



BUSINESS CODE OF CONDUCT

Table of Contents

INTRODUCTION	3
WHO ARE WE?	3
WHY DO WE HAVE THIS CODE?	3
WHAT DOES THIS CODE OF BUSINESS CONDUCT EXPECT OF YOU?	3
WHO IS THIS CODE FOR?	3
YOUR RIGHTS AS AN EMPLOYEE	4
WHAT HAPPENS WHEN YOU VIOLATE THE CODE?	4
OUR ETHICAL CODES	5
LOYALTY	5
IMPARTIALITY	5
INTEGRITY	5
ACCOUNTABILITY	5
RESPECT FOR HUMAN RIGHTS AND THE ENVIRONMENT	5
YOUR RESPONSIBILITIES	6
WHAT YOU NEED TO DO AS AN EMPLOYEE	6
AS A MANAGER YOU MUST ...	6
YOUR HUMAN RESOURCES (HR)	6
ANONYMITY AND RETALIATION	7
OUR COMPANY CULTURE	8
HUMAN RIGHTS	8
HARASSMENT	8
EQUAL OPPORTUNITY	9
OPEN - DOOR POLICY	9
WORKING HOURS	9
MANAGING RISK IN INFORMATION, COMMUNICATION AND COMPANY ASSETS	11
PERSONAL DATA PRIVACY	11
PROTECTION OF NON-PUBLIC INFORMATION	12
COMMUNICATION	12
IT AND COMMUNICATION FACILITIES	12
GENERAL DIGITAL SECURITY RULES INCLUDE:	12
COMPANY ASSETS	13
MANAGING RISK IN THIRD PARTY AND INTERNATIONAL INTERACTIONS	14
ANTI-BRIBERY AND CORRUPTION	14
ANTI-MONEY LAUNDERING	14
CONFLICT OF INTEREST	15
GIFTS, FEES, FAVOURS, ENTERTAINMENT AND OTHER ADVANTAGES	15
POLITICAL ACTIVITY AND PAYMENTS	16
HEALTH, SAFETY, AND ENVIRONMENT	16
CONCLUSION	18
YOUR FEEDBACK MATTERS	18
THE LAST DROP	18
EMPLOYEE ACKNOWLEDGEMENT	19

INTRODUCTION

Who are We?

Niger Delta Exploration & Production Plc. (NDEP) is Nigeria's first independent, publicly-owned oil and gas investment company. We are proud to say that the company has been a pioneer in many marginal field development initiatives and is prudently managed for its predominantly Nigerian shareholders, offering seven consecutive dividends. One of the reasons for our growth and success is our continued adherence to best practices. This is exemplified by our proactive approach to community relations and sustainable operations.

Why do We have this Code?

NDEP cares how results are obtained, not just that they are obtained. Directors, officers and employees should deal fairly with each other and with the Company's suppliers, contractors, competitors and other third parties.

NDEP's Code gives the guidance and support needed to conduct our business ethically and to comply with the law. The Code describes the behaviour expected of our employees and how they relate to our Business Principles and core values. The Code is not exhaustive, and it cannot describe every possible scenario, but it does provide guidance on the various topics we face in our daily activities, by describing the behaviour expected of our employees.

What does this Code of Business Conduct Expect of You?

The Code expects you to...

- Do the right thing.
- Act consistently with NDEP's ethical standards.
- Uphold our values and protect our reputation.
- Understand what NDEP expects from you from the very first day itself.
- Make good and acceptable decisions every day.
- Speak up. It is your duty to report any suspected violations of the Code.
- Understand where to go for help or guidance when you seek clarifications.
- Understand the risks in your role and how to manage them.
- Seek advice when things are not clear.

Who is this Code for?

This Code is for You. It sets the boundaries within which all NDEP staff must operate every day, without exception. Read it. Understand it. Follow it. This Code applies to every employee (full-time or contract) at every level of the Company, all the way up to the executives. It also applies to subsidiaries and entities in which NDEP either owns a majority interest or manages operations (all of these are referred to throughout this Code as "the Company"). Employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code.

Your Rights as an Employee

While we expect you to follow our Code, we also recognise your rights as a NDEP employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). This can only be achieved in an environment that fosters respect and workplace harmony. Nothing in this Code or in any Company policy is intended to limit or interfere with your rights under the law.

What Happens When you violate the Code?

When one of our employees fails to follow our Code or applicable laws, ignores or does not report someone else's failure to follow the Code or pressures someone else to violate the Code, a violation has occurred. This can harm the Company's reputation and aspiration.

