



RESERVOIR LINK ENERGY BHD

CODE OF BUSINESS CONDUCT ("COBC")

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DEFINITIONS

TERM	DEFINITION
Anti-Money Laundering, Anti- Terrorism Financing and Proceeds of Unlawful Activities Act 2001	: An Act to provide for the offence of money laundering, the measures to be taken for the prevention of money laundering and terrorism financing offences and to provide for the forfeiture of property involved in or derived from money laundering and terrorism financing offences, as well as terrorist property, proceeds of an unlawful activity and instrumentalities of an offence, and for matters incidental thereto and connected therewith.
Business Associates	: Any external individual or organisation with whom the Group has, or plans to establish, some form of business relationship. This includes (but not limited to) existing or prospective agents, representatives, intermediaries, joint venture partners, customers, consultants, advisers, contractors, subcontractors, vendors and service providers.
Competition Act 2010	: An Act to promote economic development by promoting and protecting the process of competition, thereby protecting the interests of consumers and to provide for matters connected therewith.
Hospitality	: Hospitality includes, but is not limited to, considerate care provided to or received from third parties, which may include: a. Meals or refreshment b. Organisation of corporate events or activities c. Entertainment of individuals, especially at sporting or other public events d. Travel and accommodation expenses
Malaysia Anti- Corruption Commission Act 2009	: An Act to provide for the establishment of the Malaysia Anti- Corruption Commission ("MACC"), to make further and better provisions for the prevention of corruption and for matters necessary thereto and connected therewith.
Malaysian Anti- Corruption Commission	: An independent commission that was established under Malaysia Anti-Corruption Commission Act 2009 to investigate and prevent any form of corruption and abuse of power and advice and educate the public against corruption.
Officer of a public body/ Public Officials	: Any person who is a member, an officer, an employee or a servant of a "public body", and includes a member of the administration, a member of Parliament, a member of a State Legislative Assembly, a judge of the High Court, Court of Appeal or Federal Court, and any person receiving any remuneration from public funds, and, where the public body is a corporation sole, including the person who is incorporated as such.
Personal Data	: Defined by Personal Data Protection Act 2010 as: - Any information in respect of commercial transactions, which a. is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose b. recorded with the intention that it should wholly or partly being processed by means of such equipment c. is recorded as part of relevant filing system or with the intention it should form part of a relevant filing system - that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject; but does not include any information that is processed for the

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	purpose of a credit reporting agency under the Credit Reporting Agencies Act 2010.
Personal Data Protection Act 2010 :	An Act to regulate the processing of personal data in commercial transactions and to provide for matters connected therewith and incidental thereto.
Sensitive Personal Data :	Defined by Personal Data Protection Act 2010 as: Any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, his religious belief or other beliefs of a similar nature, the commission or alleged commission or alleged commission by him of any offence or any other personal data as the Minister may determine by order published in the Act.
U.K. Bribery Act 2010 :	An Act in United Kingdom of Great Britain and Northern Ireland that make provision about offences relating bribery and for connected purposes.
Universal Declaration of Human Rights (“UDHR”) :	An international document adopted by the United Nations General Assembly that enshrines basic rights and fundamental freedoms of all human beings.
U.S. Foreign Corrupt Practices Act (“FCPA”) :	A United States law that was enacted for the purpose of making it unlawful for certain classes of persons and entities to make payment to foreign government officials to assist in obtaining or retaining business.
Employment Act 1955 :	The Employment Act (1955), also known as the EA, is an act which outlines the rights of employees and employers and their obligations under the law. The EA does not cover every single employee in Malaysia, but it does cover the majority of employees and is the main legislation on employment matters in Malaysia.

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1. OVERVIEW

The Board establishes this Code of Business Conduct (“**COBC**”) applies to all Directors and Employees of Reservoir Link Energy Bhd (“**RLEB**” or “**the Company**”) and its subsidiaries (collectively “**the Group**”) to promote safe work environment, good business conduct and maintain a healthy corporate culture that engenders integrity, transparency and fairness.

