

The background of the cover features a silhouette of an oil pumpjack against a bright orange sunset sky. In the foreground, two workers wearing hard hats and safety gear are looking at a set of papers together. The scene is set in an industrial oil field.

CODE OF CONDUCT POLICY

دليل النفط ش.م.م.
DALEEL PETROLEUM L.L.C.

Contents

Policy	1. Our Code	04
	2. What Is The Code Of Conduct	06
	3. Who Must Follow Our Code	07
People and Safety	4. Equal Opportunity	08
	5. Health, Safety And Environment	11
	6. Anti-Harassment	12
	7. Substance Abuse	15
	8. Anti-Violence	15
	9. Ethics	15
Fighting Corrupt Practices	10. Bribery And Corruption	16
	11. Conflict Of Interest	17
	12. Gifts And Hospitality	19
	13. Money Laundering	19
Safeguarding Information and Assets	14. Intellectual Property	20
	15. Data Privacy, Protection And Confidentiality	21
	16. Records Management	22
	17. Protection Of Corporate Assets	23
Communications Management	18. Business Communications	24
	19. Personal Use Of IT And Communications	25
	20. Public Disclosure	25
National and International Trade	21. Free And Fair Competition	26
	22. Trade Control	27
Human Resources		28

Every **Manager's** Responsibility

Act as a role model

Listen and respond to raised concerns

Review the Code at least once a year with your team

Ensure employees are aware of the relevant laws, regulations and Daleel's policies

Recognise and reward ethical behavior

Take corrective or preventive action when someone violates the Code

Every **Employee's** Responsibility

Read and be familiar with our Code

Ask questions and report concerns

Act in a manner that is safe, ethical and in compliance with applicable laws and Daleel policies and regulations

Conduct business in a manner that is fair, transparent, prudent, and dependable

Co-operate fully during any investigation



01 Our Code

- 1.1 Daleel Petroleum LLC (“Daleel”) conducts business with the highest professional standards. We are committed to act professionally, fairly and with integrity in all our business dealings and relationships.
- 1.2 This Code describes our approach to business conduct.
- 1.3 The success of our business depends on the trust and confidence we earn from our shareholders, customers, suppliers and mostly from you, as our Daleel Representatives. Daleel gains credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals through honourable conduct.
- 1.4 It is with these principles that Daleel introduces this Code. This Code defines the appropriate standards of conduct expected to be demonstrated from our directors, officers, employees, seconded staff, contractors, consultants and advisors trainees and interns (individually a “Daleel Representative”, and collectively, “Daleel Representatives”).
- 1.5 No Code of conduct can cover every legal or ethical question that arises in the workplace. Therefore, refer to our other policies and procedures wherever needed to get further explanation, as well as the laws, rules, regulations and



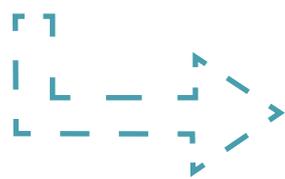
decisions in force in Oman, which are the ultimate governing laws by which you must abide.

- 1.6 In this Code, any individual or organisation with which you come into contact during the course of your work, including actual and potential suppliers, distributors, business contacts, agents, advisors, government and public bodies including their advisors, representatives and officials shall be termed "Third Party".
- 1.7 If you, or any Third Party with whom you are dealing, is in any doubt as to whether or not a business conduct has arisen, you should contact the People and Support Manager.
- 1.8 Each Daleel Representative is expected to read, understand and comply with the provisions of this Code. Daleel strongly encourages you to be open and honest in complying with this Code. The Code is a framework that provides you with guidance as

to its application and use. It does NOT provide you with an exhaustive list of how to conduct business whilst working at Daleel. You should act within the "spirit" of this Code and the principles of good faith and fair dealing at all times.



02 What is the Code of Conduct



This Code outlines the fundamental requirements on how we conduct business. It provides you with a broad overview of how we must approach our day-to-day work, our relationships, our decision making and our actions.





03 Who must follow our Code

- 3.1 This Code sets out the behaviours, standards and ethics we expect from Daleel employees, seconded staff to Daleel, seconded staff from Daleel, agents and business partners and the way we work with each other and our relationships with Third Parties.
- 3.2 All Daleel Representatives are required to comply with all applicable laws and policies, whether or not specifically addressed within this Code. Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must apply the strictest standard. Do not follow customs that violate our Code.

