



**RH Petrogas Limited**

**Anti-Bribery and Corruption Policy**

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## **RHPL GROUP ANTI-BRIBERY AND CORRUPTION STATEMENT**

1. RH Petrogas Limited (the "**Company**") and together with its subsidiaries (the "**Group**") are firmly committed to conducting our business with integrity, honesty, and ethics.
2. The Group has a zero-tolerance approach to all forms of bribery and corruption and commit not to engage in any forms of corrupt or improper practices. Therefore, the Group expects all employees, officers and directors to observe the anti-bribery and anti-corruption legislation and regulations in the countries where the Group has business activities.
3. The Group actively encourages the reporting of any suspected bribery and corruption within the Group and are dedicated to safeguarding employees who, in good faith, come forward with such information.
4. The Group recognises the critical role whistleblowers play in upholding ethical standards and sound governance. We empower our employees to report concerns without fear, and we will not tolerate any form of misconduct by our personnel - nor any act of reprisal or discrimination against those who raise concerns.
5. All reports of improper conduct will be subject to fair, impartial, and thorough investigation. The Group will take all reasonable measures to protect the identity of whistleblowers and ensure their confidentiality throughout the process unless legally required or explicitly authorised in writing by the whistleblowers. In cases where detrimental action is taken against a whistleblower, the Group will provide appropriate relief to address the harm caused.
6. While employees are strongly encouraged to report genuine concerns, misuse of the whistleblowing channel - such as malicious or false reporting - will be treated as a serious violation of this policy and may result in disciplinary actions.
7. The Group remains steadfast in its commitment to ethical conduct and compliance with all applicable laws on bribery and corruption, such as the Singapore Prevention of Corruption Act and Indonesia's Corruption Eradication Law [Amended by Law No. 20/2001]. This Anti-Bribery and Corruption Policy of the Group is to be read in conjunction with other related policies including the Group's Employee Handbook (Singapore office), Company Regulations (Indonesia office) and the Group's Whistleblowing Policy.

## 1. Policy Statement

- 1.1 This policy applies to RH Petrogas Limited (the “**Company**”) and *together with* its subsidiaries (the “**Group**”). The Group’s Anti-Bribery and Corruption Policy (the “**Policy**”) sets out the guiding principles and standards that the Group is committed towards conducting its business with integrity, honesty and ethics.
- 1.2 The Group adopts a zero-tolerance approach for all forms of bribery and corruption and upholds all applicable laws on bribery and corruption. This includes the Singapore Prevention of Corruption Act and Indonesia’s Corruption Eradication Law [Amended by Law No. 20/2001].
- 1.3 The Group and its employees must observe the anti-bribery and anti-corruption legislation and regulations in the countries where the Group has business activities and commits itself not to engage in any forms of corrupt or improper practices.
- 1.4 This Policy is to be read in conjunction with other related policies including the Group’s Employee Handbook (Singapore office), Company Regulations (Indonesia office) and the Group’s Whistleblowing Policy.

## 2. Scope and Application

- 2.1 This Policy applies to all persons, including the Group’s Board of Directors, officers and all employees (permanent, temporary, contract) of the Group.
- 2.2 In addition, this Policy applies to the employees, officers and directors of the Group’s representatives, suppliers, contractors, customers, consultants and any other individuals or entities that performs services for or on behalf of the Group or their employees, wherever located, and such persons are expected to have and comply with their own ethical business policies or comply with this Policy.

### 3. General Principles

- 3.1 This Policy prohibits all forms of bribery or corrupt action, including the offering, promising, authorizing, providing or receiving “**Anything of Value**<sup>1</sup>” to or from any customers, business partners, vendors, government officials or government entities, political entities or political associations or other third parties to induce or reward the improper benefit or performance of an activity to solicit an unfair business advantage, or personal gain or advantage,
- 3.2 This Policy also prohibits any direct or indirect contributions including donations or sponsorships to political parties, political associations and political candidates, as these payments might be perceived to be for an unfair business advantage.
- 3.3 All legitimate charitable or bona fide donations of the Company and its subsidiaries not prohibited under this Policy require the prior approval of the Executive Director and the Chairman of the Group.

### 4. Key Responsibilities of Employees, Directors and Officers (Department and Function Heads)

- 4.1 **Employees** are expected to:
- a) Be responsible for the prevention, detection and reporting of bribery and other forms of corruption (actual and suspected) that may tarnish the reputation and integrity of the Group, through the appropriate use of the established whistleblowing channel;
  - b) Attend all mandatory Anti-Bribery and Corruption communication sessions as provided or requested by the Management from time to time;
  - c) Be alert to suppliers with poor reputation or ethical practices;
  - d) Be alert to any close or perceived relationships between parties in the supply chain or with government officials;
  - e) Insist on a detailed breakdown of all fees or upfront costs, especially where services are a concern; and.
  - f) **Only** use their position, the Company’s and the Group’s name for official business purposes and not for personal advantage.

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<sup>1</sup> Refers to cash and cash equivalents such as gifts, services, employment offers, loans, travel and entertainment, charitable donations, sponsorships, business opportunities, favourable contracts, personal favours or giving anything even if nominal in value.

4.2 **Directors** must ensure that:

- a) This Policy aligns with the Group's legal and ethical obligations;
- b) All employees are made aware of and comply with this Policy and they attend the mandatory Anti-Bribery and Corruption communication sessions from time to time.
- c) Adequate internal controls are in place to mitigate any forms of corrupt or improper practices.

