

aramco



Our Code of Business Conduct

Our Code, Our Conduct



Contents

Please click below to view the relevant section:

A message from P&CEO Ahmed AlKhunaini	2
Our Values	3
We Are Committed To Living Our Corporate Values At All Times	3
Our Values At A Glance	3
Introduction	4
Our Code, Our Conduct	4
Commitment To Integrity	5
Speak Up	5
Non-retaliation	5
Our Commitment To Safety And Environmental Protection	7
Safety And Environment	7
Our Commitment To The Global Marketplace	8
Competition And Anti-trust	8
Anti-bribery And Anti-corruption	8
Gifts, Meals, And Entertainment	8
Anti-money Laundering	9
Insider Trading	9
International Trade Compliance	9
Our Commitment To Shareholders And The Company	10
Accurate Records And Disclosures	10
Use Of Assets	10
Confidential Information	10
External Communications	11
Information And Operational Technology Systems	11
Conflicts Of Interest	11
Our Commitment To The Communities Where We Operate	12
Compliance With Laws	12
Human Rights	12
Charitable Activities	12
Our Commitment To Each Other	13
Respect	13
Personal Privacy	13
Questions?	13



A Message From P&CEO Ahmed AlKhunaini

At Aramco Overseas Company, we understand the importance of upholding high standards of ethics and integrity. This is essential to the value of our brand, reputation and ultimately our license to operate.

We are committed to operating with the highest level of integrity to meet customer needs, assist our partners, and improve the communities in which we do business.

Our Code of Conduct is a formal codification of our values and the foundation of our company's core principles. It provides us with information and resources to help us make good and informed business decisions and to act upon them with integrity.

As a team, we are all accountable, so it is essential that we are all empowered to raise any concerns around business ethics through the channels outlined in this document.

If you find yourself in a situation where you do not know what to do, please seek advice from your line manager in the first instance, as well as our Compliance team.

We are all company ambassadors and our collective commitment to behaving with integrity is essential to our on-going growth and long-term success.



Ahmed AlKhunaini
President & CEO
Aramco Overseas Company



Our Values

We are committed to living our corporate values at all times.

Our behavior is what defines us - as a company, as employees, as people. Everything we do is anchored by our Values: integrity, excellence, safety, accountability, and citizenship. Our Values are the foundation of Our Code of Business Conduct and the way we do business. When faced with any decision, we consider how each option aligns with these values.

Our Values At A Glance



Integrity

We follow ethical standards in conducting our business:

We treat everyone with fairness and respect

We embrace diversity and accept differences

We do not tolerate misconduct

We protect company assets and information

Excellence

We strive for the best result and are agile in addressing new challenges:

We set challenging goals and reward top performance

We are committed to developing our people

We encourage innovation, creativity and diversity of thought

We foster teamwork and open communication

Safety

We operate safely and are committed to the well-being of our workforce:

We act safely at work, on the road and at home

We reward outstanding safety achievements

We safeguard our environment

We actively encourage healthy lifestyles

Accountability

We take responsibility for our actions and for meeting corporate objectives:

We place authority where responsibility lies

We create value for our stakeholders

We deliver on our commitments

We seek and provide constructive feedback

Citizenship

We are a positive influence in our communities:

We are a catalyst for economic growth

We demonstrate social responsibility

We support our communities and act as role models

We build solid relationships with our customers and partners



Introduction

Our Code, Our Conduct

Our Code of Business Conduct applies to the employees (often referred to as “we”, “us” or “you” in this Code), directors, and contract employees of Aramco Overseas Company, its subsidiaries and controlled affiliates (the “Company”). It outlines fundamental standards of legal and ethical behavior. We expect that anyone doing business with the Company or acting on its behalf will follow these principles.

The purpose of Our Code of Business Conduct is to help fulfil the ethical commitments we have made to each other, our Company, our stakeholders, and ourselves. The Code does not and could not address every possible ethical or legal situation. We provide many more detailed policies and procedures to guide you in those situations.

Protect yourself and our Company by always doing the right thing and using the Code and our Values to act as your guide. A violation of the Code may result in negative consequences, up to and including termination and even legal action against you or us.

By behaving legally, ethically, and responsibly, we can all play a part in upholding our reputation around the world.



Our Commitment To Integrity

We are committed to acting ethically and following legal standards in conducting our business.

When the right action is not clear

Not all business decisions are clear. We provide the summary guide below to help you evaluate difficult or ethics-related decisions and point you in the right direction.

If you find yourself in a situation where the right thing to do is not clear, ask yourself the questions below. If the answer to any of these questions is not a clear “Yes”, then stop and talk to your supervisor, another manager, contact Compliance team: compliance@aramcooverseas.com



Speak Up

We rely on people in every part of our business to speak up about issues and concerns to improve our operations and act with integrity. People who come forward with concerns play an important role in maintaining our ethical workplace. You are expected to report suspected violations of the law, policies, and the Code.

