



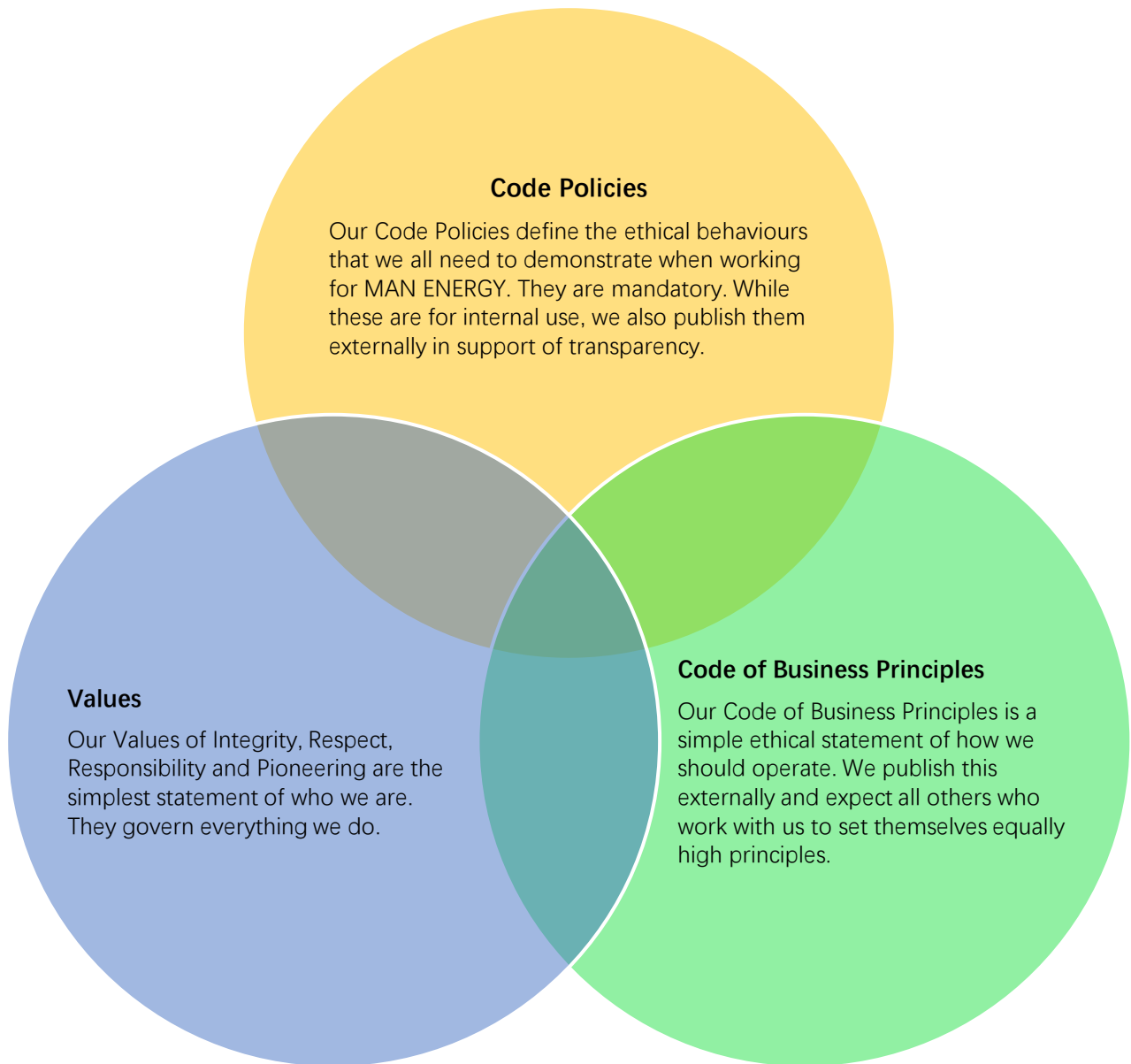
**CODE OF BUSINESS
PRINCIPLES & CODE POLICIES**

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The Code and our standard of Conduct

OUR FRAMEWORK



FOREWORD FROM CEO

Man Energy is a global green energy, water treatment and chemical trading company that is realizing the dreams and happiness of global customers by providing them with the best services and goods. Established in 2010, we grew into an “operational holding company” equipped with an independent profit structure through our business.

