



RGE Global Code of Conduct



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A Message from the Chairman



Over the first 50 years, RGE has grown from humble beginnings to be a multi-national resource-based group with businesses that are at the forefront of their respective industries globally. Today RGE employs over 60 000 people, touching lives and enhancing the communities we operate in.

All these have been made possible by our commitment to our Core Values – T.O.P.I.C.C. – which guide us in the way we pursue our goals, overcome challenges and find answers to the tough questions that can arise for a company doing business in a dynamic and culturally diverse world.

Our continued success and sustainability depend upon each of us acting responsibly with the highest level of integrity and conducting ourselves in accordance to our Core Values. Our Global Code of Conduct lays out the culture we want to build, the behaviours we want to emphasise and the commitment we've made to continue earning the trust of our communities and customers.

This document is important for the journey we're on. I would ask you to consult it regularly, ask questions and raise concerns that you may have.

In the years ahead, we must never lose sight of the guiding principle that whatever we do must be good for the Community, Country, Climate and Customer, and only then will it be good for the Company. Thank you!

Sincerely,

Sukanto Tanoto
Chairman & Founder

A Message from the President

Dear Colleagues,

The RGE Core Values – Complementary Team, Ownership, People, Integrity, Customer and Continuous Improvement (T.O.P.I.C.C.) – was launched in 2017 as part of RGE 50 celebrations. It was our first step in a multi-year effort to embed the core values throughout the company. Beyond knowing and understanding what the Core Values are, it is critical for each and every one of us to behave and act in ways that align with these values.

This Global Code of Conduct (the “Code”) outlines the company’s expectations of your conduct as an employee of RGE. It is an important document that guides how we can live our Core Values, helping us achieve our vision to create value for the Community, Country, Climate, Customer and Company.

The Code will be updated periodically to reflect new challenges that may arise in this dynamic environment. For example, governing our behaviours on social media was not relevant a decade ago but is now crucial in protecting our reputation, as social media becomes a major part of our lives. Yet others such as maintaining the highest level of integrity in the conduct of our business and daily activities are perennial and will never change over time.

Living our Core Values is paramount to our long-term success, and I look forward to your continued support.

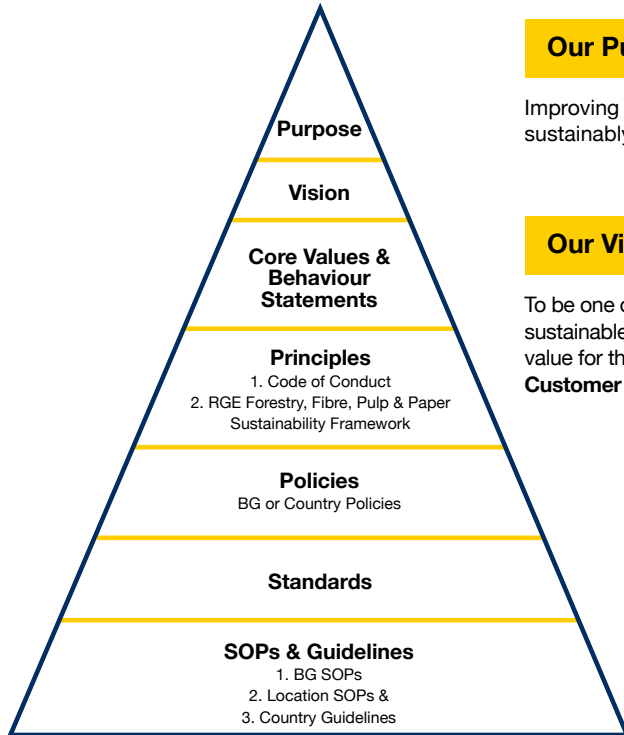
Sincerely,

Tey Wei Lin
President, RGE



Living Our Core Values

The RGE Global Code of Conduct (the Code) is driven by our Purpose, Vision and Core Values.
The Code in turn drives our policies, standards and SOPs and guidelines.



Our Purpose

Improving lives by developing resources sustainably

Our Vision

To be one of the largest, best-managed and sustainable resource-based groups, creating value for the **Community, Country, Climate, Customer and Company**

Our Core Values (T.O.P.I.C.C.)



Complementary Team

We are aligned by our common purpose and work together as a complementary team



Ownership

We take ownership to achieve outstanding results and seek value at all times



People

We develop our people to grow with us



Integrity

We act with integrity at all times



Customer

We understand our customers and deliver best value to them



Continuous Improvement

We act with zero complacency and always strive for continuous improvement

01 Understanding and using our Code of Conduct

About the Code

Using the Code

Reporting Misconduct

Investigation Process

Breaches of the Code



About the Code

The RGE Global Code of Conduct (the Code) is based on our T.O.P.I.C.C. Core Values. The Code embodies our commitment in upholding ethical and professional business practices, as well as complying with applicable legal requirements. We must be consistent and proper in how we conduct our businesses to achieve sustainable business success and maintain a strong reputation.

The Code guides our daily business conduct. It demonstrates how to apply the T.O.P.I.C.C. Core Values in our day-to-day decisions and actions.

As RGE has operations around the world, we must comply with applicable laws that govern international trade and RGE's local business activities.

The Code does not and cannot cover every law or situation that can arise in the workplace. Should you be in doubt as to what conduct is appropriate in any particular situation, or how the Code should be applied, you should seek advice and direction from your reporting manager or higher level managers and other related functional leaders.

Breaches of the Code may often also constitute breaches of law. Any violation of this Code or other RGE policies may result in disciplinary action, up to and including termination of employment, as well as civil or criminal penalties.

Our expectations of you

All RGE employees and members of the Board must adhere to the Code. We are responsible – individually and collectively – for how RGE does business and the impact RGE has in the world we live. We pursue our Vision and Purpose, whilst honouring our founder's legacy of integrity through the right behaviour.

Make sure you know the rules that apply to you and your work, and always apply them.

Zero tolerance for retaliation

RGE will not tolerate retaliation against anyone who raises concerns about a breach of the Code or participates in an RGE investigation. Retaliation will result in disciplinary action up to and including termination of employment.

We support honest and open communication and encourage you to ask questions and report concerns. Anyone who reports misconduct, including whistleblowers, will have their identity and the information they shared protected and kept confidential.

Using the Code

As RGE employees, we are responsible for applying and complying with the Code. If you are in doubt on how to apply the Code, please speak up and ask.

In each section of the Code, you will find an explanation of why a specified topic is important to our Group, what we expect of you and where you can go for further information and help. Some practical examples to help understand how to apply the Code in our day-to-day activities are also included.

Our expectations of you

When working for RGE, you agree to uphold our T.O.P.I.C.C. Core Values, the Code and any other Group policies that apply to your work.

It is your responsibility to:

- a. Understand and meet all requirements within our policies and procedures that apply to your work;
- b. Take reasonable steps to ensure parties who conduct business on behalf of RGE do so consistent with our Core Values;
- c. Speak up immediately if you have questions or concerns;
- d. Never encourage, allow or personally demonstrate retaliation for someone raising a concern;
- e. Never ignore a breach or potential breach of the Code.

Our expectations of those who lead or supervise

If you are a Business Leader or Reporting Manager, you must understand your additional responsibilities in dealing with the Code. If you lead or supervise others, you should also:

- a. Ensure employees understand the Code;
- b. Ensure that the standards set out by the Code are implemented and enforced;
- c. Foster a positive work environment in which only legal and appropriate behaviour, which are in accordance with our Core Values, are acceptable;
- d. Model appropriate behaviour that is consistent with our Code;
- e. Regularly discuss the importance of ethically and legally sound business practices and decisions. Identify and mitigate compliance risks and risks arising from deviation from RGE's Core Values;
- f. Respond appropriately and in a timely way to colleagues who seek advice or raise concerns, helping them feel secure and at ease in doing so;
- g. Maintain accountability among all employees, regardless of position or job title;
- h. Manage conflict of interest situations to achieve fair/appropriate outcomes;
- i. Keep confidential information provided by your subordinates in confidence.