The COBC is specifically written for the Company Group’s Directors and Employees as well as its business associates, i.e. contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Company Group to comply with the COBC in relevant parts when performing such work or services. Failure by contractors, sub-contractors, agents, consultants or other service providers to comply with the principles and standards as set out in the COBC may result in the termination of the non-complying party’s relationship with the Company Group.

The Company is committed to conduct its business in full compliance with all applicable laws and regulations in Malaysia and in countries where the Company has operations. The Company’s professionalism, honesty and integrity must at all times be upheld in the Company’s business dealings with customers, vendors, suppliers, contractors, government, regulators, investors, the business community as a whole and in the relationship of its own employees. Employees are not permitted to be involved or engaged in practices that affect or impair the Company’s integrity, impartiality or reputation and are required to promote the interests of the Company, perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner, abide by the Company’s policies and procedures, instructions and lawful directions that relate to their employment and duties.

It is the responsibility of every employee to act in accordance with the policies detailed in the COBC and any updates or amendments which may be issued from time to time by the Company. It is also the employee’s responsibility to seek clarification, to ask questions and to report suspected violations or express concerns regarding compliance with the COBC. Managers have added responsibility of supporting the implementation and monitoring compliance of the COBC.

2. OBJECTIVE

It is a guide to assist the Company’s directors and employees as well as business associates to observe ethical and legal business standards. It provides guidance of conduct when dealing with other parties that have business dealings with the Company. It also provides guidelines for the manner employees should conduct themselves at the work place, while performing their daily duties for the Company. It is not intended to be exhaustive and there may be additional obligations that Directors and Employees are expected to behave or conduct when performing their duties whether or not these are also imposed by law.

The objective of the COBC is to ensure that the Company’s business interactions should not in any circumstances, tainted by malpractices.

All employees must take ownership and responsibility in the performance of their duties in relation to the affairs of the Company Group and always act in the best interests of the Company.

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The Company reserves the right to modify, revise, or waive any of the provisions under this COBC from time to time at the Company's discretion. Any modification, revision or waiver of any of the provisions made from time to time shall be read together and form part of the COBC.

3. CORE AREA OF COBC

3.1 Health, Safety, Environment and Security ("HSES")

The Company will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Company's businesses and activities. Such a commitment in return requires that all Directors, Employees, sub-contractors, agents, consultants or other services providers understand and abide by the Company's HSES policies and procedures.

Everybody needs to adhere to the HSES objectives at all times of;

- Comply to HSES requirements set by the Company and applicable law
- Ensure to wear appropriate personal protective equipment (PPE) as required
- Shall follow any HSE instructions
- Attend HSE trainings and apply knowledge as required
- Report any hazard that could be a risk to their/others health and safety

3.2 Substance Misuse Policy

In accordance with RLEB's Substance Misuse Policy, the Group is fully committed to conduct at the highest possible standard of safety and has zero tolerance to substance misuse.

All employees, contractor, common carrier and vendor personnel must be free from substance misuse at all times during work.

The possession and consumption of substance misuse during working hours at work site as well as outside of the Company premises or work location is strictly prohibited.

Any personnel found violating the policy will be liable to disciplinary action including immediate termination.

3.3 Fair and Courteous Behaviour

Directors and Employees are to treat their fellow Directors and Employees with respect to maintain a healthy, safe and productive work environment that is free from discrimination and harassment based on race, religion, political inclination, gender, sexual orientation, marital status, national origin, disability, age or other factors that are unrelated to the Company's legitimate business interests.

The Group are committed in providing a workplace that is free from sexual harassment based on Employment Act 1955. Sexual harassment in the workplace is against the law

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and will not be tolerated. When the Company determines that an allegation of sexual harassment is credible, it will take prompt and appropriate corrective action.

