

The Code of Ethical Conduct

Rumaila Field Operating Organisation (ROO)

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Contents

Letter from the General Manager and Deputy General Managers	4
Section I - Foundations	5
Scope and applicability	5
Our Values: The foundation for how we work	5
Local laws, our standards and accessibility	6
Making ethical decisions: your responsibilities	6
Speak up & non-retaliation	7
Section II – Safety & People	8
Safety leadership, ESG and sustainability	8
Emergencies, disasters and crisis situations	8
Fair treatment, diversity and no discrimination	9
Harassment-free workplace.....	9
Privacy and personal data protection.....	10
Human rights.....	10
Local communities and non-governmental organisations	10
Section III – Business Integrity	10
Anti-bribery and anti-corruption	10
Accurate books and records and reporting	11
Anti-money laundering (AML), crime financing, and anti-tax evasion.....	11
Gifts, Entertainment and Hosting	11
Hosting Government Officials.....	13
Conflicts of interest	14
Political activity and contributions.....	15
Government engagement.....	15
Dealings with third parties and business partners	15
Fair competition and anti-competitive conduct	16
Sanctions, export controls and international trade restrictions.....	16
Social welfare investment, charitable contributions and sponsorships.....	16

Section IV – Protecting ROO Property	16
General principles.....	16
Cyber security and use of ROO IT systems.....	17
Confidential, secret and insider information & intellectual property	17
External Communications and Social Media	18
Section V – Miscellaneous	18
Compliance team & leadership	18
Training & awareness	19
Compliance with the Code and consequences of non-compliance	19
Annex 1 - Key terms and definitions	19



Letter from the General Manager and Deputy General Managers

Dear colleagues and business partners,

Welcome to Rumaila Field Operating Organisation's ("ROO") Code of Ethical and Business Conduct (the "Code"). The Rumaila field is operated by the Rumaila Operating Organisation (ROO) under a Technical Service Contract (TSC) between Basra Oil Company (BOC) and Basra Energy Company Limited (BECL) – a joint venture company between PetroChina, bp and the State Oil Marketing Organisation.

At ROO, how we deliver results matters as much as the results themselves. Our reputation - built over time and protected every day - depends on each of us acting with integrity, respect, and professionalism and in line with the requirements of this Code.

The Code consists of five main sections and reflects modern expectations of responsible business. The Code reflects and supports ROO's values ("Values"): **Safety, Respect, Personal Ownership, One Team, and Determination**. It brings these Values to life by setting clear expectations for how we make decisions, treat one another, and conduct business.

ROO's speak up channels are described in this Code. Use these channels whenever you need to report a concern, raise an actual or suspected breach of the Code, or flag any unethical or improper conduct. ROO will not tolerate retaliation against anyone who raises concerns or reports misconduct in good faith.

This Code cannot cover every situation. We expect everyone to use good judgment, ask questions, and seek guidance when unsure. If you need advice or clarity, speak with your line manager, Legal, Ethics & Compliance team, or HR.

Please read and apply this Code in your daily work to help sustain an ethical and compliant culture. Thank you for living our Values and for your commitment to doing the right thing.

Sincerely,

Brant Hasebe

ROO General Manager

Wasfi Taher Basht

ROO Deputy General Manager

Du Bo

ROO Special Deputy General Manager

Section I - Foundations

Scope and applicability

The Code applies to **all individuals assigned to ROO including secondees** from Basra Oil Company (BOC), bp, PetroChina, and agency staff.

This Code applies to all such persons at all times when performing work for or on behalf of ROO, whether at ROO facilities, at other work locations, while travelling for work, working remotely, working from home, or otherwise working outside ROO facilities. Compliance with this Code is not limited to conduct at ROO sites.

Our Values: The foundation for how we work

At ROO, the way we achieve results matters as much as the results themselves.

Our Values guide our decisions, how we treat one another, and how we conduct business. This Code explains what these Values look like in practice and sets clear expectations for ethical, safe and compliant behaviour.



VALUE	WHAT IT MEANS
Safety	Rumaila way, the safe way We believe safety is a basic right for all who work at Rumaila. Safety means never walking by a hazard without doing something about it - either informing somebody or, if trained, making the situation safe.
Respect	Seeing the good in everyone We respect each other, the community and the country in which we work. At Rumaila we take time to firstly understand and then to help each other, and in the process learn how to deliver a benefit for Iraq, for Rumaila and for ourselves.
Personal Ownership	Our community in our hands We believe in taking personal ownership rather than leaving it to others. The task of successful operations at Rumaila is enormous and it will take all of us working together to make it happen. Achieving the best outcome requires the courage to take ownership and take action, and speak up about what we believe is right.

