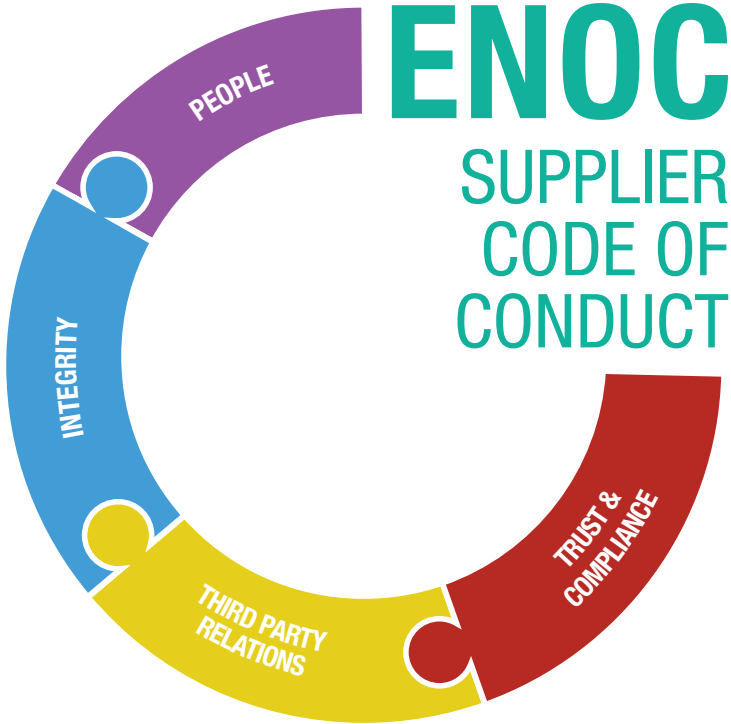


THE WAY WE LEAD...



اينوك
ENOC



THE CODE ELEMENTS



PEOPLE

Fair Treatment
Tolerance
Wages And Working Hours
Environment, Health And Safety (Ehs)

INTEGRITY

Conflict of Interest
Business Courtesies, Gifts and Entertainment



THIRD PARTY RELATIONS

Suppliers
Vendor Selection
Asset & Information Management
Property And Proprietary Information

TRUST & COMPLIANCE

Anti-Corruption Compliance
Risk Management & Audits
Whistleblowing
Antitrust And Competition



CONTENTS

1	Group CEO Message	14	TRUST & COMPLIANCE
3	OUR VISION	15	ANTI-CORRUPTION COMPLIANCE
3	OUR MISSION	15	RISK MANAGEMENT & AUDITS
4	OUR VALUES	15	WHISTLEBLOWING
6	INTRODUCTION TO THE CODE	15	ANTITRUST AND COMPETITION
8	PEOPLE	17	HOW TO CONTACT BE&C
9	FAIR TREATMENT		
9	TOLERANCE		
9	WAGES AND WORKING HOURS		
9	ENVIRONMENT, HEALTH AND SAFETY (EHS)		
10	INTEGRITY		
11	CONFLICT OF INTEREST		
11	BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT		
12	THIRD PARTY RELATIONS		
13	SUPPLIERS		
13	VENDOR SELECTION		
13	ASSET & INFORMATION MANAGEMENT		
13	PROPERTY AND PROPRIETARY INFORMATION		

FOREWORD

Group CEO Message



ENOC Group is a diversified organisation led by a unified vision to excel in everything we do.

The success of our organisation is also defined by the strong corporate governance standards that we follow. We uphold the highest ethical standards in carrying out all our business activities, thus setting a solid foundation for future growth.

We strongly believe that our partners and suppliers are integral to our journey. We work with suppliers around the world, and we believe that long-term partnerships are built through a strong understanding of each other's organisational values and purpose.

This Supplier Code of Conduct has been developed specially for you, our suppliers, with the aim of providing clear insights and understanding of the values, responsibilities, obligations and ethical standards at ENOC.

The Code also underlines our commitment to support you in achieving long-term success that is built on strong ethical fundamentals.

It highlights our approach towards fair treatment, environment, health & safety standards, workplace conduct, conflicts of interest, business courtesies, trademarks and records management, among others – all structured to ensure an effective and rewarding collaboration.

The Code is more than just a guideline on dos and don'ts at work. It is designed to provide you insights into our corporate governance framework, and outlines the ethical practices we abide by as we uphold integrity in everything we do.

We will work closely with you to help you understand the norms outlined in the Code as well as support you in its correct dissemination, implementation, monitoring and embedding at all levels within your operations in relation to ENOC.

