

## INTRODUCTION:

### Who is our Code of Conduct for

This Code applies to every member and stakeholder in SEEPCO. Contract staff working for a SEEPCO company must also follow the Code. Contractors and consultants who are agents of, or working on behalf of, are required to act consistently with the Code when acting on our behalf.

## OUR CORE VALUES AND BUSINESS PRINCIPLES

At SEEPCO, we share a set of core values – Ownership, Collaboration, Operational Excellence, Agility, Cost Optimisation Obsession, and Delivering Exceptional Results. By making a commitment to these in our working lives, each of us plays our part in protecting and enhancing SEEPCO's reputation. Our shared core values underpin all the work we do and are the foundation of our Code of Conduct and the SEEPCO General Business Principles. This Code of Conduct describes the behaviour SEEPCO expects of you and what you can expect of SEEPCO.

### YOUR RESPONSIBILITIES

Whatever your role with SEEPCO, we expect you to commit to following the Code in the work you do every day. This section outlines your responsibilities and offers a guide to ethical decision-making. There is also a section detailing the manager's responsibilities. Remember – if you know or suspect someone is violating the Code, please speak up.

- Understand the risks in your role and how to manage them.
- Seek advice when things are not clear.
- Promptly complete the ethics and compliance training assigned to you.
- Make sure that any third-party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly.
- Speak up. It is your duty to report any suspected violations of the Code.

## **YOUR INDIVIDUAL RESPONSIBILITIES**

- **DO THE RIGHT THING**

The Code of Conduct is for you. It sets the boundaries within which all SEEPCO staff must operate every day, without exception. Read it. Understand it. Follow it.

- **YOUR RESPONSIBILITIES**

Understand the risks in your role and how to manage them. Seek advice when things are not clear. Promptly complete the ethics and compliance training assigned to you. Make sure that any third-party contractors, agents or consultants you work with are aware that we are bound by our Code and that they should act accordingly. Speak up. It is your duty to report any suspected violations of the Code.

- **WHAT HAPPENS IF I VIOLATE THE CODE?**

Violations of the Code and the relevant policies as indicated can result in disciplinary action, up to and including dismissal. In some cases, SEEPCO may report a violation to the relevant authorities, which could also lead to legal action, fines or imprisonment.

## **YOUR INTEGRITY CHECK**

Our Code of Conduct cannot give you specific advice for every situation, dilemma or decision. To help you or your team think about any particular dilemma you may have relating to our Code of Conduct, work through the questions in the Integrity Check.

## **SEEK ADVICE AND SPEAK UP**

If you would like advice on any matter relating to the Code or wish to report a concern, speak to your line manager, the SEEPCO Ethics & Compliance Office, a Human Resources or SEEPCO Legal representative. Alternatively, you can contact the Global Helpline, which is available 24 hours a day, seven days a week, via a telephone number in each country or

through the internet. It is staffed by an independent third party. You can call or submit a report anonymously if you wish.

## **MANAGER'S RESPONSIBILITIES**

We depend on our managers to promote our ethical standards and act as role models for their teams. So, we expect managers to show leadership in following our Code and maintaining a culture of commitment to Ethics and Compliance, where it is normal to do the right thing and people feel confident about speaking up.

### **AS A MANAGER YOU MUST:**

Understand and follow the Code. Understand the main Code violation risks that apply in your business or function and the procedures to mitigate them. Ensure your staff make time to complete promptly the Ethics and Compliance training assigned to them. Ensure your staff understand the procedures they should follow to avoid violating the Code, including recording gifts and hospitality and potential conflicts of interest in the Code of Conduct Register. Make sure anyone new to your team is briefed promptly on our Code of Conduct, the Code risks in their role, and where they can seek advice and support. Be alert to any violations of the Code, and encourage your team members to speak up if they know or suspect a violation. If you are told of a possible violation of the Code, you have a duty to report it. You may refer it to the SEEPCO Ethics & Compliance Office, Human Resources, SEEPCO Legal or the Global Helpline. You must also ensure you keep all reported concerns confidential. Never take it upon yourself to investigate the matter. Decide and implement appropriate consequence management in response to a violation of the Code.