<p>One Team</p>	<p>Looking out for each other We recognize that Rumaila will only be fully successful once we are all working together and heading in the same direction. When things go wrong we deal with the issue as a team and not just as an individual - we understand the importance of being there for each other and never forget that it takes time to build team spirit.</p>
<p>Determination</p>	<p>Reaching further What we do is rarely easy but if something needs to be done we will find a way to do it. We are determined to work as one brilliant team. To act safely. To build our expertise and capability. And finally, to transform Rumaila into a great success story and something we take great pride in.</p>

Local laws, our standards and accessibility

ROO expects everyone to comply with applicable local laws and regulations. ROO is committed to conducting its activities in accordance with Applicable Laws. Where this Code sets a higher standard than Applicable Laws, you must follow this Code. **If complying with this Code would conflict with Applicable Laws, the Applicable Laws shall prevail.**

ROO may from time to time issue or update policies, procedures, standards, guidance and approval workflows that support this Code (together, “**Supporting Policies**”). Once such Supporting Policies become effective, they form part of ROO’s compliance framework and apply to all individuals assigned to ROO, including BOC, bp, PetroChina secondees and agency staff. ROO will make such Supporting Policies available and communicate material updates as appropriate.

If you have questions about this Code or how it applies to your work, ask before acting. You can obtain advice or raise concerns through the channels listed in the **speaking up and non-retaliation** section below.

If you need this Code in another format or need help understanding it, contact the Ethics & Compliance team for support.

Making ethical decisions: your responsibilities

Making ethical decisions is essential to ROO’s success and reputation. Regardless of position or level at ROO, everyone has a personal responsibility to act with integrity and follow this Code.

Key responsibilities

- **All individuals assigned to ROO** including secondees from BOC, bp and PetroChina, and agency staff, must comply with this Code and the Supporting Policies.
- **Managers and supervisors** must lead by example, support a speak-up culture, and ensure their teams understand and follow the Code.

- **Third party service providers** working for or on behalf of ROO must comply with applicable contractual requirements and meet ROO's expectations including those set out in this Code.

If you are unsure before acting, pause and use the questions below to guide your decision.

Ask yourself:

- Does this comply with **this Code** (including where applicable the Applicable Laws), the Supporting Policies) and/or ROO Values?
- Is it **legal**, and am I **authorised** to do it?
- Could this **harm** people, the environment, ROO, or our participating organisations?
- Could this **involve** bribery, corruption, conflicts of interest, fraud, or inaccurate records?
- Would I be **comfortable** if this were reviewed by my line manager, auditors, a regulator—or reported publicly?
- Does it feel like **the right thing to do**?

Unsure? Stop. Ask for advice. Speak up.

Speak up & non-retaliation

Our commitment to an inclusive culture

ROO is committed to an environment where everyone feels empowered to ask questions, seek guidance and raise concerns without fear. Speaking up helps to prevent harm, protects people and the environment, and supports lawful and ethical operations.

Your responsibility to speak up

Seek guidance if you are unsure what to do. If you observe or suspect a breach of this Code, Supporting Policies, or Applicable Laws—report it promptly and in good faith.

ROO provides multiple reporting channels. Use the channel you are most comfortable using:

1. Your line manager (unless the line manager is involved or you are not comfortable raising it at that level) or any other manager;
2. Human Resources (HR);
3. Ethics & Compliance team; or
4. Speak up/reporting channel: ROOCANDE@roobasra.com.

Anonymous reports will be handled to the extent permitted by law. If there is immediate danger to people, the environment, or safety and/or security, follow emergency procedures and report it immediately.

Zero tolerance for retaliation

ROO prohibits retaliation. Anyone who raises concerns or participates in investigations in good faith is protected from harassment, intimidation, or unfair treatment.

How we address concerns

ROO reviews concerns fairly, objectively and confidentially. Information will be shared only on a need-to-know basis, subject to Applicable Laws. All individuals assigned to ROO must cooperate truthfully, maintain confidentiality and preserve relevant records. If the initial assessment provides an objective basis to believe that further review or an investigation is warranted and has the

General Manager's or a Deputy General Manager's approval, as applicable, ROO will assign suitably qualified and independent personnel (internal or external) to investigate the matter. Where relevant, ROO may liaise with the individual's employer, while preserving the integrity and confidentiality of the process.

If misconduct is substantiated, ROO may take corrective action, including improving controls and/or referring the matter to the relevant employer for appropriate action, which may include removal from assignment or secondment. For Third party service providers, corrective action may include suspension or termination of contractual relationships. Where required or appropriate, ROO reserves the right to refer matters to relevant legal authorities.

