

**OQEP**

# **Third-Party Code of conduct**

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## Definitions

**Confidential information:** Includes all non-public information relating to OQEP, in written or oral form, irrespective of the media in which it was obtained from.

**Conflicts of Interests:** A situation in which an individual or corporation has the opportunity – real or perceived – to exploit their position for personal or corporate benefit.

**Intellectual property:** Refers to intangible assets created and/or owned by OQEP such as automated processes, logos, designs, trademarks and copyrights.

**Money laundering:** Process of concealing the real origin of money generated from illegal activities to make it appear as if it was derived from legitimate sources.

**OQEP:** Any company in which OQEP. has a direct or indirect controlling interest.

**Partner:** Any distributor, agent, or third-party vendor, supplier sub-contractor and partner that has a business relationship with OQEP.

**Personnel:** Any employee, officer and executive staff employed with or appointed to OQEP, as well as any agent or person working under contract that occupies a permanent or temporary position within OQEP, such as seconded staff or staff sourced from manpower contract.

## 1.0 Scope

This Third-Party Code of Conduct applies to all distributors and agents, and significant third-party vendors, suppliers, subcontractors and partners that have business relationships with OQEP. Such third parties are referred to as “Partners”.

## 2.0 Purpose

OQEP is committed to honesty, fairness and respect when dealing with our Partners, other stakeholders and our Personnel. We recognize the diverse legal and cultural context of our global activities. OQEP expects all our Partners to act with the same honesty and integrity in all aspects of their business.

We expect our Partners (those we do business with) to comply with the provisions of this Code and to acknowledge their adherence to the Code, at the time of registration with OQEP or at such other time when requested by OQEP to do so.

## 3.0 Human rights and working conditions

This Third-Party Code of Conduct narrates the standards and corporate values of OQEP, which we expect each Partner to observe, and sets out standards for human rights and working conditions that we expect our Partners to comply with.

We are committed to offering high-quality working conditions in line with applicable Omani and internationally recognized principles on labor and human rights. We expect of our Partners to operate within the framework of the United Nations Universal Declaration of Human Rights, the Fundamental Convention of the International Labor Organization, and to comply with applicable Omani laws and regulations for upholding of human rights, including the Basic Statute of the State, the Oman Labor Law and efforts of the Oman Human Rights Commission. We also expect our Partners to comply with all applicable laws to prohibit slavery, human trafficking, as well as forced, compulsory or child labor.

The Partner shall also provide a safe and healthy working environment by treating its employees, workers and personnel with fairness, dignity and respect, and not discriminate against trade unions and the right of workers to organize and bargain collectively.

## 4.0 Health, safety, security and environmental protection

OQEP is committed to an incident and injury free workplace, and to protect health and wellbeing. We are pledged to preserve and protect our environment for ourselves and for future generations. Therefore, we expect of our Partners to comply with all applicable laws and regulations addressing

environmental protection, and to ensure a safe working environment for its employees, workers and personnel by maintaining programs on accident prevention and health risk exposure minimization.

When working on the premises of OQEP, our Partner's employees, workers and personnel are required to adhere to OQEP's safety standards, systems and procedures on-site as and where applicable.

OQEP adheres to a set of Life Saving Rules that are based on the International Association of Oil and Gas Producers (IOGP) and provide guidance and act as a supplement to existing company management systems. The Life Saving Rules (as shown below) apply to all OQEP employees, contractors, sub-contractors, vendors as well as visitors associated with OQEP group, and hence all Partners are expected to adhere to these rules.