Guiding questions

Before acting, you should ask yourself:



Values:

Am I upholding the values of RGE?



Conscience and Feel:

Am I compromising my integrity or the integrity of RGE or our customers?

Am I treating others the way I expect them to treat me?



Law and Safety:

Are my actions legal and in compliance with the standards of our profession?



Reputation:

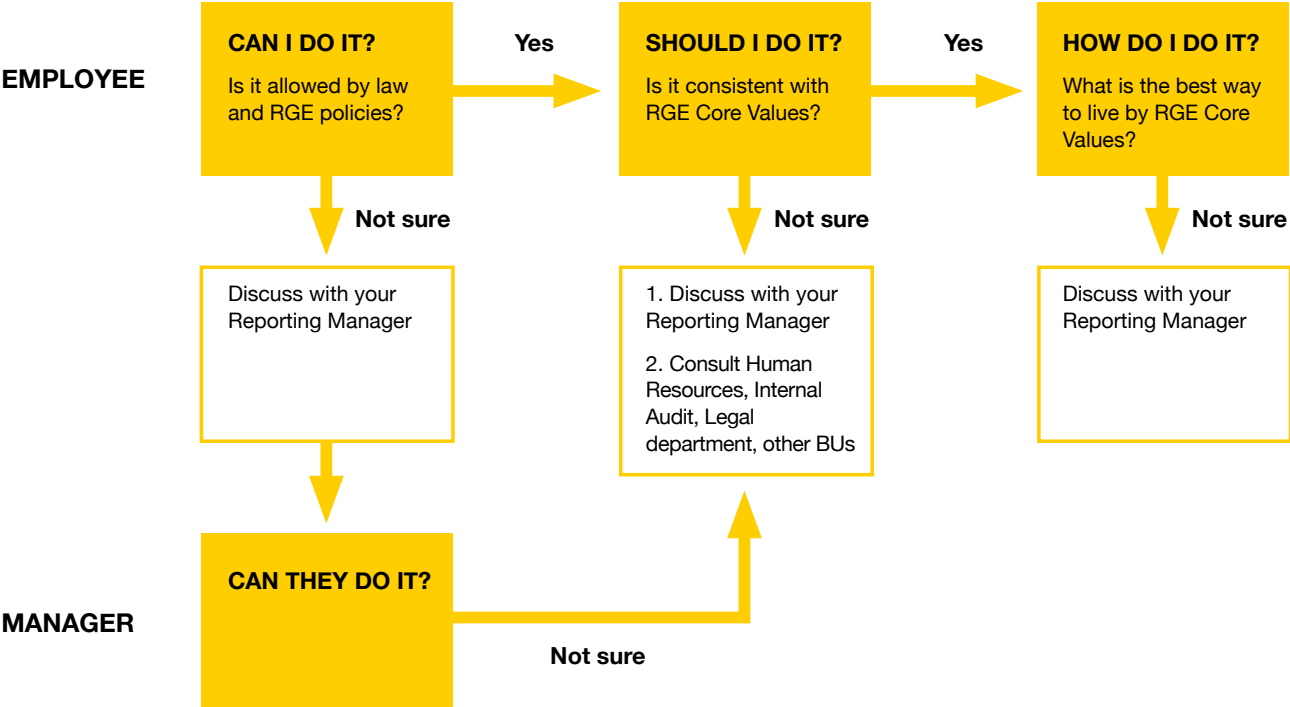
Would my actions damage the reputation of RGE?



Personal and Family Impact:

What would I tell my spouse, parent or child to do?

Using the Code



Reporting Misconduct

All employees have the responsibility to report misconduct if they observe any breach of the Code.

Your first point of contact should be your reporting manager. However, if you are uncomfortable sharing the issue with your reporting manager, your Business Group Human Resources representative is always available for consultation.

If you are aware of any suspected fraud and/or theft within RGE or related activities, you should report it to Internal Audit in your respective location through the confidential fraud reporting hotline.

Our expectations of you

When reporting a breach of the Code, you are required to provide details, including your personal information and factual evidence about the suspected misconduct to assist the investigation of the case.

Employees who report with malicious intent without any factual evidence will be subject to disciplinary actions.

Where can you report misconduct?



Your reporting manager



Your Human Resources representative



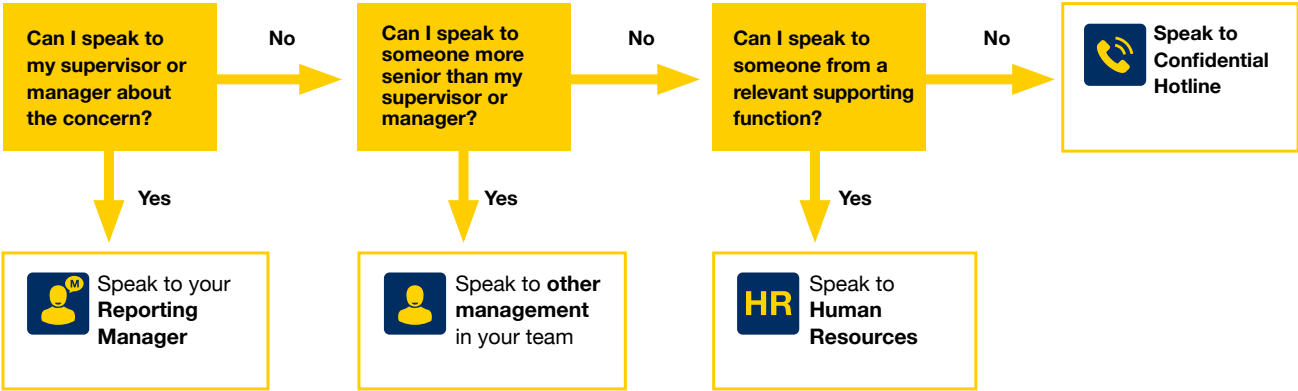
Confidential Email: whistleblow@rgei.com



Confidential Hotline (Internal Audit)

Singapore	+65 9789 6233
Indonesia	
• Fiber Business Group	+62 81 2755 2528
• Palm Business Group	+62 81 1600 9430
Malaysia	+60 12 332 9187
China	+86 137 3918 3310
Brazil	+55 0800 0066 012
All other countries	+65 9789 6233

Reporting Misconduct



Investigation Process

All reports about the breach of the Code will be treated promptly, fairly and in accordance with our legal obligations.

All reports of misconduct will undergo an initial review and may trigger an investigation process when appropriate.

The investigation process will involve the relevant panels and experts depending on the severity of the issue to determine the appropriate course of action. In the case of fraud, the Internal Audit team will also be involved.

Our expectations of you

When you report misconduct, you are required to cooperate fully in any investigation process that follows. You should keep your knowledge of and participation in such investigation confidential to help safeguard the integrity of the investigation, protect witnesses and secure relevant evidence.

Obligations of those responding to report of misconduct

Managers, Department Heads and employees who are responding to alleged breaches of the Code are obliged to:

- a. Treat all reports seriously and, where possible, maintain confidentiality of the information;
- b. Respond to issues raised promptly and professionally;
- c. Provide accurate information and advice consistent with the Code and our policies and procedures;
- d. Seek advice of experts with the right knowledge and objectivity;
- e. Know where to go for support or advice;
- f. Report all concerns to the relevant parties in the investigation process.

Breaches of the Code

Failure to comply with the Code is a serious matter that must be addressed. This may also lead to disciplinary action.

