

# Working in accordance with Company Values

In SapuraAcergy we ensure that all individuals working for or on behalf of SapuraAcergy promote the Company mission, work in accordance with the Company values and strive to meet the Company goals whilst ensuring that they all adhere to the highest ethical standards at all times. These business conduct principles and rules are equally applicable for all associated legal entities and unincorporated associations within SapuraAcergy.

The SapuraAcergy code of business conduct is applicable to all, permanent and temporary members of staff, including contractors, representatives and consultants (hereinafter the "Personnel") and should be complied with at all times.

We abide to the following rules of conduct:

**BUSINESS BEHAVIOUR:** We compete fairly and ethically within the framework of applicable competition laws.

**LAWS AND REGULATIONS:** SapuraAcergy has as one of its objective the compliance with the applicable laws and regulations of the countries in which SapuraAcergy operates or under which SapuraAcergy has any contractual association. One area in particular is the legislation prohibiting bribery and corruption.

**OWNERSHIP TO CONFIDENTIALITY OF COMPANY INFORMATION:** All the information on the SapuraAcergy computer system and in its possession by way of paper copies or otherwise can only be used for the purpose of SapuraAcergy's or its Parent companies' business. In addition to removing and/or using information for other purposes potentially being a violation of civil or criminal obligations which employees and directors are subject to, use of such information for other than SapuraAcergy or its Parent companies purposes is considered unethical and in breach of this code.

**CONFLICT OF INTEREST:** All Personnel must pay particular attention to conflict of interest issues. If an employee is faced with a situation in which his or her personal financial, political or other interests or those of individuals or entities close to them may conflict with that of SapuraAcergy, they must report it immediately to their Manager.

**TRAVEL AND OTHER EXPENSES:** Travel and other expenses are reimbursed by SapuraAcergy only upon production of a legitimate proof of expense (eg original receipt, bill).

**INSIDER TRADING:** Each individual working for or with SapuraAcergy who has access through his or her position to privileged non-public information, must not engage in divulging such information nor trade in those shares, or any other financial instruments, including exercising share options.

**PROPER ACCOUNTING AND RECORD KEEPING:** All transactions on behalf of SapuraAcergy entities must be properly and appropriately described in the records of the Company and accounted for in accordance with the prevailing accounting standards and the SapuraAcergy integrated Management System (SAIMS) and will be subject to audit.

**CODE OF ETHICS FOR FINANCIAL OFFICERS:** SapuraAcergy promotes honest, transparent and ethical conduct throughout the Finance function and their conduct must be above all scrutiny.

**INTERNAL CONTROL SYSTEM:** Management is committed to establish, maintain, and regularly evaluate the effectiveness of a business-wide internal control system including, but not limited to, detailed procedures for accounting, financial reporting and disclosure.

**RELATIONSHIPS WITH GOVERNMENT OFFICIALS, CLIENTS, SUPPLIERS, REPRESENTATIVES, AGENTS AND PARTNERS:** These relationships should be conducted ethically and in compliance with local and international statutory requirements.

**COMMUNITIES AND POLITICAL ACTIVITY:** SapuraAcergy respects and strives to promote a harmonious working relationship with the local communities in which it operates. SapuraAcergy acts in accordance with appropriate national laws in a socially responsible manner and refrains from participation in party politics or any other form of inappropriate politics.

**COMMISSIONS, FEES AND SIMILAR PAYMENTS:** All Commissions, consultants' fees, retainers or similar payments should be clearly related to, and commensurate with the agreed documented services being performed.