



JASAMERIN



**COMPANY
POLICY**



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.



CHIEF OPERATING OFFICER

Badzanishah Shahrom

01st June 2023

Rev.1

Crew Management Policy

1. In line with the Company's HSQE Policy and the requirements of MLC 2006, the Company shall :-
 - a. Respect the fundamental rights to freedom of association, right to collective bargaining, elimination of all form of forced or compulsory labour, abolition of child labour and elimination of any form of discrimination in employment and occupation.
 - b. Respect the seafarers' employment and social rights: to a safe and secure workplace that complies with safety standards, to fair terms of employment, to decent working and living condition, to health protection, medical care, welfare measures and to other forms of social protection.
 - c. Employ only healthy, certificated, qualified and experienced seafarers on board ships.
 - d. Take the responsibility to comply with the requirements of all relevant rules and regulations pertaining to safety and protection of seafarers such as STCW Code & MLC 2006.
 - e. Provide continual and comprehensive training to all seafarers while on board and when practical ashore.
 - f. Provide means to ensure that good performing seafarers are returned to the pool and deserving ones are promoted.
2. All seafarers must passed the interview conducted by the Company representative and if not practical, must pass the interview conducted by a qualified interviewer of the manning agency.
3. All seafarers must pass the additional Flag State requirements of the vessels they are assigned to.
4. Unless in the nature of emergency and/or inevitable circumstances or otherwise stated, such as parallel voyage for vessel familiarization, the Management practise a policy of not relieving both the senior Officers from the respective department at same time.



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021

Cyber Security Policy

1. The Company aims to provide a secure working environment on board ships and ashore by establishing and maintaining an effective cyber security measures to prevent unlawful acts against the ships and the shore-based office which can jeopardize continuity of the ship's operation and shore-base management services.
2. The Cyber Security is part of Company and Ship security policy which the Company may ensure that the Company Security Officer, the Master and Ship Security Officer are given necessary support to fulfil their duties.
3. The Company's objectives are:
 - To provide cyber security procedures and practices for the ship operations and shore based management.
 - To establish safeguards to mitigate the risk to the crew and shore management team.
 - To improve the cyber security awareness and skills of the shore based personnel and ship crew.
 - To prepare contingency measures for emergency relating to possible cyber security incidents.
4. The objectives will be achieved by:
 - Having a ship and shore cyber security assessment and cyber security plan.
 - Comprehensive training for all ships and shore personal.
 - Regular documented reviews and internal audits of cyber security procedures and plan. In order to allow for constant update and improvement of the plan.
 - All employees are expected to comply with the required procedures within the cyber security plan and should familiar with the relevant duties of them and the measures required to protect the ship from any unlawful act and ensure business continually.



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021



Drug & Alcohol Policy

1. The effects of drugs and alcohol abuse among personnel, particularly those on board ships performing critical operations, is being looked upon as a serious threat to a safe and efficient operation and therefore steps must be taken to eliminate or control drugs or alcohol abuse on-board.
2. To eliminate drugs and alcohol abuse, the Company enforced '**Zero Alcohol**' policy for all vessels. This means that all Masters, deck officers, engineers, rating, supernumeraries and visitors are not allowed to bring on-board, in possession and/or consume any type of alcoholic beverages while on board any of the fleet vessels.
3. All vessels must adhere but not limited to following guidelines:
 - a. The use, possession, distribution or sale of illicit or un-prescribed controlled drugs of any kind or quantity and the misuse of legitimate drugs are totally prohibited on board ships.
 - b. Consumption and supply of alcohol on board is totally prohibited on all vessels of the company.**
 - c. The Company considers a blood alcohol content of 40 mg/100ml or greater as impairment.
 - d. Screening for drug and alcohol abuse shall be required for all personnel before being employed on board and ashore. For the sea staff, the screening for alcohol can also be done upon joining the vessel.
 - e. Monthly alcohol testing on board - Master, Chief Engineer, Chief Officer and 2nd Engineer are compulsory ranks that shall be tested each month including selected ranks/ crew name to be tested for each month through email. Alcohol test for selected ranks will be notified by DPA or Crewing Manager.
 - f. Random and unannounced drug and alcohol testing of personnel by a qualified medical practitioner shall be carried out at least **once a year, Test must be carried out regardless of the crew state either just join or due to sign off as required and must be completed with at least minimum of 50% crew capacity** to deter any abuse on board all tanker vessels.
 - g. When an accident of significant nature occurs on the ship, the Company shall arrange for drug & alcohol testing by a qualified medical practitioner as soon as possible to the Master, Chief Engineer, officers and ratings on duty and other ship's crew involved in the accident.
 - h. Any breach of the Drug and Alcohol Policy will result in dismissal.**