Violations of the Code, and the relevant policies as indicated, can result in disciplinary action, up to and including dismissal. In some cases, NDEP may report a violation to the relevant authorities, which could also lead to legal actions, fines or imprisonment.

The Company has other policies and processes governing performance, conduct and behaviour. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

OUR ETHICAL CODES

Loyalty

Loyalty to the purposes, values and principles of NDEP is a fundamental obligation of all NDEP employees. They shall be loyal to NDEP and shall, at all times, discharge their functions and regulate their conduct with the interests of NDEP only in view.

Impartiality

NDEP employees, in the performance of their official duties, shall always act with impartiality, objectivity and professionalism. They shall ensure that the expression of personal views and convictions do not compromise or appear to compromise the performance of their official duties or the interests of NDEP. They shall not act in a way that can lead to actual or perceived preferential treatment for or against particular individuals, groups or interests.

Integrity

NDEP employees shall maintain the highest standards of integrity, including honesty, truthfulness, fairness and incorruptibility, in all matters affecting their official duties and the interests of NDEP.

Accountability

NDEP employees shall be accountable for the proper discharge of their functions and for their decisions and actions. In fulfilling their official duties and responsibilities, NDEP employees shall make decisions in the interests of NDEP. They shall submit themselves to scrutiny as required by their position.

Respect for human rights and the environment

NDEP employees shall fully respect the human rights, dignity and worth of all persons and shall act with understanding, tolerance, sensitivity and respect for diversity. They shall at all times, act without discrimination of any kind. NDEP employees shall always deal responsibly in our activities with the environment.

YOUR RESPONSIBILITIES

What You Need to Do as an Employee

As employees, each of us should always ask ourselves...

- » Is what I am doing ethical and in line with our Code of Conduct?
- » Is it legal and am I authorized to do it?
- » Have I thoroughly understood the potential risks, including the risks to NDEP's reputation?
- » Is it the responsible thing to do? Am I leading by example?
- » If this becomes public knowledge, will I still feel I have done the right thing?
- » Do I know or suspect someone is violating the code?
- » Would I exercise my duty to report it?

If you can answer "YES" to all of these questions, the action is probably okay. But any "no" or even "maybe" answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure. Contact any of these resources: Your manager or Human Resources officer.

If you are a manager, you have additional responsibilities ...

As A Manager You Must ...

- » Understand the main Code violation risks that apply in your business or function and the procedures to mitigate them.
- » Ensure your staff make time to completely understand the code.
- » Ensure your staff understand the procedures they should follow to avoid violating the Code, including recording gifts and hospitality and potential conflicts of the Code of Conduct.
- » Make sure anyone new to your team is briefed promptly on our Code of Conduct, the Code risks in their role, and where they can seek your advice and support.
- » Be alert to any violations of the Code and encourage your team members to speak up if they know or suspect a violation.
- » If you are told of a possible violation of the Code, you have a duty to report it, first to your Line Manager or to the Head, Human Resources, depending on the nature of the violation. You must also ensure you keep all reported concerns confidential. Never take it upon yourself to investigate the matter.

Your Human Resources (HR)

Think of your HR as a keeper of the Code – a resource for you if you have questions; you sense something you have seen or heard at work may violate our Code, our policies, or the law; or want to raise a concern.

When you report concerns, you help us handle issues proactively and properly, fix problems before they occur and (quickly) remedy situations that have already happened. Reporting a concern also gives NDEP the opportunity to detect early a potential or actual violation of the

Code. You also help build trust with each other and with our customers, our contractors and other business partners.

In some situations, you will need written approval from your HR Office before you act. Examples of situations that may require written HR approval:

- *Use of Company assets*
- *Conflicts of Interest (or the appearance of a conflict)*
- *Gifts, Meals and Entertainment Some situations are ongoing over a long period of time and will require approval at least annually, when the circumstance or role change or at other more frequent intervals. This is not clear at all?*

Anonymity and Retaliation

All reports of a breach in the Code would be treated anonymously. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

NDEP will not tolerate any form of retaliation directed against anyone who raises a concern in good faith about a possible violation of the Code. In fact, any act or threat of retaliation against NDEP staff will be treated as a serious violation of our Code.

Protection against retaliation applies to all employees of NDEP. If you feel that you have been subjected to retaliation because you reported misconduct or cooperated with an investigation, you should contact the Human Resources Office.