From beginning of the business. Values that give us the instinct to do the right thing and to treat each other with respect. Having a strong set of values that respect people, society, and the planet has always been at the heart of Man Energy, and will continue to be critical to building our purpose-led, future-fit company. Our license to operate and our ability to compete successfully, are dependent on each and every one of us living these values, day in and day out.

Yet we know that in this volatile and unpredictable world, we face numerous challenges in doing so. Challenges, but not excuses. Many cases in which we operate rank poorly in global corruption indices. The digital world increasingly presents us with new considerations for managing cyber and data security, and how our company and our brands ‘show up’ in this connected, social media world has become more complicated than ever. What’s more, the accelerating pace of change, and the greater speed with which we must operate, often intensifies these challenges.

The Code of Business Principles is our guidebook for putting our values into practice. It sets out a clear standard of conduct to ensure that we always make the right choice, providing a framework of simple “musts” and “must nots”. It’s a document which not only protects Man Energy, and each and every one of us, but will help us to have a meaningful impact on the lives of millions of people across our value chain.

Much of Man Energy’s strength lies in the shared values of our people. Behaving with integrity is part of who we are. Thank you for your diligence and for helping to create a fairer and more principled world as we work towards delivering our vision of being the reputed company in sustainable business.

It matters.

Thank you,

Weigao Ji



THE CODE OF BUSINESS PRINCIPLES

Standard of Conduct

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees.

We shall similarly respect the legitimate interests of those with whom we have relationships.

Obeying the Law

Our companies and employees are required to comply with the laws and regulations of the countries in which we operate.

Employees

Man Energy is committed to a working environment that promotes diversity and equal opportunity and where there is mutual trust, respect for human rights and no discrimination.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We are committed to safe and healthy working conditions for all employees.

We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards.

We will not use any form of forced, compulsory, trafficked or child labor.

We are committed to working with employees to develop and enhance each individual's skills and capabilities.

We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We will maintain good communications with employees through company-based information and consultation procedures.

We will ensure transparent, fair and confidential procedures for employees to raise concerns.

Consumers

Man Energy is committed to providing qualified products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. Products and services will be accurately and properly proposed.

Shareholders

Man Energy will conduct its operations in accordance with internationally accepted principles of good corporate governance. We will provide timely, regular and reliable information on our activities, structure, financial situation and performance to all shareholders.

Business Partners

Man Energy is committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principles consistent with our own.

Community Involvement

Man Energy strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies and communities in which we operate.

Public Activities

Man Energy companies are encouraged to promote and defend their legitimate business interests.

Man Energy will co-operate with governments and other organizations, both directly and through bodies such

as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests.

The Environment

Man Energy is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

Man Energy will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

Innovation

In our scientific innovation to meet client needs we will respect the concerns of our clients and of society.

We will work on the basis of sound science, applying rigorous standards of product safety.

Competition

Man Energy believes in vigorous yet fair competition and supports the development of appropriate competition laws. Man Energy companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

Bribery & Corruption

Man Energy does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe.

Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Man Energy accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

Conflicts of Interests

All employees and others working for Man Energy are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

Employees must not seek gain for themselves or others through misuse of their positions.

Compliance –Monitoring –Reporting

Compliance with these principles is an essential element in our business success. The Management is responsible for ensuring these principles are applied throughout Man Energy.

The Chief Executive Officer is responsible for implementing these principles and is supported in this by Human Resources Department which is chaired by the HR Manager.

Day-to-day responsibility is delegated to all line managers of the companies. They are responsible for implementing these principles, supported by Human Resources department.

Assurance of compliance is given and monitored each year. Compliance is subject to review by the human resources department and finance department.

Any breaches of the Code must be reported. The management will not criticize management for any loss of business resulting from adherence to these principles and other mandatory policies. Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.



LIVING THE CODE

Man Energy's reputation for doing business with integrity and respect for others is an asset, as valuable as its people and its brands. To maintain our reputation requires the highest standards of behavior.

Man Energy's Code of Business Principles (the Code), and the policies that support it (Code Policies), set out the standards required from all our employees.

Breaching the Code or Code Policies could have very serious consequences for Man Energy and for individuals involved. Where illegal conduct is involved, these could include significant fines for Man Energy, imprisonment for individuals and significant damage to our reputation.

