any provisions for the avoidance of conflicts of interest;
- have a clear understanding of the aims and purpose, capabilities and capacity of the Group Company;
- devote time and effort to attend and come prepared for meetings and to know what is required of the Board of Directors ("Board") and each of its Directors, and to discharge those functions;
- ensure at all times that the Group Company is properly managed and effectively controlled and there is proper stewardship over assets;
- stay abreast of the affairs of the Group Company and be kept informed of the Group Company's compliance with the relevant legislation and contractual requirements;
- insist on being kept informed on all matters of importance to the Group Company in order to be effective in corporate management;
- limit his/her directorship of companies to a number in which he/she can best devote his time and effectiveness subject to the limits set out under the law and / or requirements;
- have access to the advice and services of the Company Secretaries, who are responsible to the Board to ensure proper procedures, rules and regulations are complied with;
- at all times exercise his/ her power for the purposes they were conferred, for the benefit and interest of the Group Company;
- exercise independent judgement and, if necessary, openly oppose if the vital interests of the Group Company are at stake;
- excuse himself/herself from making any decision about an issue at hand in which a conflict of interests arises or could arise and in such event, disclose in writing to the Board and/or any Board Committee of which he/she is a member, as may be applicable the nature, extent and character of interests and other relevant facts or circumstances that create or could create the conflicts of interest as required by the governing laws and regulations;
- not engage in any conduct or activities that disrupt or impair the Group Company's relationship with any person or entity with which the Group Company has or proposes to enter into a business or contractual relationship;
- avoid having any financial interest in works of or contracts awarded by the Group Company, or in supplies effected or services rendered to or by such a company and where this is unavoidable or immediate family members have such a financial interest, such interest shall also be disclosed in writing to the Board or any Board Committees of which he/she is a member within the prescribed timeframe;

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- not take advantage of his/her position as Director to make any personal profit and will not seek or accept from third parties to his/her own advantage any favour in whatsoever form or howsoever described in connection with the business of the Group Company or his/her duties (except for the acceptance of such things as gifts of nominal value and working lunches, dinners and entertainment of reasonable value, of a frequency and duration appropriate under the circumstances, and subject always to the applicable Company policies);
  - not receive a loan or guarantee of an obligation as a result of his/her position with the Group Company;
  - not hold positions or jobs or engage in outside businesses or other interests that adversely impact the performance of his/her duties owed to the Group Company or the interests of the same;
  - avoid any relationship with a contractor or supplier that could compromise the ability to transact business on a professional, impartial and competitive basis or influence decisions to be made the Group Company;
  - ensure full, fair, accurate, timely, and understandable disclosures regarding himself/herself as required of directors by relevant laws and regulations and where necessary;
  - ensure all dealings or the existence of and changes in the interests in the securities of the Group Company are promptly disclosed to the relevant parties within applicable deadlines;
  - not engage in any improper use of Group Company's property, position, corporate opportunity, confidential information or compete with the Group Company to gain directly or indirectly, a benefit for himself/herself or any other person, or cause detriment to the Group Company;
  - except as the Board may otherwise require or as otherwise required by law, not share, copy, reproduce, transmit, divulge or otherwise disclose any confidential information related to the affairs of the Group Company. :
  - uphold the strict confidentiality of all meetings and other deliberations and communications of the Board;
  - seek approval of Company before conducting or engaging in any related party transactions;
  - ensure at all times that his/her appointment as a Director (in terms of eligibility, qualification and independence (where applicable)) is in accordance with all applicable laws, statutory obligations and regulations and shall disclose any matters pertaining to these to the Board or the Chairman of the Board;
  - respect and uphold the Company's Corporate Social Responsibility guidelines; and
  - refrain from any public discussion, in the media or otherwise, regarding the Group Company's business, affairs, policies or organisation.
- o The Directors and Senior Management of the Group Company shall, acting together:
- be conscious of the interests of shareholders, employees, creditors, customers, clients, counterparties, regulators and other stakeholders of the Group Company;
  - at all times promote professionalism and improve the competency of management and employees; and

|                                                                                                        |                                                          |                                     |                                      |                                             |           |
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- ensure adequate safety measures and provide proper protection to workers and employees at the workplace.

## 1.5 Reporting Breaches

### 1.5.1 Reporting Breaches of the Code (Employees/Managers)

- o Everyone involved with Bumi Armada, whether or not an employee, is encouraged to speak up if they have any concerns about unethical behaviour or activity.
- o Any breach or suspected breach of the Code must be reported immediately.
- o Reports can be made to your Head of Department, HRBP, Legal or Compliance Department. For urgent matters, such as safety, speak to a local manager to ensure prompt action is taken.
- o There are many ways to report concerns, including through our Reporting Hotline
  - the Reporting Hotline can receive reports in over 50 languages and is available 24 hours a day, seven days a week via one of the toll-free numbers listed at <http://bumiarmada.ethicspoint.com>
  - the Reporting Hotline also allows for reports to be made via a secure website (you can find the link/address on the back page of this Code).
  - all reports will be treated in confidence and investigated thoroughly.
  - you may choose to remain anonymous.
- o Reporting concerns or suspected misconduct in good faith will not adversely affect your position in Bumi Armada. The Company does not tolerate retaliation against those who have raised issues and will take action against anyone who attempts to silence any such reporting or who negatively affects a Code investigation or breaches confidentiality obligations.

