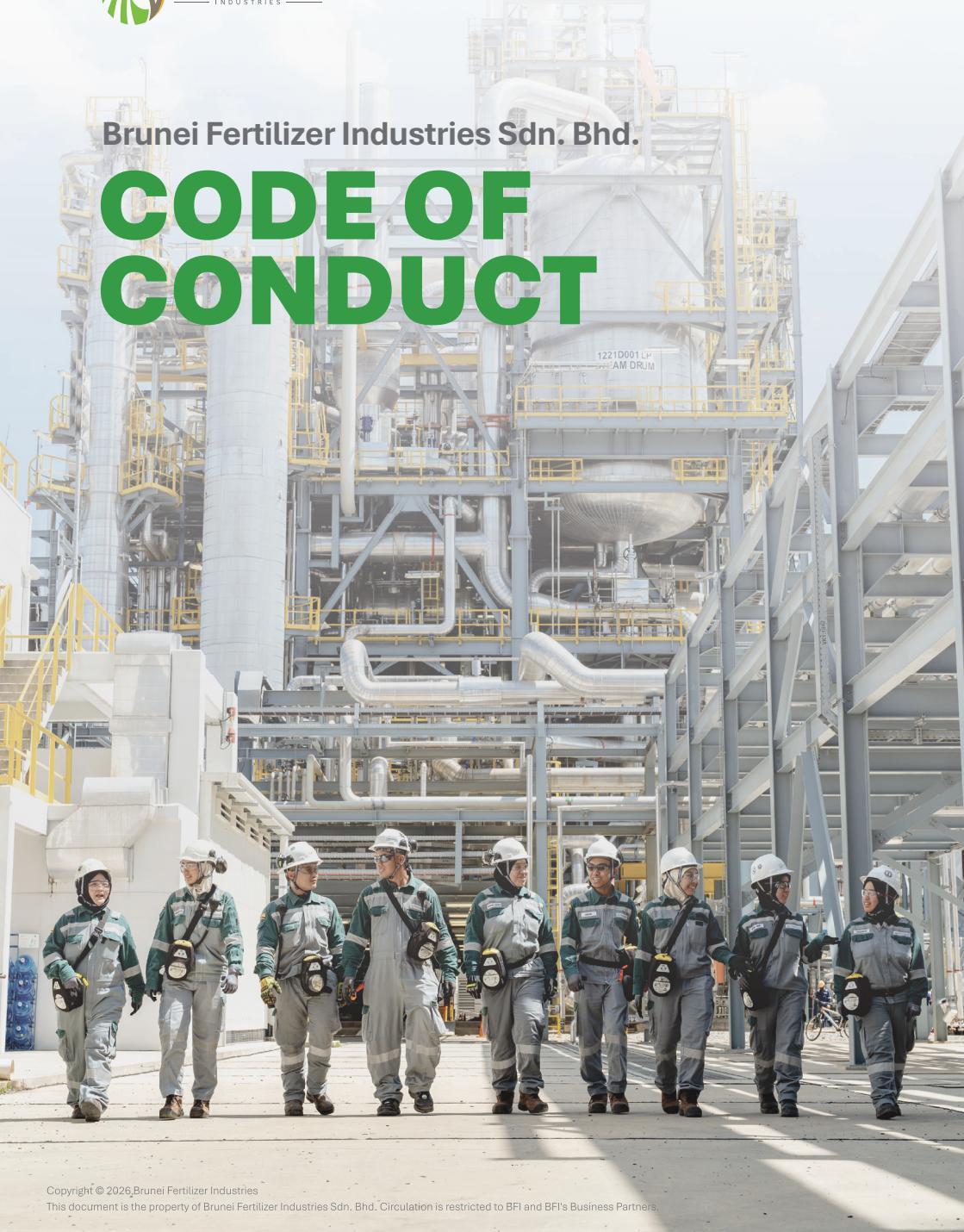


Brunei Fertilizer Industries Sdn. Bhd.

