



BECIS CODE OF CONDUCT


POLICY

SG-LE-POL-004

REVISION: 2.0


Approved By: Zhi Lim

Created By: Charmian Ong

	POLICY		
	BECIS CODE OF CONDUCT		
	Revision: 2.0	Number: SG-LE-POL-004	Release Date: 12-Aug-25
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REVISION INDEX

Revision	Date	Description of Changes	Revised By
1.0	4-Aug-25	Initial Release	Charmian Ong
2.0	12-Aug-25	Revision to Clause 13 (Appendix)	Charmian Ong

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1.0 OBJECTIVE

At BECIS we are committed to upholding the highest standards of ethical conduct, integrity, and accountability in all our business dealings and interactions. This BECIS Group Code of Conduct (this “Code”) defines the principles and standards that govern how all BECIS Personnel are expected to behave as representatives of the BECIS Group. It serves as an umbrella policy, under which other policies and guidelines – including the Anti-Bribery and Anti-Corruption Policy, Supplier Code of Conduct, General Business Principles, Grievance Redress Mechanism, and Employee Handbook – are aligned.

The Code provides guidance on expected conduct relating to business ethics, legal compliance, personal integrity, workplace behaviour, and environmental and social responsibility. It also affirms the Group’s commitment to providing fair, accessible, and confidential channels to raise grievances, report concerns, and seek redress.

All BECIS Personnel must comply with the Code, and as applicable, all relevant laws, regulations, and internal policies.

This Code is not intended to be exhaustive and should be read in conjunction with the spirit of our BECIS values and other internal policies located on our [intranet](#). When in doubt, BECIS Personnel are encouraged to seek clarification or guidance from their respective line managers.

BECIS may review and update this Code periodically to reflect changes in legal, regulatory, or business environments. All BECIS Personnel are responsible for keeping informed of the current version of the Code.

2.0 SCOPE


This Code applies to all employees, directors, officers, secondees, interns, and contractors of BECIS and its subsidiaries, joint ventures, and affiliates (collectively referred to as “**BECIS Personnel**”). It also applies to any individuals acting on behalf of BECIS in any capacity.

The Code also applies to grievances raised by internal and external stakeholders in relation to the conduct of BECIS Personnel or operations, through the reporting channels and redress process outlined in the Code and the standalone Grievance Redress Mechanism Policy.

Living By Our Principles:

BECIS’s General Business Principles define who we are and how we conduct business. They are embedded in this Code and provide a foundation for all decision-making across the organization. Key commitments include:

- a) **Integrity and Transparency:** Acting with honesty, fairness, and respect.
- b) **Sustainability:** Balancing economic performance with environmental and social responsibility.
- c) **Innovation and Excellence:** Pursuing continuous improvement and embracing innovation.
- d) **Inclusivity and Diversity:** Valuing and empowering every individual.

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- e) **Community Engagement:** Contributing to the communities we operate in.
- f) **Accountability:** Taking ownership of our actions and their impact.
- g) **Open communication:** Engaging meaningfully with stakeholders.

3.0 OWNERSHIP STATEMENT

The BECIS Group Legal Department is the custodian of this Code and is responsible for ensuring its alignment with applicable laws and global standards. Implementation, communication, and enforcement of this Code are the joint responsibilities of Group Senior Management, Country Managers, and Heads of Departments (HODs).

4.0 REFERENCES

The following policies are to be read in conjunction with this Code:


- a) General Business Principles
- b) Employee Handbook
- c) SG-LE-POL-002 Anti-Bribery, Anti-Corruption and Anti-Money Laundering (ABAC) Policy
- d) SG-HR-POL-001 Non-Solicitation Policy
- e) SG-HR-POL-002 Confidentiality Policy
- f) SG-HR-POL-004 Equal Opportunities and Human Rights Policy
- g) SG-HR-POL-005 Anti-Harassment and Discrimination Policy
- h) SG-HR-POL-007 Grievances Redress Mechanism Policy
- i) SG-HR-POL-009 Gender-Based Violence Mechanism Policy
- j) SG-HR-POL-010 Whistleblowing Policy
- k) SG-ES-MAN-001 Environment and Social Management System

5.0 DEFINITIONS

NA

6.0 RESPONSIBILITIES

- 6.1 Group Senior Management is responsible for role-modelling the standards in this Code, promoting an ethical culture, and ensuring effective communication and compliance.
- 6.2 All BECIS Personnel are individually accountable for reading, understanding, and complying with this Code and related policies.
- 6.3 Managers and HODs are responsible for cascading this Code to their teams and ensuring that all BECIS Personnel under their supervision receive appropriate training and support.
- 6.4 Legal and Compliance teams will provide advice, training, and oversight.

