



CH OFFSHORE LTD & SUBSIDIARIES

(collectively “CHO Group” or “Group”)

CORPORATE OPERATING PROCEDURES

CODE OF CONDUCT POLICY AND PROCEDURES

Revision	Date	Remarks	Document and Revision number	Prepared	Approved
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All queries, suggestions, interpretation, clarification or change request shall be addressed at the first instance to the Corporate Department.

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1.0 PURPOSES

This Code of Conduct (“Code”) addresses many of the ethical and legal issues that we encounter. Unfortunately, it is impossible to anticipate or predict every ethical or legal issue that may arise. The Code, therefore, serves as a reference tool that guides us to the Company’s policies, as well as to important laws and regulations, to help ensure our actions and behaviours meet the Company’s expectations.

This Code should be read in conjunction with the Group’s Whistleblowing Policy (CHO-SOP-CORP-004), Anti-Bribery and Corruption Policy (CHO-SOP-CORP-005) and Acceptable Use Policy (CHO-SOP-IT-010).

2.0 SCOPE

This procedure applies to the following personnel (individually, “Group Person” and collectively, “Group Personnel”):

- Directors on the Board of CH Offshore Ltd (“Board”);
- Directors on the board of Group subsidiaries;
- all Group employees, including contract staff; and
- all consultants and agents engaged by the Group for the purpose of representing the Group (“Company Representatives”).

3.0 ETHICAL STANDARDS – GUIDING PRINCIPLES

Knowing “the right thing to do” is sometimes difficult. Not all issues are clear cut. When confronted with a situation that you do not think is covered by a specific section of the Code, ask yourself the following questions:

- Is the action legal?
- Does it comply with our guiding principles of acting honestly, ethically and respectfully?
- If you do it, will you feel guilty?
- Would you be embarrassed to tell your family what you did?
- How would you feel if the local news reported about the action?

If the answer to any of these questions makes you uneasy or if you become aware of a situation that raises ethical concerns, raise it to your Head of Department. If you are uncomfortable talking about the issue, you can use the anonymous reporting systems provided by the Company (see Reporting Concerns, below).

If any doubt exists about whether a course of action is lawful, you should immediately seek advice from your Head of Department.

3.1 Violation of Code

Violating the standards in this Code will result in disciplinary action, up to and including termination of employment.

3.2 Compliance with Laws, Rules and Regulations

All Group Personnel are expected to understand and comply with the spirit as well as the letter of all laws, regulations, and company policies that apply to their positions.



Group Personnel should not engage in, or give the appearance of being engaged in or condone any illegal act or improper conduct or instruct or encourage another to do so.

3.3 Compliance to Energy, Health, Safety and Environmental (“EnHSEMS”) Management System

Group Personnel are expected to observe 100% compliance to the Group’s EnHSEMS Management System as at all times. The EnHSEMS Management System can be found in the Group shared drive.

3.4 Anti-Corruption

Bribes to or from third parties (including governmental officials) are not permitted and may be illegal under applicable laws, including Prevention of Corruption Act 1960. It is against Group policy to directly or indirectly promise, offer or provide or accept anything of value to or from third parties (including governmental officials) in order to procure or provide an unfair business advantage of preferential treatment. All Group Personnel have to abide by the Group Anti-Bribery and Corruption Policy (CHO-SOP-CORP-005).

3.5 Conflict of Interest

3.5.1 All Group Personnel have an obligation to conduct business in a manner which avoids actual or potential conflict of interest. Group Personnel must not directly or indirectly attempt to influence any decision of the Group in order to derive a personal or financial benefit.

3.5.2 A conflict of interest exists when an individual’s duty of undivided commercial loyalty to the Group is or is perceived to be prejudiced by:

- (i) that person’s personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship), whether financial or otherwise; or
- (ii) the commitments and obligations that person owes to another person or body.