OUR COMPANY CULTURE

We want NDEP to be a great place to work, and we want to protect our reputation among customers, suppliers, governments and communities as a company that always strives to do the right thing. To do that, we need everyone doing business on behalf of NDEP to live up to our values of honesty, integrity and respect for people.

This section of our Code of Conduct sets out the standards of good behaviour that we expect from you – and what you have the right to expect from your colleagues.

Human Rights

We comply with applicable laws and regulations. We also regularly engage with our stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

As an employee of NDEP, you must work to ensure that your work complies with our commitments to human rights in Social Performance, Security, Human Resources and Contracting and Procurement. If you know of, or suspect any potential human rights violations relating to our business, it is your duty to speak up.

Within this framework we aim to:

- Promote respect for Human Rights, including compliance with applicable laws and regulations;
- Adhere to corporate policies;
- Value diversity with equal opportunities for all;
- Eliminate any kind of discrimination in investment decisions;
- Contribute, directly or indirectly, to the general wellbeing of the communities within which we work

Harassment

Harassment is any unwanted behaviour which has the purpose or effect of violating the other person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the other person. It is up to the individual to determine whether a particular conduct or behaviour is offensive to him or her. It is required that the harassment must be capable of being objectively viewed as such by a reasonable person, given all the circumstances, including the individual's personal perception of the alleged harassment.

Harassment may take several forms and can be related to sex, sexual orientation, gender reassignment, marital or civil partner status, age, race, colour, nationality, national or ethnic origin, religion or belief, or disability.

Especially in the case of Sexual Harassment, individuals may not realize that their behaviour actually constitutes sexual harassment. However, all employees in any case of Harassment should consider that any behaviour which is acceptable to one person, **may not** be acceptable to another.

NDEP will not tolerate any form of harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect and avoid situations that may be perceived as inappropriate.

Feedback, criticism and challenge must always be communicated in an appropriate and respectful manner. In particular, be aware of cultural sensitivities – what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences.

Equal Opportunity

At NDEP, we offer equal opportunities to everyone. This helps us ensure we always draw on the widest possible talent pool and attract the very best people. We rely on everyone at NDEP to continue our record on equal opportunity.

Sometimes, people can breach equal opportunity policies without even realising it – for example, if they are unconsciously biased toward recruiting people like themselves. Therefore, you should always strive to be objective and ensure your personal feelings, prejudices and preferences are not influencing your employment-related decisions. You also need to be aware of local legislation that may impact employment decisions.

Open - Door Policy

An open-door policy literally means that every manager's door is open to every employee. The purpose of an open-door policy is to encourage open communication, feedback, and discussion about any matter of importance to an employee. By adopting this policy, NDEP seeks to provide all employees with the opportunity to talk with any manager at any time and encourage them to speak up if they have a question or concern.

Moreover, the Company wishes to develop employee trust and engagement, by ensuring that important information, ideas or suggestions actually reach managers, who can then utilize the information received to make necessary changes in the workplace.

Most problems can and should be solved in discussion with your immediate supervisor and this is encouraged as your first effort to solve a problem. But, through the open-door policy, you may also discuss your issues and concerns with the next level of management and, if necessary, with the Human Resources Department as well. The Company's HR Department is available to discuss with you, particular queries or concerns and will be glad to offer guidance. All employees should know that their concerns are handled in a discreet and confidential manner.

Working Hours

NDEP requires all employees to adhere to guidelines on work days and work hours. We expect that all employees:

Resume promptly for work 7:30 am and close from 4:30 pm with a 1-hour lunch break between 12:00 pm and 02:00 pm. Where employees do shift work, the shift cycle will determine resumption and closing time.

- Are expected to be regular and punctual in attendance to all work-related appointments within and outside the office.
- Respond to training and seminars sponsored by the company with the same professional ethics as official work.

- Do not use company information technology resources and tools inappropriately during and after work hours.
- Employees who are unable to work due to illness or an accident should notify their supervisor stating the reason for the absence. All absences must be reported to their Line Manager. All public holiday to be observed by the company, will be such as announced by the Federal Government of Nigeria; such days will be treated as work-free days (except where employees are working on rotation, the rotation cycle will determine work days).

MANAGING RISK IN INFORMATION, COMMUNICATION AND COMPANY ASSETS

In our everyday work, we all handle information and communicate in many different ways, and we need to consider the risks associated with these activities. Careless communication or an unauthorised disclosure of information could damage our reputation or result in legal action.

Company assets that we are entrusted with are ours to protect.

This section of our Code of Conduct is designed to deal with this type of risk.