#### Your responsibilities:

- o If you know or suspect there has been a violation of the Code, and/or any policies or procedures of the Company, you have a duty to report it.
- o To make a report, you may
  - speak directly to your Head of Department, HRBP, Legal or Compliance Department; or
  - use a secure Reporting Hotline <http://bumiarmada.ethicspoint.com> or use the toll-free number provided by Bumi Armada ethics point website.

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### 1.5.2 Reporting Breaches of Code (Directors)

- o Directors are required to report to the Chairman of the Board:
  - the conduct of another Director, officer or Employee of the Group Company whom the Director has reasonable grounds to believe has done something unethical, illegal or maybe amount to conflict of interest; and
  - breaches of this Code, including violations of laws, rules, regulations or the Company's policies.
- o The reports may be channelled to the Chairman of the Board at the email address below:
  - Raja Tan Sri Dato' Seri Arshad Bin Raja Tun Uda ([arshaduda@bumiarmada.com](mailto:arshaduda@bumiarmada.com))
- o Any reporting pertaining to the Chairman of the Board shall be directed to the Senior Independent Director:
  - Reports to the Senior Independent Director may be sent to the following email address: ([vu.kumar@bumiarmada.com](mailto:vu.kumar@bumiarmada.com))
- o Each Director should observe the provisions of this Code with respect to any matters or issues within his/her control. Sanctions for a serious breach of this Code shall be determined by the Board. Sanctions may include removal from office and dismissal as well as other remedies, all to the extent permitted by law and as appropriate under the circumstances.
- o Directors must adhere to this Code, as applicable, for such period as may be required by law or as may be reasonable after leaving office.

### 1.6 Review of the Code

- o The Board shall review and reassess the adequacy of the Code periodically and make such amendments to the Code as the Board may deem appropriate.

### 1.7 Compliance Function

- o The Company has a Compliance function that helps the business meet its ethical and regulatory obligations, monitors any compliance risks the Company faces and determines, in partnership with the business, the correct response.
- o The Compliance function (in consultation with the Board of Directors) sets policies, procedures, training and communications to ensure that the Company complies with all laws and regulations that apply to it, wherever it operates and that it continues to meet the highest ethical standards.
- o The Company's Speak Up Policy is managed by the Compliance function, which overseas investigations of reported Code breaches, misconduct or infringement of the Company's standards.

#### Your responsibilities:

- o Comply with the laws and rules of the countries where we operate, while following the Code.
- o If any doubt as to whether you should follow the Code or the local laws in question, you should follow the more stringent standard.

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## 1.8 Consequences of breach of or non-compliance with the Code

- o The consequences of breach of or non-compliance with the Code include disciplinary action which may extend to termination of employment.
- o In some cases, the Company may be required to report a breach or non-compliance to the relevant authorities, which could also lead to criminal prosecution.

*Report any concerns:*

- [SPEAK UP POLICY](#)
- [Reporting Hotline](#)

## 2.0 SECTION 2: WORKPLACE CULTURE AND ENVIRONMENT

### 2.1 Health, Safety, Security, Environment and Quality (HSSEQ)

- o Safety is one of Bumi Armada's core values.
- o The Company is committed to operating its business with the objective of zero harm to its people, the public and the environment. This principle underpins how we work with our clients, Business Partners, the public and regulators.
- o The Company's policies and working practices supports this commitment and encourages transparent reporting. Everyone needs to be aware of risks and take steps to reduce them.
- o Further information and policy details are available on the Bumi Armada intranet site (Galleon).
- o In addition to the potential loss of life, damage to property and/or destruction of the environment, breach of HSSEQ rules and regulations may lead to civil action and/or criminal prosecution against the Company and those personnel who are responsible for causing or failing to prevent the said loss, damage or destruction.

#### Your responsibilities:

- o Work safely and protect those around you.
- o Comply with applicable laws, standards and procedures.
- o Do not undertake any activity that you are not qualified to perform.
- o Speak up or if necessary, stop the work or activity if you observe any unsafe conditions, actual or real risk of pollution, misbehaviour or mismanagement.
- o Report any incident, injury or accident.
- o Understand the risks within your area of responsibility and ensure that appropriate controls are in place to mitigate them.

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- o Know the emergency procedures that apply in your workplace or worksite.
- o Ask for help and advice if you are unclear about your HSSEQ responsibilities.