3.5.3 For the purpose of this policy, ‘immediate family’ is defined as follows: spouse or civil partner, son, daughter. However, the ‘close personal relationship’ giving rise to an interest could extend to the following (this is not intended to be an exhaustive list): unmarried partner, parent, brother, sister, grandparent, grandchild, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, the (unrelated) child of an unmarried partner, as well as half and step members of family and other relatives and close friends, those sharing the household and associates.

3.5.4 There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus it is important for all employees when evaluating a potential conflict of interest to consider how it might be perceived by others.

3.5.5 The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. However, the duty is not infringed if the situation cannot reasonably be regarded as likely to give rise to a conflict of interest. Group Personnel should disclose all conflicts of interest by completing the Conflict of Interest Form (Appendix A). The Corporate Department will register all conflicts of interest in the Conflict of Interest Register (Appendix B).

3.5.6 Conflict of interest may be financial or non-financial or both. Further information about both types is set out below.



Financial conflict of interest

- 3.5.7 A financial conflict of interest, for the purposes of this Policy, is one where there is or appears to be opportunity for personal financial gain, financial gain to immediate family and close personal relationships, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.
- 3.5.8 Financial interest means anything of monetary value, for example: payments for services; equity interests (e.g. stocks, stock options or other ownership interests); and/or intellectual property rights (e.g. patents, copyrights and royalties from such rights).
- 3.5.9 The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' for one person might be very significant for another. Good practice in many situations will mean the disclosure of 'any' financial interest, however small. A conflict will arise if the interest might provide, or be reasonably seen by others, to provide an incentive to the individual which affects their actions and where he or she has the opportunity to affect a Group decision or other activity (because for example he or she is the decision-maker).
- 3.5.10 Group Personnel should not solicit or accept salaries, fees, commissions or any other types of compensation from any individual or organization that conducts or seeks to conduct business with the Group or one of the Group's competitors unless appropriately disclosed and approved.
- 3.5.11 Employees should not make a loan or extend credit to or receive a loan or credit from those who deal with the Group.

Non-financial conflicts of interest

- 3.5.12 Non-financial interests can also come into conflict, or be perceived to come into conflict, with a person's obligations or commitments to the Group. Such non-financial interest may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship).
- 3.5.13 Conflict of interest may result directly through personal activities or indirectly through the activities of an immediate family member, a person sharing your household or a person with whom you are associated (including close personal relationships). An actual or potential conflict of interest occurs when a Group Person is in a position to influence a decision that may result in a personal gain for that Group Person or for a relative or immediate family member or a person with whom the Group Person is associated (including close personal relationships) with as a result of Group business dealings.
- 3.5.14 Group Personnel should refrain from participating in any private business or professional activity or have any direct or indirect financial dealing that would create a conflict between private interests and responsibilities to the Group.
- 3.5.15 Group Personnel should actively avoid any outside activities that may raise a reasonable concern or make it difficult to perform their work objectively and effectively.
- 3.5.16 Group Personnel may not serve on a board of directors or as a trustee or on a committee of any entity (whether for profit or not-for-profit) whose interests reasonably could be expected to conflict with those of the Group.



- 3.5.17 Although the Group does not prohibit immediate family or close personal relationships within the Group, the preference is for employees to keep all working relationships within the Group on a professional basis. Other than disclosure as per Clause 3.5.18, where the conflict is in relation to immediate family or close personal relationships within the Group, on a case to case basis, there may be a need to assign one party to another department to avoid any supervisory relationship. All personal matters (positive or negative) in relation to such relationships should be kept outside the work environment and should not interfere with or affect work performance or working relationships with other parties. Conduct within the office should always be kept professional. Confidential information should also not be shared with the other party except on a need-to-know basis pertaining to work responsibilities. Any incident of harassment should be reported to the HR Department.