3.4 Use of Resources and Asset Protection

Directors and Employees must protect the assets of the Company entrusted to them for legitimate business purposes and that no property, information or position belonging to the Company or opportunity arising from these be used for personal gain.

Assets shall include all physical assets, proprietary information, intellectual property rights, patents, trademarks and copyrights.

Directors and Employees are not allowed to use the Company's assets including equipment, resources and proprietary information for any outside work or for personal gain.

Directors and Employees shall return all the Company's assets entrusted to them upon cessation of their employment including documents which contain the Company's proprietary information. Additionally, they may not disclose or use the Company's proprietary or confidential information.

3.5 Data Integrity and Records

All information must be recorded accurately, timely and with integrity in order to meet the Company's legal and financial obligations and to manage the affairs of the Company.

All books, records and accounts should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

No unauthorized, false, improper or misleading records or entries shall be made in the books and records of the Company, under any circumstances.

3.6 Confidential Information

It is pertinent that all Directors and Employees exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Company which is acquired in the course of their employment, and are strictly prohibited to disclose to any person, unless the disclosure is duly authorized or legally mandated.

Confidential Information shall include but not be limited to proprietary information with respect to the business and financing of the Group and its dealings and transactions, trade secrets, technology, financial information, contracts and tender information, technical data, patents, know-how and affairs and likewise in relation to the Group's associate companies, suppliers, principals, partners, customers, and any other persons with whom the Group is in contact.

Confidential Information is a valuable asset of the Group and must not be communicated or disclosed in any manner to competitors, customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group.

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Any unlawful or unauthorised use or disclosure of Confidential Information belonging to the Group may result in irreparable loss and/ or damage to the Group and cause significant harm to the Group’s business. In such cases, the Group may institute civil and criminal proceedings against the offending party.

Directors and Employees must comply with all laws, regulations and contractual obligations regarding the valid intellectual property rights of other parties, including patents, copyrights, trade secrets and other proprietary information. You must not infringe on the protected intellectual property rights of other parties. You must take reasonable steps to ascertain that information, data, materials or technology (including digital software/solutions) that you use or reproduce in the course of your work, employment or engagement does not infringe any intellectual property rights of any third parties.

3.7 Data Privacy and Protection

In conjunction with local legal requirements, the Group protects the personal data and/or sensitive personal data of its employees and Third Parties. Personal data and/or sensitive personal data shall have the same meanings as prescribed in the Personal Data Protection Act 2010 (“Act”).

All employees with access to personal data and/or sensitive personal data shall comply with the requirements of the Act.

3.8 Conflict of Interest

The Directors and Employees are expected to make business decisions in the best interest of the Company and should avoid involving themselves in situations where there is real or apparent conflict of interest between them as individuals and the interest of the Company. Directors and Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage.

In addition, a Director or an Employee shall avoid any situation in which the Director or Employee has an interest in any entity or matter that may influence the Director or Employee’s judgment in the discharge of responsibilities. Directors and employees shall not compete against RL Group and shall not use any position or influence or company information, assets or resources for any personal gain or improper benefit of the associates.

All directors and employees shall disclose and declare their interest on annual basis to Corporate Services, Group HR or Company Secretary, respectively, on annual basis and as soon as there is any change to the interest.

Any actual, perceived, or potential conflict of interest shall be disclosed and declared by the directors and employees, as soon as practically possible upon the occurrence of such conflict.

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3.9 Anti-Bribery and Corruption

The Group is committed to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; to implement and enforce effective systems to counter bribery and corruption. We shall constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in the country.

The bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

Corruption is defined as dishonest behaviour by those in positions of power, such as managers or government officials. Corruption can include giving or accepting bribes or inappropriate gifts, double dealing, under-the-table transactions, manipulating elections, kickbacks, diverting funds, laundering money and defrauding investor.

The Company takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all the business dealings and relationships wherever the Company operates, and implementing and enforcing effective systems to counter bribery and corruption.

