

CODE OF CONDUCT



العمانية للغاز الطبيعي المسال
Oman LNG

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ACRONYMS AND TERMINOLOGY

Acronym	Description
BOM	Business Operating Model
CoC	Code of Conduct
DGM	Deputy Chief Executive Officer
NG	Chief Executive Officer
HSE-MS	Health, Safety and Environment Management System
HSSE	Health, Safety, Security and Environment
IA	Chief Internal Auditor
LLC	Limited Liability Company
LNG	Liquefied Natural Gas
CMS	Corporate Management System
MoA	Manual of Authorities
MT	Management Team
NGF	Deputy CEO for QLNG and Chief Financial Officer
NGH	Chief Human Resources and Administration Officer
NGL	Legal Counsel
NGM	Chief Commercial Officer
OLNG	Oman LNG
ODF	Chief Executive Officer of Oman LNG Development Foundation
COO	Chief Operating Officer (Qalhat Complex/Plant Manager)
RD	Royal Decree
SGBP	Statement of General Business Principles



CHIEF EXECUTIVE MESSAGE

Our shared core values underpin everything we do and are the foundation of Oman LNG's (OLNG) Statement of General Business Principles. Our behaviors shape our reputation as each one of us acts in accordance with the law and the ethical standards set out in our Business Principles.

Our Statement of General Business Principles evolves and remains adaptive to meet the highest level of transparency in ethics and compliance, with the aim to ensure that we have the capabilities and motivation to act with integrity and protect our business.

With the publication of this Code of Conduct, we aim to provide clarity and greater detail on the standards and behaviors that we expect from all our employees and all partners who work with us. Based on our beliefs, values, and principles as they apply to our everyday business life.

The Management Team and I confer the utmost importance to the Code of Conduct in clarifying the standards we expect. In providing this clarity, it is also important for all of us to realize that these standards are not open to compromise, and failure to comply may lead to significant negative business impact and disciplinary action.

Finally, we want to encourage an open culture within Oman LNG where people are able to ask if they are unsure what compliance means in certain circumstances. We also want concerns to be raised, dilemmas discussed and escalated, if needed.

If you have a reason to believe the Code has been breached by anyone in OLNG, you have a responsibility to report such concerns. The Code sets out how you may do this, including details of our "Whistle Blowing" procedure. I reiterate here what is written in the Code, "anyone who speaks up without malice will be offered confidentiality and assurance of freedom from any form of retaliation."

We believe that our reputation and our future success are critically dependent on compliance with not only the law, but also with the highest ethical standards. A reputation built on integrity is a priceless asset and continues to serve us well. This Code of Conduct should help clarify our commitment to our reputation for integrity and will, I hope, help us to safeguard that invaluable asset.

We thank you for taking this matter seriously and faithfully

Hamed Al Naaamany
Chief Executive Officer



EXPLAINING THE CODE OF CONDUCT




OLNG re-issued its Statement of General Business Principles, which together with the Corporate Management System shape how we organise ourselves and are expected to work together to achieve our strategic objectives in the years to come. You can refresh your understanding of the OLNG General Business Principles by referring to Statement Of General Business Principles [NG-P007].

Many of us face legal and ethical dilemmas in our work and must find an appropriate solution or decide how to act. Simply put, in such situations you must follow applicable laws, follow OLNG's rules and apply basic common sense and high ethical

standards. By doing so, you will help ensure that together we do the right thing and that you are never embarrassed to tell your family, friends, colleagues, media and the communities in which we operate what we have done. If you are ever in doubt, seek advice as set out in the following pages.

It is befitting to provide clarity on the conduct we expect our employees to follow and the behaviours we expect them to adopt. It is not sufficient that we comply with all relevant laws and regulations, but we also need to make sure that our individual behaviour is in line with the OLNG core values.

CORE VALUES AND CORRESPONDING BEHAVIOURS

 INDIVIDUAL	 ORGANISATION	 BUSINESS
<p>Integrity</p> <ul style="list-style-type: none"> • Living the OLNG values • Doing what is right even if: <ul style="list-style-type: none"> - No one is looking - You know you could get away with something <p>Professionalism</p> <ul style="list-style-type: none"> • Producing Quality work at all times • Efficiency and effectiveness in carrying out assigned roles and responsibilities <p>Accountability</p> <ul style="list-style-type: none"> • Deliver on promise based on agreed targets • Demonstrate Ownership of mandated assignments 	<p>Team work</p> <ul style="list-style-type: none"> • Collaborative approach to deliver on organisational objectives • Synergy of effort in managing interface <p>Care & Respect</p> <ul style="list-style-type: none"> • Listen to concerns of stakeholders • Respecting diversity • Consideration of stakeholders' needs <p>Empowerment</p> <ul style="list-style-type: none"> • Have confidence and trust on delegated in staff to execute delegated tasks and responsibilities competently • Coaching and mentoring to continuously develop staff 	<p>Transparency & Fairness</p> <ul style="list-style-type: none"> • Engage staff/stakeholders in an open, transparent and timely manner • Provide equal opportunity to all staff without prejudice • Impartiality in staff reward and recognition • Build courage to give objective feedback <p>Reputation / Loyalty</p> <ul style="list-style-type: none"> • Compliance with the law and business principles in order to maintain credibility with stakeholders and the license to operate • Uphold business interests at all times without breaching organisational confidentiality

What is the Code of Conduct?

This Code of Conduct covers a wide range of business practices and procedures, referred to in OLNG's Statement of General Business Principles. The Code highlights the basic rules, standards and behaviours that are expected of each of us in living our core values. It explains requirements and gives guidance to OLNG employees working in areas of our business that can pose a risk to business and reputation if incorrect behaviours are adopted.

The Code of Conduct is a common reference point for anyone who is unclear about what is expected of them in specific situations; a definitive statement of OLNG's response to many

different issues and questions aimed at helping you to navigate the sometimes difficult choices you face in your work at OLNG; a valuable tool kit that can help you put OLNG General Business Principles into practice and avoid situations that may damage you or OLNG.

The content of the Code of Conduct is a summary of existing legal and policy requirements, with guidance on how to meet those requirements. The value of the Code is that this material has been brought together into a single document which provides a clear common basis for compliance. As such, it is an important component of the OLNG's Corporate Management System.

What does it not cover?

As a company-wide document, the Code of Conduct does not provide detailed guidance about compliance with every legal requirement and ethical standard. As an OLNG employee, you are responsible for compliance with the national and local laws and regulations in force which apply to your work from time to time, as well as with the Code. You are expected to familiarise yourself on a continuous basis with the Code's content and best practices surrounding its application. The Code does not provide exhaustive information about every single OLNG standard or policy. You are responsible for understanding and complying with the details of the policies relevant to your department, your role and work area.

It is important to note that the Code of Conduct does not remove the need for us all to exercise good judgement – it just makes it easier for every one of us to do so. We all have a responsibility, to OLNG and to each other, to work with integrity and good judgement as well as within the law. We also trust you to exercise your judgement in deciding if the Code covers any issue in sufficient detail to help you make the right decision.

How can the Code help you?

It is impossible to predict all the challenges you will face as an OLNG employee. When faced with questions about business conduct and behaviour, the Code is a place to start the search for guidance, advice and answers, because it provides a great deal of useful information.

- It provides practical advice on how to comply with laws and regulations
- It provides solid principles for you to follow and guidance about how you should relate to colleagues, customers, vendors, competitors, shareholders and communities
- It directs you to other useful information sources
- It can help you resolve difficult questions about business conduct – and it explains how to get confidential advice.

In some cases you may need to read more detailed material to understand fully what is required. We have included links to help you access further information, and advice on where to get help on the subject areas covered in the Code of Conduct and what they mean to you personally. You also have a responsibility to accept personal invitations to training on the topics highlighted in the Code.

Your supervisor, manager or other senior OLNG persons with whom you feel comfortable to have a conversation about the topics highlighted in the Code should always be available to help when making the right judgement is perhaps difficult. You can also consult internal experts on the relevant subject matter for advice.

Who must follow the Code?

Every employee of OLNG, whether on contract, permanent or on secondment, must follow the Code of Conduct. Contract staff must also follow the Code. Contractors or consultants who are our agents, as they are working on our behalf or 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 or consultants will be made aware of the Code as it applies to our staff in their dealings with them.

How can you report a violation of the Code?

If you believe a provision of the Code of Conduct has been or is being violated, you have a responsibility to raise your concerns with someone who can deal with the situation. You can do this through the normal management or Human Resources channels, or by contacting the OLNG Legal Department.

If you prefer, you can follow the "Whistle Blowing Policy" to report a suspected violation by telephone or via e-mail (See **NG-P044** Whistle Blowing Policy). Your concerns will be taken seriously and investigated quickly. If you wish, your anonymity will be protected. If a violation of the relevant laws or policies is proven, appropriate action will be taken.

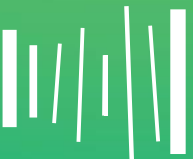
You can be absolutely sure that retaliation of any kind directed against anyone who reports an issue concerning the Code of Conduct will not be tolerated. OLNG will protect its employees against retaliation; in turn, it expects employees who know or suspect that retaliation has taken place to report it through the "Whistle Blowing Policy", or directly to the OLNG Legal Department. At the same time, anyone who files a report with the intention of spreading falsehoods or to threaten or damage any employee's reputation, will also be subject to disciplinary action.

What would happen to individuals who violate the Code?

Violation of the provisions of the Code of Conduct, or of any policies, procedures, laws or regulations governing our operations, may have severe consequences for the individuals concerned and also for OLNG. A failure to follow the Code that involves a criminal act could result in prosecution after referral to the appropriate authorities. Employees who violate the Code or any other policies, procedures, laws or regulations may also be subject to internal disciplinary action, including termination of employment. Losses incurred by OLNG as a result of misconduct may be recovered from the employee responsible.

To find out more on the consequences of any violation to any of the provisions of the Code, staff should refer to the Senior Manager, Policy, EVP and HR Operations (NGH/1), or to the Disciplinary Procedure in Ma'an Online.

HEALTH, SAFETY, SECURITY AND ENVIRONMENT (HSSE)



HEALTH, SAFETY, SECURITY AND THE ENVIRONMENT (HSSE)

How the Code can help you

You may have seen colleagues do something that you considered potentially dangerous to themselves, to others around them, or to the environment but not knowing what to do. The Code explains how you should react and provides a way to speak up about issues.

Background

OLNG is committed to achieving excellence in all its business activities, including health, safety and environmental performance. OLNG's overriding goal is to operate in environmentally and socially responsible ways and thereby:

- Do no harm to people
- Don't cause damage to assets
- Protect the environment
- Protect company reputation
- Comply with all laws and regulations

To demonstrate this commitment, we set targets for improvement and agree measures by which we appraise and report performance.

OLNG aims to provide a safe, secure and healthy working environment for all employees, contractors and suppliers. We believe that all accidents and occupational illnesses and injuries are preventable.

OLNG develops and uses energy resources, products, and services consistent with the goals outlined above and we are committed to contribute to sustainable development.