Procedures

- 3.5.18 It is the duty of every Group Person to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest. Apparent or perceived conflict of interest can be as damaging as actual conflict of interest. For the avoidance of doubt, such disclosure should be made in relation to any immediate family or close personal relationships within the Group, vendors or clients. The disclosure will help the Group manage any conflicts whether for example favoritism is shown or perhaps even where disputes or harassment arise. This will ensure a professional and harmonious working environment.
- 3.5.19 Disclosure should be made at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing (example via email) to the Head of Department (or equivalent). If the Head of Department (or equivalent) has an interest in the matter to be discussed, the disclosure shall be made to the person at the next higher level of authority.
- 3.5.20 Group Personnel who are involved in suppliers sourcing must disclose their relationships or dealings with the proposed supplier that give rise or might reasonably give rise to the perception of conflict of interest. The disclosure should be made on the supplier requisition form so that the procurement manager can make an informed decision.
- 3.5.21 Group Personnel should disclose the conflict of interest (perceived or otherwise) by completing the Conflict of Interest Form (Appendix A). Such conflict will be maintained in the Conflict of Interest Register (Appendix B).
- 3.5.22 Each conflict of interest may be managed in a different way depending on the circumstances surrounding it. The approach adopted should be documented and copies provided to the relevant parties and the respective department heads. A copy of the final plan must be held in the Corporate Department's records. One or more of the following strategies may be appropriate to manage the conflict of interest:
- (i) not taking part in discussions of certain matters;
 - (ii) not taking part in decisions in relation to certain matters;
 - (iii) referring to others certain matters for decision;
 - (iv) resolving not to act as a particular person's supervisor;
 - (v) divesting or placing in trust certain financial interests;
 - (vi) publishing a notice of interest;
 - (vii) standing aside from any involvement in a particular project; and/or
 - (viii) declaring an interest to a particular sponsor or third party.
- 3.5.23 It is the responsibility of those affected and the respective department heads to comply with the approach that has been agreed.
- 3.5.24 Any unresolved matter shall be referred to the CEO.



- 3.5.25 Conflicts of interests which have not been disclosed, especially if deliberately withheld, may result in disciplinary action in accordance with the Discipline & Termination Policy and Procedures (CHO-SOP-HR-018)

3.6 Gifts, Meals, Travel and Entertainment

Gifts, meals, travel and entertainment could potentially be used to inappropriately influence business decisions or government officials (which includes employees of national oil companies). All gifts, meals, travel or entertainment given or received by Group employees must be consistent with the Group's Gift and Hospitality Policy (CHO-SOP-CORP-006) and be of such a nature that public disclosure of all related facts would not embarrass the individual or the Group. All gifts, meals, travel or entertainment involving governmental officials must comply with applicable law and be pre-approved by the CEO.

3.7 Financial Reporting and Records

Accurate and complete records of all business transactions must be kept. This is the responsibility of all Group Personnel. Reasonable systems of internal controls must be maintained to ensure that the Group's assets are not improperly used or diverted. No payments may be approved or made if any portion of the payment is to be used for any purpose other than that described by the supporting documents. Supporting documents include invoices, purchase orders, expense reports and all other documents submitted to the Group in order to process a payment.

Group accounts should be prepared and maintained fairly and accurately and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the Group conducts its business affairs. High standards of disclosure and audit integrity in relation to Group activities and financial performance and reporting should be maintained.

3.8 Equal Employment Opportunity, Non-Discrimination and Prohibition on Harassment

All employment decisions in the Group are based on merit, qualifications and abilities of the candidate. The Group employment processes are aligned towards providing equal employment opportunities to all deserving candidates. Every supervisor is responsible for ensuring that this goal is practiced in his or her area of supervision. The HR Department and every supervisor must be familiar with the Group's Recruitment Policy and Procedure (CHO-SOP-HR-011).

The Group also strongly believes in zero tolerance to discrimination in the workplace. Workplace behaviour, course programs and sponsorships, including decisions on hiring, promotion, discipline, termination and all other terms and conditions of employment, are made without discrimination on the basis of race, colour, religion, sex, nationality, age, disability, marital status or sexual orientation.

No person should be subject to retaliation for seeking a review of a complaint of discrimination, for participating in an investigation of such a complaint, or for seeking redress for discrimination.