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7.0 CODE OF CONDUCT PRINCIPLES

7.1 Ethical Business Conduct

7.1.1 Compliance with Laws and Policies

All BECIS Personnel must adhere to applicable laws, regulations, and internal policies, regardless of location or business unit. Where this Code imposes stricter requirements than local law, the higher standard shall apply.

7.1.2 Integrity and Honesty

We conduct our business honestly, transparently, and with integrity. Misrepresentation, fraud, falsification of documents or records, and deceptive conduct are strictly prohibited.

7.1.3 Conflicts of Interest

Personnel must avoid situations where personal interests conflict — or appear to conflict — with the interests of BECIS. Any actual, potential, or perceived conflicts must be promptly disclosed to Legal or Compliance.

7.1.4 Anti-Bribery and Anti-Corruption

Bribery, corruption, facilitation payments, kickbacks, and any form of improper advantage are prohibited. BECIS Personnel must never offer or accept anything of value to influence business outcomes. Refer to the SG-LE-POL-002 Anti-Bribery, Anti-Money Laundering, and Anti-Corruption Policy for detailed guidance.

All payments to third parties must be transparent, contractual, and reflect services actually rendered. Facilitation payments are strictly prohibited.

7.1.5 Fair Competition

BECIS promotes fair and open competition and complies with all applicable anti-trust and competition laws. Collusion with competitors, bid-rigging, or other anti-competitive conduct is prohibited.

7.1.6 Political Activities

BECIS may engage with government entities in a responsible and transparent manner. Employees participating in political activities must do so in their personal capacity and ensure that it does not conflict with their role at BECIS.


BECIS does not make political donations or contributions to religious organisations. Any representation to government entities must be in line with applicable laws.

7.1.7 Use of Company Assets

Company property, assets, systems, and information must be used responsibly, only for legitimate business purposes, and safeguarded from misuse, theft, or unauthorised disclosure.

7.1.8 Confidentiality and Data Privacy

All BECIS Personnel must protect confidential information and personal data entrusted to them. Personal data must only be collected, processed, and retained in accordance with applicable laws.

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7.1.8.1 Confidentiality Obligations

All current and former employees, as well as contractual third parties working with the BECIS Group, are expected to maintain strict confidentiality over any non-public information they obtain in the course of their engagement with the Company.

For the purposes of this Code, “**Confidential Information**” includes, but is not limited to:

- a) Operational processes, commercial transactions, financial and business plans
- b) Commercially sensitive customer and supplier information, pricing strategies, marketing materials
- c) Technical designs, research data, know-how, intellectual property, trade secrets, and inventions
- d) Employee-related data such as salaries, benefits, or internal HR documents
- e) Internal communications, reports, minutes, memoranda, or non-public records in any format (paper, digital, or electronic)

Personnel must not, during or after employment, disclose or use any such Confidential Information for any purpose other than legitimate work activities, unless expressly authorised in writing by a duly authorised Company representative.

7.1.8.2 Handling and Use of Confidential Information

- a) Confidential documents must not be removed from Company premises without authorisation.
- b) BECIS Personnel may not make notes, memoranda, or reproductions of confidential content except for the benefit of BECIS.
- c) Upon resignation or termination, employees must return or confirm destruction of all Company materials containing confidential information.

7.1.8.3 Post-Employment Obligations


The obligation to maintain confidentiality survives the termination of employment and continues indefinitely, or until such information lawfully enters the public domain through no breach of this policy.

7.1.8.4 Enforcement and Compliance

- a) Failure to comply with confidentiality obligations may result in disciplinary action, up to and including termination of employment.
- b) Former employees or contractors who breach confidentiality obligations may be held liable for damages incurred by the Company, in addition to any other legal or contractual remedies available.

7.1.9 Non-Solicitation Obligations

BECIS Personnel must uphold the confidentiality and integrity of the Company's relationships with its employees, clients, suppliers, and business partners both during and after their employment.

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To protect the legitimate interests of BECIS, employees shall not, during employment and for at least six (6) months after termination of employment (whether voluntary or involuntary):

7.1.9.1 Personally, or through others, directly or indirectly approach, recruit, induce, or solicit any BECIS employee to leave the Company or accept employment with another organisation.

7.1.9.2 Persuade or attempt to persuade any customer, supplier, or business partner to reduce or cease their relationship with BECIS.

7.1.9.3 Introduce, divert, or otherwise direct business opportunities or potential orders to a competitor, except with prior written consent from BECIS.