You should:



Read and understand the Code



Certify annually that you have complied with the Code



Act in a manner consistent with the Code and other Daleel policies

PEOPLE AND SAFETY



04

Equal Opportunity

- 4.1 Each of us should have an equal opportunity to reach our full potential and contribute to Daleel's success.
- 4.2 Your employment decisions regarding employees and applicants must always be based on merit, qualifications and job-related performance, without regard to non-job-

related characteristics such as: race, colour, ethnicity, national origin, age, gender, gender identity, religion, disability or any other legally protected status.

Useful Resources: Please refer to the Daleel HR Manual/specific equal opportunities policy



Safety
first

W

**WORK
SAFETY**

Protection

Procedures

Danger



05 Health, Safety and Environment

- 5.1 We are committed to safeguarding the health and safety of all Daleel Representatives, Third Party, visitors, contractors, consumers and communities. Safety is everyone's responsibility – you must insist that work be performed safely, no matter what your job is.
- 5.2 We expect all Daleel Representatives to be familiar with our Quality, Health, Safety, Security and Environment (QHSSE) Policy, and make safety a priority. Daleel expects full compliance to Daleel QHSSE Policy.
- 5.3 Failure to observe the QHSSE Policy could pose potential risks to other Daleel Representatives, Third Party, visitors, contractors, consumers and communities, or the environment.

Useful Resources: Please refer to Daleel Quality, Health, Safety, Security and Environment Policy



YOU

Should always speak up if you observe an unsafe or unhealthy working environment.

Must STOP any activity if you observe any unsafe act or working condition.

06 Anti-Harassment

6.1 You must not harass or intimidate others in our workplace.

Harassment is any inappropriate conduct which has the purpose or effect of:

Creating an intimidating, hostile, or offensive work environment

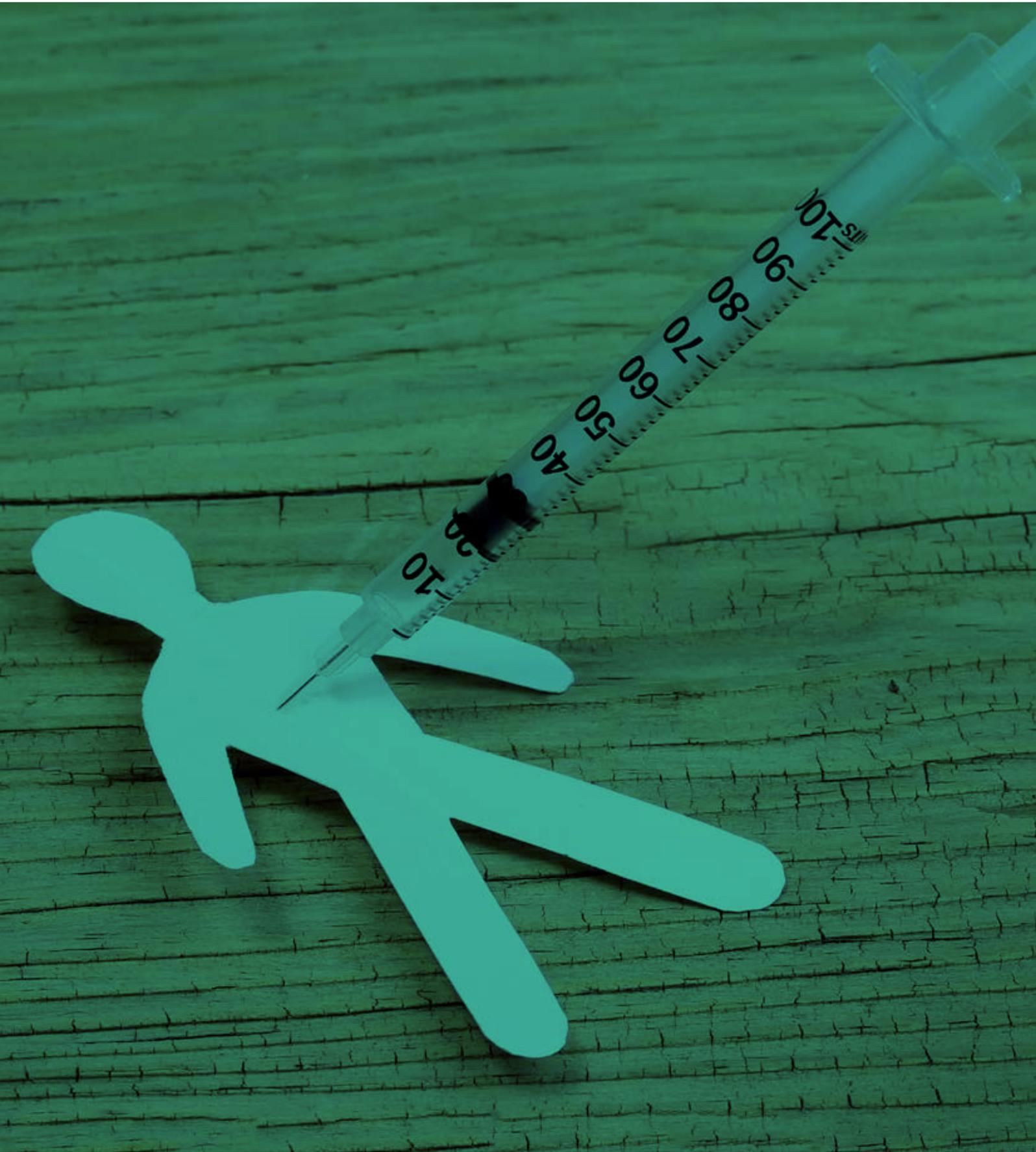
Unreasonably interfering with an individual's work performance

