



CODE OF ETHICS

Code of Business Ethics for Global LNG Sdn Bhd LNG Trading

1. Introduction

This Code of Business Ethics (the "Code") sets forth the principles and standards of ethical business conduct for Global LNG Sdn Bhd LNG Trading (the "Company"). The Code is designed to guide all employees, officers, directors, and third parties acting on behalf of the Company in their daily activities and decision-making processes.

2. Compliance with Laws and Regulations

- The Company and its employees shall comply with all applicable local, national, and international laws, regulations, and industry standards governing the LNG trading industry.
- Employees must stay informed about relevant legal requirements and seek guidance from the Company's legal department when necessary.

3. Integrity and Honesty

- All business dealings must be conducted with integrity, honesty, and transparency.
- Employees must not engage in any form of corruption, bribery, fraud, or deceitful conduct.

4. Conflicts of Interest

- Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.
- Any potential conflicts of interest must be disclosed to a supervisor or the legal department immediately.

5. Fair Competition

- The Company is committed to fair and open competition and will compete vigorously but fairly.
- Employees must not engage in any form of anticompetitive behavior, including collusion, price-fixing, or market allocation.



6. Confidentiality and Data Protection

- Employees must protect the confidentiality of Company information and respect the confidentiality of information belonging to third parties.
- Personal data must be handled in accordance with applicable data protection laws and Company policies.

7. Environmental Responsibility

- The Company is committed to conducting its operations in an environmentally responsible manner.
- Employees must comply with all environmental laws and regulations and strive to minimize the environmental impact of the Company's activities.

8. Health and Safety

- The Company is dedicated to providing a safe and healthy working environment.
- Employees must adhere to all health and safety policies and procedures and report any unsafe conditions or practices.

9. Anti-Money Laundering and Anti-Terrorism

- The Company will not tolerate any activities related to money laundering or terrorism financing.
- Employees must comply with all anti-money laundering (AMLA) and counter-terrorism financing (CTF) laws and report any suspicious activities.

10. Respect and Non-Discrimination

- The Company promotes a workplace environment that is inclusive and free from discrimination, harassment, and retaliation.
- Employees must treat all colleagues, customers, and partners with respect and dignity.

11. Responsible Communication

- Employees must ensure that all communications, whether internal or external, are accurate, truthful, and appropriate.
- Public statements and disclosures must be made in accordance with Company policies and applicable laws.

12. Reporting Violations

- Employees are encouraged to report any violations of this Code or any unethical behavior to their supervisor, the legal department, or through the Company's designated reporting channels.
- The Company prohibits retaliation against anyone who reports a violation in good faith.



13. Accountability and Enforcement

- All employees are responsible for understanding and adhering to this Code.
- Violations of this Code may result in disciplinary action, up to and including termination of employment.

14. Review and Amendments

- This Code will be reviewed periodically and may be amended as necessary to reflect changes in laws, regulations, or Company policies.

Acknowledgment

- All employees, officers, and directors of Global LNG Sdn Bhd LNG Trading must acknowledge receipt and understanding of this Code and agree to comply with its provisions.

By adhering to this Code of Business Ethics, we demonstrate our commitment to ethical conduct, integrity, and the long-term success of Global LNG Sdn Bhd LNG Trading.