*Resources:*

*The Company HSSEQ policies*

## 2.2 Use of Information Technology and Electronic Communication

- o The Company has made available access to and use of its Information Technology ("IT") systems (hardware, software and networks) to employees to enable them to perform their work.
- o Both the Company and the user (individual employee) will be subject to applicable laws governing the use of electronic communication.
- o Breach of such laws can expose the Company and/or the employee to both civil and criminal penalties.

### Your responsibilities:

- o Use Company IT systems solely for Company related work only and in accordance with Company policies and guidelines. Limited personal use is permissible provided all Company IT security guidelines are adhered to.
- o Strictly comply with all IS&T Policy and Information Security Policy of the Company.
- o Do not upload, download, send, transmit or otherwise access defamatory, false, offensive, obscene, racist, seditious or inappropriate materials.
- o Do not use a personal e-mail address or service to conduct Company business.
- o Ensure proper use and care of any Company IT hardware issued or made available to you.

## 2.3 Workplace Harassment

- o The Company strives to provide a work environment free from harassment in all forms including sexual harassment and discrimination based on race, religion, national origin, age, gender, sex, sexual orientation, or disability.
- o Harassment, in general, is unwelcome or unwanted, offensive behaviour directed to any person, which may include such conduct as slurs, jokes, intimidation or any other verbal or physical attack upon such person based on race, religion, age, gender, disability, national origin, sexual orientation, or any other conduct that creates an intimidating, hostile, or offensive working environment.
- o Sexual harassment includes the solicitation of sexual favours as a condition of an employee's employment status, any other unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. It extends to all forms of offensive behaviour, including gender - based harassment. Sexual harassment is not tolerated in the workplace or in other work - related settings such as business trips and business - related social events.

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- o Any employee found to have harassed or otherwise discriminated against another employee or individual with a business relationship with Bumi Armada or its subsidiaries is subject to disciplinary action. Retaliation against an employee or director who reports alleged harassment or discrimination because of a prohibited reason will not be tolerated.

#### **Your responsibilities:**

- o Treat others with respect at all times.
- o Help create a conducive working environment.
- o Avoid any language or behaviour that has the potential to intimidate or offend others in any dealings with them.
- o Report any workplace harassment to HRBP or the Compliance Department.

## **2.4 Unlawful Discrimination**

- o The Company strives to treat all employees with courtesy, fairness and respect.
- o The Company will not tolerate any form of discrimination at the workplace or on the job.

#### **Your responsibilities:**

- o Ensure that all your business decisions for the Company are based strictly on merit, not on origin, race, religion, gender, sexual orientation, personal relationships or any other characteristic protected by applicable laws.

## **2.5 Fair Employment Practice**

- o The Company offers equal opportunities to everyone to ensure that it can draw on the widest talent pool and attract the best people.
- o Employment is based solely on individual merit and qualifications directly related to professional competence.

#### **Your responsibility:**

- o Base your employment decisions, e.g. (hiring, promotions, assignments) on objective criteria and ensure your personal feelings, prejudices and preferences are not influencing such decisions.
- o Under no circumstances allow origin, race, religion, gender, sexual orientation, personal relationships or any other personal characteristic to influence decisions relating to employment.
- o Do not recruit a relative or close associate of:
  - an employee or director of any company in the Bumi Armada group
  - a Government Official or Politically Exposed Person

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- a third party with whom Bumi Armada has a relationship without first speaking to and clearing it with the Compliance Department.

*Report any concerns:*

- [Speak Up Policy](#)
- [Reporting Hotline](#)

### 3.0 SECTION 3: BUSINESS PRACTICES

#### 3.1 Anti-Bribery and Corruption

- o Bumi Armada adopts a zero-tolerance policy against all forms of bribery and corruption. Bumi Armada is committed to operating in accordance with the highest ethical and professional standards.
- o The Company strictly prohibits bribery and corruption in all of its business dealings.
- o Bumi Armada will not participate in or allow any form of bribery and corruption in connection with our business. Neither the Company nor outside parties acting on our behalf should bribe another party to obtain any type of benefit. Similarly, the Company will not accept bribes or be used by any other party to facilitate bribery.
- o Without limitation to the above, Bumi Armada expects all its Employees and Business Partners to uphold the following four basic principles:

- **Don't give a bribe.**
- **Don't accept a bribe.**
- **Don't ask for a bribe.**
- **Don't offer a bribe.**

*These principles are simple but underpin the Company's core values and principles which underlie this COBCE.*

- o The Bumi Armada Anti-Bribery and Corruption Policy ("ABC Policy") elaborates upon these principles, providing guidance to Employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.
- o The Company expects that contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of Bumi Armada will comply with the relevant parts of the ABC Policy when performing such work or services.
- o To ensure Bumi Armada works only with ethical business partners, the Company has implemented a Know Your Counter-Party process as part of its Supplier Quality Management and Know Your Counterparty ("KYC") Procedures to detect and address risk relating to its third-party relationships.
- o All Employees are required to read and understand Bumi Armada's ABC Policy. Please direct any questions on the ABC Policy to the Compliance Department.
- o Any suspected bribery or corrupt acts must be promptly reported either via the Reporting Hotline (see section 1.6 above) or by direct email to the Ethics Committee, Audit Committee or Senior Independent Director as stipulated in the Speak-Up Policy.

