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ENOC Third Party Code of Conduct

The Way We Lead



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THE CODE OF ELEMENTS



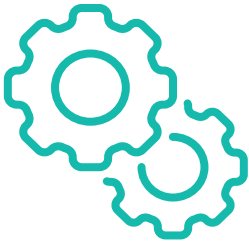
PEOPLE

Fair Treatment / Tolerance / Wages and Working Hours / Child and Forced Labor / Health, Safety & Environment



INTEGRITY & TRANSPARENCY

Conflict of Interest / Business Courtesies, Gift and Entertainment / Fair Dealings / Supplier Due Diligence



ENOC'S ASSET & INFORMATION MANAGEMENT

Confidentiality of ENOC's Information / Inside Information / Record Management / ENOC Group's Property / ENOC Group's Intellectual & Proprietary Information / Social Media



COMPLIANCE

Anti-Corruption Compliance / Risk Management and Audits / Anti-Money Laundering / Sanctions and Trade Restrictions / Antitrust and Competition

Definitions:

ENOC Group: Emirates National Oil Company Limited (ENOC) L.L.C. and its Group of Companies.

Third Party (ies): Any external party in a contractual or business relationship with ENOC Group, including, but not limited to: suppliers, vendors, contractors, agents, distributors, consultants, service providers, resellers, and/or anyone who performs work for ENOC Group or on behalf of ENOC Group.

GROUP CEO MESSAGE

ENOC Group is a diversified organisation led by a unified vision to excel in everything we do. The success of our organisation is also defined by the robust corporate governance standards that we follow. We uphold the highest ethical standards in conducting all our business activities, thus establishing a solid foundation for future growth.

We strongly believe that ENOC Group's relationships with third parties are integral to our journey. We work with third parties around the world, and we believe that long-term partnerships are built through a strong understanding of each other's organisational values and purpose.

This Third Party Code of Conduct (the "Code") has been developed specially for you, our third parties, with the aim of providing clear insights and understanding of the values, responsibilities, obligations and ethical standards upheld at ENOC Group.

The Code also underlines ENOC Group's commitment to support you in achieving long-term success that is built on strong ethical fundamentals. It highlights our approach towards fair treatment, environment, health & safety standards, workplace conduct, conflict of interest, business courtesies, trademarks, and records management, among others – all structured to ensure an effective and rewarding collaboration.

The Code is more than just a guideline on business do's and don'ts. It is designed to provide you insights into ENOC Group's corporate governance framework and outlines the ethical practices we abide by as we uphold integrity in everything we do. We will work closely with you to help you understand the norms outlined in the Code as well as support you in its correct dissemination, implementation, monitoring and embedding its principles at all levels within your operations in relation to ENOC Group.

Together, with the guidelines outlined in this Third Party Code of Conduct, we can maintain the highest ethical standards across all our business operations and build long-term relationships.

Saif Humaid Al Falasi

Group Chief Executive Officer

OUR VISION

“TO BE AN INNOVATIVE ENERGY PARTNER, DELIVERING SUSTAINABLE VALUE AND INDUSTRY LEADING PERFORMANCE.”

OUR MISSION

To deliver world-class sustainable and integrated energy solutions. We do so by striving for excellence in operations, innovation and happiness for our employees, customers, and partners.

OUR VALUES

ENOC Group’s values are embedded in the letter and spirit of the Code, namely:

TEAM WORK

We promote working together by sharing ownership, responsibilities and outcome.

INTEGRITY

We believe in being honest, truthful, reliable, and fair, while dealing with all stakeholders.

TRANSPARENCY

We are open, straightforward and consistent in all we do, by communicating with clarity, simplicity and precision.

RESPECT

We acknowledge, recognize, and value all stakeholders.

CUSTOMER FOCUS

We position customers first in all that we do.

INTRODUCTION TO THE CODE

ENOC Group has implemented this Code to effectively meet industry challenges and ensure that its third parties maintain the highest ethical practices in carrying out their business activities. ENOC Group recognises the importance of strengthening its relationships with third parties who are committed to the principles set out in this Code, we believe such commitment is essential for a solid foundation in our strategic partnerships and future growth.

The Code sets guidelines for third parties who have a contractual relationship with ENOC Group or are employed by a Business Partner to perform work for or on behalf of ENOC Group.

