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## Code of Conduct

### Revision History

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### Version History

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## 1. Purpose

Petrolink is committed to conducting its business ethically in every country where it does business as well as complying with all applicable laws.

Together with the policies and business practices referenced herein, the Petrolink Code of Conduct (the “Code”) serves as a practical guide to help you make the right legal and ethical choices.

The Petrolink Group has adopted this Code to ensure honest and ethical conduct, compliance with applicable laws and regulations and fairness with clients, suppliers, competitors and employees.

If you have any questions about the Code or how to handle a specific situation, you should speak to your line manager, a Petrolink Director or the Legal Coordinator.

## 2. Scope

The Code applies wherever we do business, to every employee including those on temporary and fixed contracts, contractors, directors and officers in every wholly owned Petrolink company and in every joint venture company under Petrolink control. Contractors, consultants or suppliers who are agents or who are working on our behalf in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with the Code when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of the Code as it applies to our people in their dealings with them. Joint venture companies not under Petrolink control and joint venture partners are encouraged by Petrolink to adopt a similar code of conduct.

## 3. Policy

### 3.1 Employment and the Workplace

#### 3.1.1 Equal Opportunities

We operate a policy of providing equal opportunities in recruitment, training and promotion whatever the gender, colour, race, religion, national or ethnic origin, sexual orientation, marital status, age or disability of an employee, having regard only to the individual's aptitudes and abilities and the requirements of the job.

Petrolink abides by all laws and regulations that govern employment practices wherever we conduct business. We are committed to the promotion of equal opportunities and to ensuring that the human resources, talent and skills of all employees are maximised. Petrolink's policy is to treat all employees with respect and dignity and to ensure that decisions are taken without reference to irrelevant or discriminatory criteria.

If you reasonably suspect any form of inappropriate discriminatory behaviour in the workplace, you should report it immediately to your line manager or your local HR manager.

### 3.1.2 Anti-Harassment

Petrolink is fully committed to promoting a harmonious working environment. Every employee has the right to be treated with respect and dignity and is entitled to work in an environment free from harassment, victimisation and bullying.

Harassment at work in any form is unacceptable behaviour and will not be permitted or condoned. Everyone must comply with the Code and the Anti-Harassment Policy. Employees should ensure that their behaviour towards colleagues and clients does not cause offence or constitute harassment.

You have the right to complain of harassment and all complaints will be dealt with seriously, promptly and where possible with confidentiality.

Where allegations of harassment are substantiated, appropriate disciplinary action, which may include dismissal, will be taken against the person(s) responsible.

Harassment may constitute direct or indirect discrimination and accordingly may be unlawful. Harassment may be a civil offence and a criminal offence and it may contravene health and safety legislation.

If you feel that you have been harassed, or have witnessed harassing behaviour, you should follow the procedure set out in the Petrolink Employee Handbook (the "Handbook").

### 3.1.3 Alcohol and Substance Abuse

We are committed to maintaining healthy, safe and productive working conditions for our entire staff, clients and visitors. We recognise the impact that both alcohol and drugs may have upon an individual's ability to work safely and correctly and, as such, we aim to ensure a working environment free from the inappropriate use of substances and where employees are able to carry out their duties in a safe and efficient manner.

Petrolink's Alcohol and Substance Abuse Policy as set out in the Handbook is designed to prevent and deal with problems created in the workplace by alcohol consumption and drug usage by promoting and encouraging employees to achieve the highest standards of health and safety at work.

## 3.2 Health, Safety and Environment

Petrolink places the highest importance on health and safety and environment ("HSE"). We recognise that exemplary HSE performance is at the heart of the success of our business. Petrolink is committed to the provision of a health and safe working environment and to the welfare of all employees. Petrolink's health and safety policy is designed to promote and encourage the highest standards of health and safety at work in all of its operations. We undertake to ensure, so far as reasonably practicable, the health, safety and welfare of all our employees at work.

Petrolink will promote avoidance and prevention of harmful environmental impacts in recognition of the sensitivity of the environment. We are continually committed to improving our environmental performance. This includes the efficient use of paper products, the appropriate disposal of office waste, recycling and energy consumption.

You must be fully aware of, and fulfil, any HSE reporting requirements related to your role at Petrolink. If you have any questions or concerns about how our operations impact human health or the environment, you should speak to your line manager, or contact your local HR representative.

### **3.3 Conflicts of Interest**

We are all responsible for acting in the best interests of Petrolink and must not participate in activities that create or appear to create conflict between our own interests and the interests of Petrolink.

You must disclose any actual or potential conflicts of interests to your line manager or your local HR representative so that they can be resolved or avoided.

#### **3.3.1 Outside Employment & Appointments**

You may not accept directorships, appointments or positions with other companies or organisations whilst employed by any Petrolink entity without the prior written approval of Petrolink.

