

Group-wide Dealing

Policy

This Policy applies to all directors, employees and contractors of Harbour Energy plc and its subsidiaries ('Harbour Energy'). This Policy has been designed to ensure that you do not misuse, or place yourself under suspicion of misusing, information about Harbour Energy which you have, and which is not public.

- You must not deal* in any securities* of Harbour Energy if you are in possession of inside information* about Harbour Energy, and you must not recommend or encourage someone else to deal in Harbour Energy's securities at that time – even if you will not profit from such dealing
- You must not disclose any confidential information* about Harbour Energy (including any inside information) except where required to do so as part of your employment or duties. This means that you should not share Harbour Energy's confidential information with family, friends or business acquaintances
- You may, from time to time, be given access to inside information about another group of companies (for example, one of Harbour Energy's customers, suppliers, joint venture partners or competitors). At such times, you must not deal in the securities of that group of companies or share the information with family, friends or business acquaintances
- Harbour Energy also operates a Dealing Code Standard, which applies to the business' directors and to employees who can access restricted information about Harbour Energy. You will be told if you are required to conform with the Dealing Code Standard. Directors and employees who are required to conform with the Dealing Code Standard must also conform with this Policy
- Employees and contractors of Harbour Energy must not deal in any securities of Harbour Energy during the 10 calendar days prior to the publication of the Harbour Energy's Full Year Results and Half Year Results (referred to as "Blackout Periods"*)
- Failure to conform with this Policy may result in disciplinary action. It may also mean that you have committed a civil and/or criminal offence
- All employees and contractors are expected to conform with Harbour Energy's 'Procedures, systems and controls for compliance with disclosure obligations'*
- If you have any questions about this Policy, or if you are not sure whether you can deal in securities at any particular time, please contact the Company Secretary

* The terms used in this Policy have the same definitions as set out in the Harbour Energy Procedures, Systems and Controls Manual.