HSE Management

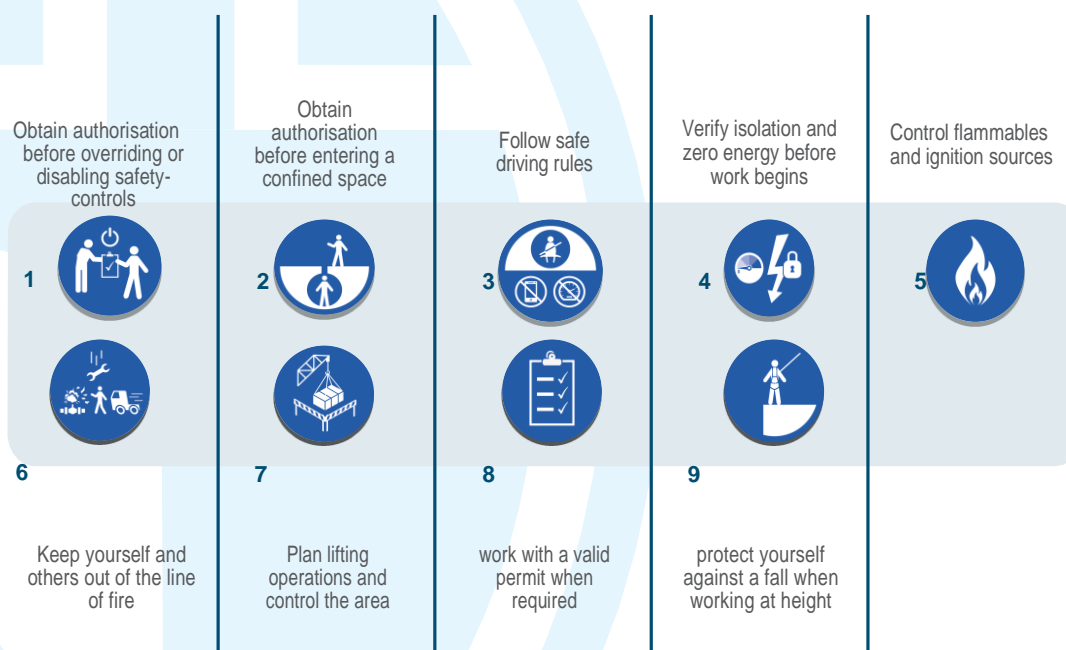
OLNG aims to play an industry-leading role in promoting best practice in the area of HSSE. OLNG has adopted a systematic approach to HSSE management and has established an assurance process for compliance with applicable laws, regulations and standards in HSSE and continuous improvement in performance.

OLNG owned and operated facilities must operate with the necessary permits, approvals and controls that are designed to protect health, safety and the environment. OLNG employees and secondees must, as part of their contractual obligations, to adhere to the Company's HSE regulations, policies and procedures at all times. OLNG's contractors, sub-contractors, suppliers and business partners are expected to commit to the same levels of HSSE protection as OLNG.

We also take responsibility for fostering awareness and responsible behaviour amongst our suppliers and customers.

HSSE Training and Evaluation

We provide on-going training to ensure that our commitment to excellence in HSSE management is reflected throughout the Company. Health, safety and environmental performance are key factors in evaluating and rewarding our employees and in selecting contractors, sub-contractors and suppliers.



HEALTH, SAFETY, SECURITY AND THE ENVIRONMENT (HSSE)

Sustainable Development

Sustainable development means helping to meet the world's growing energy needs in ways that are economically, environmentally and socially responsible. OLNG's commitment to sustainable development requires us to balance our short- and long-term interests; and integrate economic, health, safety, security, environmental and social considerations into business decisions. We aim to earn and maintain the confidence of our stakeholders and act as good neighbours, creating lasting social benefits.

OLNG embraces sustainable development principles within all its activities to deliver sustainable outcomes. This requires us to engage regularly with, and take account of the views of our stakeholders in order to create new profitable opportunities and reduce our technical, non-technical and financial risks while respecting the needs of our neighbours and contribute to communities where we operate.

Human Rights

Conducting our activities in a way that respects human rights is a business imperative for OLNG and supports our license to operate. In addition to sustainable development through social performance initiatives which seek to address the social impacts of our operations on local communities, we seek to work with companies that also strive to contribute to the general wellbeing of the communities in which we operate. This includes fair labour practices, and we assess and address the risks of child labour as well as potential violations of anti-human trafficking and anti-modern slavery laws. We are committed to ensuring child labour and modern slavery do not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce similar policies.

If you know of or suspect any potential human rights violations relating to our business activities, **it is your duty to speak up.**

Do

- 9 Understand and follow the ~~42~~-Life-Saving Rules; be aware of potential consequence management as per Ma'an in case of violations.
- 9 Make sure you are familiar with the laws, regulations, policies, and procedures that apply to your work.
- 9 Comply with the requirements of the HSSE management system at your place of work as well as all applicable Omani laws, decrees and regulations.
- 9 Make sure you handle and dispose of hazardous materials properly, safely and in compliance with permits, standards and procedures.
- 9 Intervene in unsafe or non-compliant situations.
- 9 Alert your supervisor or manager immediately to any situation which involves the discharge of a hazardous substance or which could potentially harm people or damage the environment.
- 9 Use personal protective equipment required for the task you are undertaking.

- 9 Follow OLNG procedures for making immediate reports of workplace injuries, unsafe work practices or conditions, or any other type of health, safety or environmental hazard.
- 9 Follow OLNG's procedures for making immediate reports of breaches of HSE laws or OLNG HSE requirements.

Don't

- 8 Don't start work when conditions are unsafe or carry out tasks for which you are not trained, competent, medically fit and sufficiently rested and alert.

FIND OUT MORE

For more information about HSSE standards, tools and resources please refer to:

- HSSE Control Framework
- ~~42~~-Life-Saving Rules
- HSE Management Procedure
- Ma'an Online
- NG-P002 HSSE Management System Manual
- [ODF-P201 Social Investment Programme Procedures].

PERSONAL AND BUSINESS INTEGRITY



PERSONAL AND BUSINESS INTEGRITY

BRIBERY AND CORRUPTION

OLNG has a clear position on bribery and corruption: OLNG employees do not offer or accept bribes. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including favours) by OLNG employees is unacceptable. At OLNG, we build relationships based on trust and we are determined to maintain and enhance our reputation. Even unsubstantiated claims of bribery and corruption may damage OLNG's reputation. It is important to do the right thing – and to be seen to do it.

How the Code can help you

A customer or supplier may offer you a gift or something else of value, such as the use of their company facilities in good faith. Such offer could contravene OLNG policies covering bribery, facilitation payments and kickbacks. The Code will help you make sure you do the right thing. This Code can also help you in complying with applicable local and international anti-bribery and corruption laws.

Background

Bribery occurs when you offer, pay, seek or accept a payment, gift or favour to influence a business outcome improperly. Bribery and corruption – whether involving government officials, or commercial entities – can be direct or indirect through third parties like agents or other service providers. It includes facilitation payments (see the paragraph explaining the meaning below) even though in some countries facilitation payments are legal. Even turning a blind eye to your suspicions of bribery and corruption can result in liability for OLNG and for you personally.

Applicable laws against bribery

- **PROHIBIT** the Company and any person or entity acting on OLNG's behalf from offering, promising, paying or authorising the payment, directly or indirectly, of anything of value (such as a bribe or kickback) to any employee, representative, official or agent of a contractor, supplier or Government with the intent to influence or reward any act of such official; and
- **REQUIRE** the Company and its employees to maintain accurate entries of all transactions in its books and records that properly reflect the nature of all payments, and maintain an adequate system of internal controls designed to detect and prevent improper payments (such as bribes and kickbacks).

Laws against bribery include:

- Oman Penal Code (Royal Decree 7/1994, as amended);
- Law for the Protection of Public Funds and Avoidance of Conflicts of Interest (Royal Decree 112/2011);
- Oman Ministerial Decision 129/2005 made pursuant to the Oman Labour Law – Royal Decree 35/2003, as amended;
- FCPA (United States Foreign Corrupt Practices Act of 1977, as amended);
- UK Anti-bribery Act of 2010;
- All applicable national laws adopted pursuant to the Organisation for Economic Co-operation and Development's Convention that prohibit the bribery of foreign officials in international business transactions; and
- All applicable national, regional, provincial, state, municipal or local laws and regulations that prohibit bribery that may relate to any transaction or business of Oman LNG from time to time.

Moreover, Oman has ratified the UN Convention against Corruption through Royal Decree 64/2013 and the Arab Anticorruption Convention (signed in Cairo on 21 December 2010) through Royal Decree 28/2014, which came into effect on 21 May 2014.

Facilitation Payments

OLNG policy makes no distinction between bribes and so-called 'facilitation payments', which are also prohibited. A facilitation payment is a small payment to a low-level public official, which is not officially required, to enable or speed up a process which is the official's job to arrange. We also seek to ensure that our agents, contractors, sub-contractors and suppliers do not make facilitation payments on our behalf.

What OLNG expects from employees

OLNG employees must never offer, pay, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage. This applies to transactions with a foreign or domestic government official or employee or with any private company or person, and whether in the conduct of domestic or international business. Also, it applies whether the payment is made or received directly or through a third party, such as an agent, representative, contractor, sub-contractor or distributor. OLNG employees should also ensure that charitable donations are not used as a substitute for bribery.

As an employee of OLNG, you must report any request for an improper payment (including facilitation payments), or any



indication that a person might be making corrupt payments or that a person has an inclination or plan to violate laws that prohibit bribery, immediately, to your line manager or Chief Internal Auditor, or OLNG Legal Counsel. If you make a payment because you genuinely believe your life or liberty is at risk, this is not a facilitation payment, but must be reported as if it were. You have a similar obligation to report promptly any information or knowledge of any hidden fund or asset, of any false or artificial entry in the books and records of the Company, or any payment that circumvents the Company's internal financial controls immediately to your line manager or Chief Internal Auditor, or OLNG Legal Counsel. You may also make use of the OLNG "Whistle Blowing Policy" on a confidential basis to report actual or potential violations.

Do

- 9 Challenge yourself: have you offered, given or received money, a gift or favour to influence a business decision or gain any business advantage? Are you intending to or have you given a donation which might be regarded as an improper payment? As a guide, ask yourself the question; would I feel comfortable explaining any actions to my family, friends, colleagues, or the media?
- 9 Comply with the applicable anti-bribery and corruption laws.
- 9 Use caution when giving or receiving gifts or entertainment to or from government officials or other business contacts and, if you proceed, make sure you register the detailed records and obtain necessary approvals for the same. (Please refer to the details in chapter on Gifts and Hospitality).
- 9 Seek advice from your line manager if you are unsure about giving or receiving a gift or anything else of value, or providing or accepting entertainment.
- 9 Satisfy yourself about the integrity status and track record of any agent before engaging them to work on behalf of OLNG and make sure the agent understands and agrees to abide by the OLNG position on bribery and facilitation payments.

CONFLICT OF INTEREST

OLNG employees must avoid conflicts of interests. A conflict of interest exists when your personal relationships, participation or other interest in external activities (whether private or in other business ventures) would influence or could be perceived by others to influence your decisions as part of your employment at OLNG.

Who must comply with OLNG Policy?

OLNG requires compliance with its policy on bribery, corruption and facilitation payments not only from employees but also from business partners, including agents, distributors, representatives, contractors, sub-contractors and suppliers.

OLNG senior management should proactively promote the OLNG stance against bribery and corruption with third parties and encourage their employees to do the same. Acts or allegations of bribery can do serious damage to our reputation.

Any OLNG employee who is found to be giving or taking bribes or any other acts of corruption, will be subject to disciplinary action which may ultimately lead to dismissal and may also become subject to criminal proceedings.

- 9 Report any concerns you may have about corrupt activities, including false entries into books and records, either within the Company or in dealings with third parties, to your line manager, Chief Internal Auditor, OLNG Legal Counsel or by reference to the Whistle Blowing Policy.

Don't

- 8 Don't offer, accept, solicit or pay bribes or make facilitation payments.
- 8 Don't use political or charitable donations as a substitute for bribery.
- 8 Don't use agents to offer or accept bribes or facilitation payments indirectly.
- 8 Don't record transactions incorrectly into Company's books and records.

FIND OUT MORE

For more information or advice you can contact Head of Legal Affairs (NGL), Head of Internal Audit (IA) or the Senior Manager, Governance and Financial Support (NGF/4).

How the Code can help you

You are at a dinner party with friends and relatives. Your brother-in-law asks whether you can find a job in OLNG for his first cousin who has recently qualified as an engineer from a top university. Is this an innocent enquiry or potential conflict of interest? The Code will help you decide.