Consent will invariably be refused where the proposed work competes with Petrolink's business, creates a conflict of interest or is likely to bring Petrolink into disrepute.

In other cases, consideration, when deciding whether to grant permission, will be given to whether the secondary employment is likely to affect your ability to carry out your principal job in a satisfactory and whole-hearted manner or will impinge on your working hours.

Where approval is granted in no case must any such work interfere with the performance of your responsibilities to Petrolink.

#### **3.3.2 Family and Personal Relationships**

Petrolink selects its employees, vendors and suppliers on the basis of their qualifications, not on the basis of any family connections or personal friendships. You should refrain from participating in, or attempting to influence, any decisions relating to Petrolink business dealings with relatives or close friends. It is Petrolink's usual policy to avoid family members or those with close personal relationships working in the same department however this will be determined on a case by case basis.

If you have a family member who works for or who owns one of Petrolink's competitors or an organisation with which Petrolink is considering doing business with, you should disclose this information to your line manager or your local HR representative.

#### **3.3.3 Corporate Opportunities**

You are expected to put Petrolink's interests ahead of your own. You must not use information about the Petrolink Group's business or prospects for personal gain or to compete with Petrolink directly or indirectly in any kind of business opportunity that is discovered using Petrolink property or information or through your position with Petrolink.

### 3.3.4 Disclosure of Non-public Information

It is illegal for a person to trade securities of any company based upon, or otherwise to take advantage of their knowledge of material, non-public information (“inside information”) about that company.

If you are aware of inside information concerning Petrolink or another company, you must not disclose it to anyone other than directors, employees or agents whose positions require them to know the information until it has been publicly released.

Trading in oil and gas company stocks by you or a member of your immediate family may present cases of conflict between personal and company or customer interests. Therefore, do not make a trade in such stocks if it is or can appear to be motivated by inside information. If you are in any doubt, consult with your line manager or the Legal Coordinator before making that trade.

You must also refrain from disclosing inside information concerning Petrolink to others (“tipping”) as they may profit from that information.

### 3.4 Financial Reporting

All Petrolink assets, including all cash accounts, shall be part of the books of account and included in uniform financial statements. The records supporting them shall be made fully available for audit by the Petrolink financial management team and outside independent accountants or auditors.

No entries shall be made in the books of account or in supporting documents (such as cash payment vouchers) which inaccurately or improperly describe any transactions. However, transactions of a confidential (but proper) nature maybe described in a general way provided full details are known by the manager and financial controller and made available to Petrolink financial management and outside independent accountants or auditors.

Country managers and financial controllers shall ensure that books, records and accounts related to their operations accurately and fairly reflect, in reasonable detail, the transactions and dispositions of the assets under their control.

Country managers and financial controllers shall ensure that, with respect to the operations for which they are responsible, a system of internal accounting controls is maintained which is sufficient to provide reasonable assurances that the following criteria are met:

- a) Transactions are executed in accordance with management’s general or specific authorisation;
- b) Transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and to maintain accountability for assets;
- c) Access to assets is permitted only in accordance with management’s general or specific authorisation;
- d) The recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

### 3.5 Money Laundering

Money laundering is a generic term used to describe the process of hiding the criminal origins of money within legitimate businesses or business activities.

Petrolink will only conduct business with reputable third parties who engage in legitimate business activities. You must avoid any transactions that are structured in a way that could be viewed as concealing illegal conduct or illegally obtained funds and should contact the Legal Coordinator if you have any concerns.

In practice, this means you must make proper enquiries about the origin of all monies and property we receive or procure, and of the appropriateness of the destination of money we forward in any way, on transactions in which you are involved.

### 3.6 Protection of Petrolink Assets

No asset of a service company is more valuable than the confidence of customers and employees. Confidence takes time and care to develop but can easily be destroyed by thoughtless action.

Wasteful misuse of resources and fraudulent activities are detrimental to Petrolink's objectives and are prohibited.

#### 3.6.1 Proprietary Information and Intellectual Property

You are in a position to learn about certain information which is confidential and valuable to Petrolink. You must keep information learned in your role strictly confidential and not use it for personal gain or the benefit of others.

You are also required to protect Petrolink's intellectual property, which includes Petrolink's patents, trademarks, trade secrets and copyrights. Any unauthorised disclosure or misuse of Petrolink's intellectual property either during or following your employment with Petrolink could be harmful to Petrolink or our customers, or helpful to our competitors.

Any unauthorised disclosure or misuse of Petrolink's proprietary information and intellectual property will lead to disciplinary action, up to and including termination of employment. Petrolink may also seek all legal remedies available to it to protect the unauthorised disclosure or misuse of its proprietary information and intellectual property.

Our clients, suppliers and joint venture partners entrust us with their confidential and proprietary information and we therefore must ensure that we handle it with the greatest care to merit their continued confidence.