Directors and Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.

Directors and Employees must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof. Promising, offering, giving or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may not only result in disciplinary action but also criminal charges.

The Company Group is committed in complying with anti-bribery and corruption laws that apply to its' operations, Malaysian Anti-Corruption Commission Act (Amendment) 2018, U.S Foreign Corrupt Practices Act and UK Bribery Act 2010. Under these laws, all Directors and Employees are prohibited from offering or accepting bribes to or from government officials, customers, partners, principals or suppliers to secure or award any contract, retain business or to direct business to any persons or to have an improper advantage.

If any Directors and Employee, contractor, sub-contractor, agent, consultant or other service provider is confronted with a demand or offer for a bribe from anyone, such demand or offer must be reported immediately to his or her immediate superior and/or respective Head of Department and/or senior management for further action.

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All the Directors and Employees are prohibited from corrupt practices in dealing with government officials. It is an offense to make or offer a payment, gift or other benefits to any government official in order to induce favourable business treatment.

3.10 Gifts, Entertainment, Hospitality and Travelling (“GEHT”)

Directors and Employees or their family members must not solicit any GEHT from Counterparts or Business Partners directly or indirectly. They are also discouraged from accepting GEHT from these parties. Notwithstanding this, the Company recognizes that the occasional acceptance of modest gifts may be a legitimate contribution to good business relationships.

GEHT offered or given must be;

- (a) nominal and reasonable and not lavish or extravagant and be infrequent. Corporate gifts such as calendars, diaries, umbrellas, mouse pads and the like which are inexpensive, openly distributed during festivities and special occasions such as flowers/fruit baskets and deemed trivial are acceptable.
- (b) connected to a legitimate business promotional activity or performance of any existing contract consistent with Company Group’s business practices.
- (c) appropriate to the official responsibilities of the employees.
- (d) in accordance with the prevailing guidelines and policies of Company Group such as the Company Group’s approval authority guidelines., any GEHT policy and terms and conditions of contracts with principals, customers and suppliers.
- (e) in accordance with applicable laws and regulations, customer’s internal GEHT policy, generally accepted business practices and customs.
- (f) Directors and Employees offer GEHT to promote good business relationships. However, they must be sensitive to the recipient organisation’s gifts receiving policy.
- (g) not to be given with a corrupt intent namely to improperly influence relationships or decisions or to obtain special treatment in connection with Company Group’s business.
- (h) be accurately recorded in the Company Group’s books and records.
- (i) the value of the GEHT shall be as per Company’s Guideline on Providing and Receiving of Gift, Entertainment, Hospitality and Travel . Any GEHT exceeding the threshold limit to fill Declaration Form and submit to authorized personnel for management approval.

Directors and Employees or their family members must never accept GEHT, personal services or those otherwise that may put themselves in a position of conflict, influence the business decision or was otherwise intended or given with the expectation of gaining any advantage, or which may adversely affect the Company’s reputation.

However, if not accepting the GEHT may seem disrespectful or inappropriate under prevailing circumstances, therefore, all employees must declare all GEHT receiving within (7) days or any other suitable timeframe for determining the treatment for it (reject or accept with disposition decision) as per Company’s Guideline on Providing and Receiving of Gift, Entertainment, Hospitality and Travel.

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3.11 Donations and Sponsorships

The Company Group is committed to the principles of “corporate responsibility” and is committed to sponsorships and donations to demonstrate “good corporate citizenship” to the communities in which the Company Group operates.

Any donations or sponsorships in cash or in kind offered by the Company Group to charitable organisations, non-governmental organizations, community groups will be evaluated on a case to case basis and with due regard to the merits of the donation/sponsorship request in accordance with the Group’s Guidelines on Granting of Donations and Sponsorship. Donations and sponsorships should generally be related to the industry in which the Company Group operates as well as the locations where the Company Group is based.