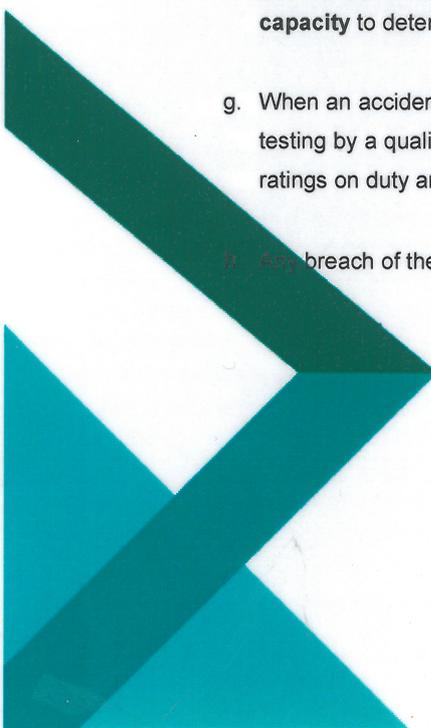


Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 1 / 10th January 2022



HSQE Policy

1. Jasa Merin Ship Management Sdn Bhd is a ship management company strategically located in Malaysia offering technical ship management of various ship types and related shipping services to Ship owners worldwide.

2. To achieve the Company's stated HSQE objectives the Company has the policy to:
 - a. Provide financial, material and human resources for safe & secure practices in ship operations.
 - b. Establish safeguards against all identified risks, ill-health, environmental aspects and potential emergency situations.
 - c. Provide training to personnel for improvement of competency, skill and education.
 - d. Comply with applicable legal and other requirements.
 - e. Continually improve the effectiveness and suitability of the management system.
 - f. To focus and strive on customers' needs so as to have fully satisfied customers.
 - g. Provide qualified, certified and medically fit seafarers in line with MLC 2006 and employment terms as per vessel's collective bargaining agreement.

3. Create awareness of Company's Environmental Policy & Activities:
 - The Company prohibits the discharge of OIL or OILY SUBSTANCES directly into the sea.
 - Disposal of GARBAGES into the sea is prohibited except for food wastes.
 - BALLAST WATER exchange should be carried out during ballast passage after all safety considerations.
 - All crew has the obligation to report to the Master and the Company all forms of pollutions and violations of the requirements in MARPOL 73/78 Annexes.



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021

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 JMSM 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 JMSM.
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



