

CORPORATE ANTI-CORRUPTION POLICY

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Lundin Energy prohibits all forms of corruption, in whatever form it may take, direct as well as indirect, active as well as passive, in all its activities.

1. Introduction

In furtherance of Lundin Energy and its affiliates (The Company) Code of Conduct commitment, the Corporate Anti-Money Laundering Policy and Whistleblowing Procedure and in accordance with the Swedish Code of Corporate Governance, it is our policy to conduct operations in an honest, transparent and ethical manner, observing the highest standards of professional integrity and complying with applicable international and national legislation.

2. Scope

2.1 Corruption or bribery may include, among others, improper benefits, abuse of function, breach of trust, embezzlement, extortion, facilitation payments, fraud, kickbacks, trading in influence, conflict of interest etc. It can be defined as providing, promising or offering (“active bribery”), as well as demanding or accepting an improper benefit (“passive bribery”) which includes gifts, rewards or the like of material or immaterial value. These benefits can be obtained either directly or indirectly, through intermediaries or family members, to or from any person, including national, international and foreign public officials, political candidates, party officials, private sector employees, etc.

2.2 Corruption is illegal, can lead to criminal or corporate liability, and can severely damage The Company’s reputation and standing. The Company prohibits corruption or bribery in all forms by its directors, officers, employees, hired contractors, consultants and others working for The Company. No individual will be penalised for or be subject to adverse consequences for refusing to pay bribes or engaging in other forms of corruption.

3. Requirements

- 3.1** Maintain The Company’s high level of integrity and ethics.
- 3.2** Resist any demands for illegitimate or facilitation payments unless your physical integrity is at risk. Record any and all payments requested or made.
- 3.3** Report immediately suspected or actual cases of bribery to the line manager or senior corporate management.
- 3.4** Refrain from any kind of gifts or related expenses to governmental officials and other third parties during an official tender or competitive bidding process.
- 3.5** Include anti-corruption principles in contractual clauses and ensure contractors’ compliance with The Company Contractor Declaration.
- 3.6** Exercise care with gifts and hospitality; in particular as some companies and countries have very strict limitations on the value and nature of gifts accepted.
- 3.7** Consider the value and nature of the benefit you intend to offer, as well as the position of the recipient, and that of any benefit offered to you. In case of doubt, consult with the line manager.
- 3.8** Conduct adequate due diligence reviews of representatives, agents, contractors or joint venture partners and raise immediately concerns about suspected or encountered corruption or bribery.

4. Responsibilities

Country Managing Director is responsible for ensuring:

- 4.1** Knowledge and training is provided throughout operations.
- 4.2** Avoidance of conflicts of interest.
- 4.3** Alleged and confirmed cases of corruption are investigated, and appropriate actions taken.
- 4.4** Anti-Corruption Register containing the details of suspicious payments is maintained.
- 4.5** Corruption risk is assessed on a yearly basis.
- 4.6** Actual breaches shall be reported to the VP Sustainability and the Company CFO.

Nick Walker
President and CEO
Lundin Energy AB