CODE OF CONDUCT



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Message from the Chairman and the CEO

Dear Colleagues,

As BFI has a diverse workforce & that we have sold to more than 17 countries, it is clear that there are times when our ethics are challenged as we are dealing with diverse cultures and business practices. In this Code of Conduct (the “Code”), we define BFI and give guidance to our way of dealing. The rules are clear and set upfront – this enables us to act consistent at any circumstances. Success can only be celebrated if it has been achieved in the right way.

The Code is a foundation to us making the difference with our Bruneian roots. It contains essential elements for our license to operate. Our ambitions are high, and we meet them through cooperation with our colleagues, local communities, and society at large, including all of our Business Partners, locally or abroad. We also must not take safety for granted. Any incidents,

near misses, as well as unsafe acts must be reported immediately so that proper action can be taken to resolve the issue – learning needs to be shared and future exposures prevented.

Every BFI employee has the right and obligation to react to any violations to the Code. Anonymous reporting of any violations that you believe in good faith to have occurred is supported, and you will be protected accordingly, as guidance is available. All concerns will be investigated and handled with confidence.

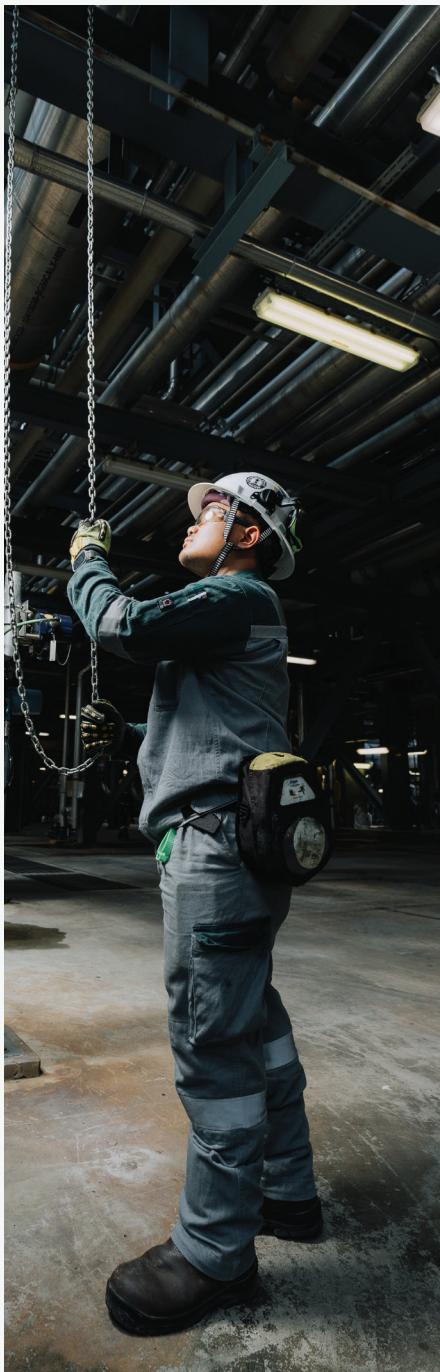
This Code applies to me, the Board of Directors, the management team, and all of us – every day anywhere while we work. These are non-negotiable ethical and safety standards forming our basis of operation. Please read it carefully and consider the ways in which it applies to you and your work.



YB Dato Seri Setia Dr Haji Mohd Amin Liew Bin Abdullah
Chairman of BFI



Dr. Harri Kiiski
Chief Executive Officer



Purpose

This **Code of Conduct** (“CoC” or “Code”) is developed to maintain a standard of conduct that is acceptable to BFI, vendors, customers and other employees. This will include the behaviour guidelines that are consistent with BFI’s policies.



Who the Code applies to?

Our Code applies to all BFI's employees including the Board of Directors, and any third parties engaged by BFI as our suppliers, customers and contractors ("Business Partners"). The Code provides the framework of principles for conducting business, dealing with co-workers, and Business Partners.

All employees and Business Partners must demonstrate their commitment to the CoC by setting the right example, maintaining a workplace environment that adheres to the Code and acting affirmatively to prevent violation of the Code. Therefore, BFI expects co-operation from everyone in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards.

