

Our approach

The nature of SEEPCO's business means we have direct and indirect interactions with governments, regulators, policymakers and other political stakeholders. These interactions range from the practical requirements of obtaining new permits so that our business can operate safely and in line with regulations to broad public policy discussions.

SEEPCO General Business Principles – Political activities responsible engagement between the private sector and political stakeholders is an important part of effective policymaking. We employ many scientists and other experts, and we are often asked by governments, international organisations, non-governmental organisations, industry associations and wider society to share our views.

Our approach to corporate political engagement is guided by the SEEPCO General Business Principles, which outline our approach to political activities. This corporate political engagement statement is based on transparency and provides details of our approach in four main areas:

1. Internal governance
2. Political contributions
3. Responsible lobbying
4. Recruitment and secondments

Policy principles for political engagement

1. Internal governance

The SEEPCO General Business Principles, Code of Conduct and Ethics and Compliance Manual help everyone at SEEPCO act in line with these values and comply with relevant laws and regulations. How we engage with political stakeholders is outlined in the SEEPCO General Business Principles activities. All SEEPCO staff and people working in joint ventures we operate are expected to understand and behave in line with the SEEPCO General Business Principles. We promote the application of the SEEPCO General Business Principles,

or equivalent principles, in our relationships with contractors and suppliers and joint ventures that we do not operate. The SEEPCO General Business Principles are approved by the Board of SEEPCO. The application of the principles is underpinned by a comprehensive set of assurance procedures, which are designed to ensure that our employees understand the principles and confirm that they act in accordance with them. SEEPCO's Code of Conduct, Ethics and Compliance Manual and anti-bribery and corruption training provide guidance for employees on how they should comply with the SEEPCO General Business Principles, including on political activities. Our Corporate Relations department has responsibility for political engagement. Other parts of our organisation may also engage with political stakeholders with guidance from Corporate Relations. In each country where we operate, we have a Country Chair or equivalent representative who is accountable for overseeing all interactions with the government in that country and for overseeing compliance with local laws on political engagement. All expenditure related to political engagement must be approved in line with SEEPCO's internal governance controls. SEEPCO sometimes employs external consultants to support our political engagement activities, for example, to monitor political developments and, in some cases, to engage government officials on our behalf. These external consultants can only represent SEEPCO to government officials with approval from a senior SEEPCO executive. Our Ethics and Compliance Manual requires that any engagement of a third party dealing with government officials as part of their work for SEEPCO is subject to rigorous due diligence. All third parties who work for SEEPCO are also required to maintain adequate written policies and procedures to comply with anti-bribery and corruption laws or, alternatively, adhere to the SEEPCO General Business Principles and Code of Conduct.

2. Political contributions

SEEPCO companies do not make payments to political parties, organisations or their representatives. SEEPCO employees, suppliers or contractors acting on behalf of SEEPCO 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. Political

payments or in-kind contributions must never be made by or on behalf of SEEPCO companies or by industry associations with SEEPCO funds.

3. Responsible lobbying

SEEPCO engages governments, regulators and policymakers directly and indirectly, for example, through industry associations or advocacy coalitions. We advocate on public policy issues in line with the SEEPCO General Business Principles and based on our advocacy priorities, which are aligned with our business strategy across lines of business and geographies. SEEPCO senior executives approve our advocacy priorities each year. We have published our principles for participation in industry associations which govern the way we manage our relationships with industry associations.

4. Recruitment and secondments

We recognise that the recruitment or secondment of individuals between government bodies and business could raise concerns about conflicts of interest. If such movements across sectors are not managed carefully, they have the potential to damage public trust in holders of public office and the decisions they take. They could also have implications for SEEPCO's own reputation. Government bodies often have requirements relating to the recruitment and secondment of individuals to third parties. SEEPCO's Ethics and Compliance Manual sets out our requirements for the recruitment and secondment of individuals to or from third parties, including government bodies.