



**JASAMERIN**



**COMPANY  
POLICY**



## ALCOHOL AND DRUGS ABUSE POLICY

The objective of this policy is to ensure a safe and healthy work environment for all personnel including passengers who serve or sail onboard JM fleet.

**To achieve the objective, the Company will ensure all its workplaces are ZERO FROM DRUG & ALCOHOL.**

To establish the effectiveness of this Policy, each employee will be required to undergo and drugs examination by the Company's HSE personnel or panel clinic as and when deemed necessary by the Company. Adulteration or switching any test sample is strictly prohibited.

**All seafarers and staffs Blood Alcohol Content (BAC) shall not exceed 0.00%** at the workplace or on board JM fleet. The Management shall take disciplinary action against all seafarers and staffs that are found under the influence of alcohol and/or drugs. The Company prohibits taking impairment-causing medication including over the counter drugs while on JM premise, lease, right-of-way, or handling JM property, unless supervisor is informed and medically approved via fitness for duty process.

The Company will not tolerate any form of alcohol or drug abuse; including manufacturing, storing, selling, procuring, possessing or distributing such substance. The Company will at all time exercise the right to conduct search and test with regard to alcohol and drugs abuse on any employee. Violators will face disciplinary action, including termination of service.

It is crucial to remind everyone the penalties of such unlawful and nefarious acts may incur mandatory death sentence, imprisonment and fine.



CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**

1st June 2023



**Jasa Merin (Labuan) PLC (LL06525)**

## **Anti-Bribery and Corruption Policy**

### **1.0 Application and Interpretation**

- 1.1 This revised Anti-Bribery and Corruption (“ABAC”) Policy is applicable to all directors and employees of Marine & General Berhad and its subsidiaries, effective 1 June 2023.
- 1.2 Rules, regulations and guidelines (including Circulars and Letters) from regulatory authorities with purview over Marine & General Berhad’s activities will automatically supersede the existing operating policies and procedures herein stated. Where such rules, regulations and guidelines that supersede the existing operating policies and procedures are issued and/or amended, the Company will circulate an appropriate advisory to the employees.
- 1.3 The word “he” shall also mean “she” unless the context states otherwise. Where the context so admits, words imparting any singular number shall include the plural number and vice-versa.
- 1.4 The terms “employee” or “staff” as used in this Code of Conduct refers to all employees of Marine & General Berhad and its subsidiaries.
- 1.5 The term director or directors, unless the context states otherwise, shall mean the members of the Board of Marine & General Berhad and its subsidiaries.
- 1.6 The term “M&G Group”, shall mean Marine & General Berhad and its subsidiaries.
- 1.7 The term “Company”, unless the context states otherwise, shall mean Marine & General Berhad.
- 1.8 The term “subsidiary”, unless the context states otherwise, shall mean both wholly-owned and jointly-owned subsidiaries of Marine & General Berhad.

1.9 The term “financial limits of authority” refers to a set of financial authority limits placed on directors and staff of a company when entering into contracts and/or commitments. At the Marine & General Berhad’s level this is primarily the Financial Limits of Authority issued by the Finance and Administration Division.

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

## **2.0 General Guidelines**

2.1 The M&G Group has a zero-tolerance policy against all forms of bribery and corruption. Directors and employees of M&G and its wholly-owned subsidiaries must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government Officials or any commercial person or entity, regardless of local practices or customs

2.2 All directors and employees of M&G and its wholly-owned subsidiaries must comply with all applicable anti-bribery laws and regulations, including, but not limited to, the Malaysian Anti-Corruption Commission Act (MACC Act).

## **3.0 Receipt of gifts, entertainment and hospitality**

3.1 It is the responsibility of the directors and employees to inform such external parties of the M&G Group’s policy in relation to receipt of gifts, entertainment and hospitality, and to request the external parties’ understanding of and adherence with this policy.

3.2 The directors and employees of the M&G Group and their family members must refrain from, directly or indirectly, receiving lavish gifts of significant value in their personal capacity from external parties or agents representing those parties, where that aforementioned external party either has a business relationship with the M&G Group or is seeking to develop a business relationship with the M&G Group. Directors and employees must abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings.

3.3 Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of the M&G Group is allowed only in limited circumstances, whereby refusing the gift is likely to seriously offend and may sever the business relationship with the external party. However, in no circumstances may an employee or his/her family/household members accept gifts in the form

of cash or cash equivalent.

3.4 In the limited circumstances mentioned, employees are expected to immediately inform the acceptance to their direct superior and the person with oversight over matters relating to human resources. Where the limited circumstances involve a director or a member of the senior management, he/she is expected to inform any acceptance of gifts to the Chairman of the Audit Committee.