This Code introduces the employees to a specific principles and policy covering key ethical issues. It will identify the risk area that the employee may encounter throughout the performance of his/her job and subsequently provide guidelines on how you should conduct yourself. Should an employee have doubts about any aspect of the CoC, they must seek clarification and guidance from their supervisor or the Legal Department. Any BFI's employee violating this Code may be subject to appropriate disciplinary action, including termination.

This CoC will be regularly reviewed and any necessary changes will be implemented by the Legal Department.

BFI is committed to protecting the health and safety of all persons who are associated with our operations and reside around the community in which we operate. Further, BFI is committed to implement a strong HSSE compliance culture.

We conduct our business in a sustainable manner with utmost care for the environment we operate in; as well as manage all risks in order to drive sustainable business growth and maintain security of our people, facilities, and assets.

BFI's employees and Business Partners shall have the responsibility and obligation to comply with BFI's Health, Safety Security and Environment ("HSSE") rules and policies guidelines to achieve a safe and healthy workplace, to take reasonable care of themselves and others and not to interfere with anything provided to safeguard their health and safety. Disciplinary actions related to non-compliance issues or any violation to the policies or the 12 life-saving rules shall be dealt with in a consistent and similar manner (either to BFI or BFI's Business Partners).

Health, Safety, Security & Environment



12 Life-Saving Rules

These 12 life-saving rules are imperative for all BFI Employees, i-Ready Apprentices and Interns to take note of and to abide by whilst within the BFI Plant areas.

Should there be any violation to any of these rules, it may result in consequence management.



1. Personal Protective Equipment

Wear required personal protective equipment.



2. Permit to Work

Work with a valid work permit when required.



3. Changes or modifications

Obtain authorisation before implementing modifications to any equipment, processes or installations.



4. Open work surfaces

Barricade area and put up signages when the opening of any grounds are created.



5. Working at height

Protect yourself against a fall when working at height.



6. Contact with moving vehicles

Keep yourself and others away from moving vehicles/line of fire.



7. Falling objects

Keep away from suspended loads, control lifting operations and danger zones.



8. Confined space entry

Ensure safe conditions before entering a confined space.



9. Disabling safety systems

Obtain authorisation before overriding or disabling safety critical equipment.



10. Energy isolation

Verify isolation and zero energy when working on energised systems.



11. Release of dangerous substances

Provide proper containment for potential release of material(s).



12. Drugs and alcohol

No drugs and alcohol.



For BFI Employees, please report any concern if you suspect or know of any violation to the above to the BFI's HSSE Department. As for Business Partners, you can report your concerns to BFI's HSSE Department and/or the Narcotic Control Bureau hotline at +673 8777444.

Drugs and Alcohol

BFI has a right to a workplace free from the effects of alcohol and drugs. BFI has **ZERO TOLERANCE** towards abuses of alcohol, drugs, or other substances pursuant to Chapter 27, Misuse of Drugs Act, 2013. Substance abuse of any kind can impair one's performance at work, and can account for threat to health, safety, and productivity of the individual and/or the colleague.

Therefore, BFI is strongly against and prohibits the following activities to be carried out within its work locations:

- i. The consumption of alcoholic drinks; and
- ii. The illicit use, possession, sale, conveyance, or distribution of controlled drugs or substances pursuant to Chapter 27 Misuse of Drugs Act, 2013.

BFI reserves the right to conduct random test for the use of alcohol or chemical substances, on its employees and contractor's personnel and conduct lawful inspection or searches at any workplace related to BFI, if there is a complaint or reason to suspect any incompliance. Failure to comply to the above will be grounds for disciplinary action which may include dismissal of the employee and instruction to withdraw the services of contractor's personnel.

Protecting Our Assets

Protecting BFI's assets are crucial to safeguard our operational stability. These assets are vital to support BFI's business both internally and externally, and as such, we need to look after them and manage them appropriately.

When using BFI's assets, employees are expected to use them in a manner which is lawful, ethical and efficient. Any use of these assets for purposes other than BFI's business is to be avoided and everyone is urged to care for it as if they are your own.