Personal Data Privacy

We are committed to respecting people's privacy and the confidentiality of personal information. We will only acquire and keep personal information that we need to operate NDEP effectively and comply with the law.

We use a classification system to identify and protect non-public information.

Labelling of information is usually the responsibility of the asset owner; and this is usually done based on the results of the risk assessment: the higher the value of information (the higher the consequence of breaching the confidentiality), the higher the classification level should be. The classification level should be visibly stated on the document or the physical or electronic folder holding the document.

- *Public: Documents that are not sensitive and there is no issue with release to the general public i.e. on a website*
- *Confidential: Documents only to be viewed internally or with third parties that have signed a non-disclosure agreement (NDA)*
- *Employee Confidential: Documents only to be viewed by employees at the company*
- *Management Restricted: Documents only to be viewed by the senior management at the company*
- *Private: Documents which contain personal information (useful for managing NDEP data privacy compliance)*

Access to employee personal information is restricted to NDEP's employees who are specifically authorised and who have a business need for that information. You must ensure that confidential information is properly protected from unauthorised access and use at all times.

Sensitive personal information includes:

- Name and contact details;
- Employment and financial information
- Age and nationality;
- Information on race or ethnic origin;
- Religion or philosophical beliefs;
- Health or sexual orientation;
- Criminal behaviour; or
- Trade union membership

Confidential information may be disclosed only if required by law or authorized for business reasons. Always protect personnel and business files which contain personal data. Classify

personal information as confidential. Failure to keep personal information confidential and secure could lead to dismissal and prosecution.

Protection of Non-Public Information

We consider any non-public information about the Company as well as certain information about our asset portfolio, customers, contractors, other commercially-sensitive information that you may have (or access) as part of your job, to be confidential information. It can be written, spoken or electronic.

Share non-public (confidential) information only with those who have both the authorisation to access it and a need to know the information in order to do their jobs. We expect you to take appropriate steps to protect classified information such as asking companies or individuals outside of NDEP to sign a confidentiality agreement before gaining access to our non-public (confidential) information. If you are not sure whether information can be shared or how to share it, ask your Line Manager or the Legal department.

Sharing non-public (confidential) information with friends or family, or discussing it in public places such as parties, country club, public transportation and restaurants or on social media can put that information at risk of being disclosed (and possibly misused). Do your part to keep it safe. (Note that this is not intended to limit or interfere with your rights under the law).

Communication

Responsible, timely and appropriate communication is essential to all our business activities. We are committed to open, transparent, impartial and timely communication with our employees, shareholders and other stakeholders, with a view toward building long-term relations based on mutual trust. We seek to listen to and engage with all our stakeholders.

All communications with the media regarding corporate issues should be coordinated with the designated communications personnel. Only authorised employees should respond to enquiries from members of the investment community, for example, shareholders or the media.

Inappropriate, inaccurate and careless communication can damage NDEP's reputation and create serious liability and compliance risks.

IT and Communication Facilities

IT and communication facilities include personal computers, mobile and desk phones, personal digital assistant and storage devices. All employees should apply high ethical standards and comply with applicable laws and regulations as well as NDEP's security policies when using the company's IT and communication facilities.

You need to keep digital equipment safe and secure at all times. Take extra care when you are working away from NDEP premises, as the above regulations also apply when you are working away, for example at home or in a hotel.

General Digital Security Rules include:

Employees' use of information, IT systems and, in particular, internet services must be governed by the needs of the business and not by any personal interests;

All employees must protect their user IDs and passwords and never share them or allow anyone else to use their account;

NDEP's communication systems should be used for business purpose only in a courteous, professional and business-like way;

All employees are responsible for maintaining electronic files and archives in an orderly manner.

No software should be downloaded via the internet into NDEP's network without prior consent from the company's IT Department.

NDEP reserves the right to prohibit access to specific websites where appropriate.

Employees should exercise care when using NDEP's computers, or other electronic equipment, particularly when accessing any non-business related sites. However, under no circumstances may NDEP's computers or other electronic equipment be used to obtain, view, or reach any immoral or unethical sites. Failure to abide by this provision shall lead to disciplinary action as the company deems fit up to and including termination of employment.

Company Assets

The buildings we work in, the technology that we work with, the ideas we develop, the emails we exchange, the Company vehicles we use, the Company-issued computers, tablets and mobile phones we use to do our jobs... all of this and more are Company assets that we are each entrusted to protect. We use them to carry out Company business and must protect them from damage, loss, misuse and theft.