Section II – Safety & People

Safety leadership, ESG and sustainability

Safety comes first. The safety of everyone at Rumaila is what we value most. ROO's life saving rules ("Life-Saving Rules"), supported by the safety leadership principles ("SLPs") set out what we must do to keep ourselves and others safe. The Life-Saving Rules tell us "what to do" and the SLPs guide us on "how to think" about safety. These requirements apply to everyone working for or on behalf of ROO. Nothing is so important that it cannot be done safely, responsibly and sustainably.

What do you need to do?

- **Follow the Life-Saving Rules and SLPs** (as amended, updated or replaced from time to time).
- **Stop work immediately** if conditions are unsafe, hazards are uncontrolled, or people or the environment may be at risk.
- **Work only when trained, competent** and fit for duty, and properly authorised.
- Follow **risk assessments**, safe systems of work and appropriate PPE requirements.
- **Protect the environment, support sustainability**, minimise waste, emissions and discharges, and report any environmental concerns promptly.
- **Adhere strictly to security protocols**, travel restrictions and site-access rules. Do not enter unapproved areas or touch suspicious objects.
- **Report** accidents, near misses, unsafe conditions, spills, environmental issues or suspected breaches promptly.
- **If unsure**, ask your line manager, **HSE team or use speak up channels**.

ROO is committed to delivering energy responsibly by integrating environmental, social and governance (ESG) considerations into its core business activities. We recognise that our long-term success is linked to the well-being of the environment and the communities where we operate, and we support sustainable development while meeting energy needs with the lowest practical environmental impact.

Emergencies, disasters and crisis situations

ROO is committed to protecting people, assets and operations during emergencies, disasters, security incidents, public health events, and other crisis situations. In such circumstances, all

personnel must act calmly, responsibly, and in accordance with applicable emergency procedures, official guidance, and ROO instructions.

What do you need to do?

- **Follow all applicable ROO emergency instructions**, site procedures, evacuation notices, shelter-in-place directions, travel restrictions, and business continuity measures.
- **Comply with official guidance** and lawful instructions issued by competent authorities and by ROO.
- **Do not ignore, bypass, or contradict emergency or safety instructions**, even if doing so may appear to save time or reduce disruption.
- **Do not spread rumours, unverified information, or unofficial updates**, including on social media or other communication means.
- **Cooperate with emergency response**, crisis management, and recovery processes as directed by ROO.

Fair treatment, diversity and no discrimination

Our people are at the core of our One Team Value. ROO is committed to a workplace where people are treated fairly and with respect, and where **diversity and inclusion** are promoted and sustained.

Discrimination includes unfair treatment based on characteristics such as race, colour, nationality, ethnic origin, religion, sect, gender, opinion, economic or social status or any other status protected by law. We expect respectful conduct toward each other and third parties we work with including those affected by our operations, and local communities.

Harassment-free workplace

Everyone at ROO is entitled to work in an environment free from harassment, bullying, threats, and abuse. This applies in all work-related settings, including ROO events and business trips. ROO does not tolerate any physical or verbal forms of harassment by anyone. Professional and respectful performance feedback is not harassment. However, abusive language, humiliation, threats, and inappropriate behaviour are prohibited.

What do you need to do?

- Treat others with **courtesy** and **respect** in words and actions.
- Never **harass, bully, threaten, intimidate, humiliate, or insult** anyone.
- **Never engage in sexual harassment** (including unwelcome advances, comments, requests for sexual favours, inappropriate contact, or suggestive behaviour).
- Avoid **jokes**, comments, images, or messages that are **discriminatory, offensive, or degrading**.
- **Use email, messaging and social media responsibly**; do not send or display offensive content or hateful symbols.
- **Report** any threats, harassment, or abusive behaviour promptly.
- **If you receive a threat or feel unsafe, report it immediately** to your line manager and/or any other manager you trust, and follow applicable safety or security procedures.

Privacy and personal data protection

ROO respects privacy and is committed to protecting the personal data of its personnel and other individuals assigned to ROO including agency staff. ROO collects and uses personal data only when necessary for legitimate business purposes, to operate effectively, to meet legal requirements, or as required under secondment/assignment arrangements. Subject to applicable local laws, ROO may monitor, audit, and access ROO systems and communications for legal, security, compliance, and operational reasons.

Human rights

ROO respects human rights and treats people with dignity in its operations and business relationships. We do not tolerate forced labour, child labour, human trafficking, discrimination or harassment. ROO is committed to respecting human rights as set out in the United Nations Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, as well as the United Nations Guiding Principles on Business and Human Rights.