All Employees are expected to comply and adhere with the relevant IT Policies and the HSSE Policies. Any non-compliance shall be ground for disciplinary action to be taken against the Employee.

Dos and don't when dealing with BFI's Assets.

- Do not react in a fit of anger by damaging assets, think of consequences and inconveniences to others and to yourself.
- Read, understand and comply with the relevant Standard Operation Manuals (SOP), signage and posters.
- Report wear and tear issues to your superior before aggravation sets in.
- Do not treat all assets as heavy-duty tools.



Intellectual Property and Copyrights

BFI's intellectual property (IP) is one of our most valuable assets. Intellectual property includes any domain names, copyrights, design rights, know-how and trade secrets relating to BFI's operations and business. This includes confidential information, patents, copyrights, trademarks, and trades. Therefore, it is vital that you take appropriate steps to protect BFI's IP. Everyone is expected to adhere to BFI's IT policies, which may be introduced or updated from time to time.

Third parties also have IP rights too and employees shall not use any third party's IP illegally. Should you require to use any third-party software or licences, you need to seek permission from BFI's licence holder. If you are unsure how to handle or seek permission to use BFI's or third party's IP, please consult the IT or Legal Department.



Confidentiality and Use of Official Information

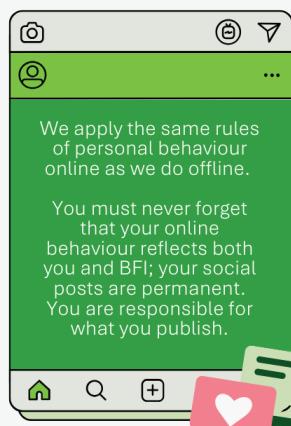
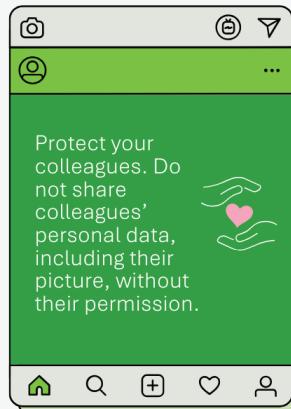
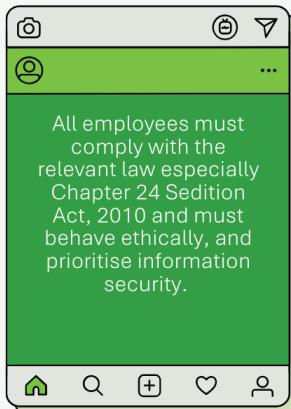
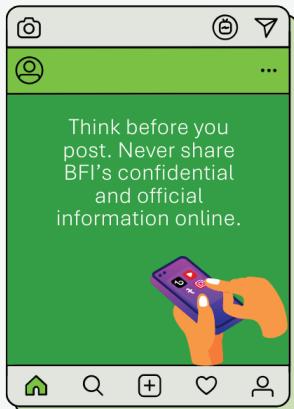
During the course of your employment with BFI (even when you leave BFI) or business relationship with BFI, you may find yourself in possession of sensitive information. Any disclosure will be deemed as a breach of confidentiality. To prevent unauthorised persons from having access to BFI's information:

- You must not discuss any BFI's sensitive or confidential matter whatsoever unless they have a legitimate business need to know it.
- Watch not only what you say, but where you say it.
- Exercise caution when sending or forwarding emails.
- Always ensure that prior to sharing any information, a non-disclosure agreement was executed accordingly.

We also have an obligation to protect confidential information entrusted to us by our Business Partners. You must not use BFI's information for personal gain or other unauthorised purposes. Any such breach of confidentiality obligation would be deemed as gross misconduct except as otherwise provided or as permitted by any current legislation. Any unauthorised disclosure could lead to disciplinary action including dismissal. If you are unsure whether to share the information or not, you can consult Legal Department for further guidance.