Personal use of some assets, within reason and as allowed by local policies and procedures, is permitted, but your use should be appropriate, infrequent, lawful and never interfere with the time, talent and passion you, or any other employees, bring to work.

MANAGING RISK IN THIRD PARTY AND INTERNATIONAL INTERACTIONS

Anti-bribery and Corruption

At NDEP, we build relationships based on trust, and we are determined to maintain and enhance our reputation. For this reason, we never accept or pay bribes, including facilitation payments. Even unsubstantiated claims of bribery and corruption may damage NDEP's reputation.

All business transactions must be properly recorded and accounted for. We expect the same ethical standards to be applied in all our business relationships in all areas of operation and we promote the Code to all our business associates.

NDEP takes any form of bribery or corruption very seriously. This means:

- ☒ Employees or representatives of NDEP must not offer, provide, accept, or promise, either directly or indirectly, any undue financial or other advantage to a public and/or private official for obtaining any favourable treatment or business advantage;
- ☒ Our employees or anyone acting on our behalf must never offer, solicit, promise, give or accept a bribe, kickback or any other improper payment – including «facilitation payments»;
- ☒ NDEP does not permit any type of *grease payments* (small value payments made to public officials to speed up a routine administrative process to which the person is entitled) to be made either directly or by those who work on our behalf. If you are asked to make such a payment, then you should refuse and report it immediately to your line manager;
- ☒ We should never personally pay for any gift or entertainment to avoid having to report or seek approval for it;
- ☒ We should never offer, give or receive any gift or entertainment that does not comply with NDEP's commitment to mutual respect, or that can reasonably be considered to be indecent or sexual oriented, or that can otherwise adversely affect the Group's reputation.

Anti-money Laundering

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. All companies are at risk of being exploited in this way – and we must be on our guard to help protect our reputation and ensure we comply with the law.

If you have knowledge or suspicion that a counter-party is involved in money laundering in connection with its transaction with NDEP, you must promptly report it to the legal department, without letting the counter-party know of your suspicions. You must not falsify, conceal, destroy or dispose of relevant documents.

Conflict of Interest

A conflict of interest occurs when your private interests interfere or appear to interfere with the interests of NDEP. You should base your decisions on NDEP's needs, rather than your own interests, or the interests of family or friends. Each of us should deal with third parties in ways that avoid even the appearance of conflict between our personal interests and those of NDEP. You are expected to arrange your private affairs so that you can provide your loyalty first to NDEP.

No employee must work on any matter of NDEP in which themselves, their spouse, partner, close relative, or any other person with whom they have close relations, has a direct or indirect financial interest, unless specifically authorized. Employees shall not work for, or provide services to anyone that he/she must deal with as part of his/her job for NDEP. More specifically, employees shall not engage in any work or business (be it part time or otherwise) which does or is likely to conflict with NDEP's business activities, nor should they perform any services or hold any financial interest with a supplier, contractor or customer of NDEP.

The activities of close relatives sometimes can create conflicts of interest, as well. If a close relative works or performs any services for a competitor, customer or supplier of NDEP, you must promptly notify your Line Manager to determine if appropriate action is required. To avoid possible conflicts of interest, try to anticipate and avoid situations where you could be faced with competing interests that may impact your impartiality. Conflicts of interest represent high-risk situations, with potential for significant, detrimental effects on the reputation of NDEP.

Gifts, Fees, Favours, Entertainment and Other Advantages

Giving or receiving gifts or entertainment of more than nominal value, or cash in any amount to or from people or companies doing, or seeking to do business with NDEP, also falls into a "conflict of interest" situation. Certain gifts and entertainment may impair other's trust in NDEP and must be avoided, as they may raise questions about conflicts of interest and can damage the company's reputation.

The Company's policy is simple. We do not exchange gifts or entertainment that look like an attempt to improperly influence a business decision. No matter if you are the giver or the recipient, you need to recognize when an offer is excessive under our policy.

It can be difficult to tell when a gift crosses the line, and laws and customs in different countries vary widely. That is where our position on gifts, meals and entertainment can help. Read the provisions in this section closely to learn what is or is not acceptable.

Our employees should never:

- Accept fees in exchange for services provided on behalf of the company.
- Provide or accept excessive gifts or entertainment from anyone doing or seeking business with NDEP or any of its affiliates. However, modest forms of gifts and entertainment with a value not exceeding \$200 (Two Hundred dollars) received from vendors are generally acceptable and do not create conflicts of interest provided however that where employees are uncertain as to whether the value of the proposed gift/entertainment exceeds the accepted threshold, such employee shall be expected to obtain clarification from either the HR or Legal department. Failure to seek clarification may be deemed to be a deliberate attempt to breach this code of conduct.