3.12 Political Activities and Contribution

The Company recognises the right of its employees, in their capacity as citizens, to participate and involve in legitimate political activities. However, to maintain RL Group’s apolitical stand and avoiding identification with any political party, employees and directors are required to use their outside office hours or annual leave entitlement for such matters.

Employees can participate as individuals in the political process on their own accord, volition, time, and resources. Political opinions are personal opinions and must not represent the Company.

Directors and Employees must not use their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties.

Directors and Employees may not make any contribution or incur any expenditure using the Company’s resources to benefit any political campaign, party or politician.

The Company’s facilities, equipment and resources may not be used for any political campaigns or party functions.

Charitable donations may not be used as a substitute for prohibited political payments.

3.13 Money Laundering and Anti-Terrorism

Money laundering is the process of concealing the true nature or source of unlawfully obtained funds and convert the “dirty” money to a legitimate source of income or asset. It is an offence under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“AMLA”).

Directors and Employees are prohibited from involvement in money laundering activities, either directly or indirectly.

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Directors and Employees are expected to be mindful of the risk of the Company's business being use for money laundering activities and to raise any suspicious transactions to their immediate superior.

Directors and employees shall not engage in any financial transactions involving properties or funds which promotes or are the results of criminal activity including diverting, concealing, receiving or using the proceeds of such criminal activity.

Directors and employees shall not also finance, sponsor, facilitate or assist any terrorist person, activity or organization or any such person's activity or organization designated as a terrorist person, activity or organization.

Any suspicious transaction shall be reported to Corporate Services for further review, assessment, and deliberation with Audit Committee. The activities may include, but not limited to the following:

- Payments made in currencies that differ from invoices;
- Attempts to make payment in cash or cash equivalent (out of normal business practice);
- Payments made by third parties that are not parties to the contract; and
- Payments to or accounts of third parties that are not parties to the contract.

3.14 Anti-Competition

Anti-competition law protects free enterprise and prohibits behaviour that limits trade or restrict fair competition and promotes a free and fair marketplace.

The Company Group complies with Competition Act 2010 ("CA 2010") in regulating and control anti-competitive conduct, hence ensuring free and fair competition in the market.

Anti-competitive behaviour will damage the Company Group's business and reputation for fairness and honesty. Anti-competitive practices are unacceptable. Violation of anti-competition law by any employee may subject both the employee and the Company Group to severe consequences.

3.15 Export and Import Controls, International Boycotts and Economic Sanctions

Directors and Employees must comply with the Group policies and procedures in effect from time-to-time regarding export and import controls, boycotts, and economic sanctions programmes.

The Group needs to be able to consider the potential impact of export control laws and economic sanctions programmes before transferring goods, technology, software or services across national borders by whatever means. In this regard, if involved with imports or exports, proper authorisation must be granted from approving authority in accordance with respective Delegation of Authority Limits (DAL), before importing or exporting goods, technology, software, or services across national borders for or on behalf of the Group.

Directors and Employees must not bring restricted goods into a country without declaring them and must not import prohibited goods. The import requirements must be meet when

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bringing goods or services into a country, ensuring duties, levies and taxes are paid and proper documentation is presented.

If involved in international business for or on behalf of the Group, Directors and Employees must keep yourself informed of the countries, organisations and persons sanctioned under the applicable laws. The sanctions area is complex, please refer to Head of Corporate Services concerning to any questions or uncertainties.

3.16 Law Compliance

The Company will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Company operates. Directors and Employees are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act (Amendment) 2018, Personal Data Protection Act 2010, Competition Act 2010, etc.

The Company reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

3.17 Harassment

The Group will not tolerate any forms of harassment. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material. Any questions concerning issues of such should be directed either to the Head of Department or the HR Department. All such reports and/or complaints shall be treated with strictest confidence.