## 12 LIFE SAVING RULES

<p><b>Overriding Safety Controls</b></p> <p>Obtain authorization before overriding or disabling safety critical equipment/systems</p>	<p><b>تجاوز أو تعطيل أنظمة ومعدات الحماية</b></p> <p>احرص على الحصول على الموافقة المطلوبة قبل قيامك بتجاوز أو تعطيل أنظمة / معدات الحماية الهامة</p>	<p><b>Mechanical Lifting Operation</b></p> <p>Plan lifting operations and control the area</p>	<p><b>عمليات الرفع الميكانيكية</b></p> <p>قم بالتخطيط لعمليات الرفع والتحكم في المنطقة المحيطة</p>
<p><b>Confined Space Entry</b></p> <p>Obtain authorization before entering a confined space</p>	<p><b>دخول الأماكن المحصورة</b></p> <p>تأكد من الحصول على التصريح المناسب قبل دخول الأماكن المحصورة</p>	<p><b>Permit to Work (PTW)</b></p> <p>Work with a valid permit when required</p>	<p><b>تصريح بدء العمل</b></p> <p>احرص على وجود تصريح ساري لبدء العمل إذا تطلب الأمر</p>
<p><b>Driving</b></p> <p>Follow safe driving rules</p>	<p><b>القيادة</b></p> <p>احرص على اتباع قواعد القيادة الآمنة</p>	<p><b>Working at Height</b></p> <p>Protect yourself against a fall when working at height</p>	<p><b>العمل في الأماكن المرتفعة</b></p> <p>قم بحماية نفسك من خطر السقوط من علو عند العمل في الأماكن المرتفعة</p>
<p><b>Energy Isolation</b></p> <p>Verify isolation and zero energy before work begins</p>	<p><b>عزل مصادر الطاقة</b></p> <p>قم بعزل مصادر الطاقة والتحقق من عدم وجود طاقة قبل بدء العمل</p>	<p><b>Personal Protective Equipment</b></p> <p>Always wear Personal Protective Equipment (PPE) where required in workplace</p>	<p><b>معدات الحماية الشخصية</b></p> <p>احرص دوماً على ارتداء معدات الحماية الشخصية المناسبة في مكان العمل</p>
<p><b>Hot Work</b></p> <p>Control flammable and ignition sources</p>	<p><b>مصادر الاشتعال والحرارة</b></p> <p>تأكد من ضمان التحكم في مصادر الحرارة والاشتعال عند العمل في الأماكن القابلة للاشتعال أو الاشتعال</p>	<p><b>Overhead Power Lines</b></p> <p>Obtain authorization for safe working within the vicinity of power lines</p>	<p><b>خطوط نقل الكهرباء</b></p> <p>قم بالحصول على التفويض المناسب للعمل عند المناطق المجاورة لكوابل الكهرباء</p>
<p><b>Line of Fire</b></p> <p>Keep yourself and others out of the line of fire</p>	<p><b>خط النار</b></p> <p>احرص على إبقاء نفسك والآخرين بعيداً عن خط مسار المواد المنطقية (خط النار)</p>	<p><b>Alcohol or Drugs</b></p> <p>No alcohol or drugs while working or driving</p>	<p><b>الكحوليات أو المخدرات</b></p> <p>يمنع تناول المشروبات الكحولية أو المخدرات أثناء العمل أو القيادة</p>

In terms of environmental protection, Partners are expected to be aware of and apply sustainable practices such as reducing waste, by ensuring their practices are aligned with OQEP's environmental objectives and sustainability commitments as outlined in OQEP's Sustainability Policy.

## 5.0 Prevention of bribery and corruption

OQEP does not tolerate any form of bribery and corruption. Therefore, we expect of our Partners to comply with all applicable anti-corruption laws and to ensure that its employees, contractors, personnel, subcontractors or representatives do not offer, promise or grant any illegal benefits, favors or payments to an individual, company or government official with the intention to unduly influence or facilitate a business decision or an official act.

Our Partner must also prohibit its employees, contractors, personnel or representatives from offering any illegal benefits, favors or payments, including inappropriate gifts or disproportionate hospitality, towards OQEP Personnel to obtain or reward business opportunities.

### 5.1 Public officials and facilitation payments

When engaging with public officials, specific rules and behaviors have to be observed. A public official is anyone in a position of official authority that is conferred by a state and includes the staff of any public organization or government-controlled entity.

The offering or providing of any benefits, favors or payments to a public official in order to unduly influence them in their official capacity (or even having the intention to) is considered as a bribe and is strictly prohibited.

Third Parties must not make any facilitation payments when acting on behalf OQEP, and it is forbidden to directly or indirectly offer, promise, give or demand anything of value to grant an improper advantage, in compliance to the Oman Penal Code.

### 5.2 Gifts and entertainment

Gifts and entertainment can build goodwill and are a part of normal business relationships. However, to avoid the perception of a conflict of interest or a bribery act, our code of conduct provides guidelines for our personnel on acceptable gift and entertainment, including gift limits and gift reporting processes.

Any giving or receiving of gifts from or for existing or prospective customers, suppliers or partners must support the legitimate business interests of OQEP and should be reasonable and appropriate under the circumstances.

Where gifts and entertainment are offered or exchanged, they must meet all the following requirements:

- the gift and entertainment should be consistent with customary business practices.
- should not be excessive in value;
- cannot be construed as a bribe or payoff; and
- should be in compliance with local laws, rules, and regulations.

We expect our Partners to uphold these principles.

## 6.0 Fair competition

OQEP maintains a strong commitment to comply with the antitrust and competition laws applicable to our business. Therefore, we expect of our Partners to comply with all applicable antitrust and competition laws, rules and regulations and not enter into restrictive agreements or concerted practices with a third party with the intent to restrict competition.