To encourage an open, candid culture, we offer several channels for you to ask questions and speak up:

Your supervisor or manager	Another member of Management	Human Resources	Compliance
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Non-retaliation

Regardless of the channel you use to speak up, we are committed to addressing the issue fairly.

The Company will not tolerate retaliation or discrimination against any person for raising a genuine concern or assisting in an investigation.

Retaliation can take many forms, including threats, intimidation, harassment, bullying, humiliation, negatively changing work responsibilities or conditions, or raising issues against someone maliciously or in bad faith. Anyone found to have engaged in retaliation is subject to disciplinary action, up to and including dismissal.



If you feel you have been retaliated against for raising an issue or concern and feel that you cannot raise this issue through other reporting channels, please contact:

compliance@aramcooverseas.com

Our Responsibilities As Employees	Additional Responsibilities Of Managers
<p>Each of us has a responsibility to:</p> <ul style="list-style-type: none">• Read, understand and follow Our Code of Business Conduct• Know the laws and policies that apply to us and follow them• Ask questions if we are not sure about the right thing to do Report situations that we believe violate the Code Cooperate with any investigation of potential violations of the Code, law, or regulation	<p>Supervisors and managers have additional responsibilities to:</p> <ul style="list-style-type: none">• Be a role model of our Values and the Code• Communicate with your team members so that they understand our Values, the Code, and the policies and procedures that apply to their jobs• Listen to concerns about potential violations of the Code, and address them without retaliation Hold yourself and your team members accountable for acting in accordance with the Code and our Values



Our Commitment To Safety And Environmental Protection

We are committed to conducting our operations safely and to protecting the environment of the communities in which we operate.

Safety And Environment

We are committed to providing a safe workplace. We are also committed to protecting the environment and promoting safety in the communities where we operate. We strive to conserve natural resources and minimize the environmental footprint of our activities.

To do your part in keeping each of us safe:

- Follow all safety, environment, and emergency preparedness standards that apply to you and your job
- Stop your work or the work of others if you see an immediate safety threat
- Report any actual or potential health, safety or environmental issues immediately to your supervisor and any others designated at your facility - never assume that someone else has already reported it



Our Commitment To The Global Marketplace

We are committed to adhering to the law everywhere we do business.

Competition And Anti-trust

We will comply with all competition laws that apply to us. These laws are designed to promote fair competition. You must always follow applicable laws, Company policies and procedures, and except where permitted by them, you must never:

- Enter into an agreement with competitors, formal or informal, that sets prices for customers, or allocates distribution, customers or territories
- Agree with competitors, formally or informally, to use or refuse to use a given company as a business partner

Anti-bribery And Anti-corruption

We do not bribe or accept bribes or kickbacks. To ensure we make business decisions based on objective criteria, and to avoid violating laws prohibiting bribery and corruption:

- Never offer or provide bribes or kickbacks in any form
- Never request or accept a bribe or kickback
- Be especially careful when interacting with government officials, which include employees of state-owned enterprises. Anything of value can potentially be considered a bribe, not just cash or expensive gifts. For example, making contributions to government officials' favored charities or employing their relatives may violate the law under certain circumstances
- Use agents and others acting on our behalf only after they have been approved under all applicable Company policies and procedures. Do not use a third party to do what the Company could not lawfully do itself
- Report any request for, or offer of, a bribe or kickback
- Follow all applicable Company policies and procedures

Gifts, Meals, And Entertainment

Gifts, meals, and entertainment are customary in many parts of the world where we do business. Offer, giver or accept a gift, meal or entertainment only if it:

- Has a legitimate purpose or is provided on a customary gift-giving occasion
- Is legal, reasonable in value, and consistent with customary business practices
- Would not cause embarrassment to the employee or the Company if publicly disclosed
- Is permissible under our policies and procedures and the policies and procedures of the donor or recipient's employer, as applicable
- Is not intended to and would not be viewed as a bribe, kickback, or other improper payment



Anti-money Laundering

We comply with laws which prohibit money laundering. Money laundering involves hiding proceeds of criminal activity, or making them appear as if they were legitimately acquired.

- To help prevent money laundering:
- Know our business partners and counterparties
- Follow all applicable Company policies and procedures
- Promptly report any suspicious transactions

Insider Trading

Various laws prohibit trading stocks and other securities based on “material” information that is not publicly known. “Material” means information that investors would find valuable in making decisions about whether to buy, sell, or hold a stock or other security.

To protect yourself and the Company:

- To not buy or sell Company stocks, bonds or any other financial investments if you are in possession of material information about the Company that is not known to the investing public
- Do not buy or sell stocks, bonds, or any other financial investments involving other companies if you are in possession of material information about such companies due to your employment at the Company and such information is not known to the investing public
- Do not provide material non-public information to others, including friends and relatives

International Trade Compliance

Products, technology, software, and information are all subject to trade compliance laws. We comply with all export controls, economic sanctions, customs, and anti-boycott laws. To help us comply, your responsibility is to:

- Make sure all imports and exports are accurately classified, valued, and labelled and receive the necessary approvals
- Understand the trade control laws that apply to the countries and parties with which you are dealing
- Abide by our trade compliance policy and procedures



Our Commitment To Shareholders And The Company

We are committed to being responsible stewards of our assets.