4.3 **Officers (Department and function heads)** must ensure that:

- a) Employees reporting to them complete the necessary communication sessions;
- b) New employees are made aware of this Policy as part of their induction and onboarding into the Group;
- c) They monitor the activities of their department and function and address issues that arise and fall under this Policy;
- d) They coordinate with Human Resources and Internal Audit on periodic assessment of compliance with this Policy, ensuring that all identified external and internal risks associated with bribery and corruption in relation to their function are addressed; and
- e) Ensure that all gifts and hospitalities given or received must be accurately recorded with valid justifications (also refer to Paragraph 5.3.5)

## 5. Types of Payments

5.1 Payments, offers or receipts of "**Anything of Value**" are not allowed, be it given to or received from a government official to or any person in a private enterprise and regardless of whether they are given or received directly or indirectly by another individual or entity on behalf of the Company, any of its subsidiaries, or the Group as a whole.

### 5.2 Facilitation Payment

5.2.1 This is not allowed by the Group. Facilitation payments refer to payments made for facilitating (or expediting) for the purpose of speeding up, assisting or securing the approval, performance or service of a particular routine or necessary governmental action by a government official to which the Group is entitled.

5.2.2 While facilitation payment may not be prohibited in certain countries and in fact may be a customary practice, facilitation payment is illegal under Singapore's laws and in certain countries where the Group operates. Everyone involved in the Group's business must comply with the relevant laws of the countries where

the Group has operations in and those that apply across borders. No employees, officers and/or directors may themselves or through any third-party initiate or make any facilitation payments for and/or on behalf of the Group.

### 5.3 Gifts, Entertainment and Travel

5.3.1 It is the responsibility of the individual giving or receiving a gift, hospitality, travel or entertainment benefit to ensure that it is not a bribe and is in strict compliance with this Policy, the Group's stance on "Conflicts of Interests" in the Employees' Handbook and other relevant policies and procedures of the Group.

5.3.2 Any giving or receiving of gifts, entertainment, travel or "**Anything of Value**" whatsoever must be given or accepted for a legitimate business purpose, reasonable and infrequent and free of any intent or understanding, express or implied, that any business decision will be influenced thereby and must not give the impression of any such intent or understanding. The recipient should not be beholden to the giver of the gifts or any benefit in kind.

5.3.3 Gifts or hospitality in cash or cash equivalent is not allowed.

5.3.4 Gifts that are considered customary token gifts and hospitality during festive seasons like 'thank you' gifts for event speakers giving their time free, or promotional items below US\$60 or IDR 1,000,000 such as pens, calendars etc. are allowed.

5.3.5 All Group employees must promptly record information of any customer, agent, consultant or third party to which i) a gift or entertainment has been given or ii) a deemed high-value gift in excess of US\$60 or IDR 1,000,000 has been received in the declaration form (refer to Appendix A), giving the reason why the gifts have been received, have the completed form reviewed and approved by an authorised approving authority (e.g. Head of Department) and submit the approved form to Human Resources in Jakarta and Singapore respectively.

5.3.6 All recorded information should be kept for at least three years.

## 6. Conflicts of Interests

6.1 All employees, officers and directors are required to declare to the Company and the Group of any potential conflicts of interest situations and recuse themselves if required by the Company or the Group.

- 6.2 All declarations shall be reviewed by Human Resources to assess if a conflict of interest exists and advise on the appropriate course of actions.

## **7. Communication Session**

- 7.1 All employees, officers and directors of the Group are to attend the Anti-Bribery and Corruption communication session on a regular basis to ensure they are up-to-date and kept aware of the requirements and obligations of this Policy and applicable regulations.
- 7.2 Thereafter, employees, officers and directors are required to make a declaration they understood the contents of this Policy and undertake to comply with this Policy.

## **8. Monitoring and Review**

- 8.1 This Policy will be periodically reviewed and updated as needed to ensure it continues to be adequate and effective.

## **9. Reporting on Actual or Suspected Bribery and Corruption Concerns**

- 9.1 All stakeholders, including employees, officers and directors of the Group who identify or suspect any suspicious internal or third party who may be acting in violation of this Policy, are encouraged to report this with the appropriate use of the established whistleblowing channel. Please refer to the Group's Whistleblowing Policy for more information.
- 9.2 Any violations of this Policy or the Group's Code of Conduct may result in disciplinary actions that include, but not limited to, termination of employment. The identified violation may be reported to the national police or relevant regulatory agency if it is a criminal act. Additionally, the Group may be exposed to criminal or civil claims and reputational damage from the violations.
- 9.3 Any employees, officers or directors found to have knowledge of such violations but deliberately concealed such information from the Group may face disciplinary actions including termination of association with the Group.

## Appendix A: Declaration Form for Gifts, Hospitality and Entertainment

Serial Number:

Section A: To be completed by Employee Making the Declaration				
i) Employee's Particulars				
Name:			Designation/ Department:	
ii) Declaration Description				
S/N	Sender's Name & Organisation	Description of Gift/ Benefit	Quantity	Est. Value (USD or IDR)
Reason(s) for receiving gift/benefit				
Date:		Signature of Employee:		
Section B: To be completed by Human Resources (if applicable)				
Valuation of Gift(s) and Recommendation				
S/N	Valuation Price (USD or IDR)	Source of Valuation	Recommended Method of Allocation/ Disposal	
Date:		Name and signature of Head of Human Resources		
* Delete as appropriate				

Note: False, misleading, incomplete, inaccurate transactions provided in the declaration form are a clear violation of this Policy and disciplinary actions will be taken against the employee in violation of this Policy.