When conducting investigations, RGE will seek appropriate penalties for misconduct, consistent with our T.O.P.I.C.C. Core Values and this Code.

If a breach has occurred, any disciplinary action will be carried out in a fair and equitable manner, commensurate with the seriousness of the allegations and other relevant circumstances.

Possible outcomes of a breach of the Code include:

- Remedial (i.e. non-disciplinary and corrective) managerial action, such as education about expectations, coaching and counselling;
- Disciplinary action, such as a formal warning, suspension of employment, demotion and dismissal.

Our expectations of you

Always abide by the Code, raise concerns promptly and fully cooperate with any investigations.

In addition to failing to comply with the Code, misconduct which may result in disciplinary action includes:

- a. Requesting others to breach the Code or our T.O.P.I.C.C. Core Values;
- b. Failing to raise promptly any known or suspected breaches;
- c. Retaliating against another person for reporting misconduct;
- d. Serious wrongdoing that could be the subject of public interest disclosure, i.e. relating to corrupt conduct, maladministration, or failure to deal appropriately with information;
- e. Committing criminal charges or convictions that have an adverse impact to the company;
- f. Making vexatious allegations or malicious complaints;
- g. Failing to comply or cooperate with the processes of investigating or managing misconduct set out in the Code and supporting policies;
- h. Failing to demonstrate leadership and diligence to ensure compliance with the Code, T.O.P.I.C.C. Core Values and the law.

02 Our People

**Workplace
Health and Safety**

**Bullying,
Harassment
and Violence**

**Alcohol,
Gambling and
Substance Abuse**

**Personal
Information,
Privacy and
Security**



Workplace Health and Safety

Workplace health and safety as well as environmental sustainability are crucial to maintaining a great place to work and fulfilling our 5C commitment.

At RGE, we are committed to provide a safe, productive and conducive workplace so that our employees can contribute and advance.

We believe all accidents and occupational illnesses and injuries are preventable, and that jobs can and must be done safely. Safe operations depend on well-maintained plants and equipment, and on every employee taking responsibility for preventing work-related injuries and illnesses.

While reporting managers are responsible for the total safety of their respective functions, every employee must accept responsibility for their individual safety.

Our expectations of you

As an RGE employee, you should:

- a. Perform your job in a safe and environmentally responsible manner, in accordance with the law and RGE policies and practices;
- b. Inform your reporting manager of any health problems that prevent you from carrying out your duty properly. If you are involved in any work-related accident, you must immediately report it to your reporting manager and follow the company's policy for reporting accidents and injuries;
- c. Report any situation where you believe a safety, health or environmental hazard exists to your reporting manager immediately.

Workplace health and safety also includes maintaining appropriate dressing and appearance at workplace.

Managers must ensure that your direct reports are trained on the safety and environmental practices relevant to their jobs as well as implement and enforce all applicable regulations and policies.



Where to go for help

Supervisor or manager
Health and Safety and Environment representative
Human Resources representative



Policies and Resources

Workplace Safety HR 309.1

Workplace Health and Safety

Some practical examples (non-exhaustive)



Do

- a. Know how to apply and always comply with our health and safety policies, standards and procedures;
- b. Identify, assess and take steps to minimise health and safety hazards associated with your work;
- c. Encourage and assist your colleagues to abide by our workplace health and safety standards;
- d. Ensure that you use the necessary safety equipment and/or clothing required for the job;
- e. Report to your supervisor and manager any accident, injury, illness, unsafe or unhealthy conditions or incidents so that appropriate action can be taken;
- f. Keep the work area clean and organised;
- g. Observe smoking regulations;
- h. Practise good housekeeping according to the 6S methodology (sort, straighten, scrub, systemise, standardise, safety) at all times.



Do Not

- a. Work unless you are in optimum condition and feel at your best;
- b. Assume others will report a risk or concern and that you do not have the responsibility to highlight it;
- c. Bypass or disable any safety switches on equipment;
- d. Wear any article of clothing that may compromise your safety and the safety of others at the workplace;
- e. Undertake or continue work if it appears unsafe.



Some examples

Q: We just expanded the production line and therefore additional manpower is needed. As part of our safety policy, all employees should wear the safety equipment. However, the site is still waiting for the safety equipment order to arrive. If I wait for the equipment to arrive, I will not have enough workers to operate the mill. What should I do?

A: You must ensure that all employees are wearing the safety equipment. You should consult your reporting manager and find alternative solutions (e.g. identify departments that have spares or source from nearby vendors).

Bullying, Harassment and Violence

RGE does not tolerate any form of bullying, harassment and violence in any of our workplaces. We embrace our corporate responsibility to honour human rights and build a working environment based on mutual trust and respect.

Bullying is abusive conduct, whether verbally, physically or psychologically by a person or group of people at work. Harassment is any unwelcome behaviour that may intimidate, offend or humiliate the recipient. Violence is any behaviour that is hostile, abusive or may make others feel threatened.

Bullying, harassment and violent behaviour in the workplace may lead to disciplinary action for employees involved.

Bullying, harassment and violence should not be misconstrued with objective feedback or coaching of an individual or group for development purposes.

Our expectations of you

- a. You must never engage in behaviour or actions that constitute bullying, harassment and/or violence;
- b. You should practise common sense in your conduct and behaviour and always ensure that you are professional, ethical, legal and socially responsible;
- c. You are expected to treat fellow employees with respect, fairness and integrity. You should always consider the implications of your behaviours, and encourage your colleagues to speak up and raise concerns;
- d. As RGE is a global company, you should always be aware of cultural considerations and demonstrate respect, particularly when travelling to different operations or countries.



Where to go for help

Reporting Manager
Human Resources representative



Policies and Resources

Code of Conduct HR308.1
Sexual Harassment Policy HR308.6

Bullying, Harassment and Violence

Some practical examples (non-exhaustive)



Do

- a. Respect everyone and treat them with dignity in line with our T.O.P.I.C.C. Values;
- b. Speak up if someone's comments or behaviours make you feel uncomfortable or upset, and talk it through;
- c. Be open to adapt your behaviour in response to feedback and be mindful of cultural considerations of another operation or country.



Do Not

- a. Engage in offensive and humiliating behaviour;
- b. Make insensitive remarks about issues such as race, gender, religion or disability;
- c. Bring weapons or any part of a weapon to RGE workplace;
- d. Practise sexual harassment behaviours;
- e. Disseminate or show offensive and inappropriate materials;
- f. Use RGE resources to distribute offensive and inappropriate materials.



Some examples

Q: Several of my co-workers regularly make derogatory remarks about my appearance and imply that I'm not qualified to do my job. When I ask them to stop, they insist that they don't mean any harm and are only joking. I am frustrated and tired of their behaviour. What should I do about it?

A: You are encouraged to report this to your reporting manager and Human Resource representative. Making repeated derogatory remarks constitutes harassment and violates our Code. As employees of RGE, we should treat everyone with respect and dignity and thus such behaviours will not be tolerated at our workplace.

Alcohol, Gambling and Substance Abuse

RGE workplaces should be free from the use of alcohol, the misuse of substances and any gambling activities.

All employees have the right and responsibility to maintain a safe and healthy work environment, free from the effects of alcohol, illegal drugs or other controlled substances.

The possession or use of controlled substances at RGE workplaces, functions or in conjunction with RGE business is strictly prohibited.

Engaging in any gambling activities at any RGE workplace will compromise our reputation and is against the company policies.

Our expectations of you

As RGE employees, you must not:

- a. Use, transfer, sell, manufacture or possess illegal drugs or other controlled substances;
- b. Consume alcoholic beverages at any RGE workplace and during working hours, except with prior management approval, such as during company-sponsored events;
- c. Gamble or participate in any games of chance at any RGE workplace, on company systems or while conducting company business.