Together, with the guidelines outlined in this Supplier Code of Conduct, we can maintain the highest ethical standards across all our business operations and build long-term relationships.

Saif Humaid Al Falasi
Group Chief Executive Officer

OUR VISION

"To be a leading regional integrated oil and gas group highly profitable and socially responsible towards employees, community and environment."

OUR MISSION



- Achieving sustainable development and highly profitable growth.
- Serving growing energy needs of Dubai.
- Attracting, developing and retaining top talent to become the employer of choice.
- Adopting latest technologies and implementing best practices thus achieving world-class performance.
- Meeting and exceeding customer expectations in terms of quality and service.
- Maintaining high industry standards in Environment, Health and Safety.

OUR VALUES

Our values are embedded in the letter and spirit within the Code



TEAM WORK
working together by sharing ownership, responsibilities and outcome.



INTEGRITY
being honest, truthful, reliable and fair while dealing with all stakeholders.



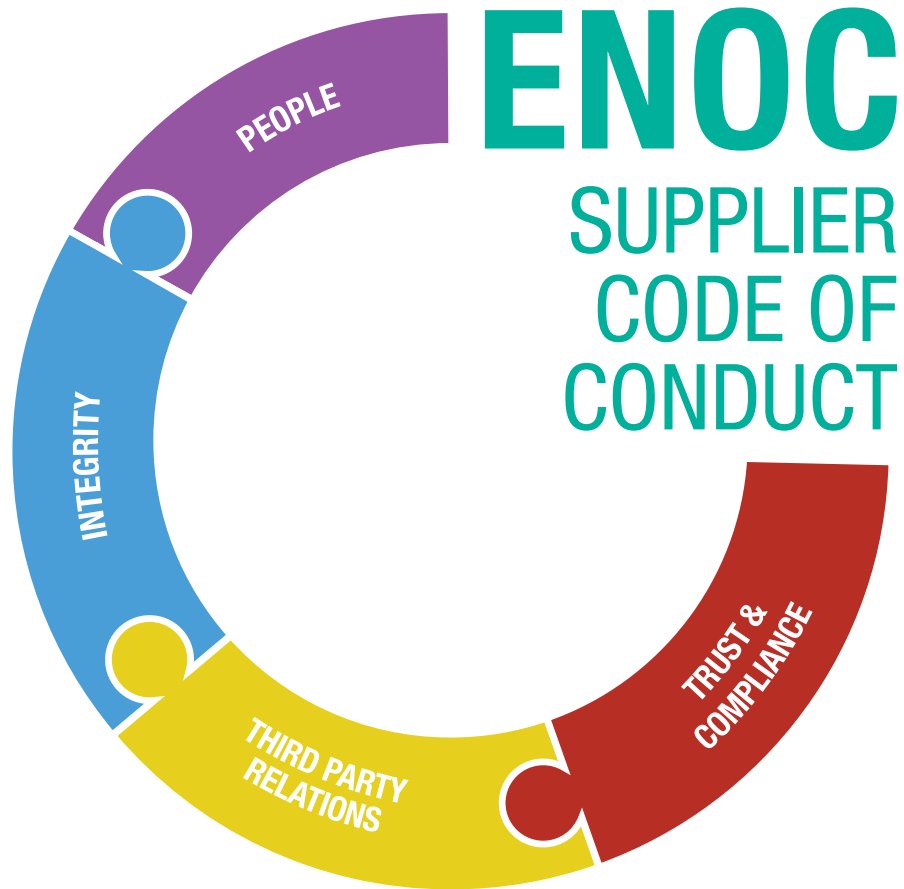
TRANSPARENCY
being open, straightforward and consistent in all we do, by communicating with clarity, simplicity and precision.



RESPECT
acknowledge, recognize, and value all stakeholders.



CUSTOMER FOCUS
position customer first in all that we do.



INTRODUCTION TO THE CODE

ENOC has implemented this Supplier Code of Conduct to effectively meet industry challenges and ensure that Suppliers maintain highest ethical practices in carrying out their business activities with ENOC. ENOC recognizes the importance of strengthening the relationship with Suppliers who are committed to the principles set out in this Code, thereby providing a solid foundation for a strategic partnership for future growth.

ENOC expects the highest values of business conduct from its Suppliers, vendors and contractors. These stakeholders are responsible for ensuring that they are in compliance with all applicable laws and regulations in each country where they conduct business and for understanding and complying with the Code as well as other ENOC policies. If ENOC's policies are in direct conflict with applicable local laws, then the local law shall prevail.