BFI expects its employees to maintain a certain standard of behaviour when using social media for work or personal purposes. When using social media for personal use, do not disclose confidential BFI information or communicate in a way that could reflect poorly on BFI or its employees.

Please follow the guidance below:



Social Media Participation

Personal Data Privacy and Protection

All of us must respect a person's right to privacy when using or gathering their data.

You are responsible for ensuring that all practices involving the processing of personal data within the course of your work comply with all relevant applicable laws and internal regulations. You may only handle personal data that could be accessed within the scope of your role with strict confidentiality, and not to use this data without authorisation.

Any breach of data discovered such as the leaking or hacking of personal or sensitive data, this should be reported immediately to your line manager and the Data Protection Officer at dpo@bfi.com.bn. Immediate action should be taken to tackle such leaks. This will further be investigated and the appropriate disciplinary actions will be taken (if necessary).



What is Personal Data?

Personal Data means any data, whether true or not, about an individual who can be identified, directly or indirectly from that data (e.g. Identification card number, contact details of a buyer).

Please refer to the Company's Personal Data Protection Policy and Procedure, which set out the framework for how personal data shall be processed and protected within the Company.

Please note:

Personal data may only be used for specified legitimate purposes and not be collected or processed unless necessary.

Human Rights and Labour

BFI supports and respects human rights and labor rights that are declared internationally such as the International Labour Organisation Declaration (“ILO”) on fundamental principles and rights at work.

BFI also does not use child labor or forced labour and will not tolerate work conditions or treatment that is contrary to international laws and practices. We practice a zero-tolerance approach to modern slavery and human trafficking in our workforce and value chain, in accordance with the definitions provided by the ILO.

Equal Opportunity and Discrimination

BFI ensures equal opportunities for all our people in our organisation by giving the employee more chances to grow by promoting and embracing the different ideas and experiences from our employees who came from various nationalities. BFI also aims to create a workforce that is diverse and balanced, while keeping talented individuals and treating everyone with respect. Employment related decisions are based on relevant qualifications, merit, performance and other job-related factors.

BFI does not tolerate discrimination, including but not limited to the discrimination on the grounds of sex, race, religion, nationality, ethnic or national origin or age. Any person who believes that they have been subject to discrimination must raise it to their line manager and thereafter the Talent Management Department (if required). This can also be reported anonymously through the *Tell Us* platform.

Harassment and Bullying

All employees have a right to work in an environment free from harassment, regardless whether the harasser is a co-worker, supervisor, vendor, contractor or visitor. BFI aims to create a safe and inclusive environment by treating everyone with respect and dignity. BFI will not tolerate any form of harassment be it violence or bullying.

Employees must treat colleagues and others with dignity and respect, and should always consider whether their words or conduct could be offensive. BFI will take allegations of harassment or bullying seriously and it shall be treated as serious/gross misconduct under the Disciplinary Procedure which may lead to summary dismissal.

Outside Employment

Employees who are involved in outside employment such as having part time job or own a business or working with other organisation and generate income from such job, must declare through the **Conflict of Interest Form** which is available on BFI's Intranet platform.

Should BFI determine that an employee's outside work may interfere the employees' performance or the ability to meet the requirements of BFI from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with BFI. Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals outside BFI for materials produced or services rendered while performing their jobs as BFI's Business Partners. Please refer to the Business Integrity Risk Policy.

BFI has zero tolerance for any form of corruption. Corruption is the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.

In these circumstances you will be subject to disciplinary investigation under BFI's disciplinary procedures, and disciplinary action up to and including dismissal may be applied. BFI also reserves the right to report any finding in relation to the bribery or corruption to the relevant authorities.

All employees including the Directors and any third parties that perform services for BFI are expected to comply with the applicable anti-corruption laws and BFI's **Business Integrity Risks Guideline**, as amended by BFI from time to time.

Fighting Corrupt Practices and Bribery



Anti-Money Laundering (AML) Compliance

BFI is committed to preventing money laundering and terrorist financing in accordance with Brunei Law and international regulations. Employees and Business Partners must:

- Conduct due diligence on customers, suppliers, and third parties to verify their legitimacy.
- Report any suspicious transactions or activities that may indicate money laundering.
- Ensure that payments and financial transactions comply with applicable laws and are properly documented.
- Avoid engaging in transactions that involve unverified sources of funds or circumvent regulatory requirements.

