

SAPURA ENERGY SUPPLIERS CODE OF CONDUCT



ABOUT US

Sapura Energy Berhad (“Sapura Energy” or “Group”) is a global integrated oil and gas services and solutions provider operating across the entire upstream value chain. The Group’s spectrum of capabilities covers exploration, development, production, rejuvenation, as well as decommissioning and abandonment.

With a highly-skilled and technically-capable workforce, strategic world-class assets and strong project management capabilities, the Group today delivers its integrated solutions and expertise in over 20 countries. Headquartered in Malaysia, the Group is committed to purposeful, responsible growth while it strives to develop solutions and expand capabilities at the forefront of the energy industry.

Learn more at www.sapuraenergy.com.

OUR VISION

To be the best entrepreneurially led, technically competent and most trusted global oil and gas company in the eyes of our customers, shareholders and most importantly, our empowered people.

We will be guided by our honesty, trust and respect for all. We will achieve our business objectives by being safe, agile and professional to continuously strive to meet all of our stakeholders’ expectations.

HONESTY

- Promote a culture where integrity and ethical behaviour is the way we do things
- Communicate openly and always in touch with reality
- Demonstrate fairness and straightforwardness of conduct

TRUST

- Exhibit a reliable and supportive personality
- Maintain a consistent and objective approach to problems
- Value promises and commitment to deliver them

SAFE

- Promote a culture where safety is also the way we do things
- Be aware and alert to hazards for ourselves and team members
- Care about co-workers and take the time to visibly engage others

AGILE

- Able to listen, understand and be responsive
- Exhibit a ‘solution provider’ and proactive behaviour
- Dare to propose change and challenge our TMS – be flexible within the framework

RESPECT

- Esteem team members, subordinates and supervisors
- Inspire people and uphold truthfulness
- Maintain objectivity and fairness in judgment

PROFESSIONAL

- Value our people and our management system
- Consistently maintain high standards and stand firm in our beliefs
- Plan the work, work the plan, take and support tough decisions where required

CODE OF CONDUCT

Compliance with Laws, Rules and Regulations

- Comply with all applicable laws, rules and regulations

Health, Safety and Environment

- Promote a safe, secure and healthy workplace
- Apply continuous efforts to improve safety, security, health and environmental performance and foster appropriate operating practices and training

Corporate Governance and Ethics

- Strict compliance with regulations on bribery, corruption and prohibited business practices
- Should not tolerate, permit or engage in bribery, corruption or unethical practices
- Mindful of the principles of law relating to corrupt practices and not make or authorise any payment or give anything of value directly or indirectly to an official of any government for influencing an act or decision of official capacity or for assisting in obtaining or retaining business for or with, or for direction of business to any person
- Support fair trade practices by not engaging in collusive bidding, price discrimination, anti-competitive, anti-trust, or other unfair trade practices

Gifts, Gratuities & Hospitality

- Must refrain from offering gifts or hospitality which are inconsistent with acceptable Sapura Energy policies, practices and applicable laws

Monitoring and Compliance

- Monitor their own business activities
- Conduct periodic internal reviews, inspections and audits
- Ensure standards and requirements are properly communicated
- Suppliers to cooperate with any inquiries
- Maintain appropriate records in compliance with terms and conditions

Confidentiality

- Suppliers shall exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with the best interests of Buyer or any of its affiliated, related, or subsidiary entities. This obligation shall apply to the activities of the Supplier including, without limitation, establishing standards, procedures, and controls to prevent its employees or agents from making, receiving, providing, or offering substantial gifts, extravagant entertainment, payments, loans, or other consideration for influencing individuals to act contrary to the best interests of Buyer or its affiliated, related, or subsidiary entities.

Conflict of Interest

- Avoid any conflict of interest

Social Performance

- Suppliers respect their neighbours and contribute to the societies in which they operate

Application

- The requirements of this Supplier Code of Conduct are not subject to waiver. Neither Sapura Energy, its Suppliers, nor their personnel or representatives are authorized to propose or approve conduct inconsistent with this Code of Conduct.