Third parties are responsible for ensuring compliance with all applicable laws and regulations in every country where they conduct business. In the UAE, they must be in compliance with the Code as well as any other applicable policies of the ENOC Group. If ENOC Group's policies are in direct conflict with any applicable local laws, then the local laws shall prevail.

The rights of ENOC Group and its third parties shall be governed by the terms and conditions stipulated in their contractual agreement and the applicable laws. This Code is not intended to modify contractual terms and conditions.

ENOC Group's third parties are responsible for ensuring that their employees interacting with ENOC Group are familiar with the Code and any other applicable requirements for doing business with ENOC Group. The most current version of the Code is available on ENOC's website. ENOC Group retains the right to amend this Code at its sole discretion.

What ENOC expects from you as a Third Party:

- To ensure that all your employees, representative(s) and any individuals or entities you hire to conduct business or perform work for ENOC Group or on behalf of ENOC Group are aware and comply with this Code and any applicable laws and regulations.
- To notify ENOC Group as soon as you come to know of or suspect potential violations of this Code, or any laws and regulations, by employees or third parties. You may report any such incidents via the **ENOC Ethics Hotline**.
- To recognise that any failure to comply with this Code may negatively reflect on your relationship with ENOC Group and
- To ask questions when in doubt by contacting ENOC Business Ethics & Compliance function or via ENOC Ethics Hotline.

Definitions:

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HOW TO CONTACT ENOC'S BUSINESS ETHICS & COMPLIANCE FUNCTION

Ask questions or any clarifications to ENOC's Business Ethics & Compliance function via email ethicsenquiry@enoc.com

ENOC ETHICS HOTLINE

ENOC Ethics Hotline has been designed to enable all stakeholders to report any issues or instances of ethical violations or misconduct in relation to dealing with ENOC Group, if such issues could not be resolved through the existing relationship between the Third Party and representatives of the ENOC Group.

You may report any suspected illegal activity or potential violations of this Code in connection to doing business with ENOC Group via the ENOC Ethics Hotline.

ENOC Ethics Hotline Reporting Tools:

United Arab Emirates:

Toll Free Number: 800 ENOC Ethic (800 3662 38442)

Singapore

Toll Free Number: 1800 3662 222 (1800 ENOC CBC)

Turkmenistan

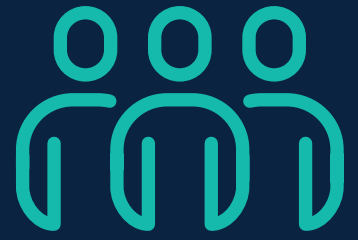
Local Number: +993 654 0 999 2

ENOC Ethics Hotline Whistleblowing Platform

Website: enoc.speakup.ae

Ethics Enquiry Line:

Email: Ethicsenquiry@enoc.com



PEOPLE

FAIR TREATMENT

TOLERANCE

WAGES AND WORKING HOURS

CHILD AND FORCED LABOR

HEALTH, SAFETY AND ENVIRONMENT (HSE)

FAIR TREATMENT

Third Parties shall treat each individual fairly and recruit, select, train, promote and compensate their employees and agents based on merit, experience and other work-related criteria.

Third Parties shall provide their employees with an environment free from harassment or discrimination, including physical or verbal abuse based on gender, race, religion, or ethnicity.

Third Parties shall comply with all applicable laws governing employment and labour practices.

TOLERANCE

Third Parties shall support and respect each employee's right to his or her personal beliefs and values. Personal beliefs aside from those covered by the Code should not be imposed on others in the workplace. Third Parties shall not use communication tools (letters, e-mail, bulletin boards, etc.) to advocate their personal, religious, ethnic, political, or other potentially sensitive personal preferences.

WAGES AND WORKING HOURS

Third Parties shall follow the applicable labour laws and other such laws and regulations in relation to the treatment of their employees and for matters including wages, working hours and overtime. Third Parties shall pay at least the minimum wage in a timely manner and shall compensate their workers for any overtime work as required by law. Likewise, workers shall be offered vacation time, leave periods and holidays consistent with the relevant laws and regulations.

CHILD AND FORCED LABOR

Third Parties shall not rely on or use involuntary or forced labour, including child labour or slavery. Third Parties shall implement effective measures in their operations and their supply chain to comply with applicable anti-human trafficking and slavery laws and regulations.

