

GENTING BERHAD

**Code of Conduct and Ethics for
Employees and Directors**

Introduction

- 1.1** The Genting Group is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Group practices a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.

Scope of this Code

- 2.1** This Code of Conduct and Ethics for Employees and Directors ("**Code**") shall apply to:
- (a) directors and employees of Genting Berhad ("**Company**"), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts; and
 - (b) directors and employees of subsidiaries of the Company (and with respect to each subsidiary, all references in this Code to the Company shall mean the subsidiary), except any listed subsidiaries that have their own code of conduct and ethics, in which case the directors and employees of such listed subsidiaries shall comply with its own code of conduct and ethics.
- 2.2** This Code is not a comprehensive guide that covers every ethical situation you may encounter in your course of work. In any circumstance which is not covered by this Code or in case of any doubt, you shall refer to your Head of Department or the Head of Human Resources Department for clarification or guidance.

Your Obligations

- 3.1** The Company is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations. You have a continuing obligation to familiarise yourself with applicable laws relating to your job responsibilities and the Company's policies.
- 3.2** If you are a new employee you must read and acknowledge this Code. You must also acknowledge any amendments as and when required after the initial acknowledgement.
- 3.3** If you are a manager and/or managing/engaging third party, contractors, vendors, consultants and/or personnel positioned in the Company's premises, you have the additional responsibility of leading and being a positive example of this Code to your staff. You must also be aware of, and report any unethical or illegal business practices.
- 3.4** You must comply and observe this Code when you are working with the Company. In some instances (such as confidentiality obligations), you are also bound by it after you have left the Company.
- 3.5** You must also observe all laws and regulations that govern all of the matters covered in this Code. In the event of a conflict between the content of this Code and any applicable law, the applicable law shall prevail and you shall comply with applicable law.
- 3.6** Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against you. Violation of applicable laws may subject you to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.

Workplace Culture and Environment

4.1 Equal Opportunity and Non-Discrimination

The Company upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement. You must strive to create a workplace where everyone is treated fairly and equally. You cannot discriminate based on race, religion, gender, politics or disability. You must be fair to all, and strive to be seen as fair to all.

4.2 Health, Safety and Environment ("HSE") Management

- (a) The Company is committed to providing a safe and healthy work environment to you. Safety is everyone's responsibility. You must ensure a safe and healthy environment for everyone including the public and comply with all related laws, the Company's policy, systems and processes that govern HSE. You must be appropriately trained and competent in the specified areas of HSE in the work that you do.
- (b) You must report any occupational incident (accident, hazard, unsafe act or condition) to your Head of Department. You are required to actively participate in related HSE programs.
- (c) If you are a manager and/or managing/engaging third party staff, contractors, vendors, consultants and/or personnel working for the Company, you have the additional responsibility to ensure that all comply with all HSE requirements.

4.3 Harassment, Threat and Violence

The Company seeks to provide a work environment where you are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour. You are responsible to report any harassment, intimidation, offensive or inappropriate behaviour. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

4.4 Drugs, Alcohol and Prohibited Substances

- (a) You are expected to perform your job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to you or others. The Company therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.
- (b) There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

Company Information, Records and Assets

5.1 Data Integrity and Data Protection

- (a) The Company has put in place numerous policies governing use of data, including, without limitation, the Personal Data Protection Policy, the Corporate Information Technology Security Policy, the Genting Group IT Computing Policy and the Document Management

Policy. You shall comply with such policies and record, manage, store and transfer all personal data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

- (b) **What is personal data?** It is any information that relates directly or indirectly to an individual, who is identified or identifiable from that information or from that or other information in your possession. Such information may include address, identification card number, passport number, email addresses and contact details, as well as any expression of opinions about that individual and any intentions of the data user in respect of that individual.

5.2 Protection and Use of Company Assets and Resources

- (a) The Company provides you a variety of resources and assets including licensed software for you to deliver your work. You shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of the Company's assets and resources.
- (b) If you use the Company's assets and resources for personal use, it must be in reasonable amount that does not go against any specific rules or policies and must not have a negative impact on the Company, such as cost, safety, reputation or productivity nor distract you from focusing on your responsibilities.
- (c) You can only use Company work vehicles for Company related purposes.
- (d) You must not store or view or download or send any materials which are pornographic, sexist, racist or illegal in nature or which can create hatred or ill feelings.
- (e) You cannot share usernames and passwords with anyone at all, nor allow access to systems through your own usernames and passwords, even if it is for work.
- (f) You cannot duplicate copyrighted materials, copy the Company's proprietary software or install unauthorized software into the Company's assets.