Partners should avoid practices that undermine fair competition, such as price-fixing, bid-rigging, market allocation, and abuse of dominant position. They should ensure that all competitive practices are conducted in a transparent and ethical manner.

## 7.0 Protecting trade

### 7.1 Export control regulations compliance

Our Partners must comply with all trade restrictions, sanction controls and export regulations applicable in the jurisdictions where they operate and must prohibit any activities that would violate any national or international, financial or economic, sanctions or embargoes towards countries, organizations or individuals, and notify OQEP where they become aware of sanctions being violated linked to their business or their sub-contract.

### 7.2 Prevention of money laundering and terrorist financing

OQEP does not support nor facilitate money laundering in any form. Our Partners must comply with the anti-money laundering laws and/or regulations and implement efficient risk management procedures as required to the extent applicable (to the business scope and jurisdiction in which it operates).

## 8.0 Protecting data, information and intellectual property

Our Personnel is committed to safeguard OQEP's non-public information and to take appropriate steps to prevent misuse of confidential information, the prevention and prohibition of insider trading, which includes but is not limited to procurement and tender information, customer and supplier information, financial or personal data in accordance with the General Data Protection Regulation.

Equally, we expect of our Partners to comply with all applicable laws concerning data protection, including the Omani Data Protection Law, and to ensure that the information collected within the scope of the business relationship with OQEP will not be improperly used or disclosed to

unauthorized third parties and is not used to commit or induce other persons to engage in insider trading. This information includes OQEP intellectual property.

Partners should not seek, discuss, or share non-public or sensitive information with outsiders or competitors, nor should they use the information to further themselves. This includes using their position to influence a competitor, making dealings based on favoritism, and operating on intelligence or confidential information. Partners must ensure that any access to OQEP's confidential information is strictly limited to those who have a legitimate business need for such information.

Partners should not act on behalf of OQEP to express any views except where they have been authorized to do so. Partners may be asked to enter into non-disclosure agreements with OQEP, where necessary to ensure protection of OQEP intellectual property and information.

## 9.0 Due diligence and monitoring

OQEP is committed to monitoring third-party compliance with our internal standards and policies. We place great importance on ensuring that the necessary and appropriate measures are implemented and adhered to identify relevant risks and appropriate mitigation steps are taken when dealing with third-parties.

### 9.1 Conflicts of interest

OQEP expects its personnel and third parties to conduct business with integrity, honesty, and ensure that their personal activities or interests do not conflict with their responsibilities and obligations to the company or partnership. Partners are required to disclose any potential or actual personal relationships with OQEP personnel as well as other matters that may pose a conflict of interest.

We expect our Partners to be mindful and comply with applicable local laws such as the Conflict of Interest and Avoidance law in Oman.

## 10.0 Whistleblowing

OQEP strives to uphold its ethical standards and values and encourages its Partners to report any observation of behavior that represents a violation of these principles by utilizing the anonymous whistleblowing system of at our corporate page.

The whistleblowing system provides the facility for phone and web reporting. The system is managed by a Third-Party, and allows the option for anonymous reporting, where reporters do not wish to disclose their identity.

All concerns must be raised in good faith and with reasonable grounds believing an unethical incident occurred or misconduct took place.

Partners may visit our corporate page to access links to the whistleblowing system.

## **11.0 Non-compliance with this Third-Party Code of Conduct**

OQEP recognizes compliance with this Third-Party Code of Conduct as essential for the relationship with its Partners and reserves the right to audit the Partner's compliance with this Code. The Partner acknowledges to communicating the content of this Third- Party Code of Conduct to its subcontractors and suppliers engaged to fulfil their obligations toward OQEP and to require them to comply with this Code and its principles.

In case of a breach of this Code, OQEP reserves its right to demand clarification of the facts and initiation of countermeasures by the Partner. In the event of failure to provide evidence that corrective action has been initiated or in the event that the breach is so significant that OQEP cannot be reasonably expected to continue the business relationship, OQEP reserves the right to terminate the contract and end the relationship with the partner or take other reasonable measures subject to applicable laws.

Partners should only seek support from those who are authorized to provide it. Support in matters related to tenders and contracts should be directed to authorized procurement and contracting department personnel. For clarifications or queries on the Third-Party Code of Conduct, you may contact OQEP's Ethics team on [ogep.ethics.elearning@ogep.om](mailto:ogep.ethics.elearning@ogep.om).

## Related documents

- [OQEP Sustainability Policy](#)
- [OQEP Responsible Procurement Policy](#)