Affecting an individual's employment opportunity



- 6.2 Daleel prohibits any form of harassment by or towards employees, contractors, suppliers or any other person.
- 6.3 Daleel seeks to provide a work environment that is free from harassment or any other offensive or disrespectful conduct. This includes unwelcome verbal, visual, physical or other conduct that can be considered intimidating, offensive, or hostile.
- 6.4 Sexual harassment, offensive language or jokes,

- and racial, ethnic, gender or religious slurs are never acceptable.
- 6.5 If you or someone else is the subject of discrimination, harassment or intimidation, **Speak up and Report it**. Daleel will not tolerate threats or acts of retaliation against Daleel Representatives for using the complaint channels or cooperating in an investigation.



Useful Resources: Please refer to Daleel HR Manual

07 Substance Abuse

- 7.1 You should not work under the influence of alcohol or drugs.
- 7.2 The use of any substance that adversely affects safety or job performance is a violation of Daleel policies. If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. Drugs may include prescription or over the counter drugs.
- 7.3 Daleel has the right to conduct unannounced tests on its staff.
- 7.4 Violation of these policies may lead to disciplinary actions, including dismissal.

08 Anti-Violence

- 8.1 You must never threaten anyone or display violent behaviour in our workplace.
- 8.3 Daleel safety programs include a zero-tolerance policy for workplace violence. You should not engage in any act that could cause another individual to feel threatened or unsafe. Please remember that this applies on Daleel premises, as well as to the behaviour of Daleel Representatives engaged in Daleel business anywhere outside of our premises.

Speak up and report threats or potential violence immediately.

09 Ethics

- 9.1 Daleel cares about how results are achieved and not just that the results are achieved.
- 9.2 All Daleel staff are expected to be in compliance with Standards of Integrity and Daleel will not tolerate the employees who achieve results obtained at the cost of violation of laws.



FIGHTING CORRUPT PRACTICES

10 Bribery and Corruption

- 10.1 You must comply with all relevant anti-bribery laws. No Daleel Representative should ever offer or accept, directly or indirectly, any form of gift, entertainment or anything of value to his or her representatives to obtain or retain business, influence business decisions, or secure an unfair advantage.
- 10.2 Your business decisions should never be influenced by corruption. Corruption generally refers to obtaining or attempting to obtain, a personal benefit or business advantage through improper or illegal means.
- 10.3 These restrictions apply to our business operations and to anyone acting on our behalf including agents, consultants, suppliers and contractors.
- 10.4 Corrupt activities are not only a code violation. They can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws.

Avoid corrupt, illegal,
and unethical practices.