PERSONAL AND BUSINESS INTEGRITY

Background

Employees must declare to their employing company potential or actual conflicts of interest. OLNG relies on its employees' good judgement in the exercise of their responsibilities to always act in the best interest of OLNG. If your decision-making can be influenced by a conflict of interest or be perceived to do so, your reputation and that of OLNG can be jeopardised.

Your employment at OLNG is regarded as your full-time occupation during working hours. In your own time, you may be active in community, government, educational and other non-profit organisations, or acquire interests in other businesses and perform external professional activities, provided these do not conflict in any way with OLNG interests.

Relevant laws include:

- the Public Money Protection;
- Conflict of Interest Avoidance Law (Royal Decree 112/2011);
- the circular 8/2013 published by the State Financial and Administrative; and
- Audit Institution (SAI).

A failure to follow the requirements of this Code can result in disciplinary action, including termination of employment, but may also entail personal consequences under the law in case the requirements are not observed.

The right to privacy

OLNG respects its employees' right to privacy in their personal affairs and activities. However, it is possible that an employee's

personal or family activities may raise an actual or potential conflict with their duty of loyalty to OLNG. Actual conflicts must be avoided and, if one exist, resolved. Potential conflicts must be declared when they arise and resolved as appropriate. This includes any personal interest which may affect employees' impartiality in any matter relevant to their duties. Employees should promptly disclose these facts or circumstances to their MT member.

Defining a conflict of interest

A conflict of interest may arise where an employee or an employee's spouse, child or close family member (such as parents, brothers, sisters, spouse(s), children, parents-in-law, brothers-in-law, sisters-in-law, uncles, aunts and first cousins) has outside employment, financial or other participation, for example as an employee, director or consultant, in any business which is a contractor, supplier, or competitor of OLNG or is seeking to become one. It is not possible to list all situations or relationships which may create a conflict of interest or the appearance of one, so each situation must be evaluated on its particular facts. In case of doubt whether a specific personal situation constitutes a potential conflict of interest, it is your obligation to contact your supervisor and refer the issue to HR Senior Manager, Policy, EVP and HR Operations (NGH/1) to help determine if a conflict exists.

If employees intend to use knowledge, information, experience or position gained through their association with OLNG to further themselves materially in some outside capacity, they have a duty to disclose that intention to OLNG.

Do
9 Complete the Conflict of Interest declaration annually – even if no conflict exists (“Nil declaration”).
9 Declare in writing the relevant facts and circumstances that create or could create any potential conflict of interest to your MT member throughout the year and ensure you discuss at that management level if any mitigation steps are required. This only takes a few minutes, and could save you from a time-consuming investigation later on.
9 Withdraw from making decisions when it creates or can be perceived to create a conflict of interest with your personal interests.
9 Seek guidance from your line manager if you have any doubts about the confidentiality of information that you have access to in OLNG when you intend to use such information to personally gain.
9 Conduct your dealings with contractors and suppliers in a professional, impartial and competitive manner.
9 Be aware that the acceptance of any offer of future employment, consultancy or directorship with an OLNG contractor, supplier, customer, competitor or business partner constitutes a potential conflict of interest.

9 As a guide, ask yourself the question; would I feel comfortable explaining any actions to my work colleagues, friends or the media?
Don't
8 Don't get involved in the hiring, supervision, management or career planning of any relative or in financial controlling and auditing or human resources discussions regarding any relative.
8 Don't conduct company negotiations of any kind with relatives.
8 Don't make improper use of your position in OLNG, or of confidential information you have gained access to, to achieve any personal gain.
8 Don't allow your relationships with contractors and suppliers to influence business decisions made on behalf of OLNG.
8 Don't accept gifts or inducements (including hospitality) that might place you under an obligation to return a favour.

FIND OUT MORE

To find out more about OLNG policy covering Conflict of Interest and the minimum declaration requirements under the relevant laws in Oman, please refer to the Conflict Of Interest Policy (NG-P039 Conflict Of Interest Policy).



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 OLNG's interests and reputation. It is therefore important that individuals keep their personal political activities separate from their role at OLNG.

Do

- 9 Make it always clear that the political views you express or actions you take are your own, and not those of OLNG, unless you are explicitly required to represent OLNG's views as part of your role.

If you are standing for election to public office, you must consult and gain approval from your line manager before standing. You must also declare your interest through the Conflict of Interest register. 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 OLNG in a conflict of interest.

Don't

- 8 Don't use OLNG funds or resources, either directly or indirectly, to help fund political campaigns, political candidates or anyone associated with them.

GIFTS & HOSPITALITY

IT IS IMPORTANT THAT GIFTS OR HOSPITALITY NEVER INFLUENCE IMMINENT BUSINESS DECISION-MAKING PROCESSES, OR CAUSE OTHERS TO PERCEIVE AN INFLUENCE.

As a general principle, OLNG discourages employees from accepting gifts or hospitality from a business partner when offered, and from offering gifts or hospitality to business partners. Although appropriate hospitality within the guidelines set out below may aid business relationships, it may also question people's integrity if not properly managed and damage the individual's and the Company's reputation, hence this area needs to be handled with care.

How the Code can help you

You and your spouse may be invited in good faith by a business partner to attend a dinner function, or you feel it is appropriate to offer your contact person at a supplier a gift as a token of appreciation after successfully achieving an important milestone. You may be unclear about whether OLNG policy allows you to do so. The Code can help you find the answers you need.

Background

OLNG recognises that the occasional acceptance or offer of modest gifts and hospitality may be a legitimate contribution to good business relationships. However, it is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence. The requirements of other OLNG policies highlighted in this Code of Conduct – especially the prohibitions against accepting or paying bribes and the avoidance of conflicts of interest – should also be taken into consideration.

OLNG requires employees to abide by these rules of behaviour not only to protect our reputation, but also to protect themselves against unfounded allegations of improper behaviour. For OLNG

employees to ask business partners to offer them gifts or hospitality of any kind is prohibited. It is also unacceptable to make a charitable contribution in order to secure an improper advantage or to influence any public official.

OLNG staff is required to declare as part of their conflict of interest annual declaration that they have registered all relevant gifts & hospitality, both offered to business partners or received from business partners and confirm that, as applicable, management approval was obtained for giving or accepting such items.

If you are offered a gift or service other than in the circumstances outlined in below paragraphs, you must politely but firmly decline and explain to your business partner that in accordance with the Company's instructions, you cannot accept it. Failure to follow these requirements may constitute an act of misconduct, conflict of interests or bribery and corruption depending on the circumstances and may result in investigation, disciplinary action, or even criminal reporting which could lead to termination of employment and other personal consequences under the law.

What you should consider

It is recognised that there are times when refusing to accept gifts or hospitality from a business partner or declining to provide them would be considered discourteous. OLNG employees should consider the following questions before accepting or offering a gift or hospitality:

- Could my acceptance or offer lead to an obligation or imply an obligation to provide a business advantage?
- Is this gift or hospitality an exceptional 'reward' for a business transaction?
- Is this gift or hospitality excessive in value?

If the answer to any of these questions is yes, the gift or hospitality should not be offered or accepted. If you are not clear how to answer these questions, please take advice from your

PERSONAL AND BUSINESS INTEGRITY

MT member or the custodian of the Conflicts of Interest Policy (NGH/1).

'Gifts' include (but are not limited to) the following:

- Goods, services, information or money in whatever form, as well as any other benefit or gratuity from which the recipient may derive a benefit;
- Offers of present and future profits (e.g. through discounts or otherwise), assistance or other benefits in any form.

It will however not include:

- Official OLNG branded items described in Communications, Branding Procedures and Guidelines [ODF-P301];
- Official grants and donations as prescribed in Corporate Sponsorship Procedure [ODF-P203];
- Items, goods, services, information or money in whatever form provided or obtained in terms of any official contract with OLNG.

'Hospitality' shall include any form or definition of hospitality, and will include:

- Sporting, theatrical and other social events;
- Meals such as dinners, lunches, breakfasts, etc.;
- Hotel accommodation;
- Entertainment of any nature;
- Spa treatments, etc. and encompasses related expenditure such as for travel and transport.

'Business Partner' means any person who is in the process of initiating business, conducting business or who had previously conducted business with OLNG.

'Public official' means any person appointed by H.M. the Sultan or the Government of Oman against a salary payable from the treasury of the State, or any person seconded or elected to perform any public service as well as employees of companies in which the Government of Oman has more than 40% shareholding.

Guidelines

- Many entities give away small, low value promotional items for advertising purposes marked with the company name or logo e.g. pens, pencils, key-rings, etc. There is usually little doubt about the value of such items, no compromise of the arms-length relationship that is involved and there is no objection to acceptance.
- At certain points in the calendar, it is often traditional for the entities to approach their main business contacts with gifts of consumable nature or diaries and calendars. In modest

quantity, there is no objection to the acceptance of such items.

- Where a discount on prices is offered to an employee by a supplier with whom he / she has a direct commercial relationship on behalf of the Company, it must be confirmed that the same level of discount will apply to all Company employees. Otherwise, the individual concerned should not accept it.
- Invitation to dinner / lunch or any other entertainment must also be considered with care. Particularly when tenders are being prepared or negotiations are being conducted, the individual should politely decline all personal invitations. In other circumstances, invitations to dinner, etc. may be accepted with discretion, provided the reason for accepting is in an objectively demonstrable business context, e.g. to discuss business related matters either with the host or with the representatives of other parties that may have business interests or activities in common with OLNG, and provided that the threshold amounts set out below are taken into account.
- Although the principles set forth herein are of general validity, specific and more stringent rules may apply when the counterparty involved is a public official. Please seek guidance from NGL before accepting or offering any gift or hospitality above the relevant threshold involving public officials.
- The following invitations should only be accepted as an exception and when the interests of the Company can be clearly demonstrated in advance and the business justification is compelling:
 - Invitations of a social nature (e.g. sporting and cultural events)
 - Attendance of conferences, training sessions, seminars or other vendor initiated events that may lead to an undue benefit to the individual and/or OLNG, e.g. if the costs of attending the event are not solely borne by OLNG.
- Light refreshments or lunch / dinner provided to attendees or presenters at the conference free of charge can be accepted but only if this the norm afforded to all participants to the event.

Prohibited gifts and hospitality

You may never accept or offer the following with or without approval:

- Cash or cash equivalents.
- Personal services or loans.
- Gifts or hospitality of an illegal or inappropriate nature or in inappropriate venues.



- Events or meals where the business partner is not present.
- Gifts or hospitality during periods when important business decisions are being made.

Acceptable gifts and hospitality (not requiring management approval or registering)

You may accept or give the following if the cumulative value remains below OMR 50 per person per calendar year (12-month period):

- A gift (whether one or more items), including corporate gifts which feature the logo of the donor (diaries, calendars, etc.) and gifts given during festive season of the year, for example Eid, New Year, Christmas, etc.
- Meals related to a business context.
- Occasional invitations to events and not extending over a period of more than one day. 'Occasional' means not more than one or two times a year with the same business partner.

Such gifts and/or hospitality below the OMR 50 value threshold in a 12-month period do not need to be entered into the gifts and hospitality register. The employee should use his / her best judgment in estimating the value of the gift and inquire if in doubt and keep track in order to assess if the cumulative value is exceeded during a 12-month period.

Gifts and/or hospitality involving the same individual or company which, on a cumulative basis within the 12-month period, exceeding the above threshold should be recorded in the electronic gifts and hospitality register on a regular basis. Teams may appoint administrative staff to do the entries for them on a regular basis, but remain responsible to ensure that this is done and confirm the same through the annual Conflict of Interest declaration.

If the giving of gifts or hospitality involves a public official and exceeds OMR 50, you should seek advice from **NGL** prior to offering the gift or hospitality to the public official. Although line management approval is not required for giving gifts or

hospitality that stay within the thresholds set out in this chapter, please note that expenses relating to offering such gifts and hospitality to a third party must still be approved in accordance with OLNG's Manual of Authority.