Any violation will immediately lead to disciplinary action, subsequent legal consequences and potential termination.



Where to go for help

Reporting manager
Human Resources representative



Policies and Resources

Code of Conduct HR308.1

Alcohol, Gambling and Substance Abuse

Some practical examples (non-exhaustive)



Do

- a. Ensure that you are in your best condition to carry out your duties;
- b. Report and take action in relation to any dependency condition in yourself or which you note in someone you supervise;
- c. Keep matters of dependency confidential. Raise concerns with your reporting manager or your Human Resources representative.



Do Not

- a. Perform your work (including driving to and from work, moving around work site and attending work functions) when you are under the influence of alcohol or drugs (illegal, legal or prescribed);
- b. Consume or offer alcohol to others at an RGE site or office unless prior management approval has been obtained;
- c. Possess, use or transfer illegal drugs or substances at an RGE site or office;
- d. Participate in gambling or any games of chance at any RGE workplaces.



Some examples

Q: I am really looking forward to the end-of-year dinner with the team as it will be a great opportunity for us to celebrate our achievements and have some fun together. I know we have zero tolerance for alcohol at work, but I plan to have a few drinks as the dinner is off-site.

A: If you are returning to a work site or office after the event then you must not consume alcohol. If you are not returning to work afterwards, then it is your personal preference/choice but be mindful of getting home safely. You should maintain a responsible level of behaviour and respect for others. Always consider your personal reputation and the reputation of RGE.

Personal Information, Privacy and Security

RGE is committed to safeguarding your personal information and privacy. Similarly, you should respect the personal information and privacy of others.

RGE protects the privacy and confidentiality of your personal, medical, family and financial information. We do not disclose such information to anyone, internally or externally, other than those with a business need for such information and where we are legally permitted to do so.

Confidential personal information includes, but not limited to, social security numbers, identification numbers, passwords, compensation information, bank account information and medical information.

Our expectations of you

You must take appropriate steps to protect your own confidential personal information.

You should never access or obtain, and disclose your colleague's personal information with anyone, either inside or outside RGE, unless there is a business need to do so and is in accordance with applicable laws, legal process and company policies.



Where to go for help

Reporting manager
Human Resources representative



Policies and Resources

Personal Data Protection Policy CL112 R1

Personal Information, Privacy and Security

Some practical examples (non-exhaustive)



Do

- a. Retain, utilise, disclose and gather personal information only if deemed required for proper business purposes;
- b. Use personal information only for its intended purpose, unless otherwise approved by the relevant individual;
- c. Maintain the accuracy of personal information;
- d. Check the legal requirements regarding personal information applicable to your jurisdiction.



Do Not

- a. Access personal information unless you have a clear business need and are authorised to do so;
- b. Disclose personal employee information to anyone inside or outside of RGE without prior approval.



Some examples

Q: Someone from another business entity within the RGE Group has just asked me for my colleague's personal information. Since we're all part of the same group, can I just share my colleague's personal information?

A: No, unless you have obtained your colleague's consent to disclose the information to the other entity. Each company within the Group is a separate legal entity and sharing your colleague's personal information without permission could be a breach of privacy law. You should ask the person requesting the information to ask your colleague directly or offer to relay the request for your colleague's consideration.

**We enable communities
we operate in to grow with us.**

03 Our Community

Political
Donations and
Activities

Sustainability



Political Donations and Activities

It is important that you understand and comply with the company policies pertaining to political donations and activities to protect the interests of RGE and its employees.

RGE is politically neutral and does not normally engage in any kind of political activity. However, RGE does join industry associations and make public policy statements and/or involves itself in political engagement, provided appropriate internal approvals have been obtained.

As employees, you may join political association or make donations to political parties provided that this is done in your personal capacity and in your own personal time (without using RGE resources and time). You must also make it clear at all times that RGE is not connected with the political activity or donations in any way.

Our expectations of you

As employees, you may be a member of political associations and make donations provided:

- a. You do so in your own time;
- b. You do not use RGE resources, including funds and premises;
- c. You make clear that you are not representing RGE;
- d. You maintain RGE neutrality;
- e. You do not coerce other RGE employees to oppose or support any political associations or activities.

Employees who are elected for officers of any government will be deemed to have terminated their employment with RGE on the day of the election.



Where to go for help

Reporting manager
Human Resources representative
BG Legal representative



Policies and Resources

Political Donations and Activity Policy CL122

Political Donations and Activities

Some practical examples (non-exhaustive)



Do

- a. Conduct business dealings on behalf of RGE with any politician, political party, elected official or candidate for public office in any country in accordance with the Code, our policies, and all applicable laws and regulations;
- b. Be mindful of RGE's reputation and how the public would perceive your actions when engaging with government officials.
- c. Make it clear that you are making a political donation on your own behalf and not on behalf of RGE.



Do Not

- a. Make a cash or in-kind contribution or incur expenditure using an RGE account to any political campaign, political party, political candidate, elected official or any of their affiliated organisations;
- b. Use or allow others to use any RGE resources for any political campaign and activities;
- c. Use your position in RGE to try to coerce another person to make political donations or provide support to any political party or politician.



Some examples

Q: I take some interest in politics and want to join a political association and make a donation to a political party of my choice. Is this permissible?

A: You may join a political association or make donations to political parties provided that this is done in your personal capacity and in your own personal time (without using RGE resources and time). It must also be clear that RGE is not connected with the political activity or donations in any way.

Sustainability

RGE's Forestry, Fibre, Pulp & Paper Sustainability Framework spells out our sustainability practices and represents our commitment to be environmentally responsible and support our communities.

At RGE, we are committed to sustainable development in all locations where we operate, by implementing best practices in social, environmental and economic spheres as guided by our business philosophy – that whatever we do must be “Good for the Community, Good for the Country, Good for the Climate, Good for the Customer, and Good for the Company”.

RGE Sustainability Framework includes:

- a. Proactive support local communities;
- b. Respecting the rights of indigenous peoples and communities;
- c. Responsible practices at our workplaces;
- d. Conservation as part of our sustainable forestry business model;
- e. No deforestation;
- f. Continuous reduction of our carbon footprint;
- g. Responsible management of peatlands;
- h. Responsible sourcing of pulp and wood chips.

Our expectations of you

You must understand the potential social and environmental impacts of the tasks you perform and look at ways you can avoid and minimise this impact.

Where actual or potential incidents contravening the sustainability framework occur, you must report these, regardless of severity.

Employees should seek continuous improvement in ensuring their areas of work are in compliance with the framework and supports RGE's purpose of improving lives by developing resources sustainably.



Where to go for help

Reporting manager
Sustainability department
Operations department
Human Resources department



Policies and Resources

RGE Sustainability Framework

Sustainability

Some practical examples (non-exhaustive)



Do

- a. Comply with RGE Sustainability Framework;
- b. Identify, assess, and take steps to minimise social and environmental impacts that may arise from your work;
- c. Immediately stop any work that may harm the environment or contribute to a significant community incident;
- d. Report to your reporting manager any actual or potential impact to the environment or communities from an accident and incident so that appropriate action can be taken to prevent, correct and/or control those conditions;
- e. Encourage our suppliers, joint venture partners, customers and other third parties to engage in environmentally and socially responsible practices.



Do Not

- a. Ignore a potential or actual environmental incident or assume that someone else will report it;
- b. Engage contractors, suppliers or joint venture partners without assessing their environmental and community impacts, risks, controls and performance;
- c. Undertake work that may potentially impact the environment unless you are trained and competent to do so and controls are in place to minimise environmental impacts.



Some examples

Q: In order to meet production targets and urgent requirements, my team member suggested procuring from a supplier that we do not normally deal with or performed prior due diligence on. This was assessed to be acceptable as the procurement quantity is small and it is a one-time arrangement.

