



Code of Conduct

Strives To Be A Good Corporate Citizen

**BEE SENG SHIPPING GROUP OF
COMPANIES**





CODE OF CONDUCT

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Message From The Managing Director

Dear Colleagues,

The Organization strives to be a good corporate citizen. It conducts business in an ethical, lawful manner. It acts with integrity and in compliance with all applicable laws and regulations in Brunei Darussalam and any applicable industry standards.

The Organization takes its Customers' business seriously and values building a long-lasting business relationship with our Customers. It considers service excellence, integrity, teamwork as an integral commitment we give to our Customers. We will always try to deliver the best personalized service at the most cost-effective price.

The Organization and its employees will maintain a respectful and good working relationship with relevant Government Authorities, Receivers, Shippers and Forwarding Agents in Brunei Darussalam. Our good relationship with them strengthens our ability to deliver the right results for our Principals.

The Organization does not condone any form of corruption. It is against illegally influencing and / or bribing public officials or business partners. It also promotes employee awareness of and compliance with Organization Policy against bribery.

This Code of Conduct provides ethical and legal guidance to help you understand and meet your obligations as the Organization employee.

This Code has my full endorsement, as well as senior management. Please familiarize yourself with the Code and ensure that you fully comply with it.

Thank you

Best regards,

TAN CHIN WAN

Managing Director



Introduction to the Code of Conduct

Our Employee Code of Conduct has been created to help you understand our core values and the behaviours expected to support them. It provides guidance and support for every Bee Seng Shipping Group of Companies employee with high standards of ethical behaviour and compliance with local laws and regulations being essential to protecting the reputation and long-term success of our business.

We must constantly live up to our values, so our clients, stakeholders and colleagues are confident to put their trust on us.

Your Commitment to This Code

Every employee of Bee Seng Shipping Group of Companies must comply with our Code. You must make time to read and understand this document. If you have any questions, or need advice please speak to your Supervisor or our HR team.

Living up to Our Values

We take great pride in having established a culture that is built upon a unified set of values. We believe our values are the essence of our brand and are instrumental to the way we work and operate. Our values guide our behavior, and collectively, our behaviours determine how we are perceived as a company.

We take pride in what we do, of who we are and what we stand for. We are proud of our name, our colleagues and our achievements.

It is our passion to provide the best service for our customers that drives us to success over our competitors.

We never compromise with challenge; we see difficulties as an opportunity to demonstrate ability. We never give up.

We work as a team to strive stronger, be more efficient and adds value to the business. Take ownership of team goals and are accountable for own part in the process. Listen to input from teammates to reach the best solution.

We act with integrity and communicate honestly and openly.

We demonstrate a passion for understanding and meeting the needs of our customers & shareholders

We are open to change and readily implement better ways of doing things.



We take active responsibility for the quality of service we provide to customers and others.

We are accountable for all of our own actions including safety, protecting the environment, and supporting our communities.

We respect each other differences and celebrate our diversity; treat employees and customers with respects, appreciate and value each other and our diverse backgrounds and life experiences.

Your Responsibilities

Everyone in our business has particular responsibilities, including:

- Leading by example
- Promoting and role-modelling good ethical behaviour and business conduct including complying with all laws and regulations
- Ensuring you have access to and receiving training on ethical issues and policies relating to this Code
- Promoting an environment where your colleagues feel confident and able to raise ethical concerns and that they are taken seriously and follow-up.

Zero Tolerance

While this Code gives you guidance for certain situations there are specific areas where we have a zero-tolerance policy:

- Unsafe, illegal or unethical working practices
- Violence and aggression
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing

Reporting a Wrongdoing

We encourage the reporting of suspected wrongdoing at work by an employee, the Company or a supplier or business partner. This set up help you to speak up in situations where you suspect dangerous, illegal, harmful or fraudulent activity is take place, or when you or your colleagues are



being treated unfairly. We conduct business to the highest standards of integrity and honesty, and we expect you to maintain these same standards in everything you do.

Ask yourself:

- Is it legal?
- Is it ethical?
- Does it comply to our company policy?

If the answer to any of these is “No” then we expect you to speak up.

Who should I speak to?

You should speak to your line manager or HR Supervisor. If it is not possible to talk to any of the above, you can email to hr.admin1@btfwdg.com or report in Microsoft Teams private chat.

Workplace Safety

We work to ensure the workplace safety of our employees, customers and stakeholders. We expect all our employees to play their part in making Bee Seng Shipping Group of Companies safer and ensuring their team has the right equipment, training and knowledge to guarantee a safe working environment.

HSE Philosophy

The essence behind our philosophy is simple: Everything that we do will have, as our first consideration, the idea that it must Cause No Harm:

- Cause No Harm to OURSELVES as individuals
- Cause No Harm to OTHERS
- Cause No Harm to OUR EQUIPMENT AND MATERIALS
- Cause No Harm to THE ENVIRONMENT
- Cause No Harm to THE PLANET as a whole
- Cause No Harm to FUTURE GENERATIONS

Your Responsibilities

- Ensure you know who the First Aiders are for your building
- Be aware of the work you are undertaking, and the hazards associated with it
- Look out for your own safety and others around you



- Report any accident, near miss, injury, ill health or unsafe condition so appropriate action can be taken
- Ensure you are properly trained for the work you are doing
- Familiarize yourself with your building's fire extinguishers, fire exits and emergency evacuation procedures

Ask Yourself:

- Do you know, understand and follow the Life Saving Rules that pertain to your work?
- Have you taken active measures to intervene, report, and mitigate a safety risk?