## **OUR BEHAVIOURS, PEOPLE AND CULTURE**

We want SEEPCO to be a great place to work, and we want to protect our reputation among customers, suppliers, governments and communities as a company that always strives to do the right thing. To do that, we need everyone doing business on behalf of SEEPCO to live up to our core values of honesty, integrity and respect for people. This section of our Code of Conduct sets out the standards of good behaviour that we expect from you – and that you have the right to expect from your colleagues. Remember – if you know or suspect someone is violating the Code, please speak up.

## HEALTH, SAFETY, SECURITY, ENVIRONMENT AND SOCIAL PERFORMANCE

SEEPCO is helping to meet the world's growing energy needs in ways that are economically, environmentally and socially responsible. Our aim is to achieve Goal Zero, with No Harm and No Leaks. We are committed to the goal of doing no harm to people and protecting the environment while developing energy resources, products and services in a way that is consistent with these objectives. We aim to earn the confidence of our customers and shareholders, as well as contribute to the communities in which we operate as good neighbours, creating lasting social benefits. Every SEEPCO company, contractor and joint venture under SEEPCO operational control is required to have a systematic approach to the management of Health, Safety, Security, the Environment and Social Performance (HSSE&SP), designed to ensure compliance with the law and to achieve continuous performance improvement, while promoting a culture in which all SEEPCO staff and contractors share this commitment. Each SEEPCO company is expected to set targets for HSSE&SP improvement and measure, appraise and report performance levels. The SEEPCO HSSE&SP Control Framework supports effective and efficient implementation of our HSSE&SP Commitment and Policy across SEEPCO. This is how we manage the impacts of our operations and projects on society and the environment.

### YOUR RESPONSIBILITIES

You must follow the three Golden Rules:

- Comply with the law, standards and procedures.
- Intervene in unsafe or non-compliant situations.
- Respect our neighbours.

You must ensure that your work complies with the HSSE&SP Commitment and Policy. You must follow the 9 Life-Saving Rules. You must report and act on an HSSE&SP incident, potential incident or near miss as soon as you become aware of it.

## HUMAN RIGHTS

Conducting our activities in a way that respects human rights is a business imperative for SEEPCO and supports our licence to operate. Human rights requirements are embedded in our existing framework, manuals and policies and include:

**Social Performance:** All major projects and facilities must have a social performance plan and address the social impacts of our operations on local communities.

**Security:** Company-wide security requirements help keep staff, contractors and facilities safe in a way that respects human rights and the security of local communities.

**Human Resources:** Our policies and standards help us establish fair labour practices and a positive work environment.

**Contracting and Procurement:** We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible. We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

## **YOUR RESPONSIBILITIES**

You must ensure that your work complies with SEEPCO commitments to human rights in Social Performance, Security, Human Resources as well as Contracting and Procurement. If you know of or suspect any potential human rights violations relating to our business, it is your duty to speak up.

## **HARASSMENT**

SEEPCO will not tolerate harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect and avoid situations that may be perceived as inappropriate. Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner. In particular, be aware of cultural sensitivities – what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences.

## **YOUR RESPONSIBILITIES**

You must treat others with respect at all times. You must not physically or verbally intimidate or humiliate others. You must not make inappropriate jokes or comments. You must not display offensive or disrespectful material. Challenge someone if you find their behaviour hostile, intimidating, humiliating or disrespectful. You may always contact your line manager, the SEEPCO Ethics & Compliance Office, Human Resources, SEEPCO Legal or the Global Helpline.

## **EQUAL OPPORTUNITY**

At SEEPCO, we offer equal opportunities to everyone. This helps us ensure we always draw on the widest possible talent pool and attract the very best people. We rely on everyone at SEEPCO to continue our record on equal opportunity. Sometimes people can breach equal opportunity policies without even realising it – for example, if they are unconsciously biased towards recruiting people like themselves. Therefore, you should always strive to be objective and ensure your personal feelings, prejudices and preferences are not influencing your employment-related decisions. You also need to be aware of local legislation that may impact employment decisions.

## **YOUR RESPONSIBILITIES**

When making employment decisions, including hiring, evaluation, promotion, training, development, discipline, compensation and termination, you must base them solely on objective factors, including merit, qualifications, performance and business considerations. You should understand the value of diversity and must not discriminate in any way based on race, colour, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin or nationality.

## **USE OF IT AND ELECTRONIC COMMUNICATIONS**

SEEPCO supplies you with IT and electronic communications so that you can conduct your work in a secure and compliant manner. Your responsibilities when using IT and electronic communications are set out below. IT and electronic communications include hardware, software and all data that is processed using these. They may include your IT equipment

when this has been authorised for business use by your line manager. SEEPCO logs and monitors use of its IT equipment and any equipment which is connected via the SEEPCO network.