A: This is not acceptable as the Sustainability Framework applies not only to RGE and its business groups but all suppliers that we deal with.

**We understand the changing
market landscape and trends,
and their impact on the organisation.**

04 Our Marketplace

Conflicts of Interest	Accepting Gifts, Entertainment & Hospitality
Relationship with Business Partner	Competition
Procurement Ethics	Trade Sanctions
Insider Trading	Business Travel



Conflicts of Interest

Employees should always be aware of any relationships which may be, or appear to be, a conflict of interest with RGE and take the necessary steps to avoid them.

Nothing you do, whether on the job or in your personal time, should conflict with your responsibilities to RGE or negatively affect your commitment to your work, the quality of your work or your ability to make impartial business decisions.

A conflict of interest is a situation where your objectivity or independence may be affected, or potentially be affected by your position within the Group or your financial or other personal interests.

Some examples that may give rise to potential or perceived conflict of interest include:

- a. Awarding RGE business opportunities for the benefit of close family or friends or for personal gain;
- b. Investing in businesses whom RGE has dealings with;
- c. Receiving gifts, money or services either directly or indirectly from RGE suppliers or other third parties;
- d. Influencing the results of bid or tender activities;
- e. Using your position to influence hiring decisions without disclosing the relationships;
- f. Holding outside jobs or affiliations.

Our expectations of you

You are expected to devote your time exclusively to the discharge of your duties and responsibilities in the Group. You should avoid business dealings and personal relationships that cause or may cause conflicts of interest, or create the appearance of a conflict or potential conflict.

You should obtain prior written approval before engaging in any employment or conduct in any form of business activities outside RGE.

If the outside employment is in conflict of interest with RGE's business, you must terminate the employment immediately or face subsequent disciplinary action, legal consequences, leading up to termination.



Where to go for help

Reporting manager

Human Resources representative



Policies and Resources

Conflict of Interest and Non-competition HR308.3

Conflicts of Interest

Some practical examples (non-exhaustive)



Do

- a. Maintain professionalism and impartiality in all our business relationships;
- b. Declare to your reporting manager in writing of any potential conflict of interest relationships and activities;
- c. Report to your HR representative or reporting manager of any actual or possible conflict of interest situations.



Do Not

- a. Use your position/authorisation in the Company for your personal benefit or interests;
- b. Hold any stakes (whether financial or otherwise) in companies with whom RGE has business dealings with;
- c. Enter business dealings and personal relationship that cause or may cause conflicts of interest;
- d. Be involved in any decision-making process where you may have an actual or perceived conflict of interest which may influence your ability to make an objective decision;
- e. Hire, promote or directly supervise a relative, unless this has been specifically authorised; misuse RGE resources or your position of influence at RGE to promote or assist an external activity or party;
- f. Interfere in the fair and transparent operation of bid and tender activities in a manner that can inappropriately influence decision-making or give the perception of inappropriately influencing decision-making processes.



Some examples

Q: I'm working on a project at RGE with a tight timeline. To complete the project, I need to hire someone as a temporary contractor to help me as soon as possible. I have a relative who is trained to do this type of work and I am confident that they can perform. Can I still hire the relative to work at RGE?

A: Although the work is legitimate, the situation creates the appearance of a conflict and does not provide fair treatment to other external candidates. You should raise this situation to your Reporting Manager and Human Resource representative so that an independent review can be done prior to committing to a contract. This will help to protect you, your relative and RGE should the relationship ever come into question.

Accepting Gifts, Entertainment and Hospitality

We must adhere to the law and local business practice in dealing with gifts, entertainment and hospitality.

Gifts, hospitality or entertainment should never be used to unduly influence business decision making, whether this is perceived or used in actual situations.

In order to protect RGE's reputation and its related third parties, you should exercise caution when accepting gifts, entertainment or hospitality.

You may only accept gifts, entertainment or hospitality if they are occasional, customary and/or of modest value as per policy guideline. Gifts, entertainment and hospitality of any kind must not be requested from anyone RGE conducts business with, including suppliers, customers and business partners.

Our expectations of you

It is important you do not accept:

- a. Product or service discounts offered exclusively to you, unless prior approval has been obtained;
- b. Any gifts, entertainment or hospitality of inappropriate monetary value or nature or one that may cause conflicts of interest.

As a general rule, you should reject offers of sponsored travel and accommodation. If there is a valid business purpose to attend an event or function, RGE will pay for any travel and/or accommodation costs. Frequent flyer redemption from an airline is not considered an offer.

Sponsored travel is not made acceptable by being undertaken during a period of leave.



Where to go for help

Reporting manager

Human Resources representative



Policies and Resources

Gifts, Sponsorship, Entertainment and Sponsored Travel HR308.7

Accepting Gifts, Entertainment and Hospitality

Some practical examples (non-exhaustive)



Do

- a. Declare any gift, entertainment or hospitality accepted, rejected or returned;
- b. Accept gifts, entertainment, hospitality only if they are modest and comply with RGE policies, standards, applicable laws and regulations;
- c. Clearly articulate RGE requirements on accepting gifts, entertainment and hospitality at the beginning of new business relationships, especially where cultural norms may be different from those outlined in the Code;
- d. Assess the potential for a conflict of interest when accepting gifts, entertainment or hospitality;
- e. Be prepared to decline politely any offer not in line with our standards;
- f. Regard gifts, entertainment, or hospitality received through an intermediary as being the same as those given directly.



Do Not

- a. Solicit a gift, entertainment or hospitality from any third parties RGE has business dealings with;
- b. Accept gifts, entertainment, hospitality or other favours from organisations which are (or may potentially be) involved in a tender or bid with RGE;
- c. Retain any gifts or accept hospitality or entertainment exceeding a modest value unless prior approval has been obtained.
- d. Accept any gifts for personal gain.



Some examples

Q: A supplier that I do a lot of business with has sent me a hamper during one of the festive seasons. Can I keep it?

A: Given you work a lot with this supplier, they should be well aware of our position on accepting gifts. Refer to the policy for the conditions on whether to declare, accept or reject the gift.

Relationship with Business Partner

In selecting a business partner, you must always ensure that they uphold our standards and contribute positively to our reputation.

RGE's business partners include joint venture partners or co-investors, or third parties who interact with others on behalf of RGE or RGE controlled entities, such as advisors, distributors, agents, customers, consultants, travel agents, freight forwarders and law firms.

Joint ventures

In joint ventures that RGE controls or operates, we will apply our policies, standards and procedures directly. If we do not control the joint venture, we will seek to influence them to comply with the same standards and procedures.

Our expectations of you

You must exercise care when selecting a business partner. Do not engage any business partner if it appears that they may violate any laws or harm our reputation when acting on behalf of RGE.

You should ensure you conduct sufficient due diligence and provide all required background information truthfully and to the best of your knowledge.

You should be confident that the business partner has the necessary competencies to perform the required work and with reasonable compensation sought.

It is important to constantly keep track and assess the performance of the business partner.



Where to go for help

Reporting manager
Human Resources representative



Policies and Resources

Criteria for Selection of Carriers SM403.1
Distributor Agent Selection and Management SM402.3

Relationship with Business Partner

Some practical examples (non-exhaustive)



Do

- a. Adhere to all the criteria and obtain all pre-approvals in accordance with our policies before engaging a business partner (including conducting mandated due diligence);
- b. Monitor the conduct of business partners including verifying invoices and highlighting any suspicious amounts;
- c. Raise any concerns or suspicions about the conduct of business partners with your Business Group (BG) Legal representative;
- d. Ensure all payments made by business partners on behalf of RGE are legitimate.