Gifts and hospitality requiring management approval

You may only accept or give the following with approval from your functional manager who is a member of the Management Team¹:

- Gifts or hospitality with a value exceeding a cumulative value of OMR 100.
- Events for periods exceeding the length, or occurring more frequently than the norms set out above.
- Travel or accommodation.

Members of the Management Team need to obtain such approvals from the Chief Executive Officer. The line MT approvals need to be logged in the gifts and hospitality register as well, and the e-form will cater to this when the value of the gift or hospitality is entered. Approval should be sought in advance, or when this is not possible (e.g. when being hosted by a business partner who is paying the bill for a joint business meal) the event should be declared to the line MT promptly after the event and be recorded.

Special occasions

Special occasions, involving senior OLNG executives and senior external parties, can be a justification for more valuable presents or entertainment, depending on generally accepted business protocol and with the approval of the Chief Executive Officer. Likewise, if OLNG's business relationships with a third party (e.g. a long term customer) entails frequent business meetings in a calendar year, it is recognised that the cumulative value of entertainment offered or received in such business context will be higher than the threshold amounts set out in this procedure.

¹ For the marketing teams, gifts & hospitality that fall within the boundaries of Board approved entertainment budgets are deemed approved, but need to be registered nonetheless.

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Do

- 9 Keep track of any gifts or hospitality of whatever value (offered or accepted) and inform your line manager.
- 9 Record on a regular basis any gifts or hospitality exceeding the cumulative value threshold through the required tool (e-form) for recording the same in the gifts and hospitality register. The form can be found on OLNG's intranet homepage under 'Quick Links'.
- 9 Take into consideration the policy of the recipient's company when considering to offer gifts or hospitality, especially when involving public officials.
- 9 Seek guidance from **NGL** in advance of offering gifts or hospitality to public officials.
- 9 Be aware of the potential conflict of interest if you accept gifts or hospitality.
- 9 Discuss with your line manager when a supplier or contractor offers substantial gifts or hospitality at the corporate level as opposed to at individual level (for example, a major contribution to a company's annual party or a valuable sponsorship for a competition at HAS club).
- 9 Understand customs for the giving or receiving of gifts, entertainment or benefits, tips and fees.
- 9 Use sensible judgement in deciding what is reasonable and seek guidance in case not sure.
- 9 Always extend the invitations to an OLNG hospitality event to the most senior executives of the organisations and respect their decisions in sending whomever is most appropriate to the event.

- 9 Make the criteria for selection of guests invited to an OLNG hospitality event clear and internally transparent; and involve more than one senior OLNG manager in making the final selection of guests.
- 9 Integrate business messages into OLNG hospitality events in the form of speeches, presentations, demonstrations, exhibitions, and other appropriate activities.
- 9 Recharge the costs of an OLNG hospitality event to the relevant business budget to maintain business ownership.

Don't

- 8 Don't accept gift vouchers with monetary value.
- 8 Don't be embarrassed to decline any offer by referring to the OLNG policy in cases when offers exceed those outlined above – this will be understood by the business counterparty – who in most cases will be subject to similar rules.
- 8 Don't give or receive a gift or a favour that you would feel uncomfortable explaining to your work colleagues, your family or the media.
- 8 Don't differentiate between the giving or receiving of gifts and hospitality directly or via an intermediary.

FIND OUT MORE

To find out more about OLNG policy covering this subject please contact the custodian of Ma'an and Conflict of Interest Policy which is the Senior Manager, Policy, EVP and HR Operations (**NGH/1**).

- Ma'an Online
- **NG-P039** Conflict Of Interest Policy

The electronic gifts and hospitality register is available in the e-form on OLNG's intranet homepage under 'Quick Links'.

FINANCIAL AND ASSET PROTECTION



FINANCIAL AND ASSET PROTECTION

PUBLIC DISCLOSURE

How the Code can help you

The issues surrounding public disclosure of information can be difficult to understand. The Code can bring clarity to many issues and also direct you to further information.

Background

OLNG will comply with all applicable laws relating to public disclosure of information. In addition, disclosure of inappropriate or inconsistent information may damage our reputation. To protect OLNG's and its shareholders' reputation and to ensure compliance, public disclosures must only be made by authorised spokespersons and be in line with applicable OLNG policies.

Any public written or oral communication that can be attributed to OLNG may amount to a public disclosure. This includes not just regulatory filings and OLNG publications but also information issued to the public by OLNG or its employees, such as press releases, speeches, presentations and the information contained on OLNG websites which are accessible to the public. The disclosures to the public authorities shall be relevant, succinct and limited as to their requirements only.

What is expected of OLNG employees?

OLNG employees must not disclose information to the public unless the request for disclosure comes from the appropriate

channel and the employee who discloses is authorised to do so. Those authorised to make disclosures must ensure that information provided to the public is true, accurate and complete (stating all material facts). Additionally, in order for any public disclosure not to be considered continuously current, it must contain the date the disclosure is being made. No disclosure should be misleading. Providing inaccurate, incomplete or misleading information may be illegal and may lead to fines, sanctions and criminal penalties for OLNG and the individuals involved. When disclosing information to a public body, the employee should exercise careful judgement based on knowledge of the relevant facts and he or she may obtain an expert's advice before making disclosure.

All external presentations, speeches, press releases, articles and publications related to OLNG must be formally cleared by the Senior Manager, Communications and Community Affairs (**ODF/3**) and conform to relevant OLNG policy prior to release. **ODF** must be consulted prior to any engagement with the media including, for example, press conferences or interviews. In case you use personal social media for personal purposes to discuss energy related topics, or to endorse or provide a testimonial of OLNG's achievements, you should disclose that you are an OLNG employee, that you are not speaking on behalf of OLNG and that the views expressed are your own and do not necessarily reflect those of OLNG.

Do	
9	Provide complete, factually correct and understandable information if you are requested to assist in making a disclosure.
9	Know and check the accuracy of your source information and review what has been previously disclosed, to ensure completeness and consistency, before seeking authorisation to make a disclosure.
9	Always keep confidential information about OLNG confidential unless you are specifically authorised to tell other persons, internally or externally.
9	Report the loss or theft of information about OLNG (such as the theft of your computer) to your line manager immediately. Tell your line manager straight away if you think you are in possession of material information that may need to be disclosed or if you become aware of any unauthorised disclosure of material information about OLNG.

Don't	
8	Don't engage with the media on behalf of OLNG and provide information about OLNG to the public unless you are specifically authorised to do so.
8	Don't delay in reporting material facts or information to your line manager.
8	Don't conceal facts. Don't omit information that may be relevant to a disclosure – always tell the whole story.
8	Don't use personal social media for disclosing confidential business information or other business purposes.

FIND OUT MORE

For more information, please contact the Senior Manager, Communications and Corporate Affairs (**ODF/3**) or connect with the Communications and Media Department in ODF. You can also refer to the Communications, Branding Procedures and Guidelines [**ODF-P301**].



FINANCIAL REPORTING

How the Code can help you

Local and international financial accounting and reporting standards change over time. OLNG employees who are responsible for accounting or financial reporting must ensure that entries in the relevant OLNG books, records, or accounts fairly reflect transactions and the financial position of the Company and comply with applicable, generally accepted accounting principles and other criteria such as local laws, for example statutory reporting and tax requirements.

Background

OLNG is required to comply with both the accounting and

financial reporting rules and regulations (IFRS & Oman Company Laws) and with the Shareholders' Agreements. OLNG expects all its employees to gain approval for every transaction, as per Manual of Authorities, before carrying it out and to ensure that accurate and true records of all transactions (including those giving rise to liabilities) are maintained in company accounts, financial statements and documents.

OLNG internal controls must enable us to demonstrate that entries in our financial reports are correct and made in accordance with applicable regulations.

Financial processes must be designed and operated in accordance with the applicable OLNG Policies and Procedures.

Do

- 9 Keep accurate and true company books, records, accounts and documentation.
- 9 Make sure you gain approval, from a person with the right level of approval authority, for all transactions.
- 9 Maintain and manage detailed and accurate records of authorised transactions. Compare asset records to actual assets, and planned results to actual results, at reasonable intervals; take appropriate action with respect to any differences.
- 9 Co-operate fully with auditors by responding to questions, providing documentation and clarifying transactions and reported data as required.

9 Report promptly on any irregularities or weaknesses in relation to auditing, accounting or internal control matters.

9 Comply with applicable, generally accepted accounting principles.

Don't

8 Don't carry out a transaction that has not been approved in advance.

FIND OUT MORE

For more information please refer to the Finance Manual **[NGF-P001]** or contact the Senior Manager, Governance and Financial Support **(NGF/4)**.

FINANCIAL AND ASSET PROTECTION

MONEY LAUNDERING

How the Code can help you

The nature of a specific transaction may concern you for a number of different reasons. You may be asked to deal with seemingly unconnected third parties, or to settle an amount in an unconventional way. The Code explains what money laundering is and provides a simple way to resolve your concerns.

Background

'Money laundering' is a generic term used to describe the process of hiding the criminal origins of money or money's worth (the 'proceeds' of crime) within legitimate businesses or business activities. It also describes the use of money of legitimate origin 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. Anti-money laundering provisions are designed to help prevent legitimate business from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.

National and international legislation

Many countries now have some form of anti-money laundering legislation. The legislation tends to place both criminal corporate liability on the company and criminal personal liability on its employees.

Offences covered by legislation

Money laundering law in Oman is governed by two Royal Decrees:

1. The Anti-Money Laundering and Combating of Terrorist Financing Law (promulgated by Royal Decree 79/2010); and
2. The Law promulgating the Executive Regulations under the Law of Money Laundering (Royal Decree 72/2004 dated 28 June 2004).

The offences covered by anti-money laundering provisions include:

- **Money laundering:** acquiring, using or possessing criminal property; concealing the nature, source, location or ownership of criminal property; converting or transferring criminal property or removing it from a country; facilitating the acquiring, retention, use or control of criminal property.
- **Prejudicing or obstructing an investigation:** falsifying, concealing, destroying or disposing of relevant documents

Do

- 9 Be aware that you have an obligation to identify and internally report suspicious transactions or incidents of money laundering.
- 9 Conduct due diligence on clients, contractors & suppliers with professional scepticism.

Don't

- 8 Don't knowingly deal with criminals, suspected criminals, or the proceeds of crime.
- 8 Don't try to investigate a case of money laundering yourself.

or tipping-off the subject.

- **Failure to report:** not reporting a suspicion when there are reasonable grounds to know or suspect that an activity may relate to laundering money or funding terrorism.

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.

It should not be assumed that this applies only to finance staff. Business people, procurement specialists or lawyers may be the first to hear how a transaction is going to be organised.

Suspicious transactions

In Oman, it is mainly the responsibility of the financial institutions to monitor suspicious transactions as far as money laundering activities are concerned. As the term 'money laundering' itself indicates it is a cleaning cycle for funds from illegal activity which is 'cleaned' through financial institutions and the financial system to make the funds legal.

OLNG needs to have guidelines to clearly identify its suppliers and avoid dealing with financial institutions which are not having money laundering policies.

Examples of suspicious transactions might include:

- Any transaction where you do not know or cannot verify the nominal details of the parties to the transaction.
- A willingness to pay substantially above market price.
- Transactions conducted through unknown or unnecessary intermediaries.
- Abnormal settlement methods.
- Unnecessary or unexplained transactions.
- Out of norm cash transactions or the use of bank drafts, money orders or cashier's cheques.
- Settlement with or through apparent unconnected parties.
- A combination of the above in the same transaction increases the level of risk.