All employees have the right to work in a harassment-free environment. "Harassment" may include unwelcome conduct or misconduct, whether verbal, physical or visual. The Group will not permit harassment of its employees based on any diverse status. All managers and supervisors are responsible for preventing and eliminating harassment.



3.9 Modern Slavery

The Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in relation to all Group business activities.

3.10 Economic Sanctions

The Company must comply with all applicable sanctions regulations that apply to doing business with or in certain foreign countries. For example, the United Nations from time-to-time imposes restrictions on commercial and economic activities in certain countries. Singapore and other applicable jurisdictions may make it unlawful of us to do business in certain countries or with certain designated persons. It is the Company's policy to strictly comply with the laws of Singapore or other applicable jurisdictions.

3.11 Electronic Communications

Computer equipment and software, including hand phones, issued by the Group are the property of the Group and are provided to conduct business. While one may use the Group's computers and systems to email about incidental personal matters, privacy in these communications would not be guaranteed.

The use of the Group's internet should be limited to business related purposes, with only incidental and limited personal use permitted. The Group's Internet shall not be used for any of the following prohibited activities:

- (i) Accessing or downloading pornographic or indecent material
- (ii) Gambling
- (iii) Soliciting for personal gain or profit
- (iv) Purposefully interfering with the work of other employees
- (v) Downloading or uploading software in violation of its copyright or without the authorization of the Information Technology Department
- (vi) Making or posting indecent or improper remarks or proposals
- (vii) Transmitting or posting inappropriate jokes or material that may be offensive or embarrassing to others

Reference to the Group's Acceptable Use Policy (CHO-SOP-IT-010) should be made for more details.

3.12 Fair Competition

The Group strives to outperform the competition fairly and honestly. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is strictly prohibited.

All employees must respect the right of, and deal fairly with, Group customers, vendors, competitors and other fellow employees. Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice would not be condoned.

3.13 Insider Trading

Insider trading is against the law of Singapore, Singapore Stock Exchange Listing Rules and against the Group's policy.



A Director or employee is not allowed to deal in CHO's shares during the period commencing one (1) month prior to announcement of the half-yearly or yearly results and ending on the date of announcement of the results.

The Corporate Department would circulate the trading restriction reminder prior to the trading black-out period.

A Director or employee should not trade in CHO's shares or Baker Technology Limited shares at all times, whether it is inside or outside the one (1) month black out period if he/she is in possession of material non-public information. As a general rule, material non-public information includes information such as:

- (i) Unreleased earnings or financial statements
- (ii) Potential mergers, acquisitions or vessel construction projects
- (iii) Potential purchases or sales of vessels
- (iv) Potential dividend announcements

In addition, a Director or employee should not deal in CHO or Baker Technology Limited shares on short term considerations.

Employees and Directors must inform the Company within 2 business days if they (including their associates) deal in shares in the Company or Baker Technology Limited.

3.14 Safeguarding Confidential Information and Personal Data

Employees and Directors are personally obligated to protect the Group's confidential information as well as the confidential information provided to the Group by our stakeholders. Confidential information is generally any material, non-public information.

Non-disclosure Agreements must be signed with third-party such as a vendor, supplier, or business partner, if material, non-public information need to be disclosed to them. Employees must never share confidential company information without the approval of the respective HOD and without a non-disclosure agreement in place.

In addition, always limit the amount of confidential information shared to the minimum level required to address the Group's business interest.

Only the CEO, a Director or the MD of CHO Ship Management Pte. Ltd. may sign a non-disclosure agreement with a third-party.

The Company abides by the Personal Data Protection Act in Singapore and has a Personal Data Protection Policy (CHO-SOP-CORP-002) in place to protect the personal information that is in the Group's possession. All Directors and employees of the Group are expected to abide by the Personal Data Protection Policy.

3.15 Social Media

The right to express oneself on the internet must be weighed against the consequences of writing inappropriate or offensive matters. Employees must not post on social media about the Group or Group related matters. When posting about general work-related matters, such posting must be clear that it does not reflect the opinions of the Group.

