



NOROIL - CODE OF CONDUCT

Code of conduct

This Code applies to every employee, director, officer, employee in every NOROIL company. Consultants who are agents of, or in any way working on behalf of, or in the name of a NOROIL company, are required to act consistently with the Code when acting on our behalf.

Where a NOROIL company has formally been designated the operator of a Joint Venture, that NOROIL company must apply the Code to the operation of the Joint Venture.

In NOROIL, we all share the same set of core values; integrity, honesty and respect for people. Each of us plays our part in protecting and enhancing our reputation, by making a commitment to our core values in our working lives.

1.0 YOUR RESPONSIBILITIES

- 1.1 Your Individual Responsibilities
- 1.2 Your Integrity Check
- 1.3 Seek Advice and Speak Up
- 1.4 Manager's Responsibilities

2.0 OUR BEHAVIOURS, PEOPLE AND CULTURE

- 2.1 Health, Safety, Security, Environment and Social Performance
- 2.2 Human Rights
- 2.3 Harassment
- 2.4 Equal Opportunity
- 2.5 Use of IT and Electronic Communications
- 2.6 Insider Dealing
- 2.7 Protection of Assets

3.0 MANAGING RISK IN INFORMATION AND COMMUNICATION

- 3.1 Data Privacy
- 3.2 Intellectual Property
- 3.3 Information and Records Management
- 3.4 Disclosure and Business Communications

4.0 MANAGING RISK IN THIRD PARTY AND INTERNATIONAL INTERACTIONS

- 4.1 Anti-bribery and Corruption
- 4.2 Gifts and Hospitality
- 4.3 Conflicts of Interest
- 4.4 Anti-money Laundering
- 4.5 Political Activity and Payments
- 4.6 Antitrust
- 4.7 Trade Compliance