## **YOUR RESPONSIBILITIES**

You must comply with SEEPCO IT security requirements. Refer to the Cyber Fundamentals in the Information Point for more information on your responsibilities. You must not use personal email accounts for work communications, unless you are authorised to do so by your line manager. You must not share your SEEPCO IT login details with others. You must not modify or disable security or other configuration settings downloaded by SEEPCO to your own IT equipment unless instructed to do so by SEEPCO IT. You must keep your personal use of SEEPCO IT and electronic communications, including social media use, occasional and brief and not use the SEEPCO name or brand in personal emails. If you have a corporate mobile phone, you must follow the policy for acceptable use. You must not access, store, send or post pornography or other indecent or offensive material when using SEEPCO IT and communication facilities, nor must you connect to online gambling sites or conduct unlawful activities. You must not store or transmit image or (streaming) media files or otherwise generate high network traffic or data storage costs due to personal use. You must not conduct your personal business activities using SEEPCO IT or communication facilities, or support others to do so. You must only use approved internet-based services (whether commercial, consumer or free-to-use) to store, process or share business information as defined in the Group rules.

## **INSIDER DEALING**

At SEEPCO, we comply with national and international laws on insider dealing (i.e., trading in shares or other securities when you have inside information about a company). Inside information is knowledge held within the Group that is precise, not generally available and which, if it did become available, would be likely to have a significant effect on the market price of shares or other securities of SEEPCO plc or any other listed company. Dealing based on inside information includes directly trading in securities and also passing inside

information on to another person who uses that inside information to trade in shares or other securities. Insider dealing is both illegal and unfair.

### **YOUR RESPONSIBILITIES**

You must not share inside information about SEEPCO plc unless you are authorised to do so. You must not deal in SEEPCO plc securities when you have inside information. If you are on the Employee Insider List, you must not deal without first obtaining clearance. If you come across inside information about any other publicly listed company in the course of your work, you must not deal in that company's shares or securities until any inside information you have becomes public. You must also not share the information with anyone unless you are authorised to do so.

### **PROTECTION OF ASSETS**

SEEPCO assets come in many different forms – physical, electronic, financial and intangible. Whether it is a SEEPCO laptop, our brand or even a facility or building, we expect everyone to take good care of our assets.

### **YOUR RESPONSIBILITIES**

You are personally responsible for safeguarding and using SEEPCO assets appropriately. You must not commit, and you must protect SEEPCO against, waste, loss, damage, abuse, fraud, theft, misappropriation, infringements and other forms of misuse. You must protect company property that has been entrusted to you and play your part in protecting SEEPCO shared assets against loss or misuse. Be alert to the risk of theft. You must not unlawfully conceal, alter or destroy documents. You must only use your corporate credit card for reasonable and approved business expenses, and you must not use it for purchases of items in prohibited categories. You must also play your part in protecting SEEPCO shared assets – such as a photocopier or a building. Although you are not personally accountable or liable for these, you should help to look after them, and if someone else is putting them at risk or using them inappropriately, intervene or report the matter.

### **MANAGING RISK IN INFORMATION AND COMMUNICATION**



Our work for SEEPCO depends on the use and exchange of information. In our everyday work, we all handle information and communicate in many different ways, and we need to consider the risks associated with these activities. These risks include the risk that personal data or SEEPCO's intellectual property could fall into the wrong hands. Careless communication or an unauthorised disclosure could also damage our reputation or result in legal action. This section of our Code of Conduct is designed to deal with this type of risk.

## **DATA PRIVACY**

Data privacy laws safeguard information about individuals – their personal data. At SEEPCO, we respect the privacy rights of our staff, customers, suppliers and business partners. We are committed to managing personal data in a professional, lawful and ethical way. Personal data is broadly defined as any information relating to an identified or identifiable individual, such as name and contact details. More private information, such as race or ethnic origin, health data, sexual orientation, criminal behaviour or trade union membership, is sensitive personal data and subject to more stringent requirements. We may only process personal data for legitimate purposes, and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. When it is to be transferred to third parties, it must be appropriately safeguarded. If we do not comply with these requirements, we risk causing harm to individuals, being ordered to cease the processing, and could face fines or litigation. We are also putting SEEPCO's reputation at risk.

