



CONFIDENTIALITY POLICY

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TABLE OF CONTENTS

Section	Page
1. Summary Statement	3
2. Objectives	3
3. Scope	3
4. Definitions	3
5. Requirements	3
5.1 Definition of Confidential Information	3
5.2 Reporting	4
5.3 Trading Restrictions and Blackout Periods	5
5.4 Maintaining and Protecting Confidential Information	5
5.5 Inventions and Discoveries	5
5.6 Communications and Enforcement	5
5.7 Obligations upon Termination	5

1. Summary Statement

This Policy sets forth the Company's requirements regarding the protection of Confidential Information and proprietary information, consistent with the expectations and plans of the Company, in consideration of PETRONAS Global's requirements. The Company's management of Confidential Information and proprietary information will be undertaken in a manner to manage risks to the Company, ensuring compliance with applicable law and the Company's policies, standards, Frameworks, and guidelines.

2. Objectives

The objectives of this Policy are to:

- Promote an awareness of the types of information that are considered Confidential Information and how that information should and should not be communicated and used by Employees, Contractors, and Consultants;
- Define the Company's ownership of Inventions and Discoveries;
- Promote the confidentiality and security of the Company's Confidential Information and proprietary information for competitive, security, and other business reasons, as well as to comply with applicable law; and
- Promote an understanding of the legal requirements among Employees, Contractors, and Consultants.

3. Scope

This Policy extends to all Employees, Contractors, and Consultants of the Company, and any other person designated to act as an Authorized Spokesperson for the Company

4. Definitions

Capitalized terms used herein have their meanings set forth in the [Master Glossary](#).

5. Requirements

5.1 Definition of Confidential Information

For the purposes of this Policy, Confidential Information means any and all knowledge, data, and information, whether documented or undocumented, in digital, physical, or other format, concerning the Company's business and affairs, and includes, but is not limited to, the following:

- Financial information, whether relating to the Company generally or to particular products, services, geographic areas or time periods, business plans, profitability analyses, financial statements, and related notes.

- Business activities, strategies, and dealings with external organizations or individuals, including, but not limited to, acquisitions and divestitures;
- Supply and service information, such as names or addresses of suppliers of services or goods, terms of supply or service contracts, or information about particular transactions or about potential suppliers, to the extent that such information is not generally known to the public and to the extent that there are details that are not generally known even if the combination of suppliers or use of a particular supplier is generally known or available;
- Business information such as the following:
 - Information relating to the Company's business, affairs, assets, structure, operations, or proposed activities;
 - Any technical, commercial, legal, financial, strategic, tactical, regulatory, or governmental information; and
 - All reports; interpretive data; geological, geophysical, seismic, engineering, environmental, health, safety, regulatory, land, accounting, operational, marketing and production data; agreements by, or on behalf of, the Company; forecasts; results of projects or operations; and information concerning pending transactions;
- Marketing information, such as details about ongoing or proposed marketing programs or agreements by, or on behalf of, the Company, sales forecasts, results of marketing efforts, or information about past or impending transactions;
- Customer information, such as any compilation of past, existing, or prospective customers' names, address, or backgrounds; records of transactions and prices; proposals or agreements between customers and the Company; and credit or related information about actual or prospective customers;
- Inventions and Discoveries; and
- Any other information that a reasonable person acting prudently would consider to be of a confidential nature.

Refer also to the [Privacy Policy](#) for information on the treatment of Confidential Information relating to Employees, Contractors, and Consultants.

The Company categorizes information under one of the following classifications:

- Secret information
- Confidential information
- Internal information
- Open information

Details on the information classification can be in the [Information Management Documentation Standard](#).

5.2 Reporting

If any Employees, Contractors, or Consultants become aware of any violation or potential violation of this Policy, they will immediately inform the Legal department about the facts related to the violation or potential violation. If Employees, Contractors, or Consultants are unsure if information is Confidential Information, then they should immediately contact a member of the Legal department before disclosing it to anyone.

5.3 Trading Restrictions and Blackout Periods

In the normal course of business, the Company deals with publicly traded companies. By virtue of these business dealings, Employees, Contractors, and Consultants may come to know material information with respect to such publicly traded companies. It is illegal for anyone to purchase or sell securities of a publicly traded issuer while in possession of material information regarding such an issuer that has not been publicly disclosed. It is also illegal for anyone to inform any other person of material, non-public information. The Legal department should be consulted if there is any uncertainty surrounding the transfer of such information. There are serious sanctions for these matters, including substantial fines and potential jail sentences for Tipping. Therefore, individuals with knowledge of Confidential Information about the Company or its counter-parties, in negotiations of potentially material transactions, are prohibited from trading securities of any counter-party until the end of the business day following the date of issuance of a news release disclosing the Confidential Information.

5.4 Maintaining and Protecting Confidential Information

Any Employee, Contractor, or Consultant privy to Confidential Information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business. Efforts will be made to limit access to Confidential Information to only those individuals who need to know the information, and those individuals should be advised that the information is to be kept confidential. Outside parties privy to Confidential Information concerning the Company and its business dealings must be made aware of this Policy and must not divulge such information to anyone else, other than in the necessary course of business.

5.5 Inventions and Discoveries

Employees, Contractors, and Consultants, as a part of their duties, are encouraged to innovate and create new products and processes on the Company's behalf. Any and all Inventions and Discoveries made or developed by the Employee, Contractor, or Consultant in the course and scope of their duties for the Company are the sole property of the Company. Individuals will inform their Vice President of any Inventions and Discoveries they make in order to evaluate their usefulness to the Company. Employees, Contractors, and Consultants must be familiar with the provisions of this Policy.

5.6 Communications and Enforcement

Any Employees, Contractors, and Consultants who violate this Policy may face disciplinary action up to and including termination of employment for cause. Violation of this Policy may also relate to the violation of certain securities laws. If it appears that securities laws may have been violated, the Company will investigate the matter in accordance with the Whistleblower Investigation Framework, and may inform the appropriate authorities.

5.7 Obligations upon Termination

Any Employees, Contractors, or Consultants who, upon their termination, have possession of any Confidential Information will deliver the same to their Vice President, on or before the final day of their employment.

For a period of two years after the cessation of an Employee's relationship with the Company, the Employee will not make use of business opportunities arising from his/her relationship with the Company's vendors, suppliers, Contractors, Consultants, principals, and/or other business partners, or cause or attempt to cause the diversion of such business opportunities from the Company or to cause or attempt to cause the termination of contracts or other business relationships of the Company without first obtaining the prior consent of the Company.