Equal Employment Opportunity

We follow the local employment law and is committed to equal employment opportunity. We will not discriminate against any employee or applicant in a manner that violates the law. We are committed to providing equal opportunity for all employees and applicants without regard to race, colour, religion, sex, age, marital status, personal appearance, matriculation or any other characteristic protected under the law. Each person is evaluated on the basis of personal skill and merit. Our equal employment opportunity applies to all aspects of employment, including recruitment, hiring, job assignments, promotions, working conditions, scheduling, benefits, wage and salary administration, disciplinary action, termination, and social, educational and recreational programs.

Bee Seng Shipping Group of Companies will not tolerate any form of unlawful discrimination. All employees are expected to cooperate fully in implementing this policy. Any employee who believes that any other employee may have violated the policy should report to the Human Resources Director.

If the company determines that a violation of this policy has occurred, it will take appropriate disciplinary action against the offending party, which can include counseling, warnings, suspensions, and termination. Employees who report, in good faith, violations of this policy and employees who cooperate with investigations into alleged violations of this policy will not be subject to retaliation.

Harassment-free Workplace

Bee Seng Shipping Group of Companies is committed to provide a working environment free from harassment and intimidation. Employees should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another.

Treat others with respect and avoid situations that may be perceived as inappropriate. Challenge someone if you find their behaviour hostile, intimidating or humiliating.



Harassment can result in disciplinary action and may lead to dismissal.

Apply this:

- Do not physically or verbally intimidate or humiliate others
- Never make inappropriate jokes or comments. If you are unsure whether something is inappropriate assume that it is
- Never distribute or display offensive material, including pictures
- Don't be afraid to speak up and tell a person if you are upset by his or her actions or behaviour. Explain why and ask them to stop.

Ask Yourself:

- Have you raised your voice or behaved in an intimidating manner?
- Have you observed and respected the cultural differences in your work group?
- Have you made inappropriate jokes or comments?
- Have you distributed or displayed potentially offensive or inappropriate material?

Bribery and Corruption

We operate a zero-tolerance policy to bribery and corruption. We do not offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or for any individual.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

Apply This:

- Never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage.
- Ensure people you work with understand bribery and corruption is unacceptable
- Report a concern if you suspect or know of corruption within Bee Seng Shipping Group of Companies or any party, we conduct business with.

Ask Yourself:

- Have you been offered or received money, a gift or favour to influence a business decision?
- Would you care if the public knew what you have done?
- Are you intending to or have you given a donation which might be regarded as an improper payment?
- How might people perceive your actions with regards to transparency?



Gifts and Hospitality

Maintaining high quality professional relationships with our clients is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.

Ask yourself:

- Did receipt of the Gifts & hospitality make you feel you were under an obligation?
- Is there a business justification for offering the gift & hospitality?
- Is the gifts being given to you as an exceptional reward or incentive for a transaction?
- Is the timing of the gift & hospitality sensitive (e.g. during negotiations)?

Conflicts of Interest

Employees must avoid conflicts between their private interests and their duty to the company. Don't let your personal interest conflict or appear to conflict with the company's interest. A conflict of interest can influence your decision-making and jeopardize your reputation and that of the company, A failure to follow the requirements of this Code or any laws or regulations can result in disciplinary action, including termination of employment.

Apply This:

- Declare to your line manager or supervisor any matter or relationship that could influence or be perceived to influence your decisions or actions
- Withdraw from decision-making that creates, or could be perceived to create, a conflict of interest.
- Be impartial, professional and competitive in your dealings with business partners
- You can be active in your own time in community, government, educational and other non-profit organizations if you comply with relevant laws, regulations and our company policies.
- You can acquire interests in other businesses and perform external professional activities in your own time if no actual or potential conflicts of interest would result. If in doubt please consult your line manager.

Ask Yourself:

- Are you hiring, managing, reviewing or appraising a relative or friend?



- Do you have a close relative or friend that works for the government, a vendor, or competitor?
- Are your personal relationships influencing or perceived to influence business decisions?
- Are you using your position or access to confidential information for personal gain?

Drug & Alcohol Abuse Policy

We have recognized the risks involved when the effects of drugs and alcohol are present in the workplace and has adopted the zero-tolerance policy for unauthorized drugs or alcohol on company premises.

On the basis of our wish to Cause No Harm to anyone or anything, no person will be permitted to enter any company work location if they are under the influence of alcohol, illegal drugs or improperly utilized medical drug. The company reserves the right to perform drug and alcohol testing at any time.

Entry into any work location is conditional upon the company's right to search personnel and their belongings for contraband items. Searches may be conducted by authorized personnel in a private and in as discreet a manner as possible.

Possession or use of any of the contraband items, failure to consent to a drug and alcohol test, failure to consent to inspection of person and personal belongings, is grounds for immediate termination.

Information Security Management Policy

We strive to assure integrity of all information we disseminate, produce, manage or store, which is duly handled through sound confidentiality procedures. This policy aims to protect our information assets from any internal, external, deliberate or accidental threats. To pursue the policy, we shall:

- Ensure that all information, including internal, third party, personal and electronic data, is treated with complete confidentiality
- Maintain integrity of all such information
- Ensure that our information system and the information contained meet the needs of our core and supporting business operations
- Comply with all applicable statutory and regulatory requirements
- Safeguard security of our information assets through effective business continuity management
- Make information available to staff and the public with minimum disruption
- Increase staff awareness of information security management through education and training
- Perform reliable access control to protect our information system against unauthorized access.



Competition (Antitrust) Order 2015

Anti-competitive practices such as price fixing, market sharing, supply control & Bid Rigging are unacceptable and are illegal.

We do not tolerate the violation of the laws. We must not agree to fix or maintain price including verbal or written agreement, any agreement on not to compete, agreement to allocate customers and share market, agreeing to limit the quantity of goods or services or conspiring competitors to raise prices to purchasers, manipulate procurement process or elimination of competition through pre-determination of winner.