8 Don't report your suspicions externally – the Company's treasurer will take responsibility for this.

8 Don't notify your suspicions to the other party to the transaction.

FIND OUT MORE

For further advice and assistance, contact the Senior Manager, Treasury and QLNG Financial Affairs (**NGF/5**). Reference is also made to guidelines at the website of the Financial Intelligence Unit, <http://www.fiu.gov.om/>



PROTECTION OF CORPORATE ASSETS

How the Code can help you

We all use OLNG assets in our everyday working lives, but how many of us really think about their value or the need to protect and preserve them? The Code reminds you of the range of company assets and provides some practical advice about how to handle them.

Background

OLNG assets may be of considerable value – whether financial or physical assets or intellectual property – and are intended to be used only to advance OLNG business purposes and goals. These assets must be secured and protected in order to preserve their value.

Company assets

All employees are entrusted with OLNG assets in order to do their jobs. We are all personally responsible for safeguarding and using OLNG assets appropriately. Such assets include buildings, sites, equipment, tools, supplies, communication facilities, funds, time, confidential information, and any other resources or intellectual property of OLNG.

We must ensure the protection of Intellectual Property (IP) interests against aggression and bad practices (whether internal or external) and promote a culture of security and OLNG values.

IP in OLNG:

- know-how
- ways of doing business
- OLNG brands and trademarks
- domain names
- licences
- company information
- marketing strategies
- plant configuration
- utility models
- designs
- personal data
- operations

OLNG employees are responsible for protecting OLNG assets against waste, loss, damage, misuse, theft, misappropriation or infringement, and for using those assets in responsible ways.

Asset and expense records

As highlighted in this chapter, accurate, reliable and timely preparation of business records and documents, including those that relate to expenses incurred by employees on behalf of the Company, are required by law. Such records are important to the Company's decision-making processes and the proper discharge of its financial, legal and reporting obligations. Falsification of asset records or misrepresentation of facts may constitute fraud and can result in civil and criminal liability for both individuals and the Company.

Assets of others

OLNG respects the physical and intellectual assets of others. Consequently, we expect our employees and contract staff never to knowingly damage or misappropriate the physical assets of

others; infringe valid patents, trademarks, or copyrights of others; misappropriate confidential information in violation of the rights of others; or use or disclose confidential information of others without proper authority. We expect others to show the same respect for OLNG physical and intellectual assets.

Time is an asset

While in the workplace, employees are expected to be fully engaged in their work and not undertake personal activities beyond a reasonably modest level. OLNG expects that all employees will devote the necessary time to their work in order to fulfil their responsibilities. Those required to record the hours they work must do so truthfully and accurately.

Protection of confidential information

All staff are subject to personal confidentiality undertakings through their employment contract with OLNG. Breaches of such confidentiality undertakings are a serious concern to the Company and will entail consequences, including disciplinary action commensurate with the gravity and nature of the misconduct and potentially also criminal reporting under Omani law. Unauthorised disclosure of data or information may trigger potential charges as follows:

- Article 164 of the Penal Code stipulates that if an employee divulges without a legal reason a secret he knows by virtue of his job, that the employee shall be sentenced to imprisonment or a fine be imposed.
- If the offender intentionally uses a computer device to divulge a trade secret, this will be considered a "computer crime" which is punishable under Article 276 of the Penal Code with imprisonment and/or with a fine.
- Additionally, the Telecommunication Regulatory Law states penalties against those using telecommunication services illegally, with imprisonment and/or a fine.

Should you have any doubts about your confidentiality obligations, please contact your functional management team member or, if appropriate, **NGL**, who will advise you on this matter.

Protection of personal data

Data privacy laws safeguard information about individuals – their personal data. At OLNG, 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.

Although personal information and data created, used or stored on OLNG IT and communication facilities or on media provided by or on behalf of OLNG may, under certain circumstances, be monitored and analysed by or on behalf of OLNG, the Company respects all individuals' right to privacy of their personal information and data and will accordingly adhere to all applicable laws on the use and monitoring of such information.

Personal data should be obtained by lawful means and, where required by law, with the knowledge or consent of the subject. The purpose for which personal data is collected and the way personal data is used should also be permitted by law. We may only process personal data for legitimate purposes and the

FINANCIAL AND ASSET PROTECTION

data must be accurate, up-to-date and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. There may be legal restrictions on the transferring or provision of personal information and data to another party, and appropriate safeguards should be in place. There may be additional legal restrictions on transferring personal information and data outside of its country of origin.

Personal data should be protected by reasonable security measures against potential risks as a result of loss or destruction or unauthorised access to, or unauthorised use, modification or disclosure of that information. When personal data in our possession is no longer required, it should be disposed of.

Be aware that personal data (name, contact details), in particular sensitive personal information such as a person's

religion, race, health, sexual orientation or criminal behaviour, is often protected by legislation, such as the new General Data Protection Regulation of the European Union that came into force on 25 May 2018. Not only personal and personnel files but also business-related files can contain personal data. Under such foreign legislation, OLNG also has a responsibility to comply with data privacy rules in respect of foreign entities or individuals that we have business dealings with.

Therefore, do not distribute, make known or share personal data before making sure you know which data protection laws, if any, are applicable and which requirements must be met. If we do not comply with these requirements, we risk causing harm to individuals, being ordered to cease the processing of personal data and could face fines or litigation. We are also putting OLNG's reputation at risk.

Do	
9	Use OLNG assets only to accomplish its business purposes.
9	Take care to prevent waste, loss, damage, misuse, theft, misappropriation, or infringement of OLNG assets.
9	Obtain appropriate permission for the use of OLNG assets for purposes other than its ordinary business purpose.
9	Prepare, maintain or submit accurate records regarding the use of OLNG assets, in accordance with applicable laws, external requirements and company processes.
9	Record time worked accurately.
9	Comply with specific restrictions placed on the use and transfer of OLNG assets.
9	Identify the privacy risks before collecting, using, retaining or transferring personal data, such as in a new IT system, project or marketing initiative.
9	When you process or share individuals' personal data, always inform them or seek their consent.
9	Contact NGH/1 or NGL if you are in doubt whether personal information can be used or whether you need to obtain the individual's prior consent.
9	Follow established guidelines and procedures in respect of authorities and approvals for dealings with third parties that involve OLNG assets.
9	Check whether the information assets that you intend to use are copyrighted.
9	Take reasonable precautions to keep all confidential information belonging to the Company secret, both during and after your employment.
9	Upon termination of your employment, if you are in possession of any originals or copies of Company documents, return the same to the Company even without being asked, except so far as consent to retain them has been given to you by the Company.

Don't	
8	Don't conceal, alter, destroy or otherwise modify Company records or documents except as authorised in accordance with established standards and guidelines.
8	Don't conceal, alter, destroy or otherwise tamper with documents relating to: actual, pending or threatened litigation or government or regulatory investigations; or relating to circumstances where there is reason to believe such litigation or investigation is reasonably likely to occur.
8	Don't intentionally make a false or misleading entry in a report, record, or expense claim.
8	Don't divulge or utilise any confidential information belonging to the Company, either during or after your employment, which may have come to your knowledge during your employment.
8	Don't copy, distribute or violate the terms of use for copyrighted materials without explicit permission of the copyright owner.
8	Don't disclose personal data of individuals such as colleagues to third parties without a legitimate OLNG business purpose, and also not without their knowledge and consent.

FIND OUT MORE

For further advice on protecting OLNG assets, contact the Senior Manager, Governance and Financial Support (**NGF/4**). Fixed Assets of the Finance Manual [**NGF-P001**] and the Conflict of Interest Policy [**NG-P039**].



OLNG is committed to free, fair and ethical enterprise. You must follow all applicable trade laws and ensure OLNG's core values are applied in all your dealings. A failure to comply with these laws and regulations can severely damage OLNG's business and expose us to criminal charges. You could face dismissal, fines and imprisonment.

ANTITRUST LAW

Antitrust law protects free enterprise and prohibits behaviour that limits trade or that restricts fair competition. These laws apply to every level of business. They combat illegal practices like agreements between competitors that have the effect (or are intended to have the effect) of fixing prices or profit margins or regarding bid pricing or other terms and conditions of a bid, or agreements not to compete for certain bids, customers or accounts or in certain geographic areas, or behaviours that aim to achieve or maintain monopoly. OLNG does not tolerate violation of antitrust laws.

Do

- 9 Leave industry meetings if competitively sensitive issues arise and ensure your departure is noticed. Report the matter to your line manager and **NGL** so appropriate follow-up action can be considered.
- 9 Report to OLNG if you know of any potentially anti-competitive practices or if you are uncertain whether practices are legal or not.
- 9 Ensure that decisions on OLNG's pricing, production, customers and markets, or about how OLNG will or will not issue tenders are taken by OLNG alone.

Don't

- 8 Don't discuss, even informally, with competitors on pricing, production, customers or markets or terms of contract without a lawful reason.

The Sultanate of Oman has adopted additional legislation which address such issues: Royal Decree 66/2014 (Consumer Protection Law); and Royal Decree 67/2014 (Competition Protection and Monopoly Prevention Law). International antitrust laws may also apply, as jurisdiction is established on the basis of where the economic effects of an (anti-competitive) arrangement is felt, and not where the related agreement was concluded or the parties to the agreement are based. It is therefore important that OLNG employees understand what these principles entail and that they comply with the spirit of free enterprise.

Anti-competitive behaviour will damage OLNG's business and reputation for fairness and honesty. Anti-competitive practices are unacceptable. They are illegal in most countries and can lead to heavy fines on the Company and individuals involved, as well as imprisonment.

- 8 Don't agree with competitors of OLNG to fix prices or any elements of prices (such as discounts, rebates or surcharges).
- 8 Don't agree with others not to compete in particular markets or for particular customers or accounts.
- 8 Don't rig bids or tenders, and don't agree with others to boycott any customers or suppliers except in connection with internationally imposed sanctions.
- 8 Don't agree with competitors to reduce or stabilise production, capacity or output.
- 8 Don't agree with independent dealers or resellers to fix a minimum resale price of a product.
- 8 Don't share or receive competitively sensitive information without a lawful reason.

NATIONAL AND INTERNATIONAL TRADE





TRADE CONTROLS: EXPORT AND IMPORT CONTROLS AND SANCTIONS

Export Controls and Sanctions laws give countries legal control over the sale, shipment, electronic transfer or disclosure of information, software, goods and services across national borders. Exports include transfers electronically, through discussions or visual inspections, and not only through traditional shipping methods. Import Controls and Sanctions give countries legal control over the purchase, shipment, electronic transfer or disclosure of information, software, goods or services into their jurisdiction. Import controls apply to OLNG as a company and also to you personally.