Do Not

- a. Ignore any red flags that indicate that a business partner may be violating laws or RGE policies. Such red flags may include unusual reimbursement claims or unreasonable remuneration;
- b. Continue engaging with a business partner if there are signs of improper behaviour. Any issues must be investigated and resolved thoroughly before we continue to engage them.



Some examples

Q: I am working in the sales team and we are currently in talks to engage a distributor for one of our products in one of our market locations. I've heard of rumours from industry contacts in the country that the distributor may be involved in litigation. What should I do?

A: You must always exercise care when selecting a business partner, such as sales agents, who will interact with others on behalf of RGE or RGE controlled entities. It is your responsibility to ensure sufficient due diligence is conducted on any prospective agents to ensure that they meet the criteria as laid out in our policies. Do not engage the agent if it appears that they may violate any laws or harm our reputation when acting on behalf of RGE.

Competition

RGE does not engage in or tolerate any form of conduct which fails to comply with the requirements and spirit of Competition Laws.

Many jurisdictions RGE operates in have developed competition laws. They typically prohibit practices that restrict competition and abuse by a company or companies with market power, such as price fixing, market sharing, bid rigging or abuses of a dominant position.

RGE is committed to:

- a. Full compliance with competition laws;
- b. Active engagement and cooperation with competition authorities; and
- c. The enforcement of anti-competition laws against those third parties who act in an anti-competitive manner towards RGE.

Our expectations of you

You must always conduct yourself in a manner that does not breach competition laws. This applies to all dealings with RGE's competitors (including competing joint venture partners), trade associations, customers, suppliers and business partners.

Breaching competition laws amounts to serious misconduct and can result in severe consequences for RGE and our employees.

You should report immediately if you suspect any anti-competitive behaviour in RGE employees or related third parties.



Where to go for help

Reporting manager
Human Resources representative
BG Legal representative



Policies and Resources

Competition Policy CL 120

Competition

Some practical examples (non-exhaustive)



Do

- a. Determine all RGE prices independently and maintain independent judgement in marketing and selling of any product;
- b. Be mindful of how your interaction with a competitor may be perceived. Avoid any behaviours that may imply possible illegal cooperation with competitors;
- c. Have legitimate business reasons when selecting or refusing to do business with potential customers;
- d. Obtain BG Legal approval before submitting any information to a competition authority.



Do Not

- a. Discuss or agree with competitors to:
 - Raise, lower or fix any list price or selling price;
 - Fix the discount to be offered, type of credit terms for customers, a range within which prices must fall, the terms or conditions of sale;
 - Limit or restrict production;
 - Divide customers, products and services and territory;
 - Refuse to do business, or do business only on specified terms, with a potential customer;
 - Exchange commercially sensitive data;
 - Limit or restrict distribution practices;
- b. Hinder investigation by a competition authority. This may include falsifying or concealing information.



Some examples

Q: There is a social function coming up which will be attended by some traders of RGE competitors. I've been invited to go. Is it ok to attend? What if the issue of price comes up? Can I share price information?

A: There is no issue attending a purely social function but you should be careful when engaging with discussions with competitors, even in a social setting. If there is competitively sensitive information being shared, you should immediately stop the conversation and tell them you are uncomfortable with continuing the conversation. If the competitor persists, you should walk away. You should immediately inform BG Legal of the incident and make detailed and contemporaneous notes about your interaction, in case there is a future investigation.

Procurement Ethics

RGE is committed to exhibit honesty, integrity and fairness in business dealings with all suppliers and potential suppliers and to expect the same in return from all such suppliers and potential suppliers.

Healthy and open relationships with all RGE suppliers are important to the success of our business. We are committed to operating a fair and equitable procurement process.

Suppliers can have a significant impact to our profitability and reputation through their actions. Therefore, it is important that our potential suppliers are clearly informed of our expectations and business requirements.

Our expectations of you

You must always protect RGE's interests in all business dealings with suppliers and ensure that our suppliers adhere to our Code of Procurement Ethics (COPE).

RGE is committed to promoting fair competition in the procurement of goods and services from its suppliers.

If you have purchasing influence, you must not use it for personal benefit whatsoever. You must not solicit or receive any gifts and/or entertainment of any nature from any suppliers. You should also avoid any potential, perceived or actual conflict of interest in dealing with suppliers, e.g. by having a direct or indirect shareholding in the supplier.

You must take due care in handling RGE's and suppliers' confidential and proprietary information that you may come across in the course of your work. You should not disclose such information to any third party and only use the information for the relevant business purpose.



Where to go for help

Reporting manager
Human Resources representative
Procurement representative



Policies and Resources

Material Management Code of Practice MM500
Code of Procurement Ethics
Gifts, Sponsorship, Entertainment and Sponsored Travel HR308.7

Procurement Ethics

Some practical examples (non-exhaustive)



Do

- a. Obtain competitive bids unless deemed not applicable by management;
- b. Ensure that our suppliers understand and are compliant with RGE business conduct requirements;
- c. Review the relationships and performance of our suppliers regularly;
- d. Get the suppliers to sign the Non Disclosure Agreement (NDA) if they are dealing with any confidential information;
- e. Report any suspected fraudulent act or intent from suppliers and/or employees;
- f. Ensure that all suppliers are informed and aligned with the Supplier COPE requirements.



Do Not

- a. Engage with suppliers who breach the laws or are involved with practices inconsistent with our T.O.P.I.C.C. Core Values;
- b. Disclose confidential information of a supplier to another supplier;
- c. Solicit or accept gifts, entertainment or hospitality from suppliers.



Some examples

Q: I work as a Business Manager in a community where one of the suppliers is owned by an influential leader. We opened a bid for a new contract and this supplier was among the parties that showed interest. After submission, the leader came to me asking to select his company as the winner of the bid. However, I am aware that his company might not meet all the standards to perform the job. If I reject his bidding, I suspect he will take actions against the Group. What should I do?

A: You must still go through an open and transparent bidding process. Based on the way we conduct business, we want to work with suppliers who share our values and respect the way we do business. If suppliers do not meet our standards and use manipulative methods to force us into choosing them, they are not the type of partners we should engage with. Report this incident to management so mitigating action can be taken as needed.

Trade Sanctions

RGE is committed to conduct all of its business lawfully and will never act contrary to, or in breach of, any trade sanctions.

RGE complies with any laws and regulations imposed by the UN, the EU, the US and a number of other jurisdictions, limiting or prohibiting activities and business dealings with certain countries, individuals, legal entities, organisations or products.

We do not enter into transactions with any country, organisation, or individual which is subject to sanctions, unless permitted by law.

Non-compliance with sanctions would result in penalties which may include significant fines, imprisonment and can affect the ability of individuals to work in trading companies in the future.

Our expectations of you

You must comply with all sanctions that prohibit or limit doing business in certain countries and with designated individuals, entities, aircraft and vessels and may not conduct business, directly or indirectly, in violation of those laws.

Perform due diligence on counter parties you deal with and seek approval before you enter into transactions involving counter parties who may be on a sanctions list or transactions which may involve, directly or indirectly, a country subject to sanctions. In some cases, heightened due diligence may also be necessary.

Sanctions are subject to frequent change. Always check with your BG Legal representative if you are uncertain whether a transaction would breach existing laws, regulations or restrictions.



Where to go for help

Reporting manager
Human Resources representative
BG Legal representative



Policies and Resources

Trade Sanctions CL 121

Trade Sanctions

Some practical examples (non-exhaustive)



Do

- a. Screen all your business partners, suppliers and other parties involved in international transactions against consolidated watch lists as required;
- b. Work with your BG Legal representative to seek assurance from a counterparty if you have concerns that the counterparty may be on-selling to a sanctioned party;
- c. Contact your BG Legal representative if in doubt.