Where ROO engages with **public security providers** (e.g., police, military) or **private security providers** (e.g., contracted guards), ROO aims to align its approach with the **Voluntary Principles on Security and Human Rights (VPSHR)** to help prevent and address human rights risks.

Local communities and non-governmental organisations

ROO aims to build and maintain respectful, transparent relationships with the communities adjacent to ROO operations. ROO engages with local communities and legitimate civil society organisations, including NGOs, in a lawful, respectful and transparent way.

What do you need to do?

- **Comply with Applicable Laws** and follow ROO procedures when engaging with communities and NGOs.
- Treat community members, representatives, and NGOs **with respect and professionalism**.
- Do not make commitments on behalf of ROO **unless** authorised to do so.

Section III – Business Integrity

Anti-bribery and anti-corruption

ROO has **zero tolerance for for any crime**, including fraud, bribery, corruption, facilitation payments and violations of antitrust laws. This includes bribery involving **Government Officials** and **private parties**, and **direct and indirect** conduct through third parties (such as agents, consultants, contractors, suppliers, and/or intermediaries). Bribery and corruption can expose ROO and individuals to severe penalties under Applicable Laws and reputational damage.

ROO uses risk-based controls to prevent, detect, and respond to bribery and corruption risks, including risk-based ACDD, approvals, accurate record-keeping, and reporting channels.

What do you need to do?

- **Never** offer, promise, provide, request, accept, or authorise a bribe - **directly or indirectly** - for any reason.
- **Never** offer, provide or receive **Anything of Value** to obtain or retain business, to secure an improper advantage or to influence anyone, including a Government Official.
- **Never** provide Anything of Value to improperly influence a Politically Exposed Person or anyone connected to a Politically Exposed Person.
- **Do not make facilitation payments** to speed up routine government actions, even if requested. If you feel pressured, refuse and seek guidance immediately.
- **Follow required ACDD** and approval steps, watch for red flags and verify third party invoices.
- **Keep records accurate** and ensure all payments and benefits are properly approved, supported, and recorded.
- **Complete any required** anti-bribery, anti-corruption (including e-learning where available) and similar **training in a timely manner**.
- **Report** any suspected bribery, corruption, red flags, or breaches promptly.

Accurate books and records and reporting

ROO records and reports information **accurately and completely**. Do not create false or misleading records, hide payments or use off-book accounts.

Anti-money laundering (AML), crime financing, and anti-tax evasion

ROO **prohibits** money laundering, crime financing and tax evasion.

What do you need to do?

- Follow ROO requirements for **screening and risk-based ACDD** for third parties and transactions.
- **Do not do business** with persons or entities you suspect are linked to illegal activity, or suspicious sources of funds.
- **Watch for red flags** such as unusual payment terms, cash requests, payments to third parties not named in the contract or other unusual requests.
- Ensure payments are made only to the **contracted counterparty**, through approved channels, and with proper supporting documentation.
- **Never** assist or advise anyone to unlawfully evade taxes or to conceal the true nature of funds or transactions.
- **Seek advice** from the Ethics & Compliance team if you are unsure about AML/crime financing/tax evasion risks, or if you identify any red flags.

Gifts, Entertainment and Hosting

Gifts, entertainment and hosting can support legitimate business relationships. However, they may also create bribery, money-laundering, conflicts of interest and/or reputational risks.

Never offer, provide or accept Gifts, Entertainment or Hosting in exchange for any preferential treatment or to influence any business decision. All Gifts, Entertainment and Hosting that are **provided, offered, accepted or declined** must be **registered** in the G&E Register.

During ordinary business meetings, social occasions, national holidays or special celebrations, (such as project milestones or birthdays), reasonable food, beverages, or snacks may be provided at ROO premises, and such occasions do not need to be recorded in the G&E Register.

If you receive a Gift (including from a Government Official) that exceeds an applicable monetary threshold set out in the table below, and declining it would be insulting under local culture, customs or traditions, you must promptly report it to your line manager and the Ethics & Compliance team. ROO will then decide whether the Gift: may be retained by the recipient; will be retained for the benefit of ROO; will be sold and the money donated to charity; or will be returned to the person who provided the Gift.

What do you need to do?