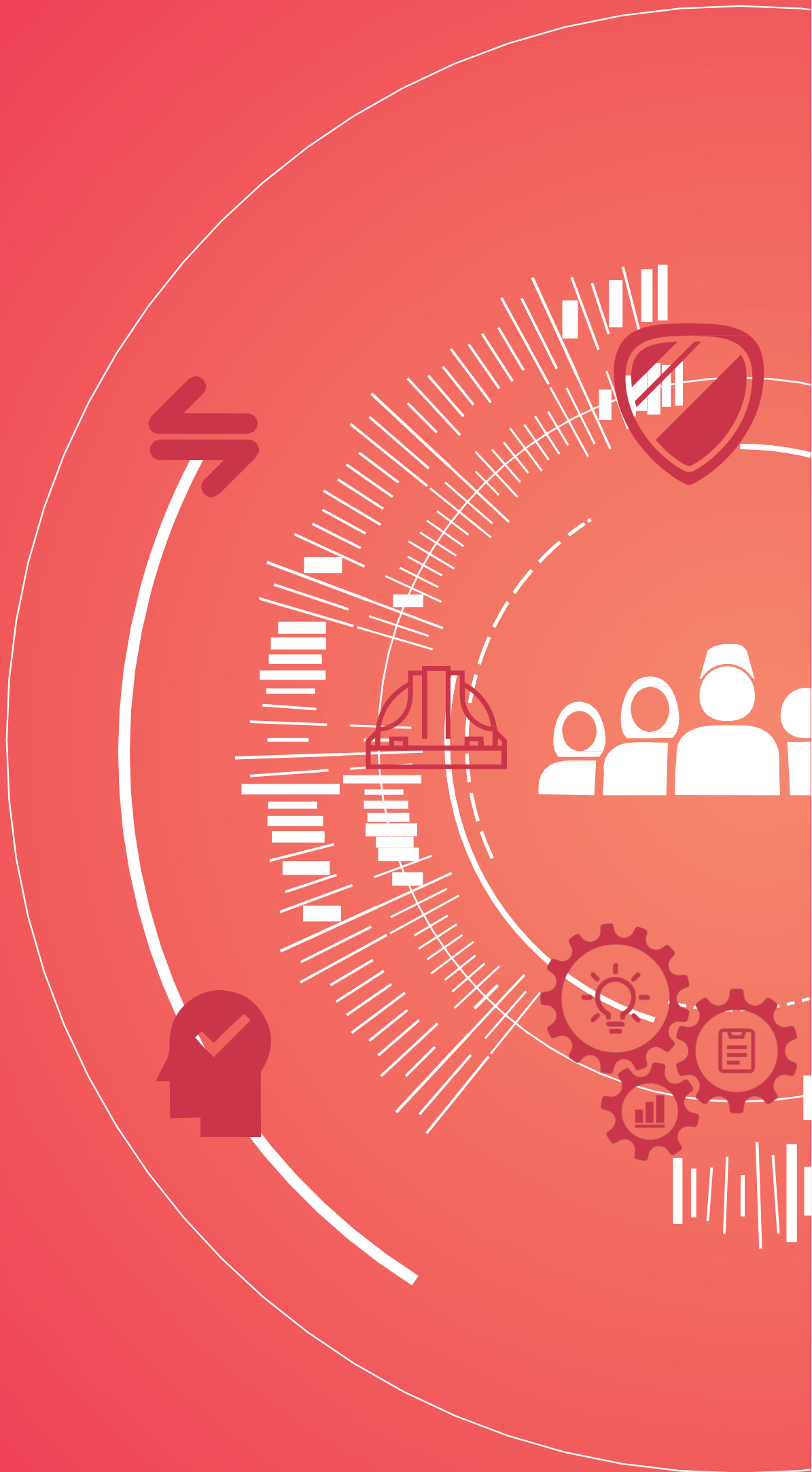
Do	
9	Think carefully about the potential impact of export control laws and sanctions before transferring goods, technology, software or services across national borders.
9	Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and goods.
9	Know which of these controls or sanctions may result in restrictions or prohibitions on the way you conduct business.
9	Meet import requirements when bringing goods or services into a country, ensuring duties, levies and taxes are paid.
9	Make sure you have proper authorisation (such as a permit or license) before exporting or importing goods, technology, software or services across national borders.
9	Know your customers and suppliers (e.g. screening them against applicable sanctions lists) and understand how they will use the goods, technology, software or services that you supply to them.

Failure to observe import control laws and sanctions can cause operational delays and damage business. OLNG could face criminal charges, fines and loss of export privileges if you do not comply with the relevant controls and sanctions. You could face dismissal, fines or imprisonment. Certain trade controls may not apply directly to OLNG, but may apply to our stakeholders such as lenders, shareholders, suppliers and customers, hence need to be carefully considered before embarking on a business initiative.

9	Keep up to date with changing rules.
9	Get legal advice if you have doubts about export and import controls or sanctions.
9	Seek legal advice before doing business with a country or individual if sanctions may apply.

Don't	
8	Don't bring restricted goods into a country without declaring them.
8	Don't import prohibited goods.
8	Don't import into any country goods from another country against which sanctions apply in the receiving country.

PEOPLE



EQUAL OPPORTUNITY

How the Code can help you

If you feel you are being treated unfairly, or are concerned that someone else is being treated unfairly, check the Code to establish OLNG's position on equal opportunity.

Compliance with lawful policies

OLNG is committed to creating and complying with lawful human resources policies and practices in all aspects of employment, including recruitment, selection, hiring, evaluation, promotion, training, discipline, development, compensation, and

termination. OLNG complies with the applicable Omani labour laws. OLNG will ensure that its employment-related decisions are based on objective factors, including relevant qualifications, merit, performance and other business / job-related factors. OLNG provides equal opportunity to all job applicants and employees through clearly defined and consistently applied employment and performance standards and management systems. We will not tolerate unlawful employment discrimination of any kind.

To be the best, we need the best people to do their best. We must give everyone equal opportunity to shine.

Do

- 9 Demonstrate respect and fairness in your interactions with employees and external parties consistent with OLNG core values and the OLNG Statement of General Business Principles.
- 9 Ensure your own employment-related decisions, including hiring, evaluation, promotion, training, discipline, development, compensation, and termination of employment are determined by merit and business considerations alone.
- 9 Understand the value of diversity.
- 9 Understand related legislation and cultures that may have an impact on workplace decisions.

- 9 Contact Human Resources if you have questions about the potential applicability of laws.
- 9 Report equal opportunity concerns through the available confidential channels.

Don't

- 8 Don't tolerate unlawful discrimination of any kind (whether based on race, colour, religion, age, gender, sexual orientation, marital status, disability, ethnic origin or nationality).

FIND OUT MORE

To find out more on equal opportunity refer to OLNG Personnel Policies Manual, Ma'an Online or contact Senior Manager, Policy, EVP and HR Operations (NGH/1).

HARASSMENT

How the Code can help you

If you feel you have been harassed, or are concerned that someone else is being harassed, check the Code to establish the OLNG position on harassment.

Background

OLNG will not tolerate harassment in the workplace – that is any action, conduct or behaviour which any individual or group of individuals finds unwelcome, humiliating, intimidating or hostile. Employees must, therefore, avoid actions or behaviours that are, or could be, viewed as harassment. Employees should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another.

Certain actions and behaviours are also illegal. Both OLNG and the individual may be subject to civil penalties if found to be in breach of a legal requirement.

The effects of harassment

The effects of harassment on individuals can be serious and may include anger, fear or depression as well as feelings of

helplessness or confusion. People may suffer physical or mental illness and may find their relationships at home and work affected. The employee may feel that it is impossible to continue working in the same department or even for their company.

The impact on OLNG can be equally serious: reduced productivity and staff morale together with higher absenteeism and staff turnover. Performance standards may drop and, as a result, the Company may lose business. Customers may experience a lower standard of care and there may be an adverse effect on our reputation. OLNG may also be legally liable for harassment carried out by its employees.

The effects of harassment for the individual who harasses are serious and may include disciplinary action, up to and including dismissal, and potentially legal action. If an employee feels he or she has been harassed, there are a number of ways to raise the issue both informally and formally. In most instances, the line manager or HR adviser should be the first point of contact. However, if none of those people is considered appropriate by the employee, he or she is invited to use the Grievance procedure (Section 25 of Ma'an) or other dispute resolution channels.

Do	
9	Avoid situations that may be perceived as inappropriate.
9	Speak up and tell a person how you feel if you are upset by his or her actions or behaviour, explain why and ask them to stop .
9	Speak to your line manager or the Senior Manager, Policy, EVP and HR Operations (NGH/1).
9	Use an informal approach to resolve the issue, where appropriate, before raising a formal grievance.
9	Use a formal grievance procedure if the matter is serious or the informal approach is not successful.
9	Treat all employees, contract staff, suppliers, customers and visitors with respect .
9	Create an inclusive work environment free from harassment.
9	Find out about behaviours, practices and customs that may differ from those you are used to, be sensitive to differences and be prepared to adapt your behaviour accordingly if travelling or working in another office or country.

Don't	
8	Don't distribute or display offensive material, including inappropriate pictures or cartoons.
8	Don't spread malicious rumours or use voicemail, email or other electronic media, including social media, to transmit derogatory, harassing or abusive information.
8	Don't behave in an unwelcome, humiliating, intimidating or hostile manner.
8	Don't make inappropriate jokes or comments.
8	Don't assume that what is acceptable in one culture or environment is equally acceptable in another.

FIND OUT MORE

To find out more on harassment refer to Ma'an Online (Section 24, Misconduct) or contact the Senior Manager, Policy, EVP and HR Operations (NGH/1).



SUBSTANCE ABUSE

How the Code can help you

You may be concerned that a colleague is consuming alcohol, abusing drugs or other substances during work hours in a way that puts you and others at risk. You may also want to do something about it, but are unclear about OLNG policy.

Background

OLNG is committed to providing a safe and productive work environment for its employees and contract staff. This means striving to ensure, among other things, that the workplace is free from substance abuse; that is the use of illegal drugs, the misuse of legal drugs or other substances, and the abuse of alcohol. This policy applies in accordance with applicable legal and regulatory requirements. OLNG wishes to ensure that all employees recognise the threat posed by substance abuse and aim to minimise the risks involved with it. We provide employees with health education programmes to raise awareness of the consequences and dangers of drug use and alcohol abuse. See also the 12 Life-Saving Rules of this Code.

Standards of behaviour

The following standards of behaviour are required of all employees:

- Employees should be fit and ready to carry out their work duties at all times while at work or on OLNG business.
- Employees are prohibited from being at work or on OLNG business while impaired by drugs or alcohol or with illegal drugs present in their systems.
- The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances is prohibited.
- Alcohol consumption is not permitted in OLNG during working hours. OLNG offices and Qalhat sites have also been designated as alcohol-free at all times. It is the employee's responsibility to know the status of their site.

Searches and 'with cause' testing

In OLNG, additional measures used to ensure a drugs and alcohol-free workplace are searches and 'with cause' testing. A

Do

- 9 Advise the Medical Occupational Health unit or your line manager if you are in a safety sensitive job or location and you are taking prescribed drugs, so that further professional advice can be sought if appropriate.
- 9 Comply with a rehabilitation programme as required.
- 9 Treat the matter confidentially.
- 9 Co-operate in a reasonable search and 'with cause' testing.

search may be conducted where there is good reason to believe that drugs or alcohol have been brought to the workplace or are in an individual's possession. Searches might include personal effects, desks, lockers and other OLNG property. The failure of an individual to consent to a search will be considered as serious misconduct.

In situations which give cause for concern either in the workplace or after accidents or near misses, OLNG will at its discretion require an employee to undergo a medical examination, including a breath or blood test for alcohol or substance abuse.

Helping employees

Without prejudice to the above standards, alcohol or drug dependency is recognised as an illness subject to legal and regulatory requirements. Subject to the substance abuse policy of his or her employing company, an employee who volunteers a dependency on drugs or alcohol will be treated in the same way as an employee with any other illness.

Equally, the employee is expected to be conscientious in seeking help and following rehabilitation treatment. For the purpose of this Code, treatment means the medical assessment, counselling and specific treatment programmes necessary to assist the individual to achieve a sustained break from dependency.

Failure to comply with the rehabilitation programme may be regarded as serious misconduct.

Returning to work

When employees are assessed as fit to return to work, a condition of their being allowed to return will be their agreement to attend follow-up counselling and submit to regular medical check-ups. An employee who occupied a safety sensitive job or worked in a safety sensitive location before rehabilitation is not guaranteed a return to the same job or location.