Harassment is any inappropriate conduct which has the purpose or effect of:

- Insults or belittling remarks;
- Inappropriate jokes and comments;
- Displays of inappropriate pictures, cartoons or other materials;
- Sexual advances, offensive contact, comments about another's sexual conduct; and
- Threats or coercion such as malicious, hostile, and intimidating statements or actions.

3.18 Insider Trading

Employees who are in the possession of market sensitive information are not allowed to trade in securities of the Company or the shares of another listed company if that information has not been made public.

Further, employees shall not disclose such price sensitive information to any third party or encourage any other person to deal in price-affected securities.

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Employees must consult their respective Head of Department if unsure of the status of the information held by them.

Employees must ensure that all transactions in the Company shares comply with the procedures set out in the Bursa Malaysia Listing Requirements and the law on insider trading.

3.19 Public Disclosure

Any written or oral communication made publicly on behalf of the Company Group is a public disclosure.

Employees shall not either orally or in writing or in any form (including on social media websites such as Twitter, Facebook, Instagram, Facebook and others) make or circulate any public statement on the policies, decisions, measures or work undertaken by the Company Group, unless the employees are duly appointed or authorised to make such statement on behalf of the Company Group.

Misleading the public can be a regulatory offence. Inaccurate and delayed information disclosure can damage the Company Group's reputation.

Directors and Employees shall be mindful and adhere to the following at all times:

- To not disclose RLEB' confidential information on their personal social media accounts or on any other accounts i.e. via comments.
- To be mindful of the copyright, trademark and intellectual property rights of RLEB and other organisations or individuals.
- To protect RLEB' brand and reputation, and to observe principles of integrity and professionalism when publishing content on RLEB.
- To not make any statement on behalf of the Group unless he or she is the designated or assigned (authorised) spokesperson.

Directors and Employees are responsible for their postings on social media, whether relating to RLEB or otherwise. Should any of the social media activities be found and deemed to have any negative impact to RLEB' image and reputation, RLEB has the right to take the necessary disciplinary action.

3.20 Conduct Contrary To Duty To Serve Diligently

As a the Group employee, you must devote your time and attention to the fulfilment of your employment obligations to RLEB. The Group employees shall not take up dual employment, in whatever capacity (including being involved in the management, direction or conduct of another enterprise) without the express written permission from your HOD or your HR Department.

The granting of permission will be subject to you satisfying RLEB that such dual employment activity will not interfere with or compromise the proper performance of your duties or the fulfilment of your obligations to the Group.

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The Group employees may take up other gainful activity or be involved in any outside business activities. If already engaged in any other gainful activity or involved, either directly or indirectly, in the management or business activities of any other company or companies, firms, corporations or other business activities, please come forward and disclose your activity according to the ABMS Guidelines RLEB-ABMS-002 Declaration of Interest.

Generally, RLEB allow the Group employees to participate in unpaid voluntary public service, recreational activities, sports and other community activities outside working hours. Whilst such activities outside working hours are encouraged, such activities must not be permitted to interfere with your duties and responsibilities during normal working hours.

3.21 Equal Opportunity

Equal opportunity is to ensure that current and potential employees are offered the same opportunities regardless of race, nationality, ethnic origin, age, religion or belief, sex, marital status, disability, or any other characteristic unrelated to the performance of the job.

The Company Group is committed to promote equal opportunities in employment to ensure that all its employees and job applicants are treated fairly and are not subjected to unfair or unlawful discrimination.

The Company Group aims to recognize and reward individual or potential talents with an equal opportunity to excel and ensure that the Company Group's vision is achieved.

3.22 Human Rights

In compliance with human rights commitment, the Company seek to all the Directors and Employees committed and respect internationally recognised human rights and contribute to sustainable development of the Company. The Group supports thirty (30) human rights as listed in the Universal Declaration of Human Rights ("UDHR") and respects the sovereignty of governments throughout the world .