This Code Policy explains how to ensure the Code and all Code Policies are understood and followed by all our employees and others working for Man Energy. It confirms everyone's responsibility to speak up and report suspected or actual breaches, and outlines how such situations must be managed. Any failure to comply with the Code and any of the Code Policies is taken very seriously by Man Energy and may result in disciplinary action, including dismissal and legal action.

References in the Code and Code Policies to 'employees' include the following:

- Employees, whether full-time, part-time, fixed-term, permanent or trainees
- Contractors, temporary staff, secondees, work-experience placements
- Persons with statutory director roles or equivalent responsibilities
- Employees of joint ventures and approved third-party labor providers where Man Energy has direct management control
- Employees of new acquisitions.

The Code and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code and Code Policies must be upheld by exercising common sense and good judgement, always in compliance with applicable laws.

MUST

All employees **must**:

- Ensure they know and understand the requirements of our Code and Code Policies;
- Undertake relevant training as required by their line manager or Human resources officers;
- Follow the Code and Code Policies: if they are unsure of how to interpret these or have any doubts about whether specific behaviors meet the standards required they must seek the advice of their line manager or Human resources officers;
- Immediately report actual or potential breaches of the Code or Code Policies, whether relating to them, colleagues or people acting on Man Energy's behalf and whether accidental or deliberate. This includes instances where business partners' behavior may not meet the same standards.

Their line manager is usually the right person to report potential or actual breaches. If this is not appropriate, they must talk to one of the following:

– Human Resources Officer

– Higher Manager prior to line manager

- If asked not to report a potential breach by their line manager or another employee, they must immediately report to Human Resources Officer.

In addition, those at Manager level and above **must**:

- Lead by example, setting a strong tone from the top, showing they are familiar with the Code and Code Policies

and taking steps to embed a culture of integrity across all operations;

- Complete an annual Code acknowledgement statement;
- Ensure that all their team members, including new joiners:
 - Have read the Code and, Code Policies or the ‘Winning with Integrity’ booklet
 - Have completed any related mandatory training
 - Understand how to raise concerns and/or report actual or suspected breaches;
- Deliver training that the human resource department or their line manager has asked of them, e.g. face-to-face briefings and team discussions;
- Offer guidance and support about the Code and Code Policies to their team where needed and escalate unresolved questions to the human resources Officer;

Ensure that anyone who raises concerns, or highlights potential or actual breaches, receives support and respect and that there is no retaliation against them;

- Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion and discussing them with their line manager as soon as possible to determine the appropriate course of action including whom else to inform;
- Collaborate further and complete any documentation (e.g. case information and lessons learnt) as may be required of them by the Human resources Officer;
- Insofar as a breach may have occurred within their operations, consider what additional communications, training or changes to business controls and procedures are necessary to reduce the likelihood of similar breaches occurring.

Must nots

Employees **must not**:

- Ignore or fail to report situations where they believe there is or may be a breach of the Code or Code Policies;
- Attempt to prevent a colleague from reporting a potential or actual breach or ask them to ignore an issue;
- Retaliate against any colleague who reports a potential or actual breach;
- Discuss any potential or actual breach under investigation with other colleagues, unless this has been cleared with the investigation team.

LEGAL CONSULTATION

Employees must at all times comply with laws and regulations that apply to the countries in which Man Energy operates. Ignorance of the law is no excuse. Timely legal consultation is essential to ensure that Man Energy's legitimate business interests and opportunities are protected.

This Code Policy sets out how and in what circumstances employees must seek legal advice from legal advisor in human resources department.

MUSTS

Heads of all functional leadership teams **must** ensure the relevant Legal business partner is a member of that leadership team upon request and/or that they have an open invitation to attend all team meetings and receive copies of all associated agendas and minutes.

Employees **must** immediately notify their line manager (or other appropriate person –see Code Policy on Living The Code) and take legal advice if they suspect or discover any illegal activity in relation to Man Energy's operations or associated activities involving third parties.