HEALTH, SAFETY AND ENVIRONMENT (HSE)

Third parties are responsible for operating their facilities in a manner that protects and preserves the natural environment and promotes the health, safety, and security of their employees, customers, suppliers, contractors, and the general public.

Third parties should be environmentally responsible and adopt a systematic approach to:

- Ensuring commitment to protect the environment, such as by ascertaining that the required permits, approvals, and registrations are valid and in compliance with all environmental laws;
- Preventing pollution by adopting sustainable business practices, reducing, or eliminating waste, substituting materials where appropriate, promoting conservation, recycling and re-using of materials, and using energy and natural resources efficiently; and
- Having a proper waste management in place for safe disposal of waste generated from operations, including waste being characterised, monitored, controlled, and treated prior to discharge and disposal.

At a minimum, third parties shall abide by local and national HSE laws, apply best practice guidelines, and comply with internationally accepted standards and practices where applicable.



INTEGRITY & TRANSPARENCY

CONFLICT OF INTEREST

BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

FAIR DEALINGS

SUPPLIER CHAIN DUE DILIGENCE

CONFLICT OF INTEREST

ENOC Group requires its third parties to refrain from engaging in, or giving the appearance of engaging in, any activity involving any conflict, or reasonably foreseeable conflict, between their interests and the interests of ENOC Group.

Third Parties shall disclose to the best of their knowledge any potential or actual conflict of interest associated with ENOC Group by any of their employees, contractors, agents, representatives, and/or affiliates working for ENOC Group or on behalf of ENOC Group.

This may include but is not limited to the below-mentioned conflict of interest disclosure examples. This includes utilising ENOC Group's confidential information for personal benefits or having financial interests associated with ENOC Group or having a family relative working within ENOC Group up to 2nd degree: father, mother, sister, brother, wife, husband, son, daughter, grandparents or grandchildren. This also includes 2nd degree relatives by marriage for all the relatives listed above, for example, a brother/sister, mother/father-in-law, etc.

If a Third Party is in doubt about whether a situation is considered a conflict of interest or not, then the Third Party has an obligation to raise the matter with the ENOC Business Ethics & Compliance function to clarify any doubt and ensure transparency.

BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

Business gifts that compromise, or even appear to compromise, someone's ability to make objective and fair business decisions are inappropriate. Third parties are encouraged to seek advice from the ENOC Business Ethics & Compliance function to clarify any doubt in favour of not giving or receiving the gift.

Third parties must exercise extra care when entertaining or exchanging gifts with government entities/officials. Third Parties shall not offer nor accept any gifts to/from ENOC employees during an open bidding process or while negotiating an important business decision. Third Parties shall obtain prior approval from ENOC Group when entertaining or exchanging gifts on behalf of ENOC Group.

FAIR DEALINGS

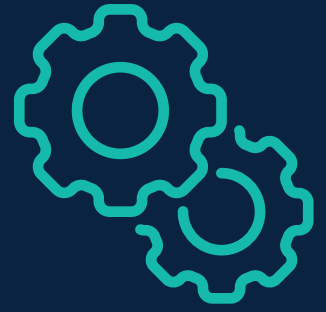
Third Parties shall compete fairly and in accordance with the highest ethical and professional standards.

Third Parties shall ensure that their business is generated based on superior services and competitive prices; and not through improper, unethical, or questionable business practices.

SUPPLY CHAIN DUE DILIGENCE

Third Parties shall ensure their vendors or others who are appointed to work for ENOC Group or on behalf of ENOC Group, comply with the below principles:

- Selection of any third party appointed to work for ENOC Group or on behalf of ENOC Group shall be based on appropriate criteria such as qualifications, competitive pricing, and reputation, and they must follow the applicable procurement policies and procedures in their business relationships.
- To notify and communicate ENOC Group's ethical policies to any third party appointed to work for ENOC Group or on behalf of ENOC Group.
- To conduct appropriate due diligence and background checks on any third party appointed to work for ENOC Group or on behalf of ENOC Group.
- Ensure that any third party appointed to work for ENOC Group or on behalf of ENOC Group shares the same commitment of complying with all applicable local and international laws, trade agreements, and regulations, as well as following the highest ethical and professional standards.
- In a situation where compliance due diligence is required, ENOC Group expects its third parties to provide accurate and complete information to facilitate compliance due diligence efforts undertaken by ENOC Group.