3.5 The M&G Group takes note that the occasional acceptance of a reasonable and modest level of entertainment provided by external parties in the normal course of business is a legitimate way to network and build good business relationships. However, it is important for directors and employees to exercise proper care and judgment before accepting entertainment offered or provided by an external party.

#### **4.0 Provision of gifts, entertainment and hospitality to external parties**

4.1 It is the responsibility of the directors and employees to inform such external parties of the M&G Group's policy in relation to provision of gifts, entertainment and hospitality, and to request the external parties' understanding of and adherence with this policy.

4.2 Directors and employees of the M&G Group must refrain from providing gifts of significant value to external parties except where it is:

- a) an exchange of gifts at the company-to-company level (e.g. gifts exchanged at a function, company visit or courtesy call);
- b) a gift from the M&G Group to external parties in relation to the M&G Group's official functions, events and celebrations; and
- c) a token gift of nominal value normally bearing the name and/or logo of the M&G Group or any subsidiary of the Company.

4.3 Any expenditure incurred in the provision of gifts to an external party must be proposed and approved in accordance with the prevailing financial authority limits of the Company or subsidiary in question.

4.4 In addition, the provision/exchange of gifts to external parties that have on-going or potential business dealings with the M&G Group should, where possible, be undertaken at either the business premises of M&G or the counterparty. Any provision/exchange of gifts at private residences is to be avoided.

4.5 Directors and eligible employees are allowed to entertain external parties through a reasonable act of hospitality as part of business networking, subject always to

any internal limits on entertainment as may be prescribed under their respective terms of service or prevailing financial limits of authority. Directors and employees are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result.

## **5.0 Charitable contributions and sponsorships**

5.1 Any charitable contribution and/or sponsorships should only be carried out where it has been approved by the appropriate approving authority overseeing charitable contribution and/or sponsorships for the Company or subsidiary.

5.2 Such contribution and/or sponsorships, must be properly recorded and documented in the Company or subsidiary's accounting records.

## **6.0 Dealings with Public Officials**

6.1 Directors and employees must not give, promise to give, or offer, a payment, loan, reward, gift or entertainment, to a Public Official, with the expectation or hope that a business advantage will be received, or to reward a business advantage already given (i.e. securing a permit, securing or renewing a contract with favourable terms, influencing a Public Official to take or omit an action in violation of his or her lawful duty etc) or to "facilitate" or expedite a routine procedure.

6.2 Directors and eligible employees are allowed to entertain Public Officials through a reasonable act of hospitality as part of business networking, subject always to any internal limits on entertainment as may be prescribed under their respective terms of service. Any entertainment activities that would involve Public Officials shall not be excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity. Any employee providing the entertainment must also inform the employee's direct superior of the entertainment provided. Where the entertainment is provided by a director or a member of the senior management, he/she is expected to inform either the Group Executive Chairman or the Chairman of the Audit Committee of the entertainment provided.

## **7.0 Facilitation payments**

7.1 The M&G Group does not make facilitation payments to secure a business advantage. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (such as the issuance of permits, licences, processing visas or work permits, provision of mail pick-up and delivery etc.). All directors and employees must avoid any activity

that might lead to, or suggest, that a facilitation payment will be made by or on behalf of the M&G Group.

7.2 Although facilitation payments to secure a business advantage is prohibited, the M&G Group recognises that there may be situations where facilitation payments may be tolerated if a facilitation payment is made in the context of an imminent threat i.e. loss of life, limb or liberty. Where such a facilitation payment had to be made, the director or employee must make the necessary disclosures to either the Group Executive Chairman or the Chairman of the Audit Committee.

## **8.0 Reporting lines**

8.1 Where a director receives a request from an external party or Public Official that is deemed inappropriate under this policy, he should diplomatically but clearly advise the requestor that it is against M&Gs policy to make such payments, and decline to make or promise to make the payment. The solicitation should be promptly reported to either the Group Executive Chairman or the Chairman of the Audit Committee.

8.2 Where an employee receives a request from an external party or Public Official that is deemed inappropriate under this policy, he should diplomatically but clearly advise the requestor that it is against M&Gs policy to make such payments, and decline to make or promise to make the payment. The solicitation should be promptly reported to their direct supervisor or Head of Department.

8.3 When a director believes or have reason to believe that another person may be in breach of the anti-bribery and corruption provisions in this Policy, the director should report the matter to either the Group Executive Chairman or the Chairman of the Audit Committee.