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### 3.2 Facilitation Payments

- o "Facilitation payment" is a small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
- o Because of the many legal and ethical issues they pose, Bumi Armada prohibits the use of facilitation payments. Employees must report any requests for facilitating payments to the Head of the Compliance Department.
- o If an employee faces an imminent threat to personal health or safety and is therefore compelled to make a facilitation payment, he/she must promptly report the payment to the Compliance Department. Such payment must also be accurately described as such and recorded in the Company's books and records.

### 3.3 Political Contributions

- o Political contributions, whether monetary or in-kind, may violate Anti-Corruption Laws if they are made for a corrupt purpose.
- o Because of the risks involved, Bumi Armada does not make corporate political contributions.
- o Employees may make personal political contributions in their personal capacity to the extent that such contributions comply with legal limits in the relevant country and do not in any way appear to be an endorsement or contribution by the Company.
- o Payments required by contract or law to a government entity such as the host country's federal treasury are not prohibited, so long as they are made with due care to the government entity and not to any individual official and are accurately recorded in the Company's books and records.

### 3.4 Charitable Contributions and Corporate Social Responsibility (CSR)

- o The Company believes that investing in the communities in which it operates is an important part of the Company's license to operate.
- o As such, the Company may from time to time make reasonable contributions to support local charities or communities in location where Company does business. Should such charitable donations be made, the Company must have written assurances from the charity that the contributions will be used for their stated purpose, i.e. not for bribery.
- o Employees proposing charitable donations must submit a written request to the Vice President, Sustainability and External Relations describing the charity involved, including the name of persons contacted and the way in which the charity was identified, and attaching any supporting documentation. Final approval must also be obtained from the CEO, in consultation with the Head of the Compliance.
- o Bumi Armada prohibits the solicitation of donations by employees and business partners for improper (corrupt) purposes.

#### Your responsibilities:

- o **Do not give, accept, ask, or offer to give any bribes.**
- o Do not give, promise, or offer, either directly or indirectly through a third-party intermediary, any payment or benefit of any kind to **anyone**, including any Government Official (GO) or Politically Exposed Person (PEP), to obtain or retain business improperly.

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- o You must also never accept a bribe in connection with your duties and responsibilities to the Company. In the event you are offered any bribe, you must immediately inform the Compliance Department.
- o If you know or suspect that Company funds will be used to bribe or otherwise improperly influence someone, refuse to make the payment and immediately contact the Compliance Department.
- o Clearly and accurately record all transactions in the Company's books and records.
- o Ensure that the Company's policies and procedures, in particular the ABC Policy, the Company's Supplier Quality Management and Business Partner Due Diligence and Monitoring Procedures, are strictly adhered to in the course of conducting business.
- o Prior to proposing any joint venture, notify and consult the Compliance Department on the appropriate due diligence to be performed on the proposed joint venture partner(s).
- o Avoid any political contributions on behalf of the Company as this is prohibited.

**Resources:**

- [ABC Policy](#)
- [Reporting Hotline](#)

### 3.5 Trade Compliance

- o The movement of money, goods, technology, software, and services across international borders is subject to the laws and regulations of the exporting country, the importing country, and any other jurisdiction which may be crossed during the execution of the transaction.
- o These laws and regulations may require licenses to export or import these goods and services (including certain technologies) depending on the product type, destination, end-user or end-use. They may also impose economic sanctions, including trade embargoes, to restrict transactions with certain countries, entities, and individuals.
- o Bumi Armada is committed to complying with all applicable import and export controls laws, customs laws, economic sanctions, and applicable trade regulations that govern cross border transactions.
- o Trade and customs compliance violations may assign personal liability to the directors of the legal entity involved and the employees who approved and performed the violation. The liability may include confiscation of the goods and penalties for the company based on its value, and imprisonment of the employees involved.

#### Your responsibilities:

- o Ensure that the Company's Economic Sanctions and Export Control Policy and Guidelines are strictly adhered to in the course of conducting business.
- o Obtain the required permissions before exporting or importing money, goods, technology, software, or services across national borders.
- o Make accurate, honest and complete declarations in connection with all exports and imports.