Employees **must** promptly seek advice from their Legal business partner in the following situations:

•**Commercial contracts, leases, licenses and transactions** –Commercial contracts for goods or services; Contracts relating to intellectual property, such as, licenses for technology, trademarks, joint development or technical assistance contracts; Treasury transactions, for example, raising equity or debt, asset leasing, derivative transactions (such as currency hedging or interest rate swaps) or guarantees of Treasury transactions; Transactions involving mergers, acquisitions, disposals or joint ventures;

Litigation and regulatory action –Civil litigation, such as employment or contractual disputes, whether threatened or actual, by or against Man energy or employee, including commencement of or settlement of such litigation; Criminal prosecutions, whether threatened or actual, by or against Man energy or employee, or at Man Energy's instigation; Communication with government or regulatory bodies about investigations, including unexpected investigations, or where Man Energy is seeking regulatory action, such as non-compliant qualifying actions through local governmental bodies (see Code Policy on Contact with Government, Regulators and Non-Governmental Organizations);

•**Competition/antitrust** –Compliance issues or questions involving competition/antitrust laws, such as trade terms, exclusivity arrangements or pricing; Meetings, contacts, collaboration, agreements or other activity, including participation in trade associations or industry groupings (formal and informal or adhoc), which may involve the exchange of information with a competitor or restrictions on competition (see Code Policies on Fair Competition, Competitors' Information and Intellectual Property);

•**Communication** –Social media or Press releases that could impact Man Energy's reputation or create legal liability, or contain 'inside' or 'price sensitive' 'confidential' information (see Code Policy on Preventing Insider Trading);

•**Claims, brands, trademarks, marketing materials** –Product claims and marketing materials, including advertising, promotional materials, packaging and labelling, trade materials, advertorials, point-of-sale materials, and web content; Clearance for use of all brand names, marks, logos, slogans, celebrity endorsements and sponsorships; Maintenance, protection and disposal of trademarks, copyrights and domain names used by the business; Competitor challenges to claims, brands, trademarks either by or against Man Energy;

•**Employment** –Issues relating to non-compete obligations, employment disputes and terminations and non-routine employment contract terms;

•**Safety** –Product or service tampering or counterfeiting; Clients complaints that may lead to legal disputes; Potential product recalls; Client, product, work force or environmental safety incidents that could have legal implications;

•**Legal or governance structures** –Changes to, or issues around, legal or governance structures at geographic or corporate level, such as changes in capital structures or Board membership, public company filings and arrangements/relationships with third-party shareholders;

•**Bribery and corruption** –Bribery or corruption issues, including related allegations or uncertainty about situations that may have bribery or corruption implications (see Code Policy on Anti-Bribery).

Employees must use their common sense and judgement in situations not covered above: if they are unsure, they must always err on the side of caution and consult legal advisor in human resources department.

MUST NOTS

Employees **must not** do anything that legal advisor in human resources department. has advised is illegal and/or unlawful. Where an activity is not illegal and/or unlawful but legal advice highlights significant risks for the company, such as litigation, they must not proceed without express senior line management authorization.

Employees outside Human Resources Department **must not** appoint, manage or remove external legal counsel or pay any legal fees that differ from the fee structures agreed by Human Resources Department.
Employees **must not** appoint a private investigator without prior approval from Human Resources Department.

RESPONSIBLE RISK MANAGEMENT

Risk management is integral to Man Energy's strategy and to the achievement of Man Energy's long-term goals. Our success as an organization depends on our ability to identify and exploit the opportunities generated by our business and the markets Man Energy operates in.

Man Energy takes an embedded approach to risk management which puts risk and opportunity assessment at the core of the leadership team agenda. Man Energy defines risks as actions or events that have the potential to impact our ability to achieve our objectives. Man Energy identifies and mitigates downside risks such as loss of money, reputation or talent as well as upside risks such as failure to deliver strategy if it does not strengthen brand equities or grow in growing channels.

Man Energy's Risk Management approach is embedded in the normal course of business. Its structural elements include:

- Governance of Man Energy, organizational structure and delegation of authority
- Vision, Strategy and Objectives
- Code of Business Principles, Code Policies and Standards
- Risk and Control Frameworks
- Performance management and operational processes execution
- Compliance and assurance activities.

MUST

All managers and above **must implement** Man Energy's Principles of Risk Management as follows:

- Accountability: they must identify and manage the risks that relate to their role;
- Risk Appetite: they must determine the level of risk, after the implementation of controls, that they are prepared to accept such that there is not a significant threat to achieving their objectives;
- Risk Mitigation: they must put adequate controls in place, and ensure that they are operational, in order to deliver their objectives.

All line managers and above **must ensure** that the risk management activities, as outlined in Man Energy's Risk and Control Frameworks, are being undertaken for their areas of responsibility.