### **YOUR RESPONSIBILITIES**

You must identify the privacy risks before collecting, using, retaining or disclosing personal data, such as in a new IT system, project or marketing initiative. You must only process personal data for specific, defined, legitimate purposes. When you process or share individuals' personal data, you must always inform them. In some cases, you will need to get their prior consent. You must always protect personal data if it is shared with a third party. If you are not sure whether you need consent or how to protect personal data when sharing with a third party, always seek advice from SEEPCO Legal or the SEEPCO Ethics &

Compliance Office. You must ensure that personal data in your possession is kept up to date and disposed of when no longer required.

## **INTELLECTUAL PROPERTY**

At SEEPCO, we have great brands, ideas and technology, which have given us a great reputation that we all need to protect. These valuable brands, ideas and technology also need protecting, as do trademarks, patents, know-how, trade secrets and other IP rights, and put to optimal use for SEEPCO. It is equally important that we respect and avoid infringing the IP rights of others. Not doing so risks damage to our business and reputation and may impact our ability or licence to operate.

### **YOUR RESPONSIBILITIES**

You must use SEEPCO's brands and trademarks appropriately, following the Brand Standards. You must report your innovations and inventions to SEEPCO Legal IP. You must classify and store SEEPCO business and technical information appropriately and with appropriate access controls. You must not disclose SEEPCO's confidential information outside SEEPCO without permission or an appropriate written agreement, and you must make a record of the information provided under the agreement. You must not accept confidential information from a third party unless you have permission to do so and you have agreed to receive it under a prior written agreement. You must not misuse confidential information of a third party. If you are responsible for introducing new brands in a market or new proprietary technology, you must first consult SEEPCO Legal IP to mitigate the risk of SEEPCO infringing IP rights of others. If you notice that a third party is infringing or misusing SEEPCO IP rights, for example, by passing on documents containing confidential information, it is your duty to speak up.

## **INFORMATION AND RECORDS MANAGEMENT**

Like all organisations, we depend on the use and exchange of information for our business decisions and day-to-day activities. We need to ensure we create, use responsibly and protect this information, especially when it comes to data such as personal details, commercially sensitive information and intellectual property – both our own and that of others. We need to take special care to protect confidential information when we are away

from the SEEPCO environment. We also have a duty to ensure we retain proper Records of our business activities to preserve corporate memory and meet legal and regulatory requirements.

### **YOUR RESPONSIBILITIES**

You must assess the risks associated with any information you handle so you can properly manage the risks and protect the information. When you create or receive information, you must assign it a confidentiality classification, declare it as a Record if required, store it in an approved Group repository, only share it with those who are entitled and permitted to receive it and follow the more detailed Information Management requirements and guidance materials. If you are working with third parties, you must ensure you are authorised to share information before doing so. If you have been instructed by SEEPCO Legal to preserve information, you must ensure it is kept as directed.

## **DISCLOSURE AND BUSINESS COMMUNICATIONS**

We communicate in all sorts of ways – and, as SEEPCO staff, everything we write or say reflects on SEEPCO’s reputation. Whichever media you use, either within SEEPCO or externally, we expect you to follow SEEPCO’s rules on disclosure and business communications, including the additional rules that apply to email and social media.

### **• YOUR RESPONSIBILITIES**

You must not disclose information about SEEPCO’s business activities unless you are authorised to do so. That applies to the things you say, as well as anything in writing. You must not engage with the media on behalf of SEEPCO without disclosure clearance from SEEPCO Media Relations. You must consult with Investor Relations before engaging with the investment community. If it is part of your role to provide information to the public and/or the investor community on SEEPCO’s business and finances, including through social media, you must ensure you have the proper clearance and that the information you give is true, accurate, consistent and not misleading. You must follow all relevant Group Standards and Manuals and ensure you use approved language, consistent with the SEEPCO Style Guide, when using terms such as ‘SEEPCO’ or ‘Group’ and always use a medium that is appropriate for your message.

## **MANAGING RISK IN THIRD-PARTY AND INTERNATIONAL INTERACTIONS**

Every time SEEPCO deals with a customer, business partner, joint venture, government official, competitor or any other stakeholder, we need to understand the risks as well as the opportunities. We also need to ensure that SEEPCO's cross-border interactions comply with all relevant trade legislation. If we do not comply with the law, it could lead to fines for SEEPCO or serious harm to our business. Individuals could also face fines or imprisonment. This section of our Code of Conduct is designed to help you keep your business interactions legal, ethical and professional, ensuring that you protect yourself from any suspicion of wrongdoing and safeguard SEEPCO's reputation. Remember – if you know or suspect someone is violating the Code, please speak up.