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- o Where a potential transaction involves a jurisdiction or entity from a jurisdiction which is subject to applicable sanctions, consult with the Compliance Department or Legal Department in advance of any interaction with any party involved or potentially involved in the proposed transaction.
- o Never hand-carry a commercial item across international borders without prior review and coordination with the Logistics Section of Supply Chain Management. Transporting commercial material as a "hand carry" is allowed and legislated in some countries, and the logistics personnel will review and advise on the feasibility on a case by case basis. If approved, and required, the carrier must declare the item through the customs red channel, pay duties and receive support from the assigned customs broker at destination.
- o Ensure that imported goods are classified accurately and assigned the correct tariff number in order to determine the appropriate duty owed. Misclassification represents fraudulent misrepresentation and is against the law.
- o Never undervalue goods on commercial documents in an attempt to reduce the applicable duty.
- o Ensure you are up to date on the changing export and import rules in the region where you work by checking with the Logistics Section of Supply Chain Management.

### 3.6 Anti-Money Laundering

- o The Company is fully committed to complying with all laws and regulations prohibiting money laundering and the financing of terrorism ("AML").
- o AML laws prohibit activities that seek to conceal the proceeds of illegal activities, try to make the source of illegal funds look legitimate, or use otherwise legitimate funds to support criminal activities, including terrorism.
- o To reduce and mitigate the risks of being exposed to AML activities, the Company will conduct appropriate due diligence on all new/unknown customers.

#### Your responsibilities:

- o Strictly abide by the Company's Supplier Prequalification Procedure and KYC procedure before a supplier/third party is engaged.
- o Ensure that relevant Legal, Finance and Tax personnel are consulted before dealing with new customers with whom the Company has no prior established relationship.
- o Watch for irregular payments and other "red flags," such as payments made in currencies other than those specified in the invoice or contract, requests for overpayments, attempts to make payments in cash or cash equivalents, unapproved payments to an individual or entity not named in the contract, and use of an irregular account for the business relationship.
- o If you have any suspicions on the legitimacy of the source of funds or the activities for which the funds are used for, immediately notify the Compliance Department.

### 3.7 Anti-Trust and Competition

- o Antitrust and competition laws prohibit behaviour that unlawfully limits trade or restricts fair competition, such as agreements between competitors that serve to fix prices, divide markets, limit production, bid-rig or otherwise interfere with the competitive operation of a free marketplace.
- o The Company fully supports free enterprise and fair competition and is committed to complying with anti-trust and competition laws in all jurisdictions in which it operates.

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- o Any attempt to manipulate a competitive bidding process may be viewed as anti-competitive behaviour.
- o The exchange of commercial information about or between Bumi Armada and third parties may also violate laws and regulations.
- o There are severe penalties for breaches of antitrust and competition laws.

#### **Your responsibilities:**

- o Be careful not to participate in any activity, e.g. conversations or meetings with competitors, that could amount to or even be seen to be inappropriate collaboration or collusion e.g. sharing price information.
- o Actively disassociate yourself from any situation in which improper agreements or information sharing between competitors occurs and promptly inform the Compliance Department.
- o Do not enter into any agreement or understanding with any competitor about any aspect of competition between the Company and a competitor, including agreements on pricing, bidding, terms and conditions or allocation of markets or customers.
- o Select business partners based on merit and make clear to all third parties that we expect them to compete for our business in a fair and honest manner.
- o Be honest and open when discussing our products and services, and never comment on a competitor's products and services without an objective basis for doing so.
- o As anti-trust and competition laws are complex, fact specific and vary between countries, consult the Compliance Department if you have a doubt or questions on whether any conduct or proposed course of action is prohibited.

### **3.8 Conflicts of Interest and Abuse of Power**

- o The Company expects you to always act in the best interest of the Company when making any business decision for the Company.
- o A conflict of interest arises when an officer, director or employee's personal relationships, participation, interest or ownership in ventures outside the Company may influence or be seen to influence business decisions or performance of the individual's duties as an officer, director or employee of the Company.
- o Activities which may give rise to a conflict of interest include, but are not limited to, recommending suppliers or candidates, holding outside jobs and affiliations, serving as a director or consultant with an external company, or holding a financial interest in a competitor, customer or supplier.

#### **Your responsibilities:**

- o Always act in the best interest of the Company when making any business decision for the Company.
- o Avoid any relationship or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job.
- o Immediately notify your Head of Department, HRBP, Legal or Compliance Department as soon as you become aware that there is actual, potential or perceived conflict of interest.

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- o Declare any directorship, partnership, shareholding or business relationships outside Bumi Armada as and when they arise or during the annual declaration to your line manager, Human Resource Department or the Company Secretary.
- o Avoid from any discussion and/or decision-making pertaining to any transaction where there may be an actual, potential or perceived conflict of interest.
- o If you have any doubt on whether a conflict of interest situation exists or may arise, please consult with the Compliance Department.

### 3.9 Supply Chain Management

- o The Company is committed to work with its suppliers in a socially responsible and ethical manner, and continuously seeks to improve the way in which business is conducted with suppliers.
- o To ensure effective, fair and transparent management of the supply chain process, the Company's Supply Chain Management (SCM) function is the only function in the Company authorised to solicit pricing and award business on behalf of the Company.
- o The acceptance of any Gifts and Hospitality from suppliers shall be strictly subject to the Gifts and Hospitality provisions of the ABC Policy.