- 10.5 Should you become aware of any potential or actual corrupt arrangement or agreement, speak up and report it. Turning a blind eye to suspicions of bribery and corruption can result in liability for Daleel and for individuals.



Useful Resources: Please refer to Daleel Conflict of Interest Policy

11 Conflict of interest

- 11.1 All Daleel Representatives must avoid actual or potential conflicts of interest between them and the Daleel business.
- 11.2 Daleel Representatives must disclose immediately any circumstances that will or may give rise to a conflict Daleel's interests. If you have an actual, potential or perceived conflict, you must protect yourself from any suspicion of misconduct by being transparent and complying with the requirements of the Daleel Conflict of Interest Policy.
- 11.3 Daleel employees, Directors or management staff are expected to declare to People and Support and Supply Chain Management - their business interests, shareholdings in businesses.

Conflicts of interest can take many forms. For example:

- . A conflict may arise when you, a family member or a friend.
 - . Engage in activities that compete with, or appear to compete with, Daleel's interests;
- . Use Daleel property, information or resources for personal benefit or the benefit of others;
- . Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom you have a relationship; and
- . Work for, provide services to, have a financial interest in or receive any personal benefit from a supplier, customer, or competitor does business with Daleel or seeks to do business with Daleel.



12 Gifts and Hospitality

- 12.1 Daleel does not accept or provide gifts or corporate hospitality in return for any business, services or confidential information, or if the intent is to bias a decision or obtain undue favors.
- 12.2 Gifts and corporate hospitality must be legal, not a bribe (or look like a bribe), payoff or kickback and not cause embarrassment to Daleel if disclosed publicly.
- 12.3 Gifts and entertainment must not be intended to create an improper advantage to Daleel or its contractor or a third party.
- 12.4 Gifts include cash and other monetary benefits, entertainment, services, prizes, use of vacation facilities, home improvements, and tickets for sporting or entertainment events or any other event not related to business.
- 12.5 Where there is any doubt, further guidance should be sought from Daleel legal or compliance function.
- 12.6 Gifts that do not exceed 50 Omani Rials from a single source in any given calendar year, may be accepted. You may not accept cash or checks made out to you under any circumstance. Gifts value which does not comply with our Code should be returned immediately and employee shall contact his or her line manager on how to dispose of them.



13 Money Laundering

- 13.1 Daleel is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world.
- 13.2 Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. Daleel will conduct business only with reputable third parties involved in legitimate business activities, with funds derived from legitimate sources.
- 13.3 Know Your Business Partners. Conduct integrity assessments and other due diligence and be familiar with their business practices.
- 13.4 Monitor financial activity. Observe and record payments and transactions consistent with all established policies and procedures.
- 13.5 Keep current, complete and accurate records of every business transaction.
- 13.6 If you have knowledge or suspicion that someone is involved in money laundering as part of Daleel transaction, you must promptly report it to the Legal Department. To meet legal requirements, do not let the counterparty know of your suspicions. You must not falsify, conceal, destroy or distort or dispose of any relevant documents.

SAFEGUARDING INFORMATION AND ASSETS

Our IP is a valuable asset that must be protected at all times.

14 Intellectual Property

- 14.1 IP includes our trademarks, logos, copy rights, inventions, patents and trade secrets. You should never allow a third party to use our trademarks or other intellectual property without proper authorization or a license agreement that has been approved by the Legal Department.
- 14.2 It is equally important that we respect other people's IP rights. Not doing so risks damage to our business and reputation and may impact our ability or license to operate.





Any information related to Daleel and our business partners are confidential

15 Data Privacy, Protection and Confidentiality

- 15.1 Confidential information consists of any information that is not in the public domain. Therefore, during your employment, you may acquire certain information about Daleel, third parties or another third party that is confidential, competitively sensitive and/or proprietary.
- 15.2 You should not disclose any confidential business information to anyone outside Daleel, even to members of your own family. You may share only the required information with your co-workers, you must only share confidential information on a need-to-know basis only.
- 15.3 You must not engage with the media on behalf of Daleel without disclosure clearance from Communication Team.





16 Records Management

16.1 Records and information management plays an integral role within Daleel as it underpins effective information sharing within our organization and externally to suppliers and any public authority.