All leadership teams of operational units must complete an annual holistic risk discussion during which:

- Key business risks for which they are responsible are identified;
- How those risks are being managed is reviewed;
- Any gaps in their desired risk appetite are identified.

For those risks where significant gaps have been identified, leadership teams **must** perform regular reviews and ensure risks are mitigated as desired.

All project leaders of transformational projects **must**, together with their teams, identify the key risks associated with their project achieving its objectives.

Risk mitigation plans **must** be prepared and progress reviewed with human resources department.



Countering Corruption

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest can have a significant negative impact on the reputation and effectiveness of Man Energy, its business and its people. This Code Policy sets out what employees must do to avert or manage actual or perceived conflicts of interest.

MUST

Employees **must**:

- Ensure Man Energy is best placed to benefit from potential business opportunities;
- Tell their line manager immediately if they believe any of their personal, financial or political activities create an actual, perceived or potential conflict of interest with their role at Man Energy and
- Complete and submit a Conflict of Interest Disclosure via email, message, online system. This will be automatically shared with your line manager for information purposes and Human Resources Officer for approval.

Employees must notify their line manager and Human Resources Officer, to agree how best to manage the situation, if they have:

- A family member or a close personal contact who is a public official;
- Family members or a close personal contact working for, or providing any services to, actual or potential competitors, customers or suppliers.

Employees **must** notify their line manager and Human Resources Officer, to agree how best to manage the situation, if they or their family members hold investments other than in publicly traded pension funds, index linked or tracker funds that represent:

- Substantial interests (5% of their net worth) in a Man Energy competitor, supplier, client or State controlled or influence entity;
- Any interest in a supplier if they, or one of their team, are involved in selecting or assessing the supplier or negotiating with them;
- Any interest in a customer if they, or one of their team, deal with them.

Employees interested in taking up, in a personal capacity, a proposed directorship (or equivalent) of another organization, whether commercial or not-for-profit, including roles in trade associations and roles for public bodies, **must** secure prior approval from their line manager and Human Resources Officer. In addition:

- They must take steps, before accepting, to ensure the role will not create an actual, perceived or potential conflict of interest, detract from their commitment and contribution to Man Energy, or take up excessive time;
- They must ensure they will not have access to commercially sensitive information concerning actual or potential Man Energy competitors (see Code Policies on Fair Competition and Competitors' Information and Intellectual Property);
- They should be clear that they will keep any fees or benefits that arise from any such role, and that this reflects the fact that Man Energy takes no responsibility in relation to them;
- Before becoming a director of any publicly listed company, they must also obtain written approval from the Chief Executive Officer, as well as notifying the Human Resources Officer;

The roles of school governors, governing positions in amateur sporting or recreational groups, and directors of property/housing blocks in which an employee lives are excluded and do not require line manager or Human Resources Officer approval.

MUST NOTS

Employees **must not**:

- Take, or divert to others, any business opportunities that arise in the course of doing their job at Man Energy that could be of interest to Man Energy;
- Allow their personal, financial or political activities to affect or be perceived to affect the way they do their job at Man Energy;
- Work for, or provide any services to, competitors, customers or suppliers unless they have prior written approval from their line manager and Human Resources Officer;
- Work as a public official unless they have prior written approval from their line manager and Human Resources Officer.

ANTI-BRIBERY

To support global efforts to fight corruption, most countries have laws that prohibit bribery: many apply these 'internationally' to behavior beyond their borders. A breach of such laws may result in fines for Man Energy and in personal penalties for individuals. Dealings with public officials are particularly high risk: even the appearance of illegal conduct could cause significant damage to Man Energy's reputation.

Man Energy's commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to all Man Energy operations, regardless of local business practices.

This Code Policy covers what employees must and must not do to meet Man Energy requirements.

MUSTS

Employees **must**:

- Always make clear, internally and when dealing with third parties, that Man Energy has a zero-tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favor to improperly influence a business outcome;
- Immediately notify their Human Resources Officer if they become aware of any suggested or actual payment or other transaction which has the potential to be in breach of this Code Policy;

Ensure that before employing or entering into contracts with any third parties to represent Man Energy or its interests externally, relevant Man Energy teams have undertaken appropriate due diligence checks to assess the third party's integrity. The outcome of such checks must be considered carefully before deciding whether to appoint the third party: employees must inform Human Resources Officer of any concerns.