#### Your responsibilities:

- o Avoid putting yourself in a position whereas you may be accused of a conflict of interest, as it may happen when a non- SCM employee engages in selecting and negotiating commercial terms with suppliers.
- o Do not accept any Gifts and Hospitality from a supplier or potential supplier without consulting the Gifts and Hospitality provisions of the ABC Policy.

### 3.10 Gifts and Hospitality

- o The Company is committed to competing solely on the merits of our products and services. We must avoid any actions that may create a perception that the Company sought, received or provided favourable treatment in exchange for any Gifts and Hospitality.
- o Therefore, giving or receiving any Gifts and Hospitality is permissible only to the extent it meets the Company's policy and procedures, complies with laws and regulations of the jurisdiction where it is offered/received and does not create any actual or perceived conflict of interest.
- o The giving or receiving of cash or cash equivalents are prohibited.
- o No Gifts and Hospitality shall be given or offered to Government Officials (GOs) or Politically Exposed Persons (PEPs). The definition of GOs and PEPs is very broad and can be found in the ABC Policy. It includes employees of state-owned companies, anyone acting on behalf of the Government in an official capacity, individuals who have been entrusted with prominent public functions by foreign governments or domestically and all their close relatives or associates
- o All gifts received above the threshold of RM500 or USD125 are to be handed over to the Compliance Department. Each individual who is offered gifts or hospitality of any value (whether it is accepted or not) is responsible for declaring such offer via the online Gifts and Hospitality Form. Line Managers are also required to keep track of gifts and hospitality offered or received by employees.

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- o No gifts or hospitality should ever be offered, given or accepted if there is any intention on the part of the donor to influence a business decision (including where Bumi Armada is in a tender or bidding situation or other business activity where there could be a perception of a conflict of interest).
- o For additional guidance, consult the Gifts and Hospitality provisions in the ABC Policy.

#### Your responsibilities:

- o Never give or receive any gift or other benefit that could inappropriately influence a business decision.
- o Exercise good judgement as host or invitee when providing or receiving any gift or hospitality to ensure no implied business obligation is provided or received.
- o All gifts, entertainment and hospitality, including any travel and entertainment, must always follow the Gifts & Hospitality provisions in the ABC Policy.
- o Ensure that all Gifts and Hospitality provided to third parties are accurately recorded and properly documented in the Gifts & Hospitality Register.
- o Ensure full, fair, accurate, timely, and understandable disclosures as required in Employee Self Declaration Form.

#### Resources:

➤ [ABC Policy](#)

### 3.11 Human Rights

- o The Company is committed to integrate the responsibility of respecting human rights into our work environment and cascading it forward to our counterparties. This includes:
  - Ensuring people's safety and health
  - Respect for Employees' Rights
  - Encouraging equal opportunities
  - Eliminating inequality, discrimination, harassment, exploitation and violence
  - Protecting equality of human rights
  - Zero-Tolerance to Forced Labour
  - No Child Labour
- o The Company prohibits any dealings with parties that indulges in human rights offences, including:
  - Human trafficking and exploitation
  - Slavery, servitude and forced or compulsory labour
  - Child labour
- o We commit to respect and protect against human rights abuse including abuse of:
  - Women's rights

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- Freedom of expression
- Indigenous peoples' rights
- Freedom of religion
- o In support of ensuring adherence to the respect of human rights, Bumi Armada commits to conduct due diligence and KYC to ensure this culture is promoted across the business.
- o Bumi Armada expects the same high standards from all its vendors, subcontractors, and other business partners by aiming to obtain an equal commitment from them in striving to eliminate forced labour.
- o Bumi Armada has a Speak Up Policy that ensures a safe environment for employees to raise their concerns without fear of retaliation. The Company continues to build awareness and develop the knowledge of its employees on their labour rights and human rights and encourages them to speak up, without reprisal through an independent third-party hotline which is available 24 hours a day and 7 days a week, with assistance in their own language. The reports can also be made via a secure website at <http://bumiarmada.ethicspoint.com> or using the toll-free number provided.

#### Your responsibilities:

- o You must promptly report any allegation of human rights violations to the Compliance Department

#### *Resources:*

- [UK Modern Slavery Act 2015](#)
- [Human Rights Commission of Malaysia Act 1999](#)
- [Bumi Armada Human Rights Policy](#)

### 3.12 Sustainable Development and Environment

- o Bumi Armada is committed to operate sustainably through the preservation of the economic, environmental, and social assets that are fundamental to our long-term value creation and stakeholders.
- o Bumi Armada believes in building a sustainable future and we shall endeavour to:
  - combat climate change, through the transition towards cleaner energy, optimisation of energy efficiency and carbon capture technologies;
  - actively manage our supply chain through the minimisation of biodiversity loss as well as enforcement of labour and human rights; and
  - regularly engage with stakeholders to further align practices with societal expectations on material social and environmental issues.