8.4 When an employee believes or have reason to believe that another person may be in breach of the anti-bribery and corruption provisions in this Policy, the employee should report the matter to their direct supervisor or Head of Department. Where this option is not appropriate, the employee should report the matter in accordance with the Company's Whistle Blowing Policy.

8.5 M&G Group commits to protect the rights of individuals who report issues, raise genuine concerns or make appropriate suggestions. M&G Group will ensure that such individuals are protected from any form of harassment or threats when he/she:

- a) Reports in good faith without malicious intent(s);
- b) Reports what he/ she suspects is a violation of the ABAC Policy

- c) Raises a compliance question or seeks advice about a particular business practice; or
- d) Cooperates in an investigation of a potential violation of the ABAC Policy.


8.6 Any form of retaliation against such person will be regarded as a serious misconduct.

## 9.0 Training and communication

9.1 All directors and employees of the M&G Group should be aware of the content of this ABAC Policy and other relevant policies and procedures. As such, this policy shall be made readily accessible to all directors and employees of the M&G Group via the Company's corporate website.

9.2 Access to appropriate ABAC training will be provided to all directors and employees of the M&G Group. It is the responsibility of the director / employee to complete the training(s) within the specified timeline.

The revised Anti-Bribery and Corruption Policy has been approved by the Marine & General Board of Directors on 27 March 2023 and will become effective from 1 June 2023 onwards.



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CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**

01<sup>st</sup> June 2023

Rev.1



# HEALTH, SAFETY AND ENVIRONMENTAL POLICY

**To promote the Health of all employees and to prevent unsafe action and substandard condition, zero personal injury, zero loss of life, zero damage to property and zero pollution to the environment:**

The Company shall comply with the statutory rules and requirements related to Health, Safety and Environment protection, including those under International Maritime Organization and International Safety Management (ISM) Code and Health, Safety and Environment Management System (HSEMS).

The Company shall provide safe practices in operation and safe working environment. Assess all identified risks in operation and establish appropriate safeguards. It deems the protection of Health and Safety of its employee at work and Environmental protection and conservation, to be an essential part of all Managers' duties and responsibilities for which they and their subordinates are accountable to at all level.

Employees' participation and contribution to the establishment and observance of safe working practices and good housekeeping, including establishing safeguards against all identified risks are vital.

All employees are expected to recognize that there is a clear duty for them to exercise self-discipline and accept responsibility to do everything they can, in order to maintain the highest practicable environmental standard and to prevent injury to themselves, others and any ensuing loss to the Company.

All activities that will be performed by the Company's members and appointed subcontractors must be carried out safely, in an environmentally sound manner.

The Company shall continuously improve safety-management skills of ashore and aboard ships' personnel, including contingency and emergency planning related to both safety and environmentally protections.



CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**

1st June 2023

# HUMAN RESOURCE AND ADMINISTRATION POLICY

1. Our Company's believe and appreciate that a good and healthy working environment and healthy and competent employees are one of the cornerstones of productivity and success of the company.
2. It is JML policy to be recognised as an actively health conscious company and to ensure that our organisation is staffed by healthy and competent personnel.
3. The Company has established procedures and guidelines to:
  - Comply with all applicable laws and regulations governing health at employees workplaces.
  - Maintain proper, fair and effective recruitment procedures.
  - As far as possible, accommodate any different physical and physiological needs of an individual's work situation.
  - Allocate high priority to the training, development, motivation and medical fitness of employees to have a preventive effect on undesired events and sick leave.
  - Provide health related information and training and encourage employees to live healthy lifestyles.
  - Ensure line management has defined responsibility for appropriate guidance and training to employees so they can fully master their role and work responsibilities as described in their functional description.
  - Establish regular performance appraisal and performance measures to maintain competent and qualified personnel.
  - Encourage employees to develop their career with JML.
4. The commitment and participation of every Company employee is essential to the success of this policy and all personnel shall at all times comply with health and safety requirements.
5. This policy directs all employees ashore and on ships to recognise their role for the health and safety of themselves and their colleagues



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**CHIEF OPERATING OFFICER**  
**Abdul Hafidz Abdul Rahman**  
1st June 2023

## SEXUAL HARASSMENT POLICY

Jasa Merin is committed in providing a workplace that is free from sexual harassment. Sexual harassment in the workplace is against the law and will not be tolerated. When the Company determines that a claim of sexual harassment is reliable, it will take prompt and appropriate corrective action.