## **ANTI-BRIBERY AND CORRUPTION**

At SEEPCO, we build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments. Even unsubstantiated claims of bribery and corruption may damage SEEPCO's reputation.

### **YOUR RESPONSIBILITIES**

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so on your behalf. You must not make facilitation payments. If a facilitation payment has been requested or made, you must immediately report it to your line manager and the SEEPCO Ethics & Compliance Office or SEEPCO Legal or to the Global Helpline. If you make a payment because you genuinely believe your life, limb or liberty is at risk, this is not a facilitation payment but must be reported as if it were. Know who you are doing business with by conducting the appropriate due diligence as set out in the ABC and AML Manual. Dealing with government officials poses a greater bribery risk, so you must follow the mandatory requirements in the ABC and AML Manual. You must report corrupt behaviour. Turning a blind eye to suspicions of bribery and corruption can result in liability for SEEPCO and for individuals.

## **GIFTS AND HOSPITALITY**

It is important to do the right thing – and to be seen to do it. For this reason, we discourage our staff from accepting Gifts and Hospitality (G&H) from business partners or offering G&H to them, especially those you would not be comfortable telling your manager, colleagues, family or the public that you had offered or accepted. In particular, you should never allow G&H, either offered or received, to influence business decisions or give other people a reason to suspect there might be an influence. We encourage you to make SEEPCO's policy on G&H known to our agents and business partners, including governments and government officials.

### **YOUR RESPONSIBILITIES**

You must not, either directly or indirectly, offer, give, seek or accept:

- Illegal or inappropriate G&H, cash or cash equivalents (including per diems unless contractually agreed), vehicles, personal services, or loans in connection with SEEPCO business.
- G&H where the business partner is absent, or during periods when important business decisions are being made.
- G&H that exceed prescribed value limits, unless line manager and other required approvals have been obtained.

You must register in the Code of Conduct Register:

- All G&H given or received above the prescribed value limits for government officials or other third parties.
- Any G&H that could be perceived as influencing or creating a Conflict of Interest.
- And declined gifts of cash or of an excessive nature, including personal items.
- When offering G&H to a government official, you must not offer or pay for additional days of travel to tourist destinations or private visits; family members/guests (unless approved by an ABC SME).
- In advance of offering any G&H to a government official where the value is greater than the prescribed value limits, you must request advance approval via the Code of Conduct Register.

- Before accepting a prize obtained in the course of your role above the prescribed value limits, you must enter the details in the Code of Conduct Register and obtain approval from your line manager.

## **CONFLICTS OF INTEREST**

Conflicts of Interest (COIs) may arise when your personal relationships, participation in external activities or an interest in another venture could influence or be perceived by others to influence your business decisions for SEEPCO. An actual, potential or perceived COI may jeopardise your reputation as well as SEEPCO's. You must avoid actual, potential or perceived COIs if possible.

### **YOUR RESPONSIBILITIES**

You must not let any decisions you make at SEEPCO be influenced by personal considerations such as relationships or outside interests of yourself, family or friends. You must register all actual, potential or perceived COIs in the Code of Conduct Register, whether or not you think it will actually influence your decision. If you are not sure whether such a conflict exists, you must consult your line manager, the SEEPCO Ethics & Compliance Office or SEEPCO Legal. Withdraw from decision-making that creates an actual, potential or perceived COI, or could be perceived as creating one.

## **ANTI-MONEY LAUNDERING**

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. All companies are at risk of being exploited in this way – and we must be on our guard to help protect our reputation and ensure we comply with the law.

### **YOUR RESPONSIBILITIES**

You must not knowingly deal with criminals, suspected criminals or the proceeds of crime. You must follow any due diligence requirement specified by SEEPCO so that we know who we are doing business with. You must ensure that your business transactions on behalf of SEEPCO do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime. You must not hide the origin or nature of criminal property. You

must not facilitate the acquiring, ownership or control of criminal property. If you have knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with SEEPCO, you must promptly report it to the SEEPCO Ethics & Compliance Office or the Global Helpline. To meet legal requirements, do not let the counterparty know of your suspicions. You must not falsify, conceal, destroy or dispose of relevant documents.