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**Your responsibilities:**

- o You should aim to create long-term value by minimising disruptions to the environment and the community, by promoting environmental awareness as well as upholding labour and human rights.

## 4.0 SECTION 4: ASSETS AND FINANCIAL INTEGRITY

### 4.1 Accounting and Financial Records

- o Accurate and reliable records of many kinds are necessary to meet the Company's legal and financial obligations and to effectively manage the affairs of the Company.
- o The Company is committed to ensure proper record keeping and accounting in accordance with accounting principles, standards and regulations applicable to the Company.
- o Any misrepresentation of facts, falsification or tampering with or destroying records (where the Company is under an obligation to retain them) is strictly prohibited.

**Your responsibility:**

- o Ensure that any records you create fully and accurately reflect the particulars of the underlying transactions.
- o Never hide, alter, falsify, or disguise the true purpose of any record or transaction.
- o Always adhere to the applicable Limits of Authority policy.
- o Fully cooperate with any external or internal audits or investigations.
- o Immediately report any accounting irregularities, incidents of fraud, or other issues that could result in inaccurate books and records to the accounting team in Finance or the Reporting Hotline.

### 4.2 Company Assets

- o Company assets come in different forms, both tangible (physical property, buildings, equipment, computers and peripherals, documents), and intangible (Intellectual Property, Confidential Information or commercial information).
- o All employees are expected to exercise due care when handling the Company's assets.

**Your responsibilities:**

- o Protect the Company assets against theft, loss or misuse of Company assets.
- o Report any misconduct relating the misuse or misappropriation of Company assets.

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### 4.3 Signing Contracts and Committing the Company

- o Each time you enter into a business transaction on the Company's behalf, there should be documentation recording that the agreement has been reviewed and approved by the Legal Department.
- o Never sign any contract on behalf of the Company unless all of the following are met:
  - You are authorised to do so under the Company's Limit of Authority. If you are unsure whether you are authorised, ask your manager or superior.
  - The contract has been approved by the Legal Department.
  - Do not make changes to the Company standard form contracts without express written approval from the Legal Department.

#### Your responsibilities:

- o Consult Legal Department before executing any contracts.
- o You are responsible for every document you sign.

#### Resources:

➤ [Limits of Authority](#)

## 5.0 SECTION 5: MANAGING INFORMATION AND DATA

### 5.1 Data Privacy and Protection

- o Data protection laws safeguard information about people and prevent abuse.
- o The Company will comply with applicable laws and regulations when processing personal data.

#### Your responsibilities:

- o Comply with the Company's policies and procedures on the use of and storage of personal data.
- o Ensure that all Bumi Armada data is kept confidential and that appropriate controls are in place to store, handle, distribute and use such data.
- o Only access personal data for valid business purposes.
- o Do not release personal data to persons outside the Company without the proper authorisation.

### 5.2 Insider Trading and Dealing with Company Shares

- o Price sensitive information including but not limited to financial and business information pertaining to the performance of the Company and other listed companies which are not publicly available are considered insider information.

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### Your responsibilities:

- o Never deal in shares or other securities of any company, included Bumi Armada, either directly or indirectly while you are in possession of insider information.
- o When dealing in shares of Bumi Armada while not in possession of inside information, Principal Officers (as informed to you by the Company Secretaries) must comply with the relevant disclosure requirements.
- o When in doubt, check with the Company Secretaries.

## 5.3 Confidential Information and Intellectual Property

- o The Company's Confidential Information is meant to be kept strictly confidential and not to be divulged or disclosed to persons inside or outside the Company without proper authorisation.
- o The Company places the utmost importance on protection of its Intellectual Property and will take all necessary legal means to protect and assert its rights in respect of its Intellectual Property.
- o The Company respects the Intellectual Property rights of third parties.

### Your responsibilities:

- o Ensure that the Information Classification Standard is followed by adhering to the information labelling and handling guidance based on the four information classification levels: Public, Internal Use Only, Confidential and Highly Confidential.
- o Ensure that that no dissemination or disclosure of Confidential Information is made without proper authorisation in accordance with the Company's IS&T policies and procedures on dealing with Confidential Information. Confidential Information includes information from others which the Company is under an obligation to keep confidential.
- o Best practice is to only discuss your work with those relevant to the particular transaction or topic.
- o Identify, handle and store all Company Intellectual Property in accordance with the Company's Intellectual Property management system.
- o Be aware that the Company owns all Intellectual Property created by employees in the course of their employment and employees are required to sign and execute all necessary documents and actions necessary to perfect the Company's rights over Intellectual Property so created.
- o Ensure the use of Intellectual Property rights of others have been duly authorised. When in doubt, consult the Legal or Compliance Department.