- Offer a gift or entertainment to anyone for the purpose of inappropriately influencing him/ her to act in favour of NDEP

Political Activity and Payments

We all have our own interests outside of work and you have the right to engage in lawful political activity in your own time. However, we also need to protect NDEP's interests and reputation. It is therefore important that individuals keep their personal political activities separate from their role at NDEP.

Every employee is free to participate in democratic political activities, provided that this it is done without reference to, or connection with, their relationship to NDEP.

Your political activity and payments involve a great risk of being viewed as those of NDEP and may impact our business and reputation. Using any NDEP resources, such as time, property, cash, equipment or branding for political activities, could cause a conflict of interest and is prohibited under this Code of Conduct. Ensure that you only engage in the political process in your own time and with your own resources.

Health, Safety, and Environment

A strong Health, Safety, and Environmental (HSE) performance is a key aspect of NDEP's overall business success.

There is a clear commitment to improving HSE performance from the Board of Directors and the key Management Staff. Additionally, NDEP's management and staff are both committed to the vigorous supervision and the implementation of the applicable legislation.

We all share responsibility for protecting people's health, safety, and the environment. We operate in hazardous environments, and we are committed to excellence and to the disciplined management of our operations. We also set measurable HSE performance targets in our business plans, which we are all committed to achieving.

NDEP is committed to the goal of doing no harm and protecting the environment while developing energy resources, products and services in a way that contributes to the communities in which we operate as good neighbours, creating lasting social benefits.

Every NDEP employee is required to have a systematic approach to the management of Health, Safety, and the Environment.

All employees are expected to:

- Comply with the company's HSE policies as communicated and regularly updated.
- Pay maximum attention to any workplace safety or health hazard.
- Ensure the safety of any activity before it is carried out.
- Minimise the impact of our business activities on the environment.
- Maintain good relationship with host communities and all stakeholders.
- Be technically certified to carry out their professional roles.
- Ensure plans and procedures are in place to respond to any emergency or loss of control.
- Ensure they have the required fitness level for their work assignments.

- Wear appropriate Personal Protective Equipment (PPE). Safety shoes, coveralls and hard hats as provided by the company.
- Manage waste in an environmentally safe manner as not to cause injury/negatively impact on plants, animals and the environment.
- Give top priority to security, health and safety of co-workers, service contractors and people affected by the company's operation.
- Refrain from the use of alcohol and substances on company premises and when on official assignment.
- Ensure security and functionality of company property, plant and equipment.
- Be familiar with all the emergency drills involving fire and similar emergencies.

CONCLUSION

Your Feedback Matters

In our attempt to constantly improve ourselves and adapt to our environment's updates, we encourage everyone to freely provide us with their feedback on this Code of Conduct. Please note that this applies to all our employees, suppliers, customers, and industry partners. In order to recommend improvements, or raise concerns about something, please contact our Human Resources department.

What we do is rarely easy. We need to have the courage to speak up and always strive to do the right thing. That means you must always ask for help when you have a question about our Code of Conduct, or believe it is not being followed properly. We encourage open and honest communication. If, however, you feel the need to communicate your concerns anonymously you may do so. You should be aware, however, that it is more difficult to investigate properly matters communicated anonymously.

The Last Drop

Of course, the Code, cannot cover every situation, so whenever you are unsure of what to do, you must seek advice. Ask you line manager or the NDEP Human Resources. This is especially relevant if you suspect that someone is violating the Code and putting NDEP at risk. In that case, it is your duty to speak up.

We hope you will refer to the Code whenever there are changes in your role or you face a new dilemma, or if you just need to refresh your memory. Above all, we want you to live by the Code every day, and ensure you always make the right decision.



MANAGING DIRECTOR

1st January 2020

EMPLOYEE ACKNOWLEDGEMENT

By the employee's endorsement of this document and its content, the signatory, is thereby bound by the agreement to comply with every code of conduct statement therein fully. Once signed, employee Codes of Conduct can be considered a legal document, they can be used as a disciplinary or legal action tool for employee infractions.

I _____ confirm that I have read, understood and agree to the conditions as stated in NDEP's Code of Conduct and understand that the version of this Code of Conduct that applies will be the latest version issued.

Signature & Date: _____