Likewise, the rights of a Supplier and ENOC's rights as a customer are governed by the terms and conditions stipulated in their contractual agreement and this Code is not intended to modify said terms and conditions.

ENOC retains the right to amend this Code at its sole discretion. ENOC's Suppliers are responsible for ensuring that their employees interacting with ENOC are familiar with the Code and any applicable requirements for doing business with ENOC. The most current version of the Code is available on ENOC's website.



PEOPLE

FAIR TREATMENT
TOLERANCE
WAGES AND WORKING HOURS
ENVIRONMENT, HEALTH AND SAFETY (EHS)

FAIR TREATMENT

Suppliers shall treat each individual fairly and recruit, select, train, promote and compensate its employees and agents based on merit, experience and other work-related criteria. Suppliers shall comply with all applicable laws governing employment and labour practices. Discrimination and harassment are not permitted in the workplace.

TOLERANCE

Suppliers shall support and respect each employee's right to his or her personal beliefs and values. However, personal beliefs aside from those covered by the Code should not be imposed on others in the workplace. Suppliers shall not use communication tools (letters, e-mail, bulletin boards etc.) to advocate personal, religious, ethnic, political or other potentially sensitive personal preferences.

WAGES AND WORKING HOURS

Suppliers shall follow the labour laws and other such laws and regulation in regard to working hours and overtime. Workers shall be offered vacation, leave periods and holidays consistent with applicable laws and regulations.

Likewise, Suppliers shall pay at least the minimum wage in a timely manner and shall compensate their workers for any overtime work as required by the applicable laws and regulations.

ENVIRONMENT, HEALTH AND SAFETY (EHS)

Suppliers are responsible to operate their facilities in a manner which protects and preserves the natural environment and promotes the health, safety and security of their employees, customers, suppliers, contractors and the general public.

Suppliers should be environmentally responsible by adapting a systematic approach to:

- Ensure commitment to protect the environment such as by having the required permits, approvals and registrations, maintained and kept valid in compliance to all environmental laws.
 - Ensure pollution prevention by reducing or eliminating waste, substituting materials where appropriate, conservation, recycling and re-using of materials, and using energy and natural resources efficiently.
 - Ensure that a proper waste management is in place for safe disposal of waste generated from the operations including waste being characterized, monitored, controlled and treated prior to discharge and disposal.
- At a minimum, Suppliers will abide by local and national EHS laws. Suppliers shall apply the best practice standards as well as comply with internationally accepted standards and practices where applicable.



INTEGRITY

CONFLICT OF INTEREST
BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

CONFLICT OF INTEREST

ENOC requires that its Suppliers not engage in, or give the appearance of engaging in, any activity involving any conflict, or reasonably foreseeable conflict, between their personal interests and the interests of ENOC.

A "Conflict of Interest" exists in cases where the personal interests of a Supplier clash with the interests of the ENOC and/or where a situation could potentially undermine the impartiality of a person in performing his duties. Examples of Conflict of Interest include not disclosing having direct family relationship with an ENOC employee, providing preferential treatment and/or giving personal favors.

If a Supplier is in doubt on whether a situation is considered a conflict of interest, then he/she has the obligation to raise the matter to ENOC representative to clarify any doubt and ensure transparency.

BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

Business gifts that compromise, or even appear to compromise, our ability to make objective and fair business decisions are inappropriate. Any doubt should be resolved in favor of not giving or receiving the gift. Supplier shall conduct all business transactions with ENOC in a transparent manner.

Suppliers shall not offer nor are permitted to accept any extravagant business courtesy or other benefit of any type offered in connection with ENOC business transactions, either directly or indirectly. ENOC neither seeks to improperly influence the decisions of Suppliers by offering extravagant business courtesies nor accepts such courtesies.



THIRD PARTY RELATIONS

SUPPLIERS
VENDOR SELECTION
ASSET & INFORMATION MANAGEMENT
PROPERTY AND PROPRIETARY INFORMATION

SUPPLIERS

Suppliers shall compete fairly and in accordance with the highest ethical and professional standards in its third party relationships. Suppliers shall ensure that their business is generated based on superior services and competitive prices; and not through improper, unethical, or questionable business practices.

VENDOR SELECTION

Suppliers shall ensure that their vendors are selected based on appropriate criteria, such as qualifications, competitive price and reputation. The terms of Suppliers' business relationships shall be established as per the applicable procurement policies and procedures, and appropriate measures shall be taken to protect the confidentiality of any ENOC information shared with vendors and/or any third parties.