Do Not

- a. Engage in negotiations, discussions or transactions of any kind with entities in countries which are subject to trade sanctions under laws applicable to RGE. If unsure, speak to your BG Legal before discussions commence;
- b. Allow a transaction to proceed with a counterparty which is intended to conceal the identity of a true counterparty.
- c. Ignore any suspicious circumstances which link any transaction to countries, entities or individuals subject to sanctions.
- d. Proceed with any transactions if in doubt about whether the transactions may breach any trade sanction laws.



Some examples

Q: I am on the verge of securing a commercial deal with a new counterparty that RGE has never dealt with before. I've heard that this counterparty may operate out of or have dealings with a sanctioned country. Do I need to check or can I just proceed with the deal?

A: You should always do due diligence on a new counterparty by seeking information about the entity's place of incorporation, its shareholders and where the entity does business. Given that you have received information that this counterparty may have dealings with a sanctioned country, you need to do heightened due diligence. Check with BG Risk (Business Controller/ tax/ finance team of your BG) and BG Legal to make sure that you are doing sufficient due diligence. You may only proceed with the transaction once you've received clearance from BG Risk and/or BG Legal.

Insider Trading

In the normal course of business, you may learn of information about RGE or other companies, such as competitors, business partners, before it is made public. Using such information for your personal benefit or conveying this information to others is prohibited.

Material Non-Public Information (“MNPI”) is material information about a company that is generally not available to the public. The information is material if it would likely have a significant effect on the price of that company’s shares. This may be about RGE’s related public company or another comp any.

Examples of possible MNPI include:

- a. The financial performance of RGE’s related public companies against its budget or forecasts;
- b. Entry into or termination of a significant contract;
- c. Actual or proposed mergers, acquisitions or joint ventures.

While it is not an offence to possess MNPI, it may be a criminal offence in many jurisdictions to buy, sell or otherwise deal in relevant securities while you have MNPI. This is called insider trading.

Disclosing information, irrespective whether the information is used for insider trading, may also be a breach of your obligations of confidentiality, as laid out in our Confidentiality Policy.

Our expectations of you

- a. You must not buy or sell securities of related public companies or any publicly trading companies while having inside information about the company. You also must not encourage others to do so;
- b. You should exercise caution if you wish to trade in the shares of a company with whom RGE has a business relationship. The same insider dealing rules apply to these shares. Such investments may also give rise to an actual or perceived conflict of interest;
- c. Never use confidential information received from a third party under a non-disclosure agreement for any purpose other than for the purpose allowed.



Where to go for help

Reporting manager
Human Resources representative
BG Legal representative



Policies and Resources

Insider Trading Policy CL 111 R1
Confidentiality Policy CL 110 R1

Insider Trading

Some practical examples (non-exhaustive)



Do

- a. Protect the confidentiality of RGE information;
- b. Report any leaks of RGE information or any suspected insider trading activities you become aware of to your reporting manager;
- c. Ask for advice from BG Legal if you have any doubt in dealing with securities;
- d. Treat any information you disclose about RGE, including your work and your conversation with colleagues, with care.



Do Not

- a. Trade the securities of RGE related public companies, whether directly or through family members, other persons or entities, while you are in possession of MNPI;
- b. Communicate or disclose MNPI to anyone outside RGE, including family and friends;
- c. Encourage anyone else to buy, sell or deal in the securities of any company, whether related to RGE or not, while you have inside information about the company;
- d. Disseminate false information or be involved in other activities that may manipulate the price of publicly listed securities;
- e. Disclose MNPI by accident, such as by talking about confidential information in public places



Some examples

Q: I overheard a colleague talking about a big commercial transaction involving a listed company in the RGE Group is going to take place. I don't know the details of the transaction but suspect it will make share prices go up. I haven't seen any public news about this information so far. Can I tell some relatives about this if I ask them to keep the information confidential?

A: Even if you don't know any details of the transaction, the information concerning the deal may be MNPI and should not be shared with anyone. If you tell your relatives and they use this information to deal in the company's securities, you and your relatives may be guilty of insider trading. You should not assume that your relatives will not make use of the information or that they will keep the information confidential. You should also inform your colleague that you overheard the information and warn him/her to be careful when discussing sensitive commercial matters, whether in the office or otherwise.

Business Travel

RGE seeks to provide those travelling on Company business with a reasonable level of service and comfort that is cost-effective and convenient, and that protects the health and safety of the traveller.

All of our business travel arrangements for flights, accommodation, ground transport should be made in the most efficient and cost effective manner without compromising the health and safety of the traveller.

Employees will be reimbursed for all reasonable travel and entertainment-related expenses incurred during the course of the business travel. These expenses need to be substantiated with valid invoices or other legitimate records.

Our expectations of you

All business travel must be appropriately approved and booked in accordance with RGE requirements.

You should not travel together on the same carrier if you and the other employees are critical to a site, work group or project team. Senior executives are also not permitted to travel together on the same carrier.



Where to go for help

Reporting manager
Human Resources representative



Policies and Resources

Business Travel HR 302.1
Prohibition of Joint Travel by Senior Executive HR 302.5

Business Travel

Some practical examples (non-exhaustive)



Do

- a. Obtain approval from the appropriate person prior to commencing travel;
- b. Use RGE's approved travel provider for all business travel bookings whenever applicable;
- c. Prepare for international travel by seeking destination-specific travel safety and health advice, vaccinations and travel kits;
- d. Ensure that all items claimed are legitimate business-related expenses, that they relate to approved business travel or approved entertainment activity and are supported by original documents where available (receipts or tax invoices);
- e. Comply with global immigration rules when travelling internationally, and ensure that employees who report to you also comply;
- f. Familiarise yourself with local behaviours, practices and customs, and be sensitive to actions or behaviours that may be acceptable in one culture but not another.



Do Not

- a. Accept offers of sponsored travel or accommodation. If there is a valid business purpose for attending the event, RGE will pay any travel and/or accommodation costs;
- b. Permit multiple employees who are critical to a site, work group or project team to travel together on the same carrier.



Some examples

Q: I recently went on a business trip for two weeks. During the weekend, I used some of my free time to explore the neighbouring city by coach. Can I claim the cost of the coach ticket as part of my travel expenses?

A: No you cannot. The costs incurred during the activities that you do in the weekend are not related to the purpose of your business travel and are therefore considered as your personal expenses. You should only claim legitimate business-related expenses that relate to the approved business travel.

**We safeguard company's
assets and knowledge.**

05 Our Assets and Resources

Safeguarding
Our Assets

Handling External
Communications

Cyber Security



Safeguarding Our Assets

As employees of RGE, we have a responsibility to protect the Company's assets.

RGE assets include those physical and non-physical properties, such as facilities, equipment, inventory, information technology, intellectual property and Company information and data.

Competitively sensitive and proprietary information and documents must be treated as an asset and protected from unauthorised use or disclosure.

Confidential information includes, but not limited to:

- a. Information relating to business methods, corporate plans, organisation, finance and business opportunities;
- b. Marketing information;
- c. Technical information;
- d. Other types of confidential information in any form.

You should not share any of this kind of information unless authorised to do so.

RGE assets should only be used for the purpose and in the manner intended, with all appropriate and accurate records kept.

You should take precautions to prevent theft, misappropriation, damage or misuse of any RGE assets. Non-physical assets should not be provided externally without appropriate approvals.

Our expectations of you

- a. You are responsible for appropriately using and safeguarding RGE assets, both physical and non-physical;
- b. You should respect both the non-physical and physical assets of others, and never intentionally damage or misappropriate those assets;
- c. When dealing with third parties outside RGE, you should ensure that they sign non-disclosure agreements (NDA) when required to do so and subsequently comply with the terms of the agreements;
- d. When in doubt about the confidentiality of the information, treat the information as confidential and seek clarification from BG Legal, as appropriate.



