



# Code of Conduct Policy

#ThisIsWhatWeDo

[www.asiapacoilandgas.com](http://www.asiapacoilandgas.com)

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## 1. OUR CODE OF CONDUCT

**Our Code of Conduct is founded on our Core Values.  
Our Code of Conduct is the basis of everything we do.**

Our code of conduct governs how we work and sets AsiaPac Oil & Gas' expectations of everyone who works for and with our organisation. Our employees, contractors, workers, partners and suppliers are all expected to work in accordance with our code of conduct, and AsiaPac Oil & Gas only chooses to do business with those whose standards align with our own. Our code of conduct helps us work consistently to the high standards we expect.

The AsiaPac Oil & Gas Code of Conduct is founded on our seven core values, and provides guidance on dealing with difficult decisions and situations. Every activity we undertake, and every business decision we make will be guided by our core values. Our core values are:

### **Our Mindset – We Will Make A Difference**

Our mindset is the way we approach challenges, make decisions and the manner in which we conduct our business. This core value encourages AsiaPac Oil & Gas employees to accept challenges positively and apply our efforts to a sustainable, adaptable and responsive business mantra. A positive mindset, fostered by a culture of inclusiveness, teamwork and accountability will allow APOGSB to adapt to changes and pursue excellence regardless of obstacles.

### **Our Customers – We Will Be Reliable & Trustworthy**

Customer satisfaction and understanding is a primary core value of AsiaPac Oil & Gas. We will always strive to fully understand our customers' needs and we will endeavour to exceed their expectations at all times.

### **Our Business – We Will Deliver**

Similar to our external stakeholders (our customers), our internal stakeholders, including our employees, have as much to gain from a sustainable and responsible business as anyone else. That is why we will always deliver on both our external and internal promises, and operate in a sustainable and responsible manner, committing 100% to any undertaking.

### **Our Wellbeing – We Will Be Safety Leaders**

Safety is our number one priority, and we will do more than just work safely – we will lead by example. We believe in wellbeing in conjunction with safety, which encompasses a whole range of health-related matters not typically covered in the usual workplace safety policies. Work-life balance, mental health, job satisfaction, workload and stress are all matters that AsiaPac Oil & Gas cover as part of our HSE program, and addressing these are a primary organisational core value. We will demonstrate our leadership by never being afraid to intervene, and look out for not only ourselves, but everyone around us.

### **Our Environment – We Will Care**

Without our environment, we have nothing. AsiaPac Oil & Gas cares for the world we live in, and we foster a culture that ensures we all work in the best interest of our environment, minimise our footprint and will always remember our commitment to our planet.

### **Our Future – We Will Be Innovative**

As our world and industry changes, so must we. To sustain our business into the long-term, we must keep up with these changes at a minimum. This core value pushes for one step further – to be ahead of the curve with our innovation, the way we do business, and how we adapt to future challenges.

In addition to these core values, we will always comply with the law and work to the highest ethical standards. It is essential that all employees, contractors, management and interested parties understand our core values and code of conduct, and it is of the utmost importance that they are followed by everyone.

**Farah Wall** – Managing Director  
October 2018

## 1.1 Laws & Regulations

At all times, AsiaPac Oil & Gas will comply with local, international, industry and customer laws and regulations. Everyone has a responsibility to ensure that all laws that apply to us and to those rendering services to us, including, but not limited to, international trade, import, export, immigration and employment laws, are being observed and followed. Our code of conduct is intended as a framework to assist employees to be compliant. Whilst it cannot cover each and every issue, instance, rule, regulation and law in detail, it should provide clarity on the way we are expected to operate.

Detailed Company Policy: [ATLAS-L2-0801 - Legal & Regulatory Compliance Standard](#)

## 1.2 Confidentiality

AsiaPac Oil & Gas Sdn Bhd is committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned. AsiaPac Oil & Gas Sdn Bhd extends the same standards to all our customers, suppliers and associates.

Detailed Company Policy: [ATLAS-L2-0802 - Confidentiality & Protection of Information Policy](#)

## 1.3 Ethics

AsiaPac Oil & Gas Sdn Bhd always conducts its services honestly and honourably and expect our clients and suppliers to do the same. Our advice, strategic assistance and the methods imparted through our training, take proper account of ethical considerations, together with the protection and enhancement of the moral position of our clients and suppliers.

Detailed Company Policy: [ATLAS-L2-0803 - Ethical Business Policy](#)

## 1.4 Duty of Care

Our actions and advice will always conform to relevant law, and AsiaPac Oil & Gas Sdn Bhd believes that all businesses and organizations, including ourselves, should avoid causing any adverse effect on the human rights of people in the organizations AsiaPac Oil & Gas Sdn Bhd deal with, the local and wider environments, and the AsiaPac Oil & Gas Sdn Bhd being of society at large.

