



PETRONAS

# PETRONAS Code of Conduct and Business Ethics

Country Supplement: **MAURITANIA**

The PETRONAS Code of Conduct and Business Ethics Country Supplement: Mauritania is a specific reference for use in Mauritania. It does not describe all applicable laws or PETRONAS policies, or give full details on any particular law or policy. It does not constitute legal advice. It does not constitute or create a contract of employment. PETRONAS reserves the right to modify, revise, cancel or waive any policy, procedure or condition without notice and without revision of the Code. Moreover, the provisions of the Code may be modified by PETRONAS to adapt them to local laws and conditions.

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# Country Supplement:

# Mauritania

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## A: Variations to the PETRONAS Code of Conduct and Business Ethics

### Part I: Core Values and Culture

#### 1. Application

- 1.1 The PETRONAS Code of Conduct and Business Ethics (the “CoBE”) (as supplemented by this Country Supplement for PETRONAS subsidiaries in Mauritania) or any provision thereof shall form an integral part of your contract of employment.
- 1.2 This Code is prepared in English and may appear in other languages. In the event of a conflict of interpretation, the English version will govern.

## B. Conduct Tending to Jeopardise Duty of Good Faith and Fidelity

#### 1. Serious Pecuniary Indebtedness

- 1.1 For the purpose of this Section, the term “serious pecuniary indebtedness” means the state of an employee’s indebtedness which, having regard to the amount of debt incurred by him/her has actually caused financial hardship to him/her.

An employee will be deemed to be in serious pecuniary indebtedness where:-

- a) he/she is a judgment debtor, for as long as the judgment sum remains unsettled; or

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- b) he/she is a bankrupt or an insolvent wage earner, for as long as he/she remains as a bankrupt or for as long as any judgment sum against him/her in favour of the Official Assignee remains unsatisfied, as the case may be; or
  - c) he/she is no longer able to settle his/her own debt within his own reasonable means.

**1.2** Serious pecuniary indebtedness from whatever cause will be regarded as necessarily impairing the efficiency and effectiveness of an employee.

**1.3** An employee will avoid habitual indebtedness unless he/she proves that such indebtedness or insolvency is the result of circumstances beyond his/her control and does not result from extravagances or dissipation.

**1.4** Subject to the requirements of applicable law, an employee will be required to disclose the full extent of his/her serious pecuniary indebtedness to PETRONAS at the earliest opportunity when such indebtedness is known to him/her.

**1.5** An employee who obtains an annulment of his/her bankruptcy may be treated as having fully restored his/her credit standing.

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## 2. Borrowing Money

- 2.1.** You may borrow from banks, insurance companies, co-operative societies or borrowing companies licensed under the Mauritanian laws or incur debt through acquiring goods by means of hire purchase agreements or other arrangements, provided that:
- such banks, insurance companies, co-operative societies or borrowing companies from which you borrow are not directly or indirectly subject to your official authority;
  - such borrowings do not lead to public scandal or be subject to construal that you have abused your position for your private advantage; or
  - the aggregate of your debts does not or is not likely to cause you serious pecuniary indebtedness as defined under Section 1.
- 2.2.** You may not borrow from any other person engaged in the business of money lending.
- 2.3.** You must comply with the limitations on borrowing as set out in the Code.

## 3. Living Beyond Official Emoluments And Legitimate Private Means

- 3.1** Where in the opinion of PETRONAS an employee is or appears to be:-
- maintaining a standard of living which is beyond his/her official emoluments and other legitimate private means, if any; or
  - in control of or in possession of pecuniary resources or property, movable or immovable, the value of which is disproportionate to, or which could not reasonably be expected to have been acquired by the employee with his/her official emoluments and any legitimate private means.

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Subject to the requirements of applicable law, PETRONAS may call upon the employee to explain in writing how he/she is able to maintain the said standard of living or how he/she acquired his/her pecuniary resources or property and also may be required to make a declaration of his/her assets which may include assets belonging to his/her family/household. Such declarations as aforesaid should be made to your Human Resource Department.

**3.2** Failure to make the asset declaration as required under Section 3.1 is viewed by PETRONAS as a lack of commitment on the part of the employee to uphold PETRONAS' policy on maintaining the highest standard of integrity, openness and transparency.

**3.3** For the purpose of this Section, "assets" includes property of any description, whether movable or immovable, as may be prescribed by PETRONAS from time-to-time.