Undesirable manners such as below are inappropriate and meet the definition of sexual harassment:

- Sexual pranks, or repeated sexual teasing, jokes, in person or via electronic media;
- Verbal abuse of a sexual nature;
- Touching or grabbing of a sexual nature;
- Repeatedly asking a person to socialize during off-duty hours when the person has said no or has indicated he or she is not interested;
- Giving gifts or leaving objects that are sexually suggestive;
- Repeatedly making sexually suggestive gestures;
- Making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace;

If anyone has been sexually harassed or if they witness behaviour amounting to sexual harassment by others, they should immediately lodge a complaint with their Line Manager and Human Resources Manager. All complaints will be kept confidential.

Employees who have been found by the Company to have subjected another employee to undesirable manner of a sexual nature will be subjected to disciplinary action which will include termination of employment.



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CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**  
1st June 2023



## SMOKING POLICY

Jasa Merin is committed to supporting the health and wellness of its employees, crews and others at workplace. Company recognizes that illness and disease is associated with tobacco products, and that breathing in other people's tobacco smoke (second-hand smoke) is a workplace hazard. Company also recognizes that smoking may poses a fire hazard.

This Policy also applies to the use of electronic cigarettes/vaping devices. The use of electronic cigarettes/vaping devices is prohibited wherever smoking is prohibited.

**SMOKING PROHIBITED**: Smoking is prohibited in all parts of the workplace and vessel, except for areas which are specifically designated as smoking areas.

**DESIGNATED SMOKING AREAS**: Smoking is only permitted at designated areas that neither impact in any way on other persons, nor pose any fire hazard.

**DISCIPLINARY ACTION**: Any violation of this Policy may subject the employee(s) to disciplinary action, including termination of employment.



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CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**  
1st June 2023

## STOP WORK POLICY

Jasa Merin (LABUAN) PLC Management places special importance in protecting the Health and Safety of all employees and avoiding damage to properties as well as preserving the Environment from any pollution or other potential hazards.

Employees have the right to **STOP WORK** if deemed necessary for the preservation of Health and Safety of themselves and their fellow colleagues, damage to property and protecting the environment from any pollution.

Employees should consult their respective supervisor for advice should the need arise or if they are in doubt. The Management shall support any of **STOP WORK** decision.



CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**

1st June 2023





**Jasa Merin (Labuan) PLC (LL06525)**

## **Human Rights Policy**

1. **Objectives**

Jasa Merin Malaysia Sdn Bhd (“JMM”) are guided by the principles as expressed in the Universal Declaration of Human Rights. Our Human Rights Policy (“Policy”) is an extension of the Group’s commitment to good workplace practices and includes people in communities in our areas of operation.

2. **Scope**

The Policy applies to all Malaysian operations within the direct control of the Group, including suppliers and subcontractors acting on our behalf.

3. **Principles**

We are guided and governed by our commitment to:

a. **Non-discrimination**

We have a zero-tolerance policy against discrimination in any form, and our employees are provided with equal career opportunities regardless of race, religion, gender, age, sexual orientation, disabilities, or nationality.

b. **Fair Employment Conditions**

The Group operates in full compliance with applicable and minimum wage, work hours, overtime and benefits laws, and strives to keep overtime work on a strictly critical or necessary basis. We remunerate our employees equitably based on qualifications, skills, and experience relevant to the work performance expectations, and we provide recognition based on performance and contribution to the Company’s success.

c. **Health and Safety**

We provide a safe and healthy workplace environment for our employees, in compliance with applicable health and safety laws, regulations, and requirements. The Group is dedicated to maintaining a productive workplace and strives to implement necessary measures to prevent job-related injuries and illnesses and aims for zero fatalities.

d. **Workplace Security**

We strive to provide a safe and mutually respectful workplace environment that is free from all forms of violence, harassment, humiliation, and intimidation.

e. **Privacy/Data Protection**

We respect the confidential personal data of our employees and treat all personal data with integrity.

f. **No Child or Forced Labour and Human Trafficking**

In compliance with applicable laws, we do not employ children. We prohibit the use of all forms of forced and bonded labour, slavery, and human trafficking.

We have established grievance procedures and whistleblowing channels which all our stakeholders are encouraged to use to report potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices. There are mechanisms in place to ensure that a person filing such a report would not be subject to discrimination or harassment.

The Policy will be reviewed and updated as and when necessary, by the SSC for the Board's approval.

The Policy sets out the general principles and guidance, and shall not constitute grounds for any counterparts, stakeholders, third parties etc. to claim against the Group for any liability.



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CHIEF OPERATING OFFICER  
**Abdul Hafidz Abdul Rahman**  
01<sup>st</sup> June 2024