Failure to comply with AML laws can result in severe legal consequences, including criminal liability. BFI also reserves the right to report any finding or suspected violations to the relevant authorities.

Sanction Compliance

BFI adheres to international sanctions regulations, including those imposed by the United Nations (UN), United States (OFAC) and European Union (EU). There may be additional local sanctions regulations applied which BFI must comply. Employees and Business Partners must:

- Screen all transactions and business partners to ensure compliance with applicable sanctions lists.
- Refrain from engaging with sanctioned individuals, entities, or countries, including indirect dealings through third parties.
- Ensure all payments and financial transactions comply with sanctions laws and are not structured to evade restrictions.
- Report any potential sanctions violations to the Compliance or Legal Department immediately.



Hospitality and Gifts

- Gifts valued at more than BND\$50 need to be declared and registered. The form for **Gifts and Benefits Declaration** is available on BFI's Intranet platform. Other values must still be reported to the **line Manager/Supervisor**.
- Gifts other than reasonable business meals or marketing collaterals (e.g. Diaries, calendars) are **prohibited**.
- Any G&H that is or can be linked to important business decisions during sensitive decision periods is prohibited.
- is only required to fill in for gifts over B\$50 (or its equivalent foreign currency).

In every circumstance where a gift is offered, the advice of your line manager must be sought and to refer to the Business Integrity Risks Policy and BFI's Gift Policy.

Dealing With Government Officials

The offering of gifts and hospitality to government officials may raise significant concerns and, as such, stricter rules and procedures are applicable. Gifts and hospitality should only be extended to government officials in the context of bona fide efforts to promote, explain, or demonstrate BFI's brand, products, or services.



Fraud and Forgery

Any effort to cheat someone out of money, property or honest services is fraud. Deliberately making false and/or dishonest statement or do an act, concealment or omission which is intended to deceive someone or BFI for your advantage or their disadvantage is forgery.

BFI has zero tolerance for fraud and forgery. Thus, everyone is expected to comply and adhere with the Business Integrity Risks Guideline.



Corporate Credit Card

Only authorised users by BFI can use BFI's Credit Card to make necessary payments on behalf of BFI.

Corporate credit cards can only be used for approved business expenses such as:	Credit cards can't be used for non-business or non-approved expenses such as:
Air fares; Hotel accommodation; Business meals; Conference/training fees; Any other expenses as pre-approved by the CEO.	Cash withdrawal; Alcoholic drinks; Personal purchases; Hotel room movies, membership charges and other non-business related hotel services.

Fair Competition

Anti-Trust Compliance Commitment

BFI is expected to adhere to the International Fertilizer Association's anti-trust compliance obligations. We therefore should not:

- Discuss or exchange information on individual prices, purchase prices, the terms of purchases among the competitors.
- Discuss any information on production or distribution cost (unless these data are historical and have already been published), action or strategies to manage market, supply, demand, recovery or other conditions that affect competition / supply chain arrangement.
- Enter into any agreements with competitors regarding the prices, bids, profit margins, price differentials, mark-ups, discounts, allowance or credit terms. This also extends to BFI's future production, sales, inventory levels, market shares, allocation of customers or sales territories or the exclusion of Business Partners.
- Disclose information of any future plans, strategies, investments unless previously publicly announced.

We have an obligation to comply in all respects with applicable competition laws and regulations.

The Supply Chain Department and each Contract Holders are to ensure that Business Partners act with honesty, integrity and fairness in all respects of their business, and that they seek to compete fairly and ethically within the framework of applicable laws, rules and regulations.

You must not engage in any bid rigging or tender manipulation, as well as conspiring with others to boycott the Business Partners, unless it is in accordance with sanctions imposed at the international level.

Dealing With Business Partners

When selecting and managing Business Partners, verify that they are qualified to do business with us. Furthermore, always ensure that when dealing with them the relevant procedures and processes are complied with.