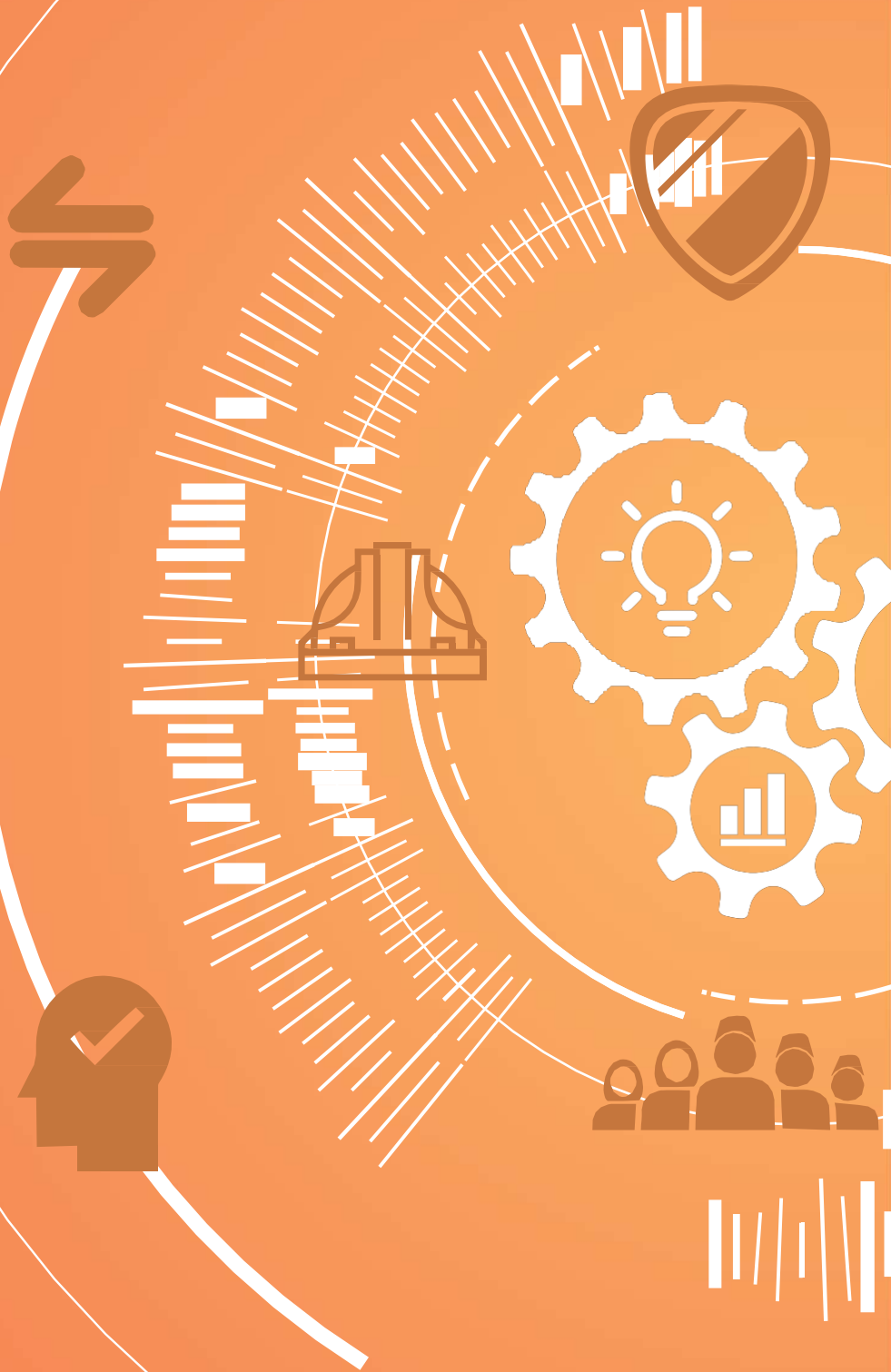
Don't

- 8 Don't use, keep, sell or distribute illegal drugs.
- 8 Don't misuse legal drugs or other substances.
- 8 Don't consume alcohol during work hours.
- 8 Don't ignore a case of substance abuse if you witness one.

FIND OUT MORE

To find out more refer to OLNG Substance Abuse Policy, Alcohol and Drug guideline **[NG-P024]** and the 12 Life-Saving Rules or contact QHSE or the Senior Manager, Policy, EVP and HR Operations **(NGH/1)**.

INFORMATION MANAGEMENT





Information can be an asset and an advantage. It should be guarded closely and used wisely. We need to take special care to protect confidential information when we are away from the OLNG office. 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.

RECORDS MANAGEMENT

How the Code can help you

Some information must be recorded and safely stored. Some information must be disposed of as soon as it is no longer of value. Corporate records need to be classified and stored in accordance with the applicable rules set forth by the National Records and Archiving Authority (NRAA). The Code outlines the main points you need to understand. It also provides links to further useful information.

Background

OLNG must be able to retrieve records quickly and reliably. When each record's retention period is over, appropriate disposal is required. The OLNG Standard for Records Management requires that records must be managed securely throughout their life cycle in line with their importance to OLNG and in compliance with legal, tax, regulatory, accounting and business retention requirements. OLNG identifies the areas of highest exposure and ensures consistent and auditable management of records.

Understanding what a record is

The Company defines a record as a sub-set of information created or received as evidence of a business activity or required for legal, tax, regulatory or accounting purposes or important to OLNG business or corporate memory. Some examples of records are: contracts; audit reports; financial information; product

specifications; corporate policies, guidelines and procedures; minutes of meetings. Records may exist in paper or be stored in an electronic readable or audible format.

How OLNG treats electronic records

Electronic records (including images, instant messaging, email messages, voice recordings or electronic files) must be treated in the same way as records in any other format. This is because it is the content which determines a record, not its format.

Information of temporary value

Some information produced in the course of OLNG business activities has only temporary value and should be disposed of as soon as it is no longer required. Determining whether information has only temporary value is a matter of judgement and if an individual is in any doubt as to whether something is a record or not they should consult the department record owner or seek advice from the custodian of the Records Control Procedure.

File plans

Records are classified and stored with reference to a file plan. A file plan is a list of the different types of records created or received by a department, together with instructions on how each type of record must be managed. The file plan provides information about the physical location of a record and its format and links the record to the Company Retention Schedule for the application of consistent Company retention periods [refer to **NG-P064** - Records Control Procedure].

Do

- 9 Make sure you understand the difference between a record and information of temporary value.
- 9 Make sure you understand when you create or receive records during the course of your work.
- 9 Identify, classify and store records in line with your departmental and company procedure [**NG-P064** - Records Control Procedure].
- 9 Protect records to ensure they cannot be subject to unauthorised access or interference.
- 9 Make sure that you preserve all relevant information (even that of temporary value) if the subject matter becomes subject to litigation, governmental or regulatory investigation, or tax audit and suspend scheduled disposal of records in such circumstances.

- 9 Dispose appropriately of records after the requirement for their retention has expired and you have determined that no preservation requirement exists for those records.

Don't

- 8 Don't forget to transfer custody of all relevant records if you change your job within OLNG or if you leave your job with OLNG.
- 8 Don't forget that the determination of what is a record is based on content and that both paper and electronic records (including email) must be managed.

FIND OUT MORE

For further information on records management and retention of information refer to the Records Control Procedure [**NG-P064**] and the OLNG Controlled Documents Procedure [**NG-P012**] or contact Head of Quality and Management Framework (**SPM/2**).

INFORMATION MANAGEMENT

COMMUNICATIONS, BRANDING PROCEDURES AND GUIDELINES

How the Code can help you

You are about to send an important email to a customer or supplier. You are unsure about how to address the contact and also about what 'tone of voice' to adopt. The Code states our policy on communications and directs you to other useful guidance.

Background

All employees and contract staff are required to take care when communicating both internally and externally, and particularly when the communication is a written document (including email). Inappropriate, inaccurate or careless communications can create serious liability and compliance risks for the Company.

Emails, in particular, are often central to litigation and regulatory

investigations. They frequently provide a frank account of events inside an organisation and they are virtually indestructible. It is also true that they may easily be misinterpreted, taken out of context or give a misleading impression.

Communications, Branding Procedures and Guidelines

The Communications, Branding and Procedures and Guidelines documents [ODF-P301 Communications and Branding Procedures and Guidelines] document sets out the rules and principles that should be applied to your business communications both internal and external to OLNG. These rules and principles have been designed to minimise liability and compliance risks. They apply to communications in any format or medium, including electronic documents, social media, instant messages, paper documents, facsimile and telex messages, voice, and voice mail recordings.

Do
9 Take care when writing.
9 Think before you send.
9 Respect the recipients' time.
9 Respect the recipients' status and authority within the receiving organisation and, in case of communications to authorities, consult the Company's Government Liaison officers in respect of complying with protocol.
9 Ask yourself 'Would I be comfortable if this communication appeared on the front page of a newspaper or was produced as evidence in legal proceedings?'
9 Ask yourself 'Do I need to make this communication (should it perhaps be issued by a colleague at a different level) and what is the most appropriate way of communicating?'
9 Make sure that your written communications contain a clear statement (in a footer on an email or on your company's headed paper) identifying your employing company and giving those details required by law (for example, the company name, the address of its registered office and its registration number), as well as your contact details.
9 Check that you are authorised to make a particular commitment.
9 Obtain legal advice to avoid accidentally creating legally binding commitments when discussions or negotiations continue over a long period of time.
9 Make sure you are authorised to share a particular piece of knowledge (especially if posting information on the OLNG intranet).
9 Apply the 'need to know' test when considering sharing knowledge with a third party.

Don't
8 Don't assign blame or be judgemental ('it was his fault').
8 Don't brag or overstate ('we ensure 100% compliance').
8 Don't write speculative opinions (describe equipment as 'unsafe' without having all the facts available).
8 Don't engage in 'chit chat' on sensitive or confidential matters or joke about serious matters.
8 Don't not send obscene, offensive or harassing material through electronic mail, electronic messages, or print.
8 Don't use e-mail as a substitute for face to face/telephone communication with colleagues. It is very important to maintain interpersonal relationships.
8 Don't make decisions for companies that you don't work for – in general, your activities in respect of any companies other than your employing company are advisory only.
8 Don't give the wrong impression about which company a communication comes from.
8 Don't impersonate or send email messages whose header fields have in any way been altered or where the message appears to originate from someone or somewhere else.
8 Don't share knowledge when this is prohibited or restricted: <ul style="list-style-type: none">– in the context of a commercially sensitive project.– by law (for instance US export controls legislation).– by an agreement, notably confidentiality or joint venture agreements.– for fiscal reasons (the information may have a commercial value so that sharing it has fiscal consequences).

FIND OUT MORE

To find out more refer to the Communications, Branding Procedures and Guidelines [ODF-P301] or contact the Senior Manager, Communications and Corporate Affairs (ODF/3) or connect with the Communications and Media Department in ODF.



GENERAL USE OF INFORMATION MANAGEMENT AND TECHNOLOGY FACILITIES

Users should be aware that the data they create on the corporate systems remains the property of OLNG. This information is not confidential to the Company and at any time, with or without notice, may be logged, monitored, searched, reviewed, disclosed, or intercepted by the Management for any legitimate purpose.

All users of OLNG's information systems shall be responsible and liable for all actions including transactions, information retrieval or communication performed on OLNG's information systems.

The hardware and software assigned to you are essential parts of the total Information Management & Technology facilities provided by the Company to you for the purpose of carrying out your job. It is important that you take good custody of these information assets, to avoid unnecessary inconvenience due to self-induced hardware and software failure. They may include your own IT equipment (e.g. smart phones), when this has been authorised for business use by your line manager.

Users are responsible for their logins, whether on office or personal machines. Users must not provide their passwords or logins to others, as any inappropriate use will be deemed as carried out by the users.

Do

- 9 Obtain explicit permission of the information asset owners before sharing or allowing access to the classified information with other users.
- 9 Contact the Information Security Officer for reporting, follow-up and resolution of information system related incidents and problems including security incidents and problems.
- 9 Exercise duty of care when using the Company's IT equipment.
- 9 Take steps to safeguard the physical security of the IT equipment assigned to you.

Don't

- 8 Don't engage in acquiring or transmitting material that is in violation of applicable regulations or material that is offensive, defamatory, or threatening to others (e.g. pornographic material, ethnic slurs, racial epithets, or anything construed as harassing, offensive, or insulting to others based on race, religion, national origin, colour, marital status, citizenship status, age, disability, or physical appearance).
- 8 Don't use Company's Information Management & Technology facilities to conduct fraud.