5.3 Records and Reporting

The Company has put in place the Document Management Policy which sets out the time period to retain and destroy data and records, based on the specific statutory and regulatory requirements, some of which are specific to a particular business operations or functions. You are responsible to retain and store proper records in compliance with Company policy, legal and regulatory requirements.

5.4 Proprietary and Confidential Information

- (a) You are required to protect Genting Group's confidential information and guard them against unauthorised disclosure or use.
- (b) You are also required to protect confidential information of third party which you have access to in the course of your work. Confidential information includes, but are not limited to, data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data. Unless required by law or authorised by the Company. You shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes. This obligation continues beyond the termination of employment.
- (c) You must mark all confidential information properly, keep it secure and do not share it with anyone for whom it is not intended for.

- (d) Don't share or discuss openly information not known yet to the public such as information on employees, customers, suppliers, business partners, technical information, data, knowhow and business information, marketing strategies, financial conditions and operations. These information should also not be used for personal gain.
- (e) You must not misrepresent, falsify, improperly amend or remove any information in the Company's records.
- (f) You must not access, copy, distribute, share or send out any customers' information without proper authorization or other than through approved process.

Duties of Good Faith, Diligence and Integrity

6.1 Conflict of Interest

- (a) You have an obligation to act in the best interest of the Company at all times. You are prohibited from using your position or knowledge gained directly or indirectly in the course of your duties and responsibilities or employment for private or personal advantage.
- (b) If you at any time think that you may have a potential or actual conflict of interest, you are obliged to disclose the conflict promptly by submitting the completed Conflict of Interest Declaration to the Human Resources Department so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, you shall adopt the highest standard of conduct.
- (c) Any dealings of family members with the Company, whether directly or indirectly, must be disclosed.
- (d) You cannot work in any other trade, business, employment or directorship other than your employment with the Company, whether within or outside of working hours, without the prior written approval from the Human Resources Department.

6.2 Accepting & Providing Gifts and other Benefits

No gifts can be offered or received in return for any business advantage or as a disguise for a bribe. You are expected to exercise proper care and judgment, taking into account pertinent circumstances and the business context, applicable laws and cultural norms in handling gift activities and behave in a manner consistent with the principles set out in the Anti-Bribery and Corruption System Manual ("**ABCS Manual**") which is available at the Genting Group Information Portal (ggip).

6.3 Bribery and Corruption

- (a) In line with the Company's policy and zero-tolerance approach against bribery and corruption, the Company has put in place the Anti-Bribery and Corruption System ("**ABCS**") to consolidate and manage elements, policies, objectives and processes in relation to bribery and corruption risks in the Company.
- (b) You are required to comply with the ABCS Manual and its corresponding policies. Please refer to the **ABCS Manual** for more information.
- (c) You shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for yourself or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

6.4 **Insider Trading**

- (a) 'Insider Trading' is a criminal offence and is prohibited under the Capital Markets and Services Act 2007 and the Listing Requirements of Bursa Malaysia Securities Berhad.
- (b) You are an 'insider' if you have material information not available to the public, which would have an effect on the price or value of the Company's securities ("**Market Sensitive Information**").
- (c) If you are in possession of Market Sensitive Information, you are not allowed to trade in securities of the Company or another listed company if that information has not been made public. You are also prohibited from disclosing any Market Sensitive Information to any third party.
- (d) You must exercise due care when dealing, either purchasing or in the sale of shares of the Company in view of the implications under insider trading laws.

6.5 **Money Laundering**

- (a) Money laundering is a process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.
- (b) You should always ensure that you are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. You need to be mindful of the risk of the Company's business being used for money laundering activities and if you suspect money laundering activities, you should report it to your respective Head of Department or the relevant person designated by the Company.

6.6 **Punctuality & Attendance**

- (a) You must be on time to any event you are required to be part of or meetings or external events which are part of your job.
- (b) You must get your supervisor's approval before leaving your workplace for personal matters.
- (c) If you are unable to report for work, you must tell your supervisor at the first available opportunity the reason for your absence. Your supervisor however has the right to reject your request and you would have to report to work immediately. Supervisors are required to exercise good judgment in such instance balancing the needs of the Company and the individual.
- (d) Please refer to the **Executive Handbook** for more information.