## **POLITICAL ACTIVITY AND PAYMENTS**

We all have our own interests outside work, and you have the right to engage in lawful political activity in your own time. However, we also need to protect SEEPCO's interests and reputation. It is therefore important that individuals keep their personal political activities separate from their role at SEEPCO.

### **YOUR RESPONSIBILITIES**

You must not use SEEPCO funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates or anyone associated with them. SEEPCO funds may not be used to support political action committees (PACs). Company resources such as office supplies, email, copy machines and telephones can only be used in support of the SEEPCO Employee PAC. You must not use SEEPCO funds to make political payments under the guise of charitable donations (see also the ABC and AML Manual). You must always make it clear that the political views you express or actions you take are your own and not those of SEEPCO, unless you are explicitly required to represent SEEPCO's views as part of your role. You must be aware of the rules on conflicts of interest and ensure that your participation in politically motivated activity does not involve you or SEEPCO in a conflict of interest. If you are standing for public office, you must consult and gain approval from your line manager before standing. You must also declare your interest in the Code of Conduct Register and comply with local laws regulating political participation.

## **ANTITRUST**

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to us, not just because it is the law, but because it is what we believe in. We expect SEEPCO staff to play their part in combating illegal practices. These include price fixing,

market sharing, output limitation or bid rigging, and anticompetitive or monopoly practices. Be vigilant in not entering into any kind of inappropriate conversation or agreement with our competitors.

### **YOUR RESPONSIBILITIES**

You must not agree with competitors, even informally, to fix price or any element of price, such as discounts, surcharges or credit terms. You must not agree with competitors to reduce or stabilise production, capacity or output. You must not agree with competitors to divide up particular customers, accounts or markets. You must not rig bids or tenders. You must not agree with others to boycott any customer or supplier except in connection with internationally imposed government sanctions. You must not attempt to set a minimum or any resale price for an independent dealer, distributor or reseller. You must not share or receive competitively sensitive information without a lawful reason. You must not discuss with competitors any matter on which competitors are not legally permitted to agree. You must follow the principle that all decisions on SEEPCO's pricing, production, customers and markets must be made by SEEPCO alone. You must leave industry meetings or other events if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to SEEPCO Legal or the SEEPCO Ethics & Compliance Office. You must speak up if you know of any potentially anti-competitive practices or if you are uncertain whether or not practices are legal.

## **TRADE COMPLIANCE**

Like any other global company, we must comply with all applicable national and international trade compliance regulations. Trade compliance includes regulations governing the import, export and domestic trading of goods, technology, software and services as well as international sanctions and restrictive trade practices.

- **YOUR RESPONSIBILITIES**

You must obtain, retain and communicate correct customs and export control classification on all goods and software moved internationally. For physical movements of goods and software, valuation and origin information is also required. You must follow company guidance when travelling with company-owned equipment and hardware,



including laptops, smartphones and other communication equipment. You must follow company procedures when utilising the services of trade/customs agents. You must follow company procedures when issuing or executing an End User Certificate. You must ensure third parties you deal with have been properly screened against applicable sanctions lists. You must stop and seek assistance from a Trade Control Manager when your dealings with a third party identify suspicious facts or 'red flags'. You must not deal in a sanctioned country or with a sanctioned party unless specifically authorised in accordance with company procedures. If you are authorised to deal in a sanctioned country or with a restricted or sanctioned party, you must strictly adhere to company guidance. You must obtain advice and assistance from your Trade Control Manager when manufacturing, selling, exporting or importing military, defence or drug-related items. You must classify, label and handle Controlled Technology in accordance with company procedures. You must stop and seek advice from a Trade Control Legal Advisor when confronted with a restrictive trade request.

## **CONCLUSION**

Of course, the Code cannot cover every situation, so whenever you are unsure of what to do, you must seek advice. Ask your line manager, the SEEPCO Ethics & Compliance Office, Human Resources, SEEPCO Legal or contact the Global Helpline. This is especially relevant if you suspect that someone is violating the Code and putting SEEPCO at risk. In that case, it is your duty to speak up. We hope you will refer to the Code whenever there are changes in your role or you face a new dilemma, or if you just need to refresh your memory. Above all, we want you to live by the Code every day, ensuring that your decisions are always aligned with SEEPCO's values and vision – making success natural.