- 8 Don't publish or distribute internal mailing lists to non-staff members or external parties without authorisation.
- 8 Don't connect or disconnect any IT equipment to OLNG network, without prior written approval from your line manager and IT manager.
- 8 Don't remove the outer case or any other parts of the IT equipment provided by the Company.
- 8 Don't perform unauthorised installation of software.
- 8 Don't copy software or make available over a network for use on second or subsequent computers, except where explicitly authorised to do so.
- 8 Don't misuse or abuse any hardware or software.
- 8 Don't deliberately perform acts which are wasteful of IM&T resources or which unfairly monopolise resources to the exclusion of others.
- 8 Don't commit a 'cybercrime' (for example: to send spam or viruses, hack or attempt to infringe security measures to access resources on the network for which you are not authorised, communicate under a false name, intercept or change communications or deface websites).
- 8 Don't disable or fiddle with OLNG security measures/controls configured.

INFORMATION MANAGEMENT

PERSONAL USE OF INFORMATION MANAGEMENT AND TECHNOLOGY FACILITIES

OLNG expects that employees using OLNG IT and communication facilities for personal reasons will apply high ethical standards, comply with applicable laws and regulations (as well as cultural or social codes that prevail in their workplace) and adhere to OLNG's information security requirements. Personal or non-business use of the facilities and systems, including social media use, shall only be permitted when used in limited manner, provided it being:

Do

- 9 Be aware of the risks to Company's information assets arising from your action and take steps to protect Company's information assets from such risks.

Don't

- 8 Don't use Company's Information Management & Technology facilities in a way that could damage OLNG.
- 8 Don't use Company's Information Management & Technology facilities to conduct your personal business.
- 8 Don't use Company's Information Management & Technology facilities for accessing, uploading/downloading and storing of offensive, inappropriate and unauthorised websites and materials even if they are for limited personal use (e.g. pornographic, indecent, gambling, cracked software, peer-to-peer / personal file sharing programmes / utilities).

- appropriate use;
- in your own time;
- occasional and brief, i.e. within reasonable usage levels.

Limited personal use shall not deny the availability of network resources to other users, incur substantial cost to the Company, negatively affect productivity, compromise confidentiality and integrity of OLNG information assets or endanger the security of OLNG information assets. OLNG will report illegal use of IT and communication facilities to the proper authorities.

8 Don't use Company's Information Management & Technology facilities for storing or transmitting images or (streaming) media files or otherwise generate high network traffic or data storage costs due to personal use.

8 Don't indicate your affiliation with the organisation in any public domain bulletin board discussions, chat sessions and other offerings on the Internet.

8 Don't send personal e-mails using the OLNG name, brand or footer (Outlook signature) attached.

8 Don't register Company e-mail address in any public forums, mail lists, etc. for personal use.



INFORMATION SECURITY

“People, Process, and Product” contribute to the security of the Company’s information assets. Hence, you (the “People” element) play a vital role in ensuring security of our information assets.

- Information resources must not be used for any illegal or unethical purposes and should not generally be used for

recreational or personal use.

- The use of information resources is subject to the regulations and guidelines outlined in this Code.
- It is the responsibility of the individual to be aware of the regulations and guidelines. Ignorance of the regulations and guidelines is not acceptable as an excuse or defence.

Do

- 9 Safeguard all portable storage media and other computer readable media to prevent loss, misuse or corruption of business data.
- 9 Ensure that if the computer is left unattended it is either switched off or locked with a password.
- 9 Switch off your IT equipment (not network printer) at the end of the working day.
- 9 Use strong passwords and ensure that the passwords are kept confidential and changed regularly.
- 9 Check the files, e-mail attachments and other storage media for viruses and other malware before dispatching them to intended recipients.
- 9 Take necessary precautions to prevention infection by and spread of malware such as computer viruses, Trojans, etc.
- 9 Avoid keeping data locally. In case data is kept locally, make regular and systematic backups of this data.
- 9 Use Power-On password on portable computers.
- 9 Report any security incident (virus, hackers etc.), suspected weaknesses or software malfunctions immediately to the IT Helpdesk or Information Security Officer. Early detection of, and quick response to security incidents helps to minimise the risks and impact to the business.

Don't

- 8 Do not allow visitors to connect their portable computers or other equipment to the Company’s network without authorisation.
- 8 Don't connect modems to computer in Company's network without authorisation as this can provide access to external information threats to the Company.
- 8 Don't auto-forward your e-mails without restriction to your personal/private e-mail account as your personal e-mail account may not be secured in line with Company's standards.
- 8 Don't write your passwords down on paper or use the same internal systems passwords for external systems (e.g. public web sites).
- 8 Don't share user accounts and passwords without authorisation.

FIND OUT MORE

To find out more refer to the Information Security Policies Framework **[NG-P080]** Information Security Policies Framework or contact the Information Security Officer **(IT/5)**.

INFORMATION MANAGEMENT

CYBER CRIME

How the Code can help you

You are at a well-known coffee shop with free WiFi which is not secure and you are about to access your bank account to attend to a banking transaction which will require you entering your access pin or pass code. The Code states our policy on Cyber Crime and directs you to other useful guidance.

Background

Cyber Crimes are offences that are committed against individuals or groups of individuals or entities with a criminal motive to intentionally harm the reputation of the victim or cause harm to the victim directly or indirectly. The Cyber Crime Law (applicable to acts whether in or outside of Oman, provided the effects of the actions are felt within Oman) aims to safeguard information about entities or individuals and their personal data, and to sanction violations thereof. OLNG is committed to managing personal data in a professional, lawful and ethical way. Data, whether personal or otherwise, should be obtained by lawful means and, where required by law, with the knowledge or consent of the subject.

Information Security Classification

When information is generated (in paper or electronic form), the appropriate level of security classification should be determined.

Line managers should be consulted if uncertain. The security classification determines how the information should be handled. Oman LNG defines four categories of Information Security Classification as per National Records & Archives Authority (NRAA), Oman: Unclassified, Confidential, Restricted, Secret or Top Secret. To find out more about security classification refer to **[NG-P064 - Records Control Procedure]**

The Cyber Crime Law (RD 12/2011) provides for:

- Illegal or unauthorised access to electronic sites and systems;
- Unlawful deletion, change, disfigurement, misuse, mischief and copying of personal and confidential data;
 - Forgery and fraud in relation to electronic data;
 - Misuse of IT tools;
 - Content crimes;
 - Criminal sanctions (fines and imprisonment).

Aspects for compliance

1. Avoid any actions or behaviours that are or could be construed as Information Security Incident or data breaches.
2. Be conscious about information classification.
3. Certain activities may be considered illegal.
4. Both OLNG and individual maybe subject to civil penalties if found to be in breach of legal requirements.

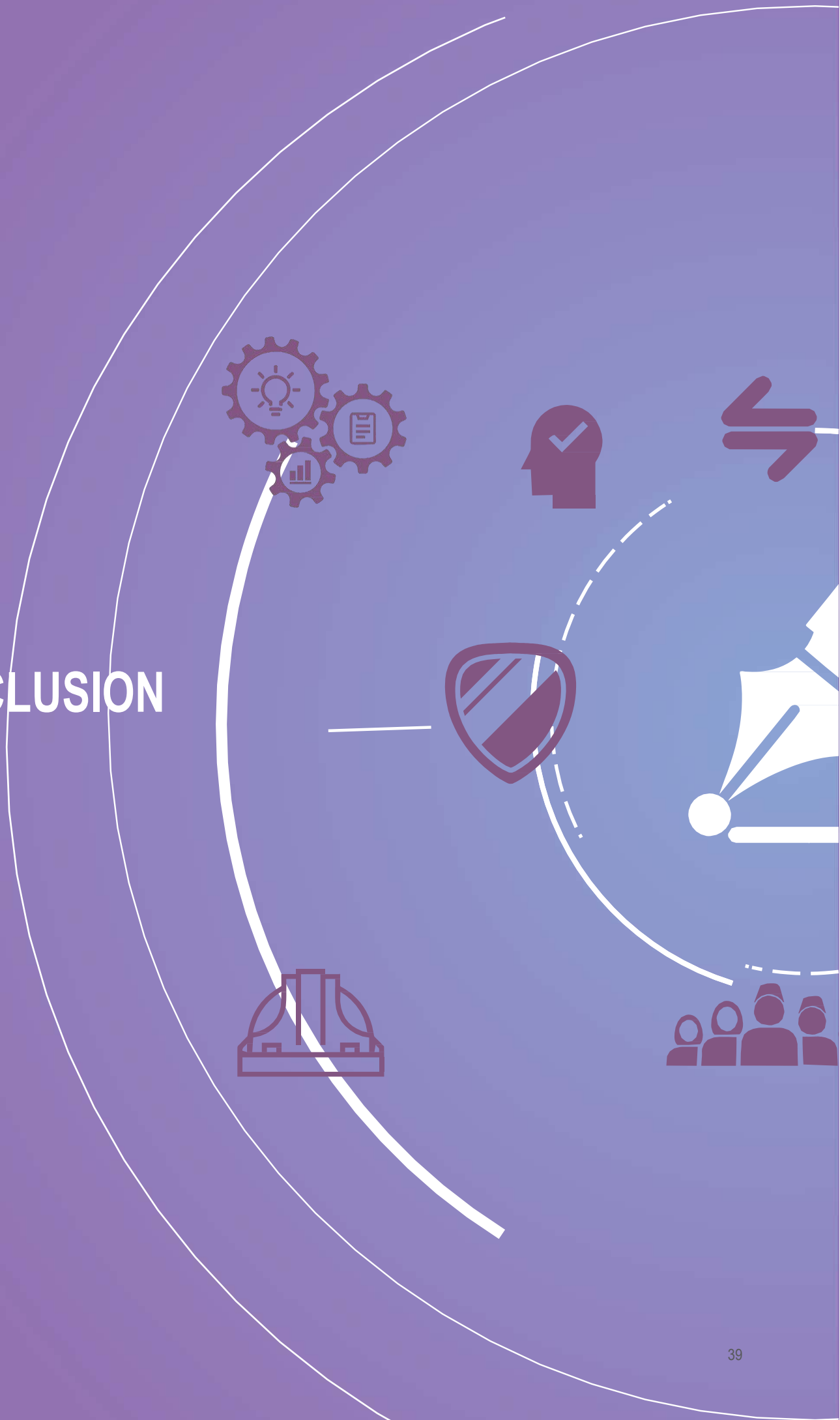
Do	
9	When creating confidential documents, indicate the security classification and treat the documents accordingly.
9	Know your security classification (Unclassified, Confidential, Restricted, Secret or Top Secret).
9	Store confidential information on SharePoint and maintain access rights and share by emailing the link .
9	Use strong PIN/passwords and keep them secret and safe, using different passwords for business and personal purposes.
9	Be careful of publishing information on social media as it may be misused.
9	Only publish OLNG information with approval.
9	Only use WiFi hotspots from a reputable provider and ensure you set up a VPN connection.

Don't	
8	Do not open suspicious (phishing) emails or attachments; do not click links in social media messages from unknown people.
8	Do not save information on memory sticks unencrypted and do not store information permanently thereon.
8	Do not discuss confidential information in public spaces where you can be overheard.
8	Do not use commercial internet services (e.g. Dropbox) to store OLNG data unless expressly approved.
8	Do not leave your laptop and smartphone unattended.

FIND OUT MORE

To find out more refer to the Information Security Policies Framework **[NG-P080]** contact Information Security Officer **(IT/5)** or refer to Ma'an "Violations in Relation to Work Discipline and Ethics".

CONCLUSION



CONCLUSION

Thank you for taking the time to read through our Code of Conduct. It will help you understand the main risks to you and OLNG and how you can safeguard OLNG's reputations by knowing and understanding your responsibilities.

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, NGL, HR or IA, or use the Whistle Blowing Policy. This is especially relevant if you suspect that someone is violating the Code and putting OLNG 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, and ensure you always make the right decision.





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