6.7 **Fraud**

- (a) You are responsible to detect and report fraudulent activities such as:
 - (i) Forgery or alteration of documents;
 - (ii) Misappropriation, destruction or disappearance of funds, inventories, supplies or other Company's tangible or intangible assets;
 - (iii) Improper handling or reporting of financial transactions;
 - (iv) False, fictitious or misleading entries of reports; and
 - (v) False or misleading statements to those conducting investigation of irregularities.

- (b) Suspected irregularities or corruptions must be reported in accordance with the Whistleblower Policy immediately. Please refer to the **Whistleblower Policy** for more info.
- (c) Do not discuss your suspicions with anyone other than the investigation team.

6.8 Purchasing & Sourcing

- (a) Your purchase decision must be made in the interest of the Company. You must practice equal treatment to all vendors, with due care on confidentiality, transparency and with no conflict of interest.
- (b) Any conflict of interest through relationships, business or others must be declared to your Head of Department, regardless if you have access or not to tender or procurement-related sensitive information.
- (c) All monetary commitments on behalf of the Company must be within the Company's Limits of Authority.
- (d) If you have tendered your resignation, you are no longer allowed to make any commitment on behalf of the Company. Consultants are not allowed to make such commitments at all times.

6.9 Competitors

- (a) The Company does not tolerate anyone who steals, procures, obtains or possesses any of its competitors' proprietary information or trade secrets. If you have obtained such information by mistake, immediately consult the Legal Department.
- (b) As much as we want to gain competitive advantage against our competitors, we will not use illegal or unethical methods to achieve such goal. For comparative advertising, employees should use only information obtained from competitors' own statements to compare with the Company's products and services.

Media and Interactions

7.1 Social Media

- (a) Social media is a very fast changing area. Whilst the Company respects your rights to freedom of speech, you must be mindful of what is acceptable and what is not to be posted on social media. If you are officially posting on behalf of the Company, you must have been authorized to do that, and you must comply with applicable procedures and policies. If it's a personal post, you must not give the impression you are posting on behalf of the Company, and you must be aware that your comments may be associated with the Company even if you posted it as a personal post.
- (b) You must not publish, post, release any materials or confidential information or participate in any forums that may harm the reputation of the Company.
- (c) Any posting which may potentially create an unpleasant working environment within the Company is not acceptable.
- (d) These requirements apply to postings done during or after working hours, regardless of whether you are using your own or the Company's equipment/devices.

7.2 Media

- (a) If you receive any queries from the media, direct them to the relevant person designated by the Company. They are the right people to handle such matters. Do not respond unless you have been authorized to do so.
- (b) Requests from financial analysts and shareholders should be treated in a similar manner.

7.3 Your Conduct with Internal Parties

- (a) Treat your colleagues the same way you want to be treated. Respect is a two-way street.
- (b) The Company does not tolerate anyone using their ranks, seniority, race, physical size or gender to intimidate others.
- (c) If you are a supervisor then you have the added responsibility of managing your employees. You must make objective decisions and without any prejudice or discrimination.
- (d) You are responsible to monitor and ensure effective controls are implemented in your respective area of work.
- (e) Your conduct must reflect the Company's values.

7.4 Your Conduct with External Parties

- (a) How you behave out there portrays the image of the Company. Therefore, you must at all times ensure business is done with the highest integrity and professionalism.
- (b) The Company does not condone anyone who offers, makes or demands for unlawful payments to secure sales/business. We take pride in doing business the honest way.
- (c) If you receive any non-routine requests from government or regulatory agencies, immediately check with the relevant departments handling the matter.

Your Security Responsibility

- 8.1** You must report any security incidents and/or any potential security related risks to your supervisor or Head of Department.
- 8.2** You must always wear and display your Company ID tag within the Company's premises and report any losses.
- 8.3** Your ID tag and access into the Company's premises is for your use only and not to be shared.
- 8.4** If you are a supervisor and/or managing/engaging third party, contractors, consultants and/or personnel positioned in the Company's premises, you have the additional responsibility to ensure that all comply with all the security requirements as per this Code.

Whistleblower

- 9.1** The Company has put in place a Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables employees and members of the public to raise genuine

concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

- 9.2** If you think you know of any possible violations of law or unethical conducts such as fraud, corrupt practices, misrepresentations or deliberate errors connected with our financial statements, any form of harassment or conflict between personal life and work or anything else that carries substantial risks to the Company and/or public health or safety and security, you must report it.
- 9.3** Your identity will be kept confidential when you raise concerns or report any violations of this Code, unless required to be declared under the law