These obligations also apply to **former employees and contractual third parties** (regardless of whether their contract is fixed-term or open-ended), and reflect terms included in relevant employment agreements and prevailing local labour laws.

7.2 Workplace Conduct and Respect

7.2.1 Diversity, Inclusion, and Equal Opportunity

BECIS is committed to providing a workplace free from discrimination and harassment. We embrace diversity and ensure all employees are treated with respect and dignity, irrespective of race, gender, nationality, religion, age, disability, sexual orientation, or any other protected attribute.

7.2.2 Health, Safety and Wellbeing

Safety is a shared responsibility. We are committed to providing a healthy and safe working environment for all. Health and safety are integral to every task we perform, and all personnel must follow established procedures, participate in training as required, and report any hazards or incidents. No person shall be asked to perform a task they consider unsafe without appropriate support or training.

7.2.3 Harassment and Bullying

Harassment, bullying, intimidation, or any other behaviour that creates a hostile or offensive work environment will not be tolerated.

7.2.4 Substance Abuse


Personnel must not use, possess, or be under the influence of illegal drugs or alcohol while performing work-related duties.

7.2.5 Anti-Discrimination and Anti-Harassment

BECIS is committed to providing a safe and respectful workplace for all employees, contractors, and third-party workers. Discrimination or harassment of any kind will not be tolerated.

Discrimination includes any unfair or prejudicial treatment based on personal characteristics such as:

- a) Race, ethnicity, nationality, or skin colour
- b) Gender identity and/or sexual orientation

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- c) Religious or political beliefs
- d) Union membership or non-membership
- e) Disability, illness, or learning differences
- f) Age
- g) Pregnancy, maternity, or paternity status

Harassment may include, but is not limited to:

- a) Offensive or humiliating remarks, jokes, or gestures
- b) Intimidation, threats, or unwanted attention
- c) Sexual harassment, including verbal, physical, or non-verbal conduct of a sexual nature that causes offence, humiliation, or intimidation

Sexual harassment can include quid pro quo scenarios (e.g. offers of workplace benefits in exchange for sexual favours), as well as conduct that creates a hostile work environment. It may occur between individuals of the same or different genders.

7.2.5.1 BECIS applies a zero-tolerance approach to all forms of discrimination and harassment and will treat all allegations seriously and confidentially.

7.2.5.2 All employees must behave respectfully at all times, including during off-site meetings, business travel, and training sessions.

7.2.5.3 Managers and supervisors are responsible for ensuring a safe work environment and are accountable for addressing inappropriate behaviour.

7.2.5.4 All employees are required to complete training on this policy during onboarding and attend refresher sessions annually.

7.2.5.5 BECIS Personnel may report any violation through the existing Grievance Redressal Mechanism, which is a standalone policy referenced in this Code and ensures fair, confidential, and prompt handling of complaints.

7.3 Environmental and Social Responsibility

7.3.1 Environmental Stewardship


BECIS aims to reduce its environmental impact and promote sustainability. All personnel should contribute to responsible resource use, waste reduction, and environmental compliance in day-to-day operations.

7.3.2 Community Engagement and Human Rights

We respect human rights and local communities in all areas where we operate. BECIS condemns all forms of forced labour, child labour, and human trafficking. We align with the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Right, and the ILO's core conventions.

7.4 Reporting, Accountability and Enforcement

7.4.1 Reporting Misconduct

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All BECIS Personnel have a responsibility to report suspected violations of the Code, internal policies, or applicable law. Reports may be made to the following functional teams and individuals:

- a) Legal: compliance@be-cis.com
- b) Human Resources
- c) Line Manager or HOD
- d) Anonymous reporting channel: grievances@be-cis.com

Reports may be made anonymously where permitted by law and will be handled confidentially. Remaining silent about potential misconduct may worsen the issue and harm trust. You will not be penalised for raising concerns in good faith.

7.5 No Retaliation

BECIS strictly prohibits retaliation against any person who raises a concern in good faith. We are committed to protecting employees who speak up. Retaliation will be treated as a serious disciplinary matter.

7.6 Investigations and Consequences

Violations of this Code may lead to disciplinary action, including warnings, demotion, suspension, or termination. Where laws are breached, legal action may also be taken.

7.7 Whistleblowing Policy

This policy enables all BECIS Personnel and relevant third parties to confidentially report, in good faith, any suspected misconduct, legal or ethical violations, or other concerns without fear of retaliation. BECIS is committed to addressing such disclosures appropriately and taking corrective action, which may include disciplinary measures, termination, and remediation.


