



# Code of Business Conduct

SEPLC-BMS-HR-GUID-00001

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## Revision summary

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## Revision record

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## Contents

<b>Revision summary</b>	<b>2</b>
<b>Revision record</b>	<b>2</b>
<b>Controlled copy distribution record</b>	<b>2</b>
<b>Contents</b>	<b>3</b>
<b>1 Introduction</b>	<b>4</b>
<b>2 Scope</b>	<b>4</b>
<b>3 Eligibility</b>	<b>4</b>
<b>4 Legal Compliance</b>	<b>4</b>
<b>5 Corporate Governance</b>	<b>4</b>
<b>6 Modern Slavery</b>	<b>4</b>
<b>7 Anti-Bribery and Corruption</b>	<b>5</b>
<b>8 Gifts and Hospitality</b>	<b>5</b>
<b>9 Political Contributions</b>	<b>5</b>
<b>10 Conflicts of Interest</b>	<b>5</b>
<b>11 Relationships with Communities</b>	<b>6</b>
<b>12 Business Information and Public Communications</b>	<b>6</b>
<b>13 Policies</b>	<b>6</b>
<b>14 Issues and Queries</b>	<b>6</b>
<b>15 Whistleblowing</b>	<b>7</b>
<b>16 Acknowledgement</b>	<b>7</b>

## 1 Introduction

This Code sets out the behaviours expected of “personnel” of Serica Energy plc and its subsidiaries (“the Company”). The Company is committed to complying with all applicable legal requirements and working to the highest ethical standards. This Code is a guide to the general principles of working with each other and with the Company’s customers, suppliers, vendors, competitors, government bodies and the public, including the Company’s shareholders. It also provides practical advice to help personnel in their day-to-day work.

All personnel are required to have regard to this Code in their day to day business behaviour and any breach of the Code will be treated very seriously.

## 2 Scope

This Code provides uniform guidelines and procedures for all personnel. This Code may be amended, withdrawn or replaced at any time and for any reason by the Company.

## 3 Eligibility

This Code applies to all personnel engaged in support of the Company and its subsidiaries. Personnel are defined as (permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers or interns.

## 4 Legal Compliance

The Company and its personnel are required to comply with the law of the countries in which they operate and to have regard to regulations and standards which apply to the Company’s business.

## 5 Corporate Governance

The Company seeks to comply with the highest corporate governance standards for a company of its size. The Board of Directors meet monthly and have overall responsibility for ensuring the policies laid down by the Company comply with our legal and ethical obligations and will remain under our Audit Committee for review.

## 6 Modern Slavery

Following legislative requirements under the Modern Slavery Act 2015, the Company has published a statement, added a clause to all contracts and provided training to staff regarding the steps taken to ensure slavery and human trafficking is not taking place in its business or supply chains.

The Company does not tolerate any form of modern slavery in its business or supply chain and expects that its service providers, suppliers, vendors and business partners will maintain the same expectations and standards within their respective business and supply chains. Our contractual terms require the highest standards of business ethics,

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compliance with applicable laws and commitment to health, safety and the protection of the environment. The Company reserves the right to audit contractors / suppliers' policies, procedures and records at any time to verify compliance.

Anyone concerned about modern slavery within our organisation or supply chains should raise this with their Line Manager, HR Department or via our confidential whistleblowing service.

## 7 Anti-Bribery and Corruption

The Company expects all personnel to conduct their business dealings honestly and with integrity. The Company has adopted an Anti-Bribery and Corruption policy and has put in place procedures designed to counter bribery and corruption with a zero-tolerance approach. In accordance with the laws with which it is obliged to comply, the Company prohibits bribery and facilitation payments and any gifts or hospitality given or received must be reasonable and appropriate in the circumstances and must not cause a conflict of interest. All personnel are required to read and acknowledge their understanding and adherence of the Anti-Bribery and Corruption Policy either by completing the e-learning module or by signing the policy document

## 8 Gifts and Hospitality

The Company Anti-Bribery and Corruption Policy does not prohibit reasonable and appropriate hospitality (given & received) to or from third parties which is consistent with practices generally in our business. A register is maintained to record those (accepted or declined) that have exceeded set limits and for which prior approval has been received from the Chief Executive Officer. The threshold for gifts or hospitality to be entered on the register is £50 or £100 for Senior Managers.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable and the intention behind the gift should always be considered.

Those with access to the Company Sharepoint site can access the register and those without direct access are requested to email entries to [compliance@serica-energy.com](mailto:compliance@serica-energy.com)

## 9 Political Contributions

The Company does not make contributions to any political party.

This document and associated HR policies, guidance and forms can be accessed via the Company Intranet.

## 10 Conflicts of Interest

Personnel are required to disclose any direct or indirect interest in any of the Company's suppliers, customers or competitors which could conflict with the Company's best interests and to avoid any actual or potential conflicts of interest. Personnel are expected to act solely for the Company's benefit.

## 11 Relationships with Communities

The Company seeks to operate responsibly and with regard to local communities and to recognise human rights wherever it operates. The Company aims to ensure that the countries and communities where business is carried out benefit from the Company's presence. Where possible we aim to align these commitments with the United Nations Sustainable Development Goals.

## 12 Business Information and Public Communications

Personnel may only use information received in the course of business dealings for the purpose for which it is intended or normally used and never for personal gain. Personnel are required to abide by the internal procedures for the publication of information regarding the Company and can find more information on our intranet Sharepoint site for logos, templates and branding guidelines. Personnel are required to abide by the Company's Share Dealing Code (a copy of which can be downloaded from the intranet or requested via HR).

## 13 Policies

All policies that are referenced in this document can be found on the Company's Intranet. If you do not have access to these please request the relevant documents from HR ([HR@serica-energy.com](mailto:HR@serica-energy.com)).

- Anti-Bribery and Corruption Policy
- Personal Data Protection Policy
- Equal Opportunities and Dignity at Work Policy
- Travel and Expenses Policy
- Share Dealing Code
- Subject Access Request Policy

## 14 Issues and Queries

Any issues or queries should be addressed in the first instance to your Line Manager. However, where the concern involves your Line Manager or you do not feel comfortable speaking to your Line Manager you can contact the HR Department or utilise the Whistleblowing services.

## 15 Whistleblowing

The Company is committed to upholding the highest standards of conduct and ethics in all areas of our organisation. We encourage all employees, consultants, contractors or other interested parties who suspect any breaches in our policies or the way in which we conduct business to report those to allow us to consider appropriate investigation and response. To this end the Company has appointed an independent, confidential reporting service, SeeHearSpeakUp, who operate a confidential phone line, online and email reporting tool also available 365 days a year, 24/7. The Company guarantees that there will be no detrimental treatment of an individual as a result of that person raising a concern.

How to contact SeeHearSpeakUp:

Call the hotline: 0800 056 2539

Report online: [www.seehearspeakup.co.uk/en/file-a-concern](http://www.seehearspeakup.co.uk/en/file-a-concern)

Email: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

## 16 Acknowledgement

I acknowledge receipt and acceptance of this policy;

EMPLOYEE/WORKER'S NAME:	
JOB TITLE:	
EMPLOYEE SIGNATURE:	
DATE:	

***Please return the signed document to [HR@serica-energy.com](mailto:HR@serica-energy.com)***