

CORPORATE ANTI-BRIBERY & CORRUPTION POLICY

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

It is in this regard that the Company has established and implemented this Anti-Bribery and Corruption Policy throughout its various locations and applies it to all countries in which we operate including all subsidiaries and associates. The Company has zero tolerance for any forms of corruption, fraud, theft, maladministration, bribery and/or any dishonest activities by employees or persons acting on our behalf.

The purpose of this policy, as it integral to the Core Values of the Company, is to promote awareness, along with training, procedures, prevention controls and checking mechanisms that assist employees and others in adhering to the rules regarding the provision of gifts, hospitality and travel-related expenses to and/or from customers, vendors, contractors and public officials so as to avoid instances of or the appearance of improper influence or the perception that such actions are forms of bribery.

Although not currently under the jurisdiction of the United States of America, AsiaPac Oil & Gas follows the Foreign Corrupt Practices Act (FCPA) of 1977, as this act is known as the industry standard, and the most stringent. As APOGSB is a registered company in Malaysia, it is bound by the Malaysian Anti-Corruption Commission Act (MACCA) 2009.

AsiaPac Oil & Gas Sdn Bhd adheres to both acts, and where there are two conflicting clauses, the most stringent will take precedence.

It is the responsibility of all Company employees, directors, officers, consultants and contractors to adhere to this Policy.

Farah Wall

Managing Director
AsiaPac Oil & Gas Sdn Bhd



Revision	Date	Changes	Author	Approver
01	23/12/18	Final revision released to ATLAS		