Detailed Company Policy: [ATLAS-L2-0011 - Duty of Care Policy](#)

## 1.5 Conflicts of Interest

Due to the nature of our services, AsiaPac Oil & Gas Sdn Bhd must be mindful of who we provide services to in order to avoid potential conflicts of interest. A conflict of interest is considered any activity where an employee's personal interest might contradict the interest of AsiaPac Oil & Gas Sdn Bhd or the interest of our customers. This is an unwanted circumstance as it may have heavy implications on the employee's judgement and commitment to the company, and by extension to the realization of our company goals.

Detailed Company Policy: [ATLAS-L2-0804 - Conflicts of Interest Policy & Guidance](#)

## 1.6 Contracts

Contracts between AsiaPac Oil & Gas and our customers, employees, suppliers or any interested party will be in the form of a detailed agreement, including applicable aims, activities, costs, timescales and deliverables. Our contracts will always be in compliance with applicable laws and regulations, free from conflicts of interest and in accordance with our company core values.

Detailed Company Policy: [ATLAS-L2-0805 – Contracting Policy](#)

## 1.7 Bribery & Corruption

AsiaPac Oil & Gas is committed to conducting business with the highest regard for integrity, regulatory and statutory requirements, paying close attention to the ethical impact of our activities in the markets that we operate. The Company remains committed to upholding national and international laws that are in place for combating bribery and corruption in our global workplace.

AsiaPac Oil & Gas follows the Foreign Corrupt Practices Act (FCPA) of 1977 and as APOGSB is a registered company in Malaysia, it is bound by the Malaysian Anti-Corruption Commission Act (MACCA) 2009. AsiaPac Oil & Gas Sdn Bhd adheres to both acts, and where there are two conflicting clauses, the most stringent will take precedence. It is the responsibility of all Company employees, directors, officers, consultants and contractors to adhere to this Policy.

Detailed Company Policy: [ATLAS-L2-0005 - Anti-Corruption & Bribery Policy](#)

## 1.8 Gifts, Donations & Hospitality

We only give or receive gifts or hospitality for business if they are reasonable. We never offer or accept them if they could influence a business decision improperly. We will only give or accept gifts and hospitality that are for business purposes and are proportionate, and are not material or frequent. We will only accept gifts or hospitality that fall within the guidelines set out in AsiaPac Oil & Gas policies.

Detailed Company Policy: [ATLAS-L2-0806 - Gifts, Donations & Hospitality Policy](#)

## 1.9 Equality & Discrimination

We treat everyone fairly and equally and value diversity. AsiaPac Oil & Gas has a fair employment policy, which means that no decision will be taken or influenced by any factors that do not have a direct bearing on the ability of the individual to perform the job. Workplace Diversity means having an inclusive, respectful environment that accepts each individual's differences, embraces their strengths, skills and attributes and provides opportunities for all employees to achieve their full potential. Inclusion means everyone has something unique to contribute and we believe that active inclusion promotes lateral and original thinking and is the best way to promote and leverage skills and talents, and to achieve superior organisational performance.

We are committed to recruiting and promoting our employees fairly and without discrimination. We actively recognise diversity by building a culture of equal opportunity, mutual respect and collaboration.

Detailed Company Policy: [ATLAS-L2-0904 - Equality & Discrimination Policy](#)

## 1.10 Bullying & Harassment

Bullying or harassment of any kind is not acceptable from any AsiaPac Oil & Gas employee, contractor, worker, customer, partner, supplier or other interested party. Reports of bullying or harassment will be addressed swiftly and with maximum focus, and all AsiaPac Oil & Gas personnel are obligated to report bullying and harassment, whether actual or perceived.

Detailed Company Policy: [ATLAS-L2-0905 - Bullying & Harassment Policy](#)

## 2. REPORTING

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The company code of conduct must be followed at all times by all AsiaPac Oil & Gas Sdn Bhd employees, contractors, suppliers, partners, workers, clients and any other interested party. Should any of these parties choose not to comply with our code of conduct or core values, they choose not to do business with AsiaPac Oil & Gas. Any nonconformance to our code of conduct must be reported immediately to your line manager, or via email to [conduct@asiapacoilandgas.com](mailto:conduct@asiapacoilandgas.com).

Detailed Company Policy: [ATLAS-L2-0906 - Reporting Misconduct Procedure](#)

## 3. CHANGE LOG

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Revision	Date	Changes	Author	Approver
01	12/10/18	Final revision released to ATLAS		