Where to go for help

Reporting Manager

Human Resources representative

BG Legal representative



Policies and Resources

Confidentiality Policy CL 110 R1

Information Security IT604.6

Safeguarding Our Assets

Some practical examples (non-exhaustive)



Do

- a. Use RGE assets solely for their proper business purposes;
- b. Safeguard our assets from any potential damage, misuse or theft
- c. Adhere to the relevant requirements and laws regarding the use of our assets;
- d. Report any potential damage, misuse or theft of RGE assets immediately;
- e. Assume that information is confidential when in doubt;
- f. Maintain files securely and avoid storing information on computer systems that can be accessed by other individuals;
- g. Restrict the copying and distribution of sensitive documents within the Company



Do Not

- a. Use Company assets for personal benefit;
- b. Involve our assets in any fraudulent or illegal transactions;
- c. Allow unauthorised access to an RGE site or office or to our information technology;
- d. Ignore security complaints or an inadequate security procedures;
- e. Discuss confidential matters in areas where the conversation could possibly be overheard;
- f. Gossip about RGE's affairs.



Some examples

Q: I received some confidential information for a particular project from a third party which we signed an NDA with. That project didn't go through and we are now in talks with another party to do a similar project. Can I disclose the information to this new counterparty as part of our discussions?

A: Since the information you received was under an NDA with an obligation of confidentiality, you need to check the terms of the NDA to see if you are still obliged to keep the information confidential. Sharing the information with another party may be a breach of the NDA which would expose RGE to legal liability. You should reach out to BG Legal for assistance.

Handling External Communications

RGE is committed to truthful and transparent communication with its internal and external stakeholders.

Public information refers to information collected, assembled, or maintained by RGE; and RGE owns the information or has the right of access to it. This information is usually made freely available to employees and/or external parties, usually in the form of publications, publicity collateral or information posted on the company's online communication assets.

Only designated spokespersons or Corporate Communications personnel are authorised to make public any news and/or information.

Employees are responsible to ensure the accuracy and authenticity of the information that is being disseminated to internal and external stakeholders.

Our expectations of you

You should always maintain the confidentiality of all non-public information relating to RGE and refer all requests for news and information from external parties or media to the designated Corporate Communications representative.

Care must be taken to ensure that you are not speaking on behalf of RGE unless authorised to do so by your Corporate Communications representative.

Dealing with social media

As an RGE employee, your conduct on personal social media can and may be associated with the company. You should not post inappropriate content on social media, e.g. discriminatory remarks, libel, defamatory statements or unlawful conduct. You should act sensibly and responsibly according to our Core Values, local laws and respect cultural sensitivities and intellectual property rights.

You should not disclose any information that is confidential, embargoed, proprietary to RGE and its businesses, vendors, customers, etc in accordance with our confidentiality policy.



Where to go for help

Reporting Manager

Corporate Communications representative



Policies and Resources

Communications Policy CP101.3

Social Media Policy CC 701

Trade Marks & Branding Policy CL 102.9

Handling External Communications

Some practical examples (non-exhaustive)



Do

- a. Check the rules relating to who can make public statements on behalf of RGE;
- b. Report the loss or theft of RGE information to your manager immediately;
- c. Refer any external party requesting information about the company to your Corporate Communications representative immediately;
- d. Report to your reporting manager or Corporate Communications representative immediately if you encounter any materials that willfully or accidentally give a misleading picture of RGE;
- e. Advise your reporting manager if you are attending an informal external event such as a trade meeting or professional network. In all cases, take care not to say anything that may disclose confidential information or cause harm to the reputation of RGE.



Do Not

- a. Disclose information to the public unless you are specifically authorised to do so;
- b. Divulge what may be confidential information, either internally or externally, unless you are specifically authorised to do so. If you are unsure about the degree of confidentiality of the information, consult your reporting manager;
- c. Use company logos, copyrights, trademarks unless you have the approval from Corporate Communications department;
- d. Post commentary about RGE or photographs of work locations and processes/activities on social media sites. Commentary on RGE should only be published to social media by those authorised to do so.



Some examples

**Q: I posted a news article relating to my industry on my social media account. A friend responded to my post, commenting on developments in a competitor company and asking for my views.
How should I respond?**

A: You should respond professionally and factually using verified public information and state that you are responding in personal capacity. You should not say anything that disparages the company or its competitors.

Cyber Security

It is important for RGE employees to be mindful of our cyber security and take measures to protect our information systems and data. This is part of RGE's commitment to personal and corporate security.

The safeguarding of RGE property, including computer hardware, software and RGE data stored on computer resources and personal devices, is the responsibility of all our employees.

We are committed to continuously protecting ourselves against emerging cyber threats. RGE provides you with information technology according to your business needs, and you should use these responsibly, securely and adequately to prevent any loss, damage, misuse or unauthorised access.

Using information technology or data inappropriately may expose RGE to cyber security risks, such as virus attacks. Inappropriate use of RGE computer resources may lead to disciplinary action including possible termination, civil and criminal liability.

For the purposes of maintenance, business needs or to meet legal or policy requirements, RGE has the right to access, review and disclose data stored on RGE systems.

Our expectations of you

You should only use RGE information technology for its intended business purpose.

RGE monitors your use of information technology, and may report or block where necessary to mitigate risk and comply with laws, regulations and RGE policies and standards.

The prohibited use of our information technology includes, but not limited to:

- a. Displaying, storing or communicating fraudulent and inappropriate materials such as those that are sexually explicit, obscene and defamatory;
- b. Performing actions that result in wastage of computer resources or unfairly monopolise resources to the exclusion of others;
- c. Copying or writing of data to any unauthorised storage device connected to company-issued computer resources.

You are also responsible for protecting your personal RGE accounts such as by establishing good protection of passwords. All user access must comply with the policy set and agreed by the owners of the systems and applications.



Where to go for help

- Reporting Manager
- IT representative
- Human Resources representative



Policies and Resources

- Information Security IT604.6
- Use of RGE Computer Resources IT602.6
- Access Management Policy IT604.1
- Internet Policy IT602.1
- Email Policy IT602.2

Cyber Security

Some practical examples (non-exhaustive)



Do

- a. Protect RGE hardware, software and data for which you are responsible;
- b. Report incidents on any misuse of RGE computer resources to site IT;
- c. Take necessary care to prevent unauthorised access to materially sensitive data;
- d. Use caution when opening email attachments and clicking links which have been received from unknown senders or unfamiliar email addresses;
- e. Advise your IT representative of inappropriate unsolicited material, for example, a suspicious email that asks you to open an attachment or click a website link or if you receive feedback from business of a possible spoofed email impersonating an RGE personnel;
- f. Treat emails and other electronic forms of communication as official RGE records;
- g. Return all computer resources provided by RGE Group upon termination of service or when required by the Company.



Do Not

- a. Use RGE computer resources to perform functions that you are not authorised to do so;
- b. Share your password to anyone or reuse passwords across systems;
- c. Leave electronic equipment or mobile devices unattended in public places while travelling;
- d. Engage in fraud or commit a crime online;
- e. Install software into RGE equipment unless you have obtained appropriate approvals to do so;
- f. Store, send, post or publish RGE confidential, commercially sensitive or otherwise proprietary information outside of any RGE systems or devices without prior authorisation.



Some examples

Q: I received an email from a colleague asking me to click on a website link. However, the email had spelling and grammatical errors in it and the link looked suspicious. What should I do?

A: The email may be coming from cyber criminals who is attempting to impersonate someone you know to get you to open an attachment to either access your personal information or potentially infect your computer. If you receive a suspicious email from a familiar person, check with the person directly before responding and do not reply to the email that you received. If the email is fraudulent, you should inform your IT representative.

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