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## 6.0 SECTION 6: EXTERNAL COMMUNICATION

### 6.1 Corporate Branding

- o The Company' brand and image is an asset that needs to be protected.
- o Employees' behaviour reflects on the Company's reputation and thus employees should behave in conformity with the spirit of this Code.
- o The use of any element of the Company's brand, e.g. on social media or at a conference or exhibition, souvenirs, brochures etc must be vetted and approved by the Corporate Communications Department.

### 6.2 Media Relations

- o Considering that we are a public listed company and having a global presence, we have to be careful on how information about the Company is disseminated to external parties.
- o While we cannot avoid talking about our Company to our friends and family, it is critical that we understand what can and cannot be shared publicly.
- o In addition, we must understand that each employee is an ambassador of the Company.
- o The only persons authorized to speak to the media are the
  - Chairman;
  - Chief Executive Officer;
  - Chief Financial Officer;
  - Vice President, Sustainability and External Relations; and
  - Any other person as authorised by the Board.

#### What is permissible

- o It is acceptable to talk about the business we are in, what you do for a living and about work in general. The best guide is to keep within what is available in the public domain, e.g. what is on our website or already announced in the media, i.e. publicly available information.
- o If approached by members of media or research companies, politely inform them that you are not authorised to speak for Company. Take their particulars and pass them on to the Corporate Communications Department. Do not enter into 'off the record' conversation with any third party.
- o If you are unsure of whether you should disclose any information, stop and check with the Corporate Communications Department.

### 6.3 Social Media

- o Social media is changing the way we communicate at work. However, employees need to be mindful that anything they post about the Company or any of its stakeholders can impact the Company's reputation and contract obligations. As such, social media needs to be used responsibly.
- o Remember to respect privacy, confidentiality and intellectual property. Your obligations to comply with the Code and Company policies and procedures apply to activities on social media.
- o Avoid making comments or posts that could be defamatory or offensive.

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- o Do not post personal opinions or speculative statements regarding work related matters.
- o Do not disclose information that is not publicly available.
- o In order to avoid situations of conflict, employees should not post any company information, activities or other corporate updates to social media.

#### 6.4 Publication of Materials

- o While the Company encourages employees to present at conferences, seminars and to publish academic papers, employees are required to seek approval from Business Unit/Division heads before accepting any invitation to speak or present and before submitting any article or paper for publication.

#### 7.0 SECTION 7: CONCLUSION

Thank you for taking the time to read the Code. You should continue to refer to the Code to guide you in your decision making as an employee of the Company.

Obviously, the Code cannot cover each and every situation in the course of doing business. Ultimately, the Company relies on each person subject to this Code to use good judgment in the performance of their responsibilities. In exercising that good judgment, you should consider both the guidelines stated in the Code, as well as their intent and spirit.

If you have questions, you should consult with the Compliance Department.

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## 8.0 SECTION 8: GLOSSARY

**Confidential Information:** means information classified in accordance with the Company's Information Classification Standard or any revisions thereto.

Intellectual Property means patents, designs, inventions, copyrights, trademarks, trade secrets, moral rights, service marks, trade names, domain name rights, know-how and all similar intangible, proprietary or industrial property rights of the Company.

**Gifts and Hospitality** refers to gifts or meals, travel, accommodations, entertainment and other promotional expenditures (collectively, Hospitality) we may receive from or provide to any person in connection with the Company's business.

### Government Official (GO) includes

- o An officer of a public body such as the Government, the Government of a State, local authority or statutory authority;
- o An Employee or Official of a state-owned or controlled company, even if operated like a privately-owned corporation;
- o Anyone acting in an official capacity for or on behalf of the Government (including a state-owned or controlled companies); or
- o Immediate family members and close relatives of a GO (such as a sibling, spouse, child, or other dependents).

### Politically Exposed Person (PEP) includes

- o Foreign PEPs – individuals who are or who have been entrusted with prominent public functions by a foreign country. For example, Heads of State or Government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations and important political party officials;
- o Domestic PEPs – individuals who are or have been entrusted domestically with prominent public functions. For example, Heads of State or Government, senior politicians, senior government (includes federal, state and local government), judicial or military officials, senior executives of state-owned corporations and important political party officials;
- o Persons who are or have been entrusted with a prominent function by an international organisation which refers to members of senior management. For example, directors, deputy directors and members of the Board or equivalent functions; or
- o Close associates are individuals who are closely connected to a PEP, either socially or professionally.

**Principal Officer** means in relation to the Company, the chief executive who is not a director, the chief financial officer or any other employee of the Company who has access or is privy to price-

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sensitive information in relation to the Company. If you are considered a Principal Officer, the Company Secretary will notify you accordingly.

**Reporting Hotline** means the independent third-party reporting hotline established pursuant to the Company's Speak Up Policy. Links to the Policy and Reporting Hotline communications channel can be found here: <http://bumiarmada.ethicspoint.com>

## 9.0 APPENDICES

| Appendix No | Document Title | Form / Template No |
|-------------|----------------|--------------------|
| N/A         | N/A            | N/A                |