

Ethics & Business Integrity Policy

“ We must ensure we maintain the highest standards of business integrity in all our dealings with employees, customers and suppliers, partners, communities and host governments”

Chairman OEPEL 2014



High Standards of Business Integrity

OUR GOALS ARE

To promote and maintain honesty, Integrity, and high ethical standards

To prevent financial and reputational damage to OEPEL and its employees

If you have any concerns or questions about this policy you should contact (in confidence) the OEPEL General Counsel at compliance@oceanap.com. OEPEL undertakes to investigate all reports and to ensure no retaliation against anyone who makes such a report in good faith.

OEPEL personnel must be committed to achieving these goals

- Managers are responsible and accountable for upholding and communicating this policy and leading by example.
- All OEPEL personnel must comply with this policy and promptly report concerns or violations.

To ensure compliance with our Ethics & Business Integrity Policy we must

- Comply with the laws governing OEPEL and its operations and all OEPEL policies.
- Treat all staff, business partners and local communities fairly and with respect.
- Ensure we avoid making any illegal payments including to customers, agents and host governments'.
- Avoid all conflicts of interest including any transactions which could be perceived as conflicts of interest.
- Ensure all OEPEL documentation, including financial accounts and records, are accurate, complete and truthful.
- Maintain the confidentiality of commercially sensitive information.
- Compete fairly.
- Report all violations and concerns in a spirit of openness and transparency.