- **Only** exchange Gifts/Entertainment or provide Hosting where the exchange or provision complies with the requirements of the Code and the **table below, and has a legitimate business purpose.**
- **Never** solicit, offer, provide or accept Gifts/Entertainment or provide Hosting where doing so is intended to influence or could reasonably be seen as influencing a decision, providing an improper advantage, or being a bribe or otherwise improper or illegal.
- Individuals assigned to ROO, including BOC, bp and PetroChina secondees, and agency staff engaged in **tender, competitive bidding or contract award process**, are prohibited from exchanging any Gifts/Entertainment with third parties.
- **No cash or cash equivalents** may be provided or received as Gifts/Entertainment.
- **Record Gifts, Entertainment and Hosting** accurately in the G&E Register, including the recipient/provider, organisation, nature of the item or event, business purpose, date, approximate value and approval details.
- **Do not** provide, offer, promise, request, solicit or accept any Gift, Entertainment, or “Anything of Value” to or from a **Government Official** unless **pre-approved in writing** by **your line manager** and the **Ethics & Compliance team**. This applies **regardless of value**, including items of nominal value.
- **Any approved** Gift, Entertainment or other “Anything of Value” must be **lawful** under the **Government Official’s rules** and Applicable Laws, modest, infrequent and for a legitimate business purpose, and never capable of being seen as influencing a decision.

In addition, follow the requirements set out in the table concerning Gifts and Entertainment (always subject to the Applicable Laws and as table may be revised or updated from time to time):

Scenario	Gifts Value (USD)	Entertainment (incl. meals) Value (USD)	Approval	Recording in the G&E Register
Scenario 1	< \$20	< \$20	No pre-approval, self-approval	Yes
Scenario 2	\$20-\$100	\$20-\$250	Line Manager + Ethics & Compliance team	Yes
Scenario 3	≥ \$100	≥ \$250	Line Manager + Ethics & Compliance team + GM	Yes

Note: All Gifts and Entertainment must be recorded in the G&E Register, including those that are provided, offered, accepted and/or declined. If Gifts/Entertainment are exchanged with the same third party more than once a year, **line manager pre-approval is required irrespective of value**.

The Gifts & Entertainment table above continues to apply to Gifts/Entertainment involving Government Officials. Hosting of Government Officials is governed by the section below.

The G&E Register is available on the ROO intranet at [Gifts and Entertainments Register - Home](#), or such other location as ROO may designate from time to time.

Hosting Government Officials

ROO's interactions with Government Officials carry heightened bribery and corruption risk. Hosting rules apply to all Government Officials, including **ROO Government Officials where the activity relates to** their assignment and/or secondment to ROO. For the purposes of this Code, employees of BOC and PetroChina assigned or seconded to ROO are treated as "**ROO Government Officials**".

Where Hosting involves ROO Government Officials, ROO may, where appropriate and properly approved, cover or reimburse certain legitimate travel, accommodation or daily living expenses (including per diems) of ROO Government Officials, all **in accordance with this Code and any Supporting Policies**, including the travel policy.

For the avoidance of doubt, any Hosting of ROO Government Officials must be assessed and approved on a case-by-case basis. Where a proposed arrangement does not fall within the definition of Hosting but is governed by relevant contractual arrangements, it must be handled in accordance with those contractual arrangements and any applicable approval requirements.

What do you need to do?

- Follow this Code and any **guidance regarding Hosting Government Officials**.
- No Hosting of a Government Official, including a ROO Government Official, is allowed **unless** it has been **pre-approved in writing** by Ethics & Compliance team and Legal.

- Any approved Hosting must have a clear, documented **legitimate business purpose**, be reasonable and proportionate, and must never be intended (or appear intended) to influence an official decision or obtain an improper advantage.
- **Hosting must never include cash or cash equivalents except that, in the case of ROO Government Officials**, certain per diems and travel-related cash expenses may be permitted if approved in accordance with this section, and must not be provided to family members or companions or include leisure/side trips or other non-business elements.
- All approved Hosting must be **promptly and accurately recorded** in the **G&E Register**, including the recipient's name, title, entity, business purpose, date, location, value, and approver details.

Conflicts of interest

A conflict of interest can arise when your personal interests, or those of relatives or close relationships, interfere or appear to interfere with ROO's interests or your duties. Conflicts are not always wrongdoing, but they must be disclosed and properly managed.

Relatives or individuals who have close personal relationships must not be in direct or indirect reporting lines or positions that influence employment decisions. Individuals assigned to ROO, including secondees and agency staff, must act in ROO's best interests and avoid situations where their employer's interests conflict with ROO's interests.

Affiliate or related-party dealings can create bribery, favouritism, procurement and reputational risks, especially where a shareholder affiliate, connected entity or entity linked to a Government Official is involved. As such, ROO recognises heightened risk where ROO involves an **affiliate of any of the shareholders or another related party** (including entities owned/controlled by, or connected to, individuals assigned to ROO, as well as secondees/agency staff or their close family members). Note: ROO may apply enhanced controls before approving any such arrangements.

Types of conflicts of interest:

- **Actual:** a conflict exists now (i.e. your interest is affecting, or could affect, your decisions).
- **Potential:** a conflict could arise in the future (e.g., you are considering outside work with a supplier).
- **Perceived:** others could reasonably believe a conflict exists, even if you believe it does not.

