

Business Partner

Code of  
Conduct





---

<b>Section 1: Introduction</b>	<b>02.</b>
Message from the CEO	04.
Our Core Values	05.
The Code	06.
Speak Up	07.

---

<b>Section 2: Requirements and expectations</b>	<b>08.</b>
1. Health, safety, environment, security and climate	10.
2. Acting with integrity	12.
3. Human rights	14.
4. Communities	15.
5. Compliance with trade and sanctions laws	15.
6. Record-keeping	15.

---

<b>Section 3: Due diligence and supplier management</b>	<b>16.</b>
---	------------

---

<b>Section 4: Further resources</b>	<b>20.</b>
-------------------------------------	------------

# 1

## Introduction

### In this section

---

Message from the CEO	04.
Our Core Values	05.
The Code	06.
Speak Up	07.

# Message from the CEO

Dear Business Partners,

I am pleased to introduce our Business Partner Code of Conduct – a guide to ethical decision-making and expected behaviours when working with or on behalf of Harbour Energy. This Code reflects our unwavering commitment to upholding the highest standards of business conduct.

Our Core Values are Integrity, Responsibility, Collaboration and Innovation, and we expect all our Business Partners to align with these values.



## Harbour Energy has:

- Zero tolerance for any form of bribery and corruption
- Zero tolerance for any form of fraud
- Zero tolerance for any form of modern slavery, forced labour or child labour
- Zero tolerance for any form of discrimination, bullying and harassment
- Zero tolerance for retaliation against anyone raising a concern in good faith

This Code outlines the fundamental standards of our business activities. Each of our Business Partners is responsible for supporting Harbour Energy in upholding this Code, as it protects our reputation, ensures compliance and preserves shareholder value. Please keep in mind this Code as our working relationship evolves.

If you come across any situations that do not align with this Code or if you are unsure of Harbour Energy's expectations, please raise a concern (Speak Up). We take your concerns seriously and ensure protection from retaliation. Section 1 of this Code explains how to raise concerns.

Thank you for your commitment and support in applying this Code to our everyday working practices. Together, we can uphold our Core Values to promote the continued success of our businesses.

**Linda Z Cook**  
Chief Executive  
Harbour Energy plc

# Our Core Values

Ethical business conduct is central to how Harbour Energy operates and does business. Our approach to how we do business is underpinned by our **Core Values**:



## Integrity:

Always doing the right thing in a professional, respectful and honest way.



## Responsibility:

For safety and the environment, for complying with our policies and procedures, for delivering against individual and team goals.



## Innovation:

Encouraging a more creative approach to business.



## Collaboration:

Working together to achieve shared goals and successfully execute our business plans.

Our Core Values represent what we stand for, what is important to us and what we do not compromise on.

# The Code

The Harbour Energy Business Partner Code of Conduct (the 'Code') provides guidance on how to act in accordance with the Harbour Energy Core Values while working with us.

The Code applies to contractors, i.e. any individual or organisation that provides goods and/or services directly to Harbour Energy, as well as our intermediary entities and operating partners (together our 'Business Partners').

**While engaged by Harbour Energy, all Business Partners are expected to:**

- Understand and comply with the Code
- Act in a manner consistent with the Code
- Report any identified or suspected breach of the Code within a reasonable timeframe, and cooperate with any subsequent investigation

**In addition, we encourage our Business Partners to:**

- Set expectations for their own sub-contractors and business partners, that align with the Code
- Have equivalent speak up mechanisms available for their own sub-contractors and business partners, that enable individuals to raise relevant concerns confidentially and without fear of retribution or retaliation



# Speak Up

We expect our Business Partners to provide to their stakeholders, including their workforce, sub-contractors and associated communities, access to mechanisms for the confidential raising of concerns regarding compliance with the Code without the fear of retaliation or retribution.

If, for whatever reason, an individual wishes to raise a concern directly with Harbour Energy instead they may do so confidentially via email to: [compliance@harbourenergy.com](mailto:compliance@harbourenergy.com), or via Safecall, an independent company which offers anonymous reporting channels for all Harbour Energy employees, contractors, sub-contractors, Business Partners and other stakeholders.



The Safecall line operates 24 hours a day/7 days a week, and has translation services available, enabling concerns to be reported across multiple languages.