Directors and Employees requires to adhere to the following principles;

- (a) Freedom of Labour, by not engaging or employing people, under any circumstances, against their own free will or engaging in bonded labour/debt slavery.
- (b) Prevention of Child Labour, by not employing children below the legal minimum working age requirement of any country. Employees and contract personnel must be at least eighteen (18) years of age (unless otherwise determined by the local laws of the host country).
- (c) Wages and Benefits, by complying with all applicable laws related to employee compensation, including minimum wage, overtime hours and legally mandated benefits.

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- (d) Working Hours, by complying with local laws of the host country or agreements regarding working hours, overtime hours, and work during holidays.
- (e) Establish Grievance Mechanisms, which provide a means of grievance reporting and appropriate follow-up measures while ensuring that the identity of the complainant is protected.
- (f) Non-Discrimination, by respecting diversity in the workplace and not engaging in any form of unlawful discrimination based on gender, race, ethnicity, skin colour, religion, nationality, sexual orientation, age, marital status, pregnancy, political affiliation, or disability in hiring and employment practices.
- (g) Freedom of Association, by respecting the legal rights of employees to become members of a labour union or otherwise.
- (h) Humane Treatment, by respecting employee's rights and ensuring no harsh and inhumane treatment, including any form of mental or physical coercion, or verbal abuse of employees.
- (i) Foreign or Migrant Workers, where if foreign or migrant employees are engaged, they are to be employed in full compliance with the labour and immigration laws of the host country.

3.23 Disclosure Duties

Directors and Employees shall report any suspected, illegal, unethical or improper conduct of which they have become aware during the performance of work and business dealings.

Directors and Employees may also disclose any alleged or suspected improper conduct using the procedure provided for in Company's Whistleblowing Policy.

Any breach of the COBC shall be reported to the immediate superior and/or respective Head of Department and/or Management Committee and/or Head of Human Resources in accordance with the description in COBC.

The Company Group will not tolerate any retaliation against anyone making such a report in good faith. Appropriate action will be taken against employees making a not good faith complaint according to the Company's Whistleblowing Policy.

4. VIOLATIONS OF THE COBC

Violation to any part of the COBC is deemed to have committed misconduct and may result in disciplinary action and /or punishment as per Conduct and Discipline Policy and relevant regulations that may be deemed appropriate by the Group.

In the case of suspected criminal activities or breach of law or regulation, the Company has the right to report the case or breach to the appropriate authorities.

The followings are deemed as misconduct:

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- a. Failure to maintain and observe secrecy with respect to the Group's activity as well as classified information throughout employment;
- b. Absence without leave or without reasonable cause;
- c. Publication of information of any sort, confidential or otherwise, in any form, obtained by the employee in the course of the employment with the Group, without any authorization;
- d. Misuse of the Group's name, letter head or stationery or the emblem, logo or trademark in providing the reference;
- e. Making unauthorized public statement;
- f. Performing any activities outside the Group by taking part, either directly or indirectly in the management or business activities of any entities without written permission from the Group;
- g. Perform any unauthorized action or being associated with such action leading to the loss to the Group; and
- h. Violation of any part of the Code of Business Conduct.

Any Employee who knows of, or suspects, a violation of the COBC, is encouraged to whistle blow or report the concerns through the Whistle Blowing Policy. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the COBC.

5. REVIEW OF THE COBC

The Board will review the COBC from time to time to ensure that it continues to remain relevant and appropriate.

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**RESERVOIR LINK ENERGY BHD
CODE OF BUSINESS CONDUCT (COBC)
DECLARATION BY EMPLOYEE**

I, (NRIC/Passport No.....), hereby confirm that I have read and understand the Code of Business Conduct (“COBC”) and agree to observe and adhere to the COBC as amended from time to time.

I shall conduct myself with complete professionalism, integrity and be true to the spirit of the COBC in the daily execution of my duties and assignments and as an employee of Reservoir Link Energy Bhd (RLEB).

I acknowledge that failure to abide by the COBC will lead to the appropriate action being taken against me.

Name:

Date :