Disclosure: Conflicts of interest must be disclosed at onboarding (including assignments and secondments) and whenever new conflicts arise or circumstances change. Failure to disclose may result in notification to your employer.

What do you need to do?

- Follow the **ROO conflicts of interest guidelines**, which are available on the ROO intranet. Promptly disclose any **actual, potential, or perceived** conflicts of interest cases, including affiliate/related-party cases.
- **Do not participate in decisions where you may have a conflict of interest**, such as supplier selection or approval of an invoice.
- **Seek guidance** from your line manager, HR, Legal, or the Ethics & Compliance team if you are unsure how to handle a situation.

- **Cooperate with any applicable mitigation measures** (e.g., recusal, alternative approver, change of reporting line).

Further guidance on conflicts of interest is available on the ROO intranet **Ethics and Compliance page**, [Rumaila Operating Organization SharePoint Home - Ethics and Compliance](#).

Political activity and contributions

ROO is politically neutral and does not participate in party politics or make political statements, donations or sponsorships, whether in cash or in kind, unless explicitly permitted by Applicable Laws and approved in accordance with ROO procedures including the pre-approval of Legal, the Ethics and Compliance team and the General Manager or a Deputy General Manager, as applicable.

What do you need to do?

- **Do not** use ROO's (or any participating organisation's) name, trademarks, funds or property to support political parties, candidates, campaigns, or political fundraising.
- **Do not allow personal political activity to create a conflict of interest** or interfere with your duties to ROO.
- If you plan to seek, accept, or hold public office or a political appointment, **notify your line manager in advance**, and follow any guidance from HR, Legal or the Ethics & Compliance team.
- **Always make clear that your political views and actions are personal** and do not represent ROO or the participating organisations.

Government engagement

Any engagement with Government Officials (excluding routine engagement with ROO Government Officials in the ordinary course of their assignment and/or secondment to ROO) on behalf of ROO must be conducted with integrity and transparency and authorised by the General Manager or a Deputy General Manager, as applicable, including obtaining relevant consultations from Legal, Communications & External Affairs ("ROO C&EA") and other relevant functions, where applicable. We only engage in lobbying to provide information or advocate for policies that support our legitimate business interests. Such engagement must be transparent, accurate, and consistent with ROO policies and anti-bribery and anti-corruption requirements.

Dealings with third parties and business partners

ROO works with Third party service providers and business partners. These relationships are essential to our operations, but they can also create legal, operational, and reputational risks. ROO selects and manages third parties using objective procurement processes and **risk-based ACDD**.

What do you need to do?

- **Follow** ROO procurement, contracting, ACDD and approval processes.
- **Complete** required ACDD before onboarding, renewing, or materially changing any third-party relationship.

- **Include appropriate integrity clauses** in contracts with Third party service providers where required, such as compliance with applicable laws, anti-bribery, audit, termination and reporting obligations.
- **Watch for red flags** (examples: unusual payment requests, pressure for a speedy response, refusal to provide ownership details, requests for cash or third-party payments) and escalate where applicable.

Fair competition and anti-competitive conduct

ROO is committed to fair and lawful competition. Competition (antitrust) laws prohibit conduct that restricts competition, such as price-fixing, bid rigging, market allocation, and improper exchange of competitively sensitive information.

Sanctions, export controls and international trade restrictions

ROO follows applicable sanctions, export control and trade restriction requirements. These rules may restrict dealings with certain countries, parties, goods, technology or services and can change quickly.

What do you need to do?

- Speak with Ethics & Compliance team or PSCM to find out more about sanctions and trade compliance requirements.
- **Do not proceed** with a transaction if a party, destination, end-user, or activity is restricted—pause and escalate.
- **Do not** structure transactions to avoid controls.

Social welfare investment, charitable contributions and sponsorships

ROO may support social investment, charitable contributions, and sponsorships where they are lawful, transparent, and aligned with ROO's Values and community commitments. Implementation of social welfare investments, charitable contributions, and sponsorships is managed by ROO C&EA, including ensuring required approvals and documentation. To obtain more information on these activities and relevant procedures/policies, contact ROO C&EA.

Section IV – Protecting ROO Property

General principles

ROO property, funds, information and systems must be protected, including from loss, theft, damage, misuse and unauthorised access. This applies to physical assets (such as equipment, technology, facilities, vehicles and tools), financial assets (such as cash, bank systems and tools), and intangible assets (including data, intellectual property and confidential information).

What do you need to do?

- Use ROO assets **for legitimate business purposes** and in line with ROO procedures.