**There are three ways to contact Safecall:**

• **By Freephone telephone:**

UK: 0800 915 1571  
Norway: 00800 7233 2255  
Indonesia: +62-21-50863399  
Vietnam: 120 11157  
(or 122 80725 for Viettel users)  
Mexico: 01800 1231757

• **By email:** [harbourenergy@safecall.co.uk](mailto:harbourenergy@safecall.co.uk) or

• **By sending a report via Safecall's website:** [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Safecall will ensure that all concerns raised are brought to the attention of Harbour Energy's leadership team or an independent director. Harbour Energy wants to maintain an open culture where concerns are raised without fear of retaliation and where there is a robust and fair investigation of every concern raised, therefore our policies state that we have zero tolerance for retaliation against anyone who raises a concern in good faith, and that any threat or intimidation will result in Harbour Energy taking appropriate steps.



# 2

## Requirements and expectations

**In this section**

---

1. Health, safety, environment, security and climate	10.
2. Acting with integrity	12.
3. Human rights	14.
4. Communities	15.
5. Compliance with trade and sanctions laws	15.
6. Record-keeping	15.

# Requirements and expectations

## 1 Health, safety, environment, security and climate

### Harbour Energy commitment

We are committed to creating a safe and sustainable operational environment in our operations and assets around the world, and to protecting the health and safety of everyone working in, or affected by, our operations.

Our goal is to minimise, wherever reasonably practicable, any negative impact our operations have on air and water quality and biodiversity, and where practicable deliver socio-environmental benefits. Our ambition is to achieve net zero by 2035 for our gross operated Scope 1 and 2 CO<sub>2</sub> emissions.

### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Adopt the highest standards of vigilance and care to ensure the health and safety of everyone working in our operations
- Know the emergency procedures that apply where you work
- Understand the hazards associated with the work you are undertaking and stop your work, or the work of others, if it feels or appears unsafe. You must also not undertake work that you are not qualified to perform



- Report any health and safety incidents immediately, including unsafe acts, as well as any environmental incidents or risks
- Be fit for duty and sure that performance is not impaired, for example by a lack of sleep, alcohol, or any drugs, including prescription or over the counter medication
- Understand and follow all of our policies and procedures that are designed to protect health and safety, the natural environment and the communities affected by our activities
- Contribute to the delivery of our environmental targets including our goal to reduce greenhouse gas emissions
- Abide by Harbour Energy's personal, physical and IT security, and personal data protection protocols, which help keep our employees, contractors and assets safe



## 2 Acting with integrity

### a. Anti-bribery and corruption Harbour Energy commitment

We have zero tolerance for any form of bribery and corruption.

**What is corruption?** Corruption is the abuse of power for private gain. It involves dishonest, often fraudulent and criminal conduct, by individuals in power or authority. Paying a bribe to someone in power or authority is a typical example of corruption.

**What is a bribe?** A bribe is the giving or receiving of a payment, gift, hospitality or favour to influence a business decision, whether as a direct transaction or via an intermediary. Bribery is a criminal offence. Both the individual who offers the bribe and the individual who receives it can be liable to prosecution.

**What is a facilitation payment?** If a public official asks for an additional fee to speed up a procedure that is their responsibility to perform, they are asking for a facilitation payment. This is illegal under UK law and therefore prohibited by Harbour Energy across its business.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Never offer, pay, make or request a bribe or facilitation payment
- Ensure that you and your sub-contractors do not pay a bribe or engage in any form of corruption on Harbour Energy's behalf

- Resist any request to pay a bribe and immediately report any such request to Harbour Energy's General Counsel (via email to: [compliance@harbourenergy.com](mailto:compliance@harbourenergy.com))

### b. Gifts and hospitality Harbour Energy commitment

We are committed to working with honesty and integrity. As part of this commitment, we ensure that we never offer or receive gifts or hospitality that could be construed as a bribe to obtain a benefit for Harbour Energy. We also ensure that we never accept gifts or hospitality that could influence our business decisions.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Avoid gifts or hospitality that could be construed as a bribe
- Never offer hospitality or provide gifts if it might be perceived that it could create a conflict of interest
- Never offer any gift or hospitality to a public official when working for Harbour Energy

### c. Fraud Harbour Energy commitment

We have zero tolerance for any form of fraud. We are committed to protecting our assets and ensuring that they are used only for the benefit of Harbour Energy.