Each Daleel Representative should:

1. Ensure all transactions are properly authorized, recorded and reported, as required;
2. Follow all applicable laws and Daleel procedures and policies when creating, maintaining, retaining or destroying documents including those in electronic formats;
3. Make sure you have the necessary approvals when you respond to a request for information from a government or regulatory agency; and
4. Ensure that any third party who creates or updates Daleel records follows the same rules, where appropriate.





Make sure your user ID and password are always secured



17 Protection of Corporate Assets

- 17.1 Use Daleel assets only for the purposes of fulfilling Daleel's business and your assigned responsibilities.
- 17.2 Daleel's assets are meant for business use, not for personal use. We all have a responsibility to protect Daleel's assets from loss, theft, misuse and waste. Daleel's assets include tangible assets, such as products, equipment and facilities, as well as intangible assets, such as corporate opportunities, intellectual property, trade secrets and business information. Daleel's asset should never be used for personal gain. You should not allow Daleel's assets to be used for illegal activities.
- 17.3 Theft or misuse of assets may result in disciplinary action, including dismissal.

COMMUNICATIONS MANAGEMENT



Useful Resources: Please refer to Daleel HR Manual

18 Business Communications

- 18.1 You must use Daleel email and internet accounts responsibly. You must protect the security of our information systems at all times.
- 18.2 Every communication to the public on behalf of Daleel must be accurate in all material respects, complete, relevant, and balanced. Each communication must also comply with all applicable laws and regulations and shall be made by authorized persons only.
- 18.3 You may only use Daleel-approved social media channels for business use if you are an approved user and have received the required training.
- 18.4 Daleel has the right to stop a user account in case of misuse.





19 Personal use of IT and Communication

- 19.1 Computer equipment, phones, email and internet access are provided for business purposes.
- 19.2 Avoid using business IT and communications for personal use. Daleel may monitor and record your use of its equipment, systems and services, and may intercept any information sent or received by you as a result of such use, at any time.

20 Public Disclosure

- 20.1 Do not speak on behalf of Daleel unless authorized to do so.
- 20.2 You may be contacted by a member of the media, a shareholder, a financial analyst, a governmental authority or any other third party for information about Daleel and its business, and a response can have far-reaching implications.
- 20.3 If you receive a request from outside Daleel to speak on Daleel's behalf and you are not authorized to do so, refer the request to the head of your business unit or forward the request to Daleel Communication Team.

NATIONAL AND INTERNATIONAL TRADE



21 Free and fair Competition



- 21.1 Do not engage in anti-competitive behaviour.
- 21.2 Each Daleel Representative must deal fairly with third parties. You should not of or create an unfair advantage, whether through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

Do not engage in the following activities: any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.

- 21.3 Under no circumstances should information be obtained through theft, illegal entry, blackmail, or electronic eavesdropping.



22 Trade Control

- 22.1 If you are involved in the import or export of goods, you must comply with international trade regulations.
- 22.2 As Daleel deals with international traders and suppliers, our business transactions are subject to various trade controls and laws that regulate export and import, including:
- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts; and
 - Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the Omani government.
 - International Trade Control regulations.
- 22.3 If you are involved in the transfer of goods or services across national borders on behalf of Daleel or our customers, you must comply with these laws, regardless of where you are located.
- 22.4 Always consult with the [Legal Department] for proper guidance on this subject.



Human Resources





Daleel is responsible for managing all aspects of its own Daleel Representatives' relations e.g. pay, pensions, benefits, hours of work, agreements with unions, discipline, recruitment, promotions etc. These should be in accordance with the local legislation and custom and practice. However the principles relating to the treatment and respect due to the individual, are set out in Daleel's Human Resource Manual.

Review Of The Code

Daleel will review this Code on a regular basis and at least once in two years. We shall provide all Daleel Representatives with information about any changes or updates made to this Code. You shall comply with any and all changes or updates made to this Code from time to time as notified to you.

The Daleel Management Team



Thank You

Thank you for taking the time to review our Code and for your personal and professional commitment to our Code of Conduct. The principles set forth in this Code are general in nature, and can be found in more specific policies and procedures on our website.

We expect all Daleel employees to be guided by the spirit of this Code. With these principles in mind, we will continue to maintain a reputation of inclusion, transparency and creativity. Above all, we want you to live by the Code every day and ensure you are making the right decision.



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