7.7.1 Whistleblowing refers to the act of reporting misconduct, unethical behaviour, or legal breaches that may adversely impact BECIS. This includes but is not limited to:

- a) Financial irregularities (fraud, money laundering, misappropriation of funds)
- b) Health, safety, or environmental risks
- c) Harassment or discrimination
- d) Legal or regulatory violations
- e) Misuse of company resources
- f) Actions that may cause reputational harm to BECIS

7.8 Whistleblowing Officer

The Group Head of HR serves as the Whistleblowing Officer, responsible for:

- a) Receiving and acknowledging reports
- b) Managing investigations confidentially and impartially
- c) Ensuring anonymity of whistleblowers

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- d) Promoting a safe and transparent reporting culture
 - e) Reporting findings to senior management and regulatory authorities, where required
- If a conflict of interest arises, an interim officer will be appointed to ensure impartiality.

7.9 Confidentiality

All reports will be handled with the utmost confidentiality. The identity of the Whistleblower will be protected, and access to information will be limited to those directly involved in the investigation.

7.10 Protection Against Retaliation

BECIS prohibits any form of retaliation against whistleblowers or individuals cooperating with investigations. Retaliation itself constitutes a violation of this policy and may result in disciplinary action.

False Reporting

Reports made maliciously or in bad faith are not protected under this policy and may result in disciplinary measures.

8.0 ANTI-BRIBERY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING (ABAC)

The BECIS Group maintains a zero-tolerance approach to bribery, corruption, facilitation payments, and money laundering. This section summarises key obligations under the Group's ABAC Policy, which applies globally to all BECIS Personnel and associated third parties.

This policy applies to all employees, officers, directors, contractors, agents, and third parties acting on behalf of BECIS. It extends to all jurisdictions where BECIS operates.

8.1 Prohibited Conduct


You must not, directly or indirectly:

- a) Offer, give, request, or accept bribes, kickbacks, or facilitation payments;
- b) Engage in coercive, collusive, or fraudulent conduct;
- c) Make improper payments to public officials;
- d) Conceal or disguise the origin of funds obtained through unlawful means;
- e) Use charitable or political donations to gain business advantage.

8.2 Gifts and Hospitality

Reasonable hospitality may be permitted only if:

- a) It is for legitimate business purposes (e.g. marketing or relationship-building);
- b) It is not excessive, secretive, or intended to influence a decision;
- c) It does not involve cash or cash-equivalents;
- d) It is reported to the Compliance Officer if over US\$100 in value.

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8.3 Record-Keeping and Controls

All payments, gifts, and business expenses must be transparently recorded. “Off-book” accounts are strictly prohibited. The Compliance Officer maintains the Gift Register and oversees periodic audits.

8.4 Money Laundering Risks

You must not:

- a) Engage in any transaction intended to disguise the origin of illicit funds;
- b) Assist or benefit from laundering activities;
- c) Fail to report suspicious transactions.

Due diligence and Know-Your-Customer (KYC) procedures must be observed in all third-party engagements.

8.5 Raising Concerns

If you suspect a potential violation of this section, you must promptly report it to:

compliance@be-cis.com.

9.0 GRIEVANCES REDRESS MECHANISM (GRM)


BECIS encourages open communication and is committed to addressing concerns in a timely and impartial manner. The Grievance Redress Mechanism (GRM) provides a structured process for reporting and resolving grievances relating to BECIS operations, including those involving its contractors or suppliers. The procedure is summarised below and further detailed in the standalone GRM Policy.

9.1 Reporting Channels

Complaints may be submitted via the channels summarised below. These channels are also set out in the standalone GRM policy and summarised in Appendix A of this Code.

- a) Email:
 - General grievances: grievances@be-cis.com
 - HR-related: hr@be-cis.com
 - Legal/compliance-related: compliance@be-cis.com
 - EHSS-related: ehss@be-cis.com
- b) Anonymous submissions: Use an anonymous email account and email: grievances@be-cis.com
- c) In person: Submission of grievance forms or verbal reports to BECIS staff at project sites or via grievance boxes.

Complaints must be made in the official national language of the country in which BECIS operates. Replies will be provided in the same language.

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9.2 Procedure


- a) Acknowledgement:
 - Email complaints: Acknowledged within five (5) working days.
 - Postal complaints: Acknowledged within ten (10) working days.
- b) Initial Review: If the complaint is not related to BECIS, efforts will be made to guide the complainant to the appropriate institution.
- c) Investigation:
 - The BECIS Redress Committee (BRC) will record the issue and conduct a full enquiry.
 - Relevant stakeholders may be interviewed, and documentation reviewed.
- d) Decision:
 - A Draft Resolution Report will be submitted to the CEO for decision and finalisation.
 - The complainant will receive a Final Resolution Report with proposed corrective actions.
- e) Escalation:
 - If unsatisfied, the complainant may submit a confirmatory complaint within fifteen (15) working days.
 - If corrective actions are not implemented or are unsatisfactory, the matter may be escalated to the Board within one (1) month of the resolution report.