#### 3.6.2 Physical Assets

Petrolink's physical assets such as computers, phones and facilities should only be used for business purposes.

### 3.7 Privacy and Data Protection

Any employee handling proprietary or sensitive personal information should follow the applicable privacy and data security laws along with Petrolink's privacy and security policies.



Petrolink is committed to maintaining the security and privacy of our employees' personal information. Petrolink will act at all times in accordance with local legislation and applies specific data protection principles in regard to the keeping and maintaining of employee records.

Petrolink ensures that employees' records remain confidential and has adopted procedures and security methods for accessing data, preventing unauthorised access and removal of staff records from the workplace. Any information identified as no longer necessary will be securely destroyed and removed from computer records.

Petrolink takes very seriously the right to privacy of our clients, customers, suppliers, contractors and contacts as well as our employees. You must not pass any personal information in relation to a client, customer, supplier, contractor, contact or colleague to any third party unless you have been specifically authorised to do so. If you are unsure whether you can disclose the information you should contact your line manager for advice.

### 3.8 Anti-Bribery and Anti-Corruption

Petrolink complies with all applicable laws including but not limited to compliance with anti-bribery and anti-corruption laws such as the UK Bribery Act 2010, the Isle of Man Bribery Act 2013 and the USA's Foreign Corrupt Practices Act 1977. To this end, you must at all times ensure compliance with the Petrolink Global Anti-Bribery and Corruption Policy.

No Petrolink employee may offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. Failure to comply with any anti-bribery laws will result in disciplinary action, dismissal, legal proceedings and possibly imprisonment.

It is not acceptable for you, or someone on your behalf to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- Accept a payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return; or
- Threaten or retaliate against another employee or person working on behalf or representing Petrolink who has refused to commit a bribery offence or who has raised concerns under this policy.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are normally payments made in return for a business favour or advantage. Petrolink does not make facilitation payments or kickbacks of any kind and you must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by Petrolink.

If you are asked to make any payment on behalf of Petrolink, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods

or services provided. You should always ask for an invoice or a receipt which details the reason for the payment. If you have any suspicions or queries regarding a payment you should raise these with your country manager or the Legal Coordinator.

Petrolink is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment you should inform your country manager or the Legal Coordinator immediately.

### 3.9 Gifts and Hospitality

Reasonable gifts and hospitality may be appropriate during the normal course of business but must never compromise the integrity of Petrolink's business relationships.

In general, gifts, entertainment and hospitality should not:

- Be offered and accepted during any bidding process;
- Be solicited;
- Be offered to or accepted by the same recipient with unreasonable frequency; or
- Violate applicable law or policies.

Gifts to business contacts are not permitted. The only exception is the usual practice of providing appropriate business-related items bearing the Petrolink logo and must always be approved in advance by your line manager and comply with Petrolink's Anti-Bribery and Corruption Policy. Petrolink will not accept claims for any gift which is not acceptable in a professional sense and which would be questioned by Petrolink's auditors.

Gifts offered to Petrolink employees must be declined and the offer reported to your line manager. The only exception is the offer of appropriate business-related items bearing the logo of the company concerned.

### 3.10 Reporting and Investigation

Petrolink encourages employees to discuss any concerns informally whenever possible and, if necessary to report formally any wrongdoing or malpractice within the workplace which they believe has occurred or is likely to occur. We all have a duty to help Petrolink uncover and address illegal activities and promote appropriate action on ethical issues.

There are a number of ways to report issues which are detailed in the Whistleblowing section of the Petrolink Employee Handbook (the "Handbook"). If you raise a legitimate concern about wrongdoing or malpractice your issue will be taken seriously, treated as confidential, to the extent practical or to the extent permissible by law and you will not be subject to any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated.

There may be matters that cannot be dealt with internally and external authorities may also be involved. As an employee you are expected to cooperate fully with all internal and external investigations or audits.

Any individual who makes a disclosure in good faith, in a timely manner and in accordance with the Code and the procedures outlined in the Handbook will not be subject to any action by virtue of having made the disclosure. This is provided that the making of the disclosure does not constitute a criminal offence itself.

Failure to properly disclose any such matters of which you are aware or making a disclosure that is not in good faith may lead to disciplinary action, up to and including termination of employment and legal action in some cases.

#### **4. Conclusion**

Everyone at Petrolink is responsible for making sound decisions that comply with both the letter and spirit of the laws governing our actions. We must all work together to create a respectful working environment and continue to build a company in which we can be proud.

The Code will be updated periodically to reflect changes in law and/or in Petrolink policies. If you have any suggestions to improve the legal and ethical culture at Petrolink, please contact the Legal Coordinator.

The Code does not provide any rights, contractual or otherwise, to any third parties or to any personnel of the Petrolink Group.