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021

Navigation Policy

1. The Master has the ultimate responsibility for the safe navigation of the ship.
2. The Master has the **OVERRIDING AUTHORITY** and responsibility to make suitable and justifiable decisions in matters regarding safety of ship personnel, vessel and pollution prevention.
3. Under the following circumstances, Master in his professional judgement shall exercise his overriding authority by refusing to continue with the passage and immediately inform Marine Superintendent:
 - In-adequate chart survey.
 - Extreme current for the size and engine capacity of the vessel.
 - In adequate stability.
 - Low visibility with high traffic density.
 - Crew fatigue and insufficient rest which is justifiable despite careful planning and watch arrangement anticipating the trade pattern and cargo operation of the vessel.
 - In case typhoon or tropical storm expected at the intended passage.
4. The ship shall always be navigated in a manner that ensures the safety of life, Safety of ship, the safety of cargo and safety of marine environment. The Safety of Life and the Safety of Ship take precedence over all other considerations.
5. The passage plan shall be planned in such a way that the vessel will not be put into danger and violate international and national regulations which protect other marine life. The voyages planned shall be executed in accordance with the planned passage. Vessel shall NOT proceed to sea without the passage plan ready and approved by Master.
6. Master shall ensure the vessel has on board the necessary ENC and paper chart (where required) and necessary publications for the voyage intended prior proceeding out to sea.
7. Master shall ensure that vessel is adequately manned to at least comply with minimum safe manning for the intended voyage, all essential navigation equipment and associated machinery shall be maintained in a fully operational condition and critical spares are available should there is need for repair while performing the voyage without hampering the safety of vessel. He shall ensure as well any newly joined officer is well familiarized with the bridge navigation equipment and prior proceeding out to sea.
8. A factual recording of the voyage events shall be made in the ship's logbooks relevant for the navigation.
9. Necessary information shall be obtained from local agent for a port to ensure safe departure and arrival.



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021

Security Policy

1. It is JMSM policy to provide a secure working environment to prevent acts which endangers the security of personnel and Company vessels.
2. The Company has established procedures and guidelines to maintain required security measures by:
 - Appointing trained Company Security Officers (CSO) responsible for developing, implementing and maintaining the JMSM security programs for vessels under full technical management.
 - Designating trained Ship Security Officer (SSO) on each vessel responsible for ensuring that the Ship Security Plan and the preventive measures in the Plan are implemented and maintained at all times.
 - Allocating responsibility to each ship management office to ensure ISPS code compliance for vessels under full technical management and that any equipment required by the ISPS Code is available on-board.
 - Regular training, drills and exercises on-board to verify that all personnel have an adequate understanding of the security measures and improve their security management skills.
 - Prompt investigation and actions by the company for deficiencies that have an effect on security.
 - Hardening vessels as deemed necessary in accordance with industry and Company guidance.
3. The Master of the vessel has the overriding authority and responsibility to make decisions with respect to security issues and to request assistance from Company Security Officer or any contacting government as may be necessary.
4. The commitment and participation of every Company employee is essential to the success of this policy. All employees must always be alert at all levels of the organization - from recruitment to vessel operations to information management and within any business dealings.
5. This policy directs all employees ashore and on ships to recognise their role for the maintenance of security requirements and shall be distributed to and read by all persons within the organisation and made available to other interested parties upon request.



Captain Mohd Azri Rahamat

Director

Jasa Merin Ship Management Sdn Bhd

Revision 0 / 01st March 2021

Social Media Policy

1. Our Company's Social Media policy is to ensure that all shore based and ship based personnel use the internet in a responsible manner. All are personally responsible for the content they publish on-line.
2. Whether in a blog, social computing site or any other form of user-generated media.
3. The following criteria should always be adhered to but not limited to when a person wish to communicate via social media regarding the status of our company or the assets under our company's management:
 - They should always be careful about what information and/or images they make available to others on the internet about the company and the assets managed under our company.
 - Do not act in an appropriate manner, intentionally or otherwise and do not communicate any confidential information or other sensitive matter online and to third parties.
 - Do not publish contents that might allow interferences to be drawn which could be drawn to damage Company's reputation or any relationship with the Company.
 - Do not use ethnic slurs, discriminatory remarks, personal insults, obscenity or engage in any similar conduct.
 - Show consideration for others privacy.
3. All company employees, ashore and on board ships are expected to comply with the required procedures within the Safety Management system pertaining to Social Media and appropriate use of internet.
4. When there is an absolute need for handling and responding to the media, the Director will appoint and approve the responsible Spokesperson accordingly to be in full charge. This will be announced promptly to all concerned and respective parties in this event of need.



Captain Mohd Azri Rahamat

Director

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Revision 0 / 01st March 2021