Always choose Business Partners based on merits, avoiding conflict of interests, inappropriate gifts and entertainment, or any other favouritism that might improperly influence or appear to influence the selection process.

BFI's Business Partners shall warrant that it has made all reasonable investigations into its labour practices, and those of its suppliers, to ensure that there are no such practices used in its business or by any of its suppliers; Business Partner undertake that it has taken, and will take in the future, all necessary actions and investigations if the Seller becomes aware, or suspects it being practiced in its business or any of its suppliers.

Conflict of Interests

Employees should not, directly or indirectly, engage in, or have any interest, financial or otherwise, in any other business enterprise which interferes or is likely to interfere with their independent exercise of judgement in relation to their work at BFI.

Generally, a conflict of interests exists when an employee is involved in an activity:

- Procurement of products or services directly to, or purchase products with a businesses or individuals who is related to the employee such as family members or friends or;
- Which subjects the employee to unreasonable time demands that prevent the employee from devoting proper attention to his or her responsibilities
- Which is so operated that the employee's involvement with the outside business activity will reflect adversely on BFI.

Each of us must identify potential conflict of interests or the appearance of conflicts of interest when they arise and bring them to the attention of your supervisor, Talent Management Department or the Legal Department.

Community Services

We support your personal efforts to make the world a better place, and we celebrate your outreach to people and causes that matter to you as long as any community service activities that you undertake are lawful and do not create a conflict of interest with the work you do at BFI.

In an event where any community service activity may create, or has created, a potential, perceived or actual conflict of interest, you must discuss this with your supervisor / manager / Head / Chiefs immediately:

- Avoid using any BFI money, assets and information to conduct your activities unless you receive a sponsorship and approval from BFI.
- Please always be respectful and comply with the law at all times.



Public Disclosure

We need to ensure that any information about BFI is portrayed accurately in the public eye. The Corporate Communications Department is responsible for ensuring that all responses to media inquiries are prompt, accurate and made by authorised personnel. For avoidance of doubt, any public statement for and on behalf of BFI will be made by the Corporate Communications Department and/or other authorised personnels.

If you are contacted by any member of the public media, you must politely refer the inquiry to the Corporate Communications Department.

Dress Code

Employees play an important part in projecting a good image of BFI. BFI's Dress Code guideline is designed to clearly provide clothing guidance which are appropriate and suitable to be worn when at work, attending meetings or working visit either in Brunei or overseas and in line with the mission and objectives of BFI to provide service with the utmost professionalism. Please refer to the **Dress Code Guideline (Document Code: BFI/PG/HRD/23/2020)**.

Whistleblowing, Reporting and Guidance

At BFI we foster a speak-up culture and welcome hearing from anyone whether they are employed by BFI or not – to raise questions and concerns.

There are multiple ways to speak up, either speak to or send an email to:

- Your manager or line supervisor
- Colleagues in the Talent Management Department
- Colleagues in the Legal Department at legal@bfi.com.bn
- *Tell Us* platform at www.bfi.com.bn

No tolerance for retaliation

We do not tolerate retaliation against persons who do the right thing by speaking up. You will not suffer any adverse consequences for:

- raising a concern in good faith about actual or potential misconduct, or
- assisting someone in raising a concern, or
- cooperating with an investigation.

Retaliation is a violation of this Code of Conduct. If you believe you have been retaliated against, you should speak up. All retaliation allegations will be investigated confidentially and if appropriate, disciplinary action will be taken. Fear of being punished or losing your job should never prevent you from speaking up.

Consequent Management

Violation of the provisions of the Code may have severe consequences and anyone found to be violating the Code or BFI's policies may be subject to internal disciplinary action leading to dismissal. All disciplinary actions will be reasonable, proportionate and in accordance with BFI's disciplinary procedures.

If the violation includes infringement of local laws or regulations, or if BFI has a claim for damages, any such violations may additionally subject the individual to civil and criminal prosecution.

Notes

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Notes

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Making A Difference, With Bruneian Roots.