Comments that can be interpreted as demeaning, inflammatory, racist, etc. must be avoided. Anything posted online has a tendency to go viral and will remain online for a very long time. Consider how it will reflect on oneself and also on the Group. While posting online, one must be responsible, accountable and answerable for the consequences.



3.16 Environment

The Group is committed to sustainable environmental principles and minimising the impact on the environment in which the Group operates. All employees are expected to be mindful of and consider the responsible use of energy and other resources, the minimisation of emissions and the use of environmentally friendly technology and procedures in their daily tasks.

4.0 EMPLOYEES' RESPONSIBILITIES

Maintaining the Group's commitment to ethics and compliance is a team effort – a commitment which has clear expectations for all employees. Our obligations, as employees extend beyond simply knowing what is included in the Group Code of Conduct. Employees must:

- (i) Speak up and report any known or suspected violations of the Code, applicable laws or regulations, or our Group policies
- (ii) Use good judgment, and
- (iii) Be honest, transparent, and proactive in cooperating with all audits and investigations, both external and internal.

5.0 LEADERS' RESPONSIBILITIES

Supervisors and managers have critical responsibilities regarding their conduct and behaviour. The Group depends on leaders to model ethical decision-making and sound integrity in daily activity. As a leader, supervisors, managers and Directors are expected to:

- (i) Lead by example
- (ii) Create a work environment that focuses on building relationships, recognises efforts, and values open communication
- (iii) Demonstrate ethical leadership through your actions and communication
- (iv) Communicate to employees about this Code and applicable ethics and compliance policies
- (v) Be proactive – seek out opportunities to address ethical and compliance challenges
- (vi) Build an environment where everyone feels comfortable asking you questions and reporting potential violations of this Code and related policies, and
- (vii) Never ask someone else or pressure them to do something that is inconsistent with this Code or the Group's values.

The Group will not tolerate retaliation against an employee who makes a report about potential issues or speaks up about potential challenges. Leaders will be held accountable for embodying the Group's values and treating employees with dignity and respect.

6.0 SPEAKING UP

All employees occasionally encounter difficult situations or choices at work. Everyone makes mistakes from time-to-time. While nobody is perfect, raising concerns or mistakes immediately helps everyone retain and build trust. If employees have any concerns, they should never hesitate to stop what they are doing and talk to their supervisor. If after speaking with their supervisor, they still have concerns, such employees should contact anyone listed below to discuss their concerns. Employees may also follow the Whistleblowing Policy (CHO-SOP-CORP-004) and contact:

Chairperson of the Audit & Risk Management Committee
Mr Tham Chee Soon
Email : whistleblowing@choffshore.com.sg



Offshore employees (Vessel crew) are also encouraged to write to the following email address:

we-care@choffshore.com.sg

Attention to:

Dr Benety Chang
Chief Executive Officer

Or

Ms Rashidah Binte Abdul Rashid
Managing Director (CHO Ship Management Pte. Ltd.)

The Group policy strictly prohibits retaliation against anyone who makes a report in good faith about a problem or concern.

7.0 RECORD OF CHANGES

No.	Date	Revision No.	Revision Detail / description	Signature
1	01.12.2018	1	Updated of New Management and office address/contact	Dr Benety Chang
2	06.11.2019	2	Change of we-care email Key contact Person	Jeanette Chang
3	15.01.2020	3	Change of this policy from "HR Policy" to "Corporate Policy"	Jeanette Chang
4	15.01.2020	3	Scope of policy expanded to include Directors	Jeanette Chang
5	06.02.2020	4	Update email address of AC Chairperson	Jeanette Chang
6	30.11.2020	5	Update recipients of "we-care" group email	Jeanette Chang
7.	18.02.2021	6	Editorial updates to clause 3.3 - Compliance to HSE Policies and Procedure. Changed the terms "HSSE" to "HSE" and "HSSEMS" to "HSEMS"	Jeanette Chang
8.	18.02.2021	6	"we-care" group email – update designation of Mr Kenny Lim to MD of CHO Ship Management Pte. Ltd	Jeanette Chang