In respect of immovable property, assets include:-

- i. land, including land occupied under temporary occupation licence;
- ii. all types of residence such as houses, flats, apartments and condominiums; and
- iii. building, including a shop or portion of a shop, office space or stall.

In respect of movable property, assets include:-

- i. any form of cash wherever deposited or retained;
- ii. shares, stocks, debentures, bonds or other securities;
- iii. any form of trade, business or commercial licence permits; and
- iv. any other movable property, including all types of motor vehicles, jewellery, club memberships, household furniture and sports equipment.

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## C. Information Security

You must comply with the PETRONAS Information Security Policy in effect from time to time, which may be obtained from the Chief Digital Officer.

## D. Workplace Culture And Environment

### 1. Absence Without Leave or Without Reasonable Cause

- 1.1** An employee who is absent will, at the earliest opportunity, inform the officer of PETRONAS to whom he/she reports of his/her absence and the cause for his/her absence.
- 1.2** Where the absence without leave and without reasonable excuse is for more than three (3) consecutive working days, the employee will be deemed to have breached his/her contract of service with PETRONAS.
- 1.3** Where an employee is absent for more than three (3) consecutive working days without reasonable excuse, as soon as possible thereafter a registered letter will be sent to the employee's last known address requiring him/her to provide explanation for his/her absence. Upon a lapse of two (2) days after the said registered letter is deemed received, if nothing is heard of him/her or no satisfactory explanation is given by him/her, then the said employee is deemed to have broken his/her contract of service and in such circumstances PETRONAS will have the right to terminate his/her service. In addition, PETRONAS will be entitled to recover from the former employee concerned all sums due from the employee to PETRONAS.



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## 2. Dress Code

- 2.1** For the purposes of Part III Section 4 of the Code, the Dress Code of PETRONAS (as established by PETRONAS for employees in Mauritania) shall be adopted and be applicable to all PETRONAS employees in Mauritania.

## 3. Making Traditional Tea

- 3.1** Making traditional Mauritanian tea in the workplace is prohibited.
- 3.2** Traditional Mauritanian tea should only be prepared in the place designated for this specific purpose and by the person to whom this task is assigned to by PETRONAS.

## 4. Smoking Prohibition

- 4.1** Smoking is prohibited in the workplace.
- 4.2** Employees are allowed to smoke in the designated smoking areas only.

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## E. Disciplinary Process And Sanctions

### 1. Disciplinary Process

- 1.1** Where the circumstances warrant, PETRONAS may suspend an employee on full pay pending the investigation and/or inquiry into alleged acts of misconduct committed by the employee
- 1.2** If the investigations reveal concrete and cogent evidence in support of the alleged misconduct, PETRONAS may institute disciplinary action against the said employee

### 2. Disciplinary Punishments

The Punishing Authority may after due inquiry impose any or a combination of the following punishments against the employee:

- i. written warning;
- ii. suspension without pay for a period of one (1) to three (3) days;
- iii. suspension without pay for a period of four (4) to eight (8) days;
- iv. dismissal.

### 3. Punishing Authority

For the purpose of this Part IV, "Punishing Authority" shall refer to the officer of PETRONAS who has been given the authority to mete out punishment against an employee as provided by the Human Resource Management Limits of Authority.

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## 4. Appeal Procedure

- 4.1** An employee who is aggrieved by the decision of a disciplinary action has the right to appeal in writing within thirty (30) days from the date of service or posting of the letter communicating the decision of the Punishing Authority.
- 4.2** The Appeal Authority is to consider the grounds of appeal set out in the letter of appeal and is required to conclude whether to dismiss the appeal or to allow the appeal by either:
- a) reversing the finding of guilt; or
  - b) reducing the punishment.
- 4.3** The Appeal Authority shall consider the appeal on the basis of the written submissions by the aggrieved employee and also after considering the report of the Domestic Inquiry and the grounds for the decision as made by the panel of the Domestic Inquiry.
- 4.4** For the purpose of this Section, "Appeal Authority" shall refer to the officer of PETRONAS who has been given the authority to consider and decide on appeal as provided by the Human Resource Management Limits of Authority.

## F. Conflicts

**In the event that any of the policies in this Country Supplement and the CoBE shall be inconsistent, ambiguous and contradict with one another, the policies of this Country Supplement shall prevail.**

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