Suppliers are responsible for setting up and communicating high ethical expectations with their vendors or any third parties they are dealing with. Other third parties that conduct business with and/or represent ENOC's Suppliers are required to comply with all applicable local and international laws, trade agreements and regulations as well as follow the highest ethical and professional standards.

ASSET & INFORMATION MANAGEMENT

Suppliers shall adhere to the highest standards of honesty and integrity. It is essential that the internal and external reports and documents that Suppliers create, make public, or provide to their stakeholders, are full, fair, accurate, timely and properly maintained.

Suppliers must ensure the retention of records for requisite periods and

that such records are subject to timely destruction when the specified retention period expires. "Records" for this purpose includes but is not limited to hard copies of documents, records on computers and electronic systems.

PROPERTY AND PROPRIETARY INFORMATION

Suppliers shall protect ENOC's company property to ensure its efficient use. All assets are to be used for legitimate company purposes. Any suspected incident of fraud or theft should be immediately reported through provided means of communications like the ENOC Ethics Hotline.

The Supplier should ensure that ENOC's proprietary information including confidential business information, trade secrets, patented inventions, processes, trademarks, logos and copyrighted works are protected and used solely in pursuit of ENOC's interest and in line with prior agreement with ENOC.

Suppliers should obtain approval in writing from ENOC Group Communications prior to issuance of any public statement involving ENOC to the media and/or any third parties.



TRUST & COMPLIANCE

ANTI-CORRUPTION COMPLIANCE
RISK MANAGEMENT & AUDITS
WHISTLEBLOWING
ANTITRUST AND COMPETITION

ANTI-CORRUPTION COMPLIANCE

Suppliers shall prohibit entities / employees from bribing, providing facilitation payments or offering, promising, or authorizing giving anything of value directly or indirectly in order to obtain or retain business. Suppliers shall abide by anti-corruption laws and regulations.

RISK MANAGEMENT & AUDITS

Suppliers shall set in place appropriate measures to identify the risks associated with their operations, and implement appropriate controls to mitigate the identified risks.

Suppliers shall periodically conduct objective and independent audits, taking into account the high levels of business ethics, integrity and honesty in dealings required. A strong audit effort helps assure compliance with established policies, procedures and controls as well as assists in identifying potential deficiencies.

Accordingly, Suppliers shall ensure prevention and timely correction of non-compliance and the implementation of improvements as appropriate.

WHISTLEBLOWING

Whistleblowing is relevant to all organizations as every corporate entity faces the risk of things going wrong internally. Where such a risk arises, usually the first people to realize or suspect the wrongdoing will be those who work in or with the organization. Suppliers and their representatives dealing with ENOC shall be aware of ENOC Ethics Hotline. EthicsPoint Website: www.enoc.ethicspoint.com – Hotline Number: 800 ENOC Ethic (800 3662 38442)

ENOC Ethics Hotline has been designed to enable the stakeholders to easily and confidentially report any issue or instances of ethical violation and misconduct in relation to dealing with ENOC if such issues could not be resolved through the existing relationship between the Supplier and ENOC representatives.

ENOC Ethics Hotline is an independent and confidential multi-lingual platform available through phone and web-based reporting to report conduct that may be in violation with ENOC's Supplier Code of Conduct. The service is manned by professional and experienced consultants, able to attend to employees effectively and take the initiative in dealing with sensitive disclosures appropriately.

ANTITRUST AND COMPETITION

Suppliers shall not enter into any agreement that might restrain trade which includes price fixing, dividing or manipulating the market, colluding in bids, limiting production, refusing to sell to certain clients or purchase from certain suppliers or unlawfully restricting competition.

Suppliers shall comply with all applicable competition laws in every jurisdiction where their operations are conducted. Compliance with all applicable antitrust and competition laws promotes healthy competition in the market place.



HOW TO CONTACT BE&C

For any clarifications or feedback, contact the Business Ethics & Compliance Function through businessethics@enoc.com or ENOC's Chief Ethics and Compliance Officer – Aley Raza at sjafri@enoc.com.

YOUR FEEDBACK IS VALUABLE TO US.

ENOC Ethics Hotline details:
Hotline Number: 800 3662 38442
EthicsPoint Website: www.enoc.ethicspoint.com

Emirates National Oil Company Ltd. (ENOC) LLC
ENOC House I, P.O. Box: 6442
Dubai, United Arab Emirates
www.enoc.com