- Protect assets and **report promptly** any loss, suspected theft, or improper use.
- **Do not use ROO property, funds** (including any company bank cards), or resources **for personal commercial activities** or any unauthorised personal use.
- **Ensure** requests for payments, reimbursements, procurement, or asset transfers are accurate, complete, and properly approved.
- **Do not conceal, alter, falsify, or destroy records.** Never dispose of documents to avoid an audit, investigation, or legal requirement.
- **Return ROO property when requested.**

Cyber security and use of ROO IT systems

ROO is committed to protecting confidential, sensitive, and proprietary information belonging to ROO and its partners. Cyber security is a shared responsibility, and all personnel play a critical role in safeguarding ROO's systems, data, and operations. Information created, stored, transmitted, or received using ROO systems and devices remains the property of ROO. While ROO respects individual privacy, subject to Applicable Laws and regulatory requirements, ROO reserves the right to monitor, audit, and restrict the use of its systems and networks to protect security, ensure compliance, and maintain operational integrity. ROO systems and communications must be used in a responsible, ethical, and lawful manner.

What do you need to do?

- **Do not** engage in **illegal, unethical, or offensive activities.**
- **Do not** access, store, or distribute **inappropriate or unauthorised content.**
- **Do not** install or use **unauthorised software or services.**
- **Do not** attempt to **bypass security controls or compromise system integrity**, including through the use of unauthorised VPN or anonymisation services.

ROO supports innovation and productivity, including the responsible use of Artificial Intelligence (AI) tools where permitted. However, AI technologies introduce specific risks related to data privacy, accuracy, and intellectual property. Users must:

- use AI tools only in accordance with ROO IT policies and approved platforms;
- not enter confidential, sensitive, or proprietary information into unapproved AI tools; and
- review AI-generated content for accuracy, appropriateness, and compliance before use.

For further details on cyber security, acceptable use, AI usage, and data protection requirements, please refer to the ROO ITC Acceptable Use Policy (AUP) and related ITC policies.

Confidential, secret and insider information & intellectual property

ROO protects ROO and third-party confidential, secret, non-public and proprietary information, including intellectual property. Unauthorised disclosure may create legal, security, operational, contractual and reputational risks.

What do you need to do?

- **Protect ROO confidential, secret and non-public information** and do not disclose, share or discuss it outside ROO including in public places, on social media, or in public forums, unless authorised and lawfully permitted.
- **Respect third-party confidential information, trade secrets and intellectual property.**

- **Do not obtain competitor information unlawfully** or through improper means.
- If you receive or become aware of **insider information**, do not use it, disclose it, or encourage anyone to trade in securities based on it; seek guidance from the Ethics & Compliance team.

External Communications and Social Media

ROO communications must be accurate, consistent and authorised. Only designated personnel may speak on behalf of ROO externally. Personal use of social media must not disclose ROO confidential information or damage ROO's legitimate interests or reputation.

What do you need to do?

- **Do not make public statements about ROO or on behalf of ROO unless you are authorised** in advance in writing by the General Manager or a Deputy General Manager, as applicable.
- **If you receive an external enquiry** (for example: media, public, NGOs, analysts), refer it to the ROO C&EA manager and the ROO General Manager or a Deputy General Manager, as applicable.
- **Obtain written approval from the ROO General Manager** or a Deputy General Manager, as applicable, **before delivering external presentations**, using or publishing ROO materials or materials related to ROO work.
- **Exercise discretion before posting, uploading, forwarding, or otherwise sharing photos or videos of ROO colleagues or ROO facilities.** Approvals may be required.
- **Use good judgement and treat others respectfully;** do not post content that is discriminatory, harassing, or misleading. Seek guidance if in doubt.
- **Conduct social media activity in a personal capacity.** Do not use ROO's or your employer's name, logo, branding, email address, job titles, or other identifiers in any way that could reasonably suggest that you are speaking for ROO, representing ROO, or that ROO endorses your views or content.
- Individuals assigned to ROO, including BOC, bp and PetroChina secondees and agency staff, must accurately describe their employment status. **They should identify their actual employer when describing their professional background** and must not state or imply that they are employees of ROO or, in the case of agency staff, employees of BOC or one of the BECL's shareholders, bp or PetroChina, as applicable.

Section V – Miscellaneous

Compliance team & leadership

The Ethics & Compliance team is the functional owner of this. It supports ROO by providing guidance and advice, delivering training, monitoring compliance, conducting risk assessments and third-party due diligence, managing reports and internal investigations, and driving continuous improvement.

ROO leadership sets the tone from the top and provides oversight and adequate resources to maintain an effective compliance programme.