#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Never falsify records
- Ensure that all expenses and invoices are accurate and that you never claim for payments that you are not entitled to receive
- Work within the internal controls in place and not abuse your position

### d. Conflicts of interest Harbour Energy commitment

We are committed to working with honesty and integrity, ensuring that any potential or actual conflict of interest is transparently declared and properly managed.

**What is a conflict of interest?** A conflict of interest arises when your personal or financial interest interferes with, or appears to interfere with, Harbour Energy's interests. This can also include any personal or financial interest that may influence or appear to influence your loyalty or objective exercise of your duties when working for Harbour Energy. This could arise for example when you have a personal connection to a third party who is responsible for any authorisation, such as awarding a permit to Harbour Energy.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Be alert to situations where your personal interests and the interests of Harbour Energy may conflict
- Declare any potential or actual conflicts of interest between you and Harbour Energy as soon as they are identified and agree a mitigation plan if necessary

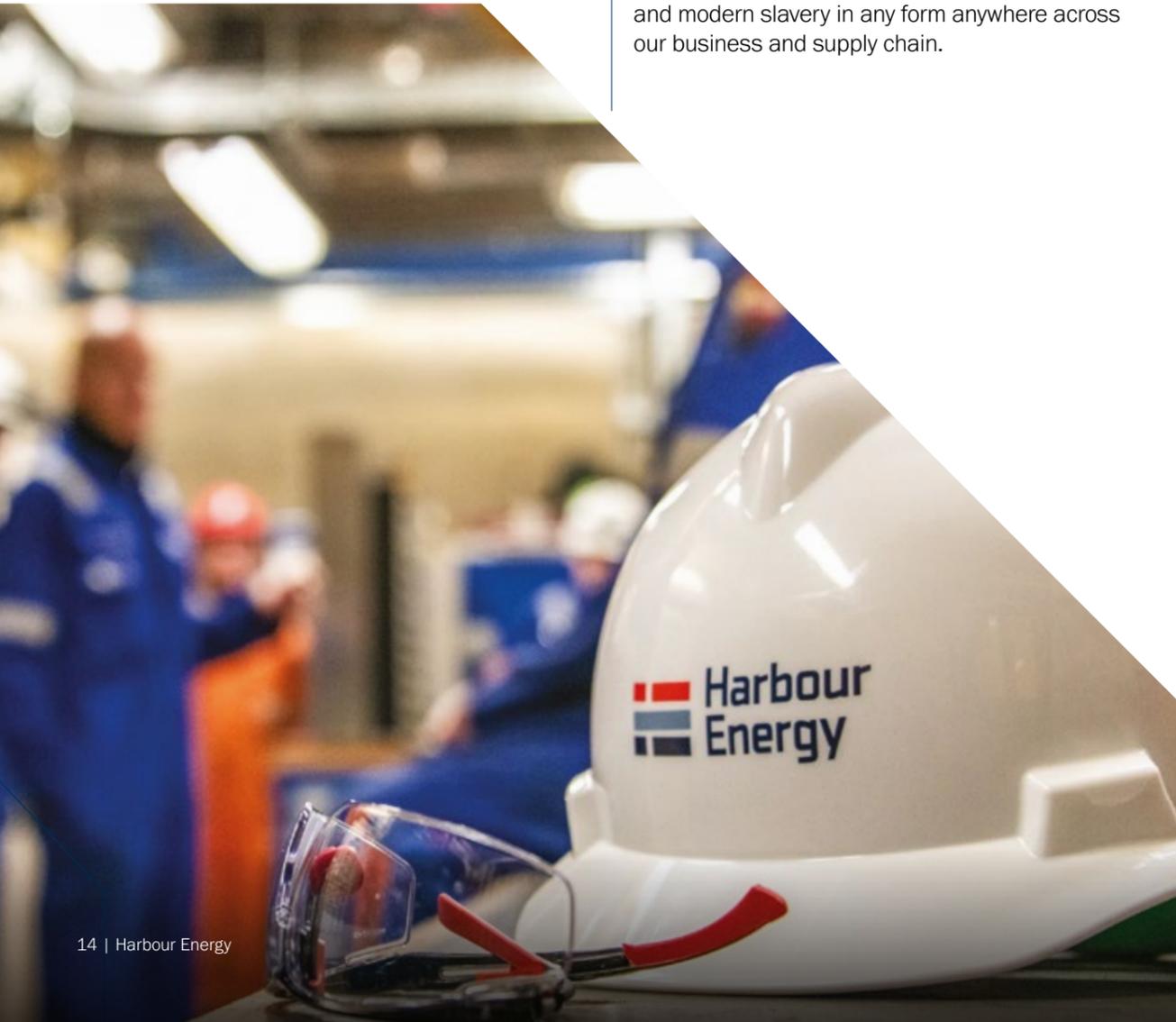
### e. Political activity and donations Harbour Energy commitment

