



ZERO TOLERANCE POLICY

Miclyn Express Offshore Limited (MEO) and its subsidiaries (collectively, the “Group”) are committed to having zero tolerance towards fraud, major health and safety accidents, major non-compliance with corporate policies and procedures, and unacceptable working behaviour.

This Zero Tolerance Policy helps to promote a safe, healthy and ethical workplace for all, and support acceptable and professional behaviour throughout the Group.

This policy will complement the Code of Conduct and Whistleblower Policy and is applicable to all onshore and offshore employees including permanent, contract and temporary employees, and company directors.

Below are some examples of-

- **Fraud:** Bribery and corruption, assets misappropriation, and fraudulent financial statement.
- **Major health and safety accidents:** Negligence in complying stop work policy, occupational health and safety policies and procedures.
- **Major non-compliance (“MNC”) with corporate policies and procedures:** Unauthorised transactions (including side-commitment to customer or supplier); fail to comply with Code of Conduct, Gifts and Donations Policy, Diversity Policy, Drug and Alcohol Policy, and data privacy rules; fail to declare conflict of interest to the Group, internet misuse etc.
- **Unacceptable working behaviour:** Sexual harassment; discrimination against religion, race, ethnicity, language, gender or age; physical assault; verbal abuse (including offensive and vulgar language); intimidating / threatening / behaving impolitely to others; sending hostile email; damaging company properties and assets; misuse of drug and alcohol etc.

This list is not exhaustive and certain wordings abovementioned may be subject to different interpretation by different stakeholders. So, if you have any question about this policy, please consult either Group Human Resources or Group Legal.

In order to promote effective implementation of this policy, full cooperation from all employees is required. If you were to observe or notice any potential fraud, unhealthy or unsafe conduct, MNC with corporate policies and procedures or unacceptable working behaviour, please report immediately to either Group Human Resources or Group Legal. All alleged cases will be investigated by Group Human Resource or Group Legal or designated departments under the direction of the Group’s Senior Management.

Disciplinary action, including penalty/punishment or dismissal in the extreme circumstances, may be taken if, in the Group’s reasonable opinion, the allegations are found to be true.

This policy shall be effective from 6 January 2020.


Diederik DeBoer
Director / Interim Chief Executive Officer
6 January 2020