9	27.10.2022	7	<p>Editorial changes to:</p> <ul style="list-style-type: none"> • Clause 3.0 – Ethical Standards – Guiding Principles • Clause 3.4 – Anti-Corruption • Clause 3.5.1 – Conflict of Interest • Clause 3.8 – Equal Employment Opportunity, Non-Discrimination and Prohibition on Harassment • Clause 3.10 – Economic Sanctions • Clause 3.13 – Insider Trading • Clause 3.14 – Safeguarding Confidential Information and Personal Data • Clause 3.15 – Social Media • Clause 4.0 – Employees’ Responsibilities 	Jeanette Chang
10.	27.10.2022	7	Clause 3.3 – Compliance to HSE Policies and Procedure - Update hyperlink	Jeanette Chang
11.	27.10.2022	7	Clause 3.4 – Anti-Corruption – Replaced Singapore’s Bribery Prevention Act to Prevention of Corruption Act 1960.	Jeanette Chang
12.	27.10.2022	7	Clause 3.6 – Gifts, Meals, Travel and Entertainment – Reordered of Clause No.	Jeanette Chang
13.	27.10.2022	7	<p>Additional New Sub-Clause</p> <ul style="list-style-type: none"> • Clause 3.9 – Modern Slavery • Clause 3.16 – Environment 	Jeanette Chang
14.	11.11.2022	8	Broadened the scope of Clause 3.13 to include Baker Technology Limited	Jeanette Chang
15.	25 Apr 2024	9	Update AC Chairperson’s name and email address – Clause 6.0	Jeanette Chang
16.	21 Jun 2024	10	Changing of “Audit Committee” to “Audit & Risk Management Committee” throughout the policy	Jeanette Chang
17.	13 Jan 2025	11	General overall revisions	Board
18.	21 Jan 2026	12	Update Managing Director’s name (CHO Ship Management Pte. Ltd.) – Clause 6.0	Jeanette Chang



APPENDIX A CONFLICT OF INTEREST FORM



CH OFFSHORE LTD & SUBSIDIARIES (collectively CHO Group” or “Group”)

CONFLICT OF INTEREST DISCLOSURE STATEMENT

NAME: _____

POSITION: _____

DEPARTMENT: _____

I understand that if I, or any members of my immediate family¹, have any direct or indirect interest in any company which has business dealings with or is in the same line of business as or has a conflict of interest with CHO Group or Baker Tech Group, I shall have the obligation to submit this Conflict of Interest Disclosure Statement.

No.	Conflict of Interest Situation(s)	Yes	No
1	Are you or any members of your immediate family related to a staff member of CHO Group or Baker Tech Group?		
2	Do you or any members of your immediate family have any direct or indirect interest in any business transaction(s), agreement(s), and investment(s) with CHO Group or Baker Tech Group?		
3	Do you or any members of your immediate family have business dealings or transactions with a customer, vendor, supplier, subcontractor, charterer, oil major and/or government official which could result in financial or personal gain (e.g., gifts, salary, facilitation payments, employment offers, loans, sexual favours, free services or discounts) to you?		
4	Are you aware of any other events, transactions or situations that have occurred or may occur in the future that you believe is a conflict of interest and should be brought to the knowledge of the Baker Tech Group's Board of Directors?		

¹ The term "immediate family" includes spouse, children, parents, siblings or any relatives and friends

If **Yes**, to any of the above, please elaborate on the potential conflict arising from the above situation with regards to the transaction concerned (e.g., nature of service/transaction. If members of immediate family are involved, to state the identity of the family member and your relationship with that person):

I HEREBY DECLARE that all the information provided in this Statement, as well as in the documents and materials submitted are true and accurate to the best of my knowledge.

Signature

Date



APPENDIX B CONFLICT OF INTEREST REGISTER



CH OFFSHORE LTD & SUBSIDIARIES (collectively "CHO Group" or "Group")

Conflict of Interest Register

Date of conflict	Name of person declaring a conflict	Position	Meeting or event where the conflict arose	Details of the conflict	Action taken in response to the conflict