Training & awareness

ROO shall provide regular training on the key requirements of this Code and, where applicable, the Supporting Policies. All individuals assigned to ROO, including BOC, bp and PetroChina secondees, and agency staff must complete required training on time.

ROO may require, on a risk-based and periodic basis, that certain Third party service providers complete training or awareness sessions on the core requirements of this Code and, where relevant, the Supporting Policies.

Compliance with the Code and consequences of non-compliance

This Code does not alter the terms and conditions of your employment but is an integral part of your assignment, secondment, and/or agency relationship at ROO. Failure to comply with the Code may result in appropriate consequences. For individuals assigned or seconded to ROO, ROO may refer the matter to the relevant employer for appropriate action which may include removal from assignment or secondment. For Third party service providers, non-compliance may result in suspension or termination of the relevant contractual relationship. In case of any inconsistency between translated versions, the **English version prevails.**

Annex 1 - Key terms and definitions

“ACDD” means the due diligence process, which includes the systematic collection, storing and analysis of information for the purpose of assessing business integrity risks associated with establishing, renewing, continuing or amending a business relationship with a Third party service provider. These risks may include, without limitation, the following: bribery and corruption, sanctions and trade compliance, anti-money laundering, anti-tax evasion, fraud, modern slavery, human rights, conflicts of interest, reputational concerns and other compliance or business integrity risks.

“Anything of Value” means any benefit, advantage or item of value, whether monetary or non-monetary, including cash and cash equivalents, such as cheques, cryptocurrency and e-wallets.

“Applicable Laws” means all laws and other legally binding requirements (including statutes, regulations, decrees, codes, rules, regulatory requirements and permit/licence conditions), in each case as amended from time to time, that apply to ROO and/or individuals assigned to ROO including secondees and agency staff, including any applicable extraterritorial anti-bribery/anti-corruption and books-and-records laws to the extent they apply (such as, the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act).

“Entertainment” means the provision of access to, or payment/reimbursement of costs related to an event (e.g., a cultural or sports event), including tickets, meals/refreshments, lodging/accommodation, travel and transportation.

“Gifts” include Anything of Value offered to or received by an individual or their relative, excluding Entertainment.

“Gifts and Entertainment Register” or **“G&E Register”** means the web-based register located on the ROO intranet ([Gifts and Entertainments Register - Home](#) or such other location as ROO may designate from time to time) used to record, disclose and/or obtain approvals for the provision, offer, acceptance or refusal of Gifts and Entertainment, the arranging, provision or acceptance of Hosting for Government Officials.

“Government Official” is defined as: (i) any official representing the executive, legislative or judicial branch of government (whether elected or appointed official), (e.g., a minister, judge or mayor); (ii) any executive, legislative or judicial branch employee, (e.g., a civil servant, court clerk, prosecutor, legislative aide or administrative employee); (iii) an employee or representative of any government (whether at a national, regional, municipal or local level); (iv) any official or employee of any government agency, department, or other public body (including military, police and customs); (v) any director, officer or employee of any government-owned or controlled enterprise (e.g., national oil company, national airline, national railway or national shipping company; or state-owned educational institution); (vi) any official or employee of a public international organisation (e.g., World Bank, United Nations, International Monetary Fund); (vii) any political party officials or candidates for political office; (viii) any member of a royal or similar ruling family, a tribal leader or other individual holding a similar position/status; or (ix) any close family member of any of the foregoing.

“Hosting of Government Officials” or **“Hosting”** means the payment, provision or reimbursement to or for a Government Official of travel, accommodation, daily living expenses or other related expenses connected with travel or accommodation.

“Politically Exposed Person” means any individual who holds or has held a prominent public function, including senior government officials, senior executives of state-owned entities, judges, military officials, regulatory authority officials, political party leaders, and candidates for political office, where such individual may be in a position to influence the success of a transaction or contract. It also includes any person with an influential political position who holds an economic interest in the transaction, as well as close family members or close associates of such individuals, and any legal entity owned or controlled by, or established for the benefit of, such individuals.

“ROO Government Official” means any individual assigned, seconded, nominated, appointed or otherwise made available to ROO by or from BOC, PetroChina or any other governmental, government-owned, government-controlled or state-owned entity. For the purposes of this Code, all ROO Government Officials must be treated as Government Officials.

“Third party service providers” means any person and/or entity that ROO does or intends to do business with, either on a regular or one-off basis. Third party service providers include but are not limited to consultants, representatives, advisors, contractors, subcontractors, service contractors, or similar intermediary, business development agents/consultants, shipping agents and freight forwarders, customs agents, sales agents, expeditors and “formalities agents,” real estate agents/brokers, lawyers, accountants, tax advisors and political advisors.

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