Accurate Records And Disclosures

Accurate business records are essential for us to manage the Company. Financial disclosures based on these records must always be truthful and complete. Regardless of your position, it is important for you to:

- Be honest, accurate, and complete in every record you create or approve, including safety, time, expenses, human resources, and every other type of business record
Accurately record all funds, transactions, and assets - never keep funds or assets off the books for any reason
- Remember that email and other electronic communications may be business records, so avoid exaggeration and language that would be embarrassing or harmful if read by someone outside the Company
- Create, retain, protect and dispose of records according to the policies and procedures of your business

Use Of Assets

We are all responsible for the proper use of Company assets. Assets include facilities, equipment, tools, vehicles, supplies, resources, and information.

To safeguard our assets:

- Follow the applicable procedures to ensure safeguarding our financial, physical, and other assets
- Do not take or use our assets for your personal benefit, or allow them to be sold, given away or used by others without proper authorization

Confidential Information

Our confidential information must be protected. To keep confidential information safe, you have responsibility to:

- Recognize the many types of proprietary or confidential information, including any non-public plans, financial data, reserve estimates, processes, formulas, and information about employees, other individuals, and business partners
- Not communicate this information outside the Company without proper authorization, and not share it internally unless the other person has a legitimate business need to know
- Take care in discussing our business in any public setting



- Be sure that your external emails, texts, web postings, and social messages are appropriate and don't reveal confidential information

External Communications

We are committed to making timely, full, and accurate disclosures in public filings and in communicating to the media and external parties. Each of us has the responsibility to:

- Keep Company confidential information confidential and safe - do not share confidential information through social media channels
- Avoid being seen as speaking on behalf of the Company, including in communications with investors or the media, unless your communication has been specifically approved by Corporate Communications

Information And Operational Technology Systems

Without secure technology we could not do business. To protect our information and operational technology, you have a vital role to:

- Only use Company-provided computer equipment, phones, and internet/intranet services as permitted
- Safeguard your Company equipment, especially when you are not at one of our facilities
- Be vigilant against cyber-attacks and scams. Do not click on suspicious links or open suspicious looking emails or messages.
- Use caution when downloading files and do not download from unknown sources
Promptly report any potential or actual loss of our information, potential or actual unauthorized access to our technology, or any potential or actual breach of our systems or data

Conflicts Of Interest

We rely on our employees to avoid situations in which their personal interests may conflict with the Company's business. An actual, potential or even perceived conflict of interest could jeopardize both your reputation and the Company's. Follow established procedures to identify, avoid and disclose any potential conflicts of interest, such as:

- Owning or acquiring a personal interest in a business that competes with, does business with, or seeks to do business with the Company or any of our vendors, contractors, subcontractors or customers
- Acting as an independent consultant to, holding a position in, or engaging in activities of any of our vendors, contractors, subcontractors, or customers
- Taking advantage of any Company property, information or opportunities for personal gain



Our Commitment To The Communities Where We Operate

We are committed to being a good corporate citizen everywhere we do business.

Compliance With Laws

The first responsibility of being a good citizen is to obey the law. We comply with the applicable laws and regulations everywhere we conduct business.

To help us comply, you:

- Are responsible for obeying laws and regulations where you work. Failure to do so could lead to negative consequences for you and/or the Company
- Must promptly report any actual or potential violation

Human Rights

We are committed to the health and safety of our employees. We require our suppliers to demonstrate a similar commitment and to source all goods or services from third parties that meet, as a minimum, country of origin standards for health, safety, working hours, pay and employment conditions.

To help us comply, your responsibility is to:

- Follow all applicable labor laws and regulations in the countries in which we do business
- Promptly report any actual or potential violations

Charitable Activities

We have a long history of providing charitable, educational, humanitarian, scientific and other support to the communities in which we operate or do business. We donate and partner with vetted organizations and institutions only. To help us be a good citizen, only make charitable contributions on behalf of the Company as authorized, and in accordance with our donations program and guidelines.



Our Commitment To Each Other

We are committed to providing a respectful workplace for all our employees and those with whom we work.

Respect

We are committed to treating each one of our employees and others with respect. To maintain a respectful workplace:

- Treat others with dignity
- Do not engage in discrimination
- Do not harass
- Do not bully or behave in a hostile or intimidating manner
- Do not engage in or tolerate harassment of any nature
- Be considerate in all your communications - offensive messages, derogatory remarks, and inappropriate jokes are never acceptable

Personal Privacy

We respect the privacy of those who work for the Company, those who have worked for the Company, those with whom we do business, and those we support. Your role is to:

- Protect the personal data of fellow employees and others with whom we do business and support
- Obtain and use personal data only for legitimate business purposes, and only if you have a legitimate business need to know
- Follow any privacy policies and procedures applicable to you

Questions?

If you have any questions about this policy, please contact: compliance@aramcooverseas.com