We are committed to the highest standards of business conduct in relation to our interactions with governments, whether national or local, and societies where we operate. It is our policy not to make political donations and we do not use funds for any political purpose. We only engage with public officials as required by our business activities. Any lobbying activity undertaken on behalf of our interests is fully registered and properly managed.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Keep any personal political activities separate from those of Harbour Energy
- Ensure that any political views you express, or actions that you take, are expressed to be your own



### 3 Human rights

#### Harbour Energy commitment

We are committed to respecting human rights (as set out in the United Nations Universal Declaration of Human Rights) and to upholding worker welfare standards (as defined by the ILO Core Labour Standards) throughout our operations, and we expect our contractors and sub-contractors and their employees to do the same.

We are committed to preventing human trafficking and modern slavery in any form anywhere across our business and supply chain.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Ensure that all sub-contractors working for you are paid a fair wage and are treated with dignity and respect
- Be alert to human rights, modern slavery and human trafficking risks and report any concerns identified to us

### 4 Communities

#### Harbour Energy commitment

We are committed to treating all local communities with sensitivity and respect and to ensuring that our business activities provide a positive, sustainable and long-lasting impact. We listen to the views of local communities and their representatives to make sure that any potential negative impacts are identified and managed properly.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Be respectful of the local communities affected by our activities
- Work with us to avoid any negative impact on local communities when performing services for Harbour Energy
- Support Harbour Energy's efforts to leave a positive legacy in the local communities where we operate

### 5 Compliance with trade and sanctions laws

#### Harbour Energy commitment

We comply with the trade laws of all countries in which we operate, including sanctions and import and export laws.

#### Your responsibility

We expect everyone who works for or with Harbour Energy, and who is involved in business dealings with a sanctioned country, organisation, entity or person, to ensure compliance with applicable sanctions laws and regulations.

### 6 Record-keeping

#### Harbour Energy commitment

We are committed to being honest and transparent about our operations and performance. We recognise that all our Business Partners rely on Harbour Energy maintaining accurate and complete disclosures and business records.

#### Your responsibility

We expect everyone who works for or with Harbour Energy to:

- Comply with the laws and regulations applicable to them and to Harbour Energy in the countries in which it operates and where goods or services are provided to it
- Ensure all transactions are properly approved, recorded and reported, where relevant
- Follow Harbour Energy's processes and procedures when creating, maintaining, retaining or destroying documents and data
- Prevent, and/or not facilitate, third-party tax evasion



# 3

Due diligence  
and supplier  
management

# Due diligence and supplier management

Our due diligence processes address supply chain risks associated with compliance with laws, respect for human rights (such as equality, non-discrimination and diversity), respect for workers' rights of freedom of association, modern slavery, child labour, health and safety and environmental impacts.

We take a risk-based approach to assessment and identification of compliance risk in our supply chain and across our business.

In all circumstances where we believe that our suppliers have not met our expectations, or their contractual obligations, we will take appropriate action.

This may include, in circumstances where a Business Partner is unable or unwilling to meet our expectations, the review of, and ultimately the termination of, our relationship with them.



# 4

## Further resources

### Harbour Energy Code of Conduct



[harbourenergy.com/about-us/values-code-of-conduct](https://harbourenergy.com/about-us/values-code-of-conduct)

### Harbour Energy Modern Slavery and Human Trafficking Statement



[harbourenergy.com/site-services/slavery-and-human-trafficking](https://harbourenergy.com/site-services/slavery-and-human-trafficking)