9.3 Confidentiality and Safeguards

Complaints are handled with strict confidentiality. Complainants, witnesses, and involved parties will be protected from reprisals. Disclosure of identity or facts will only be made where required by law or necessary for resolution, with prior consultation from the complainant.

9.4 Governance and Oversight

- a) First-tier Committee:
 - Group Head of HR (BECIS Grievance Officer)
 - Group Head of ES&HS
 - General Counsel
- b) Functions:
 - Promote a fair and respectful complaints process
 - Conduct investigations and recommend solutions
 - Maintain confidentiality and integrity of the process
- c) Second-tier Committee:
 - BECIS CEO and CFO
 - Review unresolved or escalated complaints and provide final decisions

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- Receive monthly reports from the first-tier committee

10.0 BECIS COMPLIANCE FRAMEWORK

10.1 Commitment to Compliance

Compliance is a top priority for BECIS, particularly in view of its obligations to international investors, development finance institutions (DFIs), and financing banks. The BECIS Compliance Framework is designed to ensure:

- No legal, financial, or regulatory violations occur;
- All relevant risks are identified and appropriately mitigated; and
- An ethical and transparent work environment is consistently upheld.

10.2 Structure and Oversight

BECIS operates in accordance with intentionally recognised standards, local regulatory obligations, and shareholders requirements. The framework integrates best practices derived from BECIS's shareholder group and is embedded in the "One-BECIS Culture".

The Compliance Framework is built on three pillars:

- Ethical Conduct and Governance
- Regulatory Compliance
- Operational Compliance

The General Counsel serves as the Compliance Officer and works in collaboration with Functional Heads to develop, implement, and maintain compliance policies and related training programmes. The Audit and Risk Committee (ARC) provides oversight of the Compliance Framework, in accordance with its Charter, which includes review and assessment of:

- Financial and enterprise risk
- Legal and regulatory compliance
- Tax compliance
- Environmental and social responsibility
- Cybersecurity


Compliance is a standing item at Board meetings, and regular reporting is provided to Senior Lenders and Shareholders, supported by internal audits and other assurance mechanisms.

11.0 TRAINING AND ACKNOWLEDGEMENT

All BECIS Personnel are required to complete training on this Code and related policies upon joining and at regular intervals thereafter.

Personnel may be required to acknowledge receipt and understanding of this Code.

Annual refresher training may be assigned to ensure continued awareness. Managers are responsible for ensuing team compliance.

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12.0 IMPLEMENTATION

This Code will be communicated to all BECIS entities, integrated into onboarding and training processes, and reviewed regularly to ensure effectiveness. Feedback may be submitted to the Legal or Human Resources departments.

13.0 APPENDIX

13.1 APPENDIX A: REPORTING CHANNELS SUMMARY

This appendix provides a consolidated overview of reporting lines and contact details referenced throughout the Code of Conduct. BECIS Personnel are encouraged to use the appropriate contact channel depending on the nature of their concern.

Issue Type	Reporting Contact / Email	Additional Notes
General Legal or Policy Violations	compliance@be-cis.com	Legal Department – for Code of Conduct breaches, conflicts of interest, fraud, and related concerns
Compliance / Bribery / Corruption / Money Laundering	compliance@be-cis.com	Compliance team – for issues relating to ABAC policy, gifts, hospitality, or improper payments
Grievances (General)	grievances@be-cis.com	For general grievances not specific to HR or Compliance
HR-Related Grievances or Concerns	hr@be-cis.com	Human Resources – for discrimination, harassment, workplace conduct, or employment matters
ES&HS Issues (Environmental, Social Health & Safety)	ehss@be-cis.com	ES&HS team – for health, safety, or environmental risks
Whistleblowing / Anonymous Reporting	grievances@be-cis.com	Employees may also use an anonymous email account to raise concerns anonymously. A formal channel is to be inserted once implemented.
Internal Reporting (Non-email)	Line Manager or HOD	Employees may report issues to their direct manager or HOD when preferred
On-Site Concerns	Grievance Box or In-Person Submission	Grievance forms or verbal submissions accepted at project sites
Whistleblowing Officer	Group Head of HR	Receives and investigates all whistleblower reports; ensures confidentiality and protection against retaliation
Post-employment Confidentiality Breaches or Non-Solicitation	compliance@be-cis.com	Legal Department – for potential contractual breaches after termination