ENOC'S ASSETS & INFORMATION MANAGEMENT

CONFIDENTIALITY OF ENOC'S INFORMATION

INSIDER INFORMATION

RECORD MANAGEMENT

ENOC PROPERTY

ENOC INTELLECTUAL & PROPRIETARY INFORMATION

SOCIAL MEDIA

CONFIDENTIALITY OF ENOC'S INFORMATION

Third parties shall take appropriate measures to protect the confidentiality of ENOC Group's information, and only share in limited circumstances as authorised by and in written agreement with ENOC.

Particular care must be taken to protect ENOC Group's confidential information which is not available in the public domain.

Third parties shall notify ENOC Business Ethics & Compliance function immediately if ENOC Group's information has been disclosed or used in an unauthorised way.

INSIDER INFORMATION

Third parties shall not seek access to non-public information, competitive confidential information of a competitor or any other third parties to use it for their personal benefit.

Third parties shall not provide tips or encourage anyone to buy or sell stocks, securities, options, or shares based on insider information or material and non-public information.

Third parties shall immediately notify any suspicion of any misuse of insider information obtained during working for ENOC Group or on behalf of ENOC Group to ENOC Business Ethics & Compliance function.

RECORD MANAGEMENT

Third parties shall ensure that all internal, external reports and documents developed or published or shared with their stakeholders are full, fair, accurate, and properly maintained in line with applicable laws and regulations.

ENOC PROPERTY

Third parties who have access to any property of ENOC Group shall protect it and ensure its efficient use and are required to report any suspected incident of fraud or theft via ENOC Ethics Hotline.

ENOC INTELLECTUAL & PROPRIETARY INFORMATION

Third parties shall ensure that ENOC Group's proprietary information including confidential information, trade secrets, patented inventions, processes, trademarks, logos, and copyrighted works are protected and used solely in pursuit of ENOC Group's interests and in line with prior agreement with ENOC Group.

SOCIAL MEDIA

Third parties shall not publish any public statement on behalf of ENOC Group and shall obtain approval in writing from ENOC Group Communications prior to issuing any public statements involving ENOC Group to any media or social media platforms.



COMPLIANCE

ANTI-CORRUPTION COMPLIANCE
RISK MANAGEMENT AND AUDITS
ANTI-MONEY LAUNDERING
SANCTIONS AND TRADE RESTRICTIONS
ANTITRUST AND COMPETITION

ANTI-CORRUPTION COMPLIANCE

Third parties shall set effective measures in their operations to prevent bribery and corruption.

Third parties shall abide by applicable anti-corruption laws and regulations and shall prohibit their employees, agents and/or representatives from bribing, providing facilitation payments or offering, promising, or authorising gifting anything of value to obtain or retain businesses connected with ENOC Group.

Third parties shall not support any illegal or criminal activity including money laundering or fraud.

RISK MANAGEMENT & AUDITS

Third parties shall set in place appropriate measures to identify the risks associated with their operations and implement appropriate controls to mitigate the identified risks.

Third parties shall periodically conduct objective and independent audits, taking into account the highest level of business ethics, integrity and honesty.

Third parties should be alert for any ethics and compliance issues that they may encounter while performing a job for ENOC Group or on behalf of ENOC Group and are expected to cooperate with ENCO Group in case of any internal or external investigations in relation to any work conducted for ENOC Group or on behalf of ENOC Group.

ANTI-MONEY LAUNDERING

Third parties shall follow applicable anti-money laundering laws and shall not engage in any form of money laundering including concealing illegal funds generated by criminal activities.

Third Parties are advised to not commit to any contracts that seem suspicious in this regard or that might facilitate any form of money laundering.

SANCTIONS AND TRADE RESTRICTIONS

Third parties must comply and refrain from violating any of the international trade laws and sanctions.

Third parties are advised to conduct appropriate due diligence and screen potential business partners against applicable sanctions lists before signing any contract with them.

ANTITRUST AND COMPETITION

Third parties shall comply with all applicable competition laws in every jurisdiction where their operations are conducted.

As such, third parties shall not enter into any agreement that might restrain trade, including price fixing, dividing or manipulating the market, colluding in bids, limiting production, refusing to sell to certain clients or to purchase from certain suppliers, or unlawfully restricting competition.



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