In exceptional situations where employees cannot escape imminent threat of physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details of the demand and any payment to Human Resources Officer. This is to ensure that the matter can be fully investigated, necessary financial records kept, and further steps taken where appropriate (see also Code Policy on Accurate Records, Reporting and Accounting).

MUST NOTS

Man Energy employees must not, directly or indirectly (e.g. via suppliers, agents, distributors, consultants, contractors, intermediaries or anyone else):

- Offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions by any



person about Man Energy;

- Request or receive bribes or improper advantages from any third party, which may, or give the impression that they may be, intended to influence decisions by Man Energy about that third-party.

Where an employee considers that a bribe, improper advantage or facilitation payment has been given or received, they must not conceal this or take any steps that could delay information being passed to Human Resources Officer.

GIETS & HOSPITALITY

All company's relationships must reflect its ongoing commitment to doing business with integrity.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of company's business activities.

This Code Policy sets out responsibilities of employees in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are always prohibited. It also explains in what circumstances gifts or hospitality may legitimately be given or received.

Employees **must** apply this Code Policy in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest (see Code Policies on Anti-Bribery and Avoiding Conflicts of Interest).

Team leaders **must** ensure that save as otherwise provided in this Code Policy, gifts and hospitality either given or received do not exceed local monetary limits, as approved by the Human resources department. These limits **must** be clearly and regularly communicated by them in each country and will apply equally to the offer and receipt of gifts and hospitality.

Gifts

- Employees **must** ensure that any gifts offered or received do not exceed the local monetary limits and are one-off or irregular in nature and at all times comply with the Code Policy on Avoiding Conflicts of Interest. Although employees are not required to record such gifts centrally, they **must** keep their own records for inspection.

- If employees are offered a gift that exceeds the local monetary limits they **must** politely decline and explain the Man energy rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely preclude their return, Man Energy employees must:

- Consult their line manager and Human Resources Officer; and

- Where appropriate take steps for the gift to be donated to charity.

- All gifts by employees that take the form of Man Energy branded merchandising materials **must** be legitimate and proportionate.

Hospitality

Employees **must** ensure that hospitality is only offered or accepted if:

- There is a legitimate business interest in doing so;

- It is in the form of a locally hosted meal, attendance at, or participation in an organized 'team-building' occasion, local cultural or sporting event, local industry award ceremony, or similar responsible activity;

- Usual business contacts from Man Energy and other parties are physically present;

- Its value does not exceed the local monetary limits; and
- It remains one-off or irregular in nature.

Employees are not required to record such hospitality within their local monetary limits centrally, but **must** keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of, Man Energy is approved using company's standard local expense processing and clearance systems.

In exceptional circumstances where employees seek to offer or accept hospitality above the local monetary limits, they must:

- Check their line manager supports the proposal;
- Complete and submit a Gifts and Hospitality Disclosure via our online to Human Resources Department. This will be automatically shared with your line manager for information purposes and Human Resources Officer for approval.
- Once approval is received, ask the third party to confirm that the offer or acceptance of such hospitality also complies with its equivalent gifts and hospitality policy.

In other circumstances where employees are offered or asked for hospitality that exceeds relevant local monetary limits, they **must** politely decline by reference to this Code Policy.

Must not

Employees **must not** discuss, offer or receive any gifts or hospitality activity involving public officials or their family members without prior clearance from human resources officer.

Employees **must not**:

- Offer or accept any gifts or hospitality, or any other favors which are intended or might be seen to influence business decisions or create an obligation to do something in return;
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options;
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from human resources officer;
- Offer or accept any hospitality that is not consistent with the Code Policy on Respect, Dignity and Fair Treatment, or may cause offence under local norms and customs.

PROTECTING ASSETS & INTELLECTUAL PROPERTY

Employees are responsible for ensuring Man Energy's assets are protected. This Code Policy covers the protection of physical assets/ property, financial assets and intellectual property.

Musts

Physical assets/property

Employees **must** take care to ensure that all company physical assets/ property they come into contact with while working are not damaged, misused or wasted. Physical assets/ property includes office/workshop tools/equipment, products or components, buildings, computers and company motor vehicles.

The line manager **must**:

- Identify potential hazards from activities and services onsite;
- Evaluate the risk of damage to site assets of such hazards and of any potential business interruption or liability that could result; and
- Take steps to reduce risks to an acceptable level.



Financial assets

Employees **must**:

- Protect Man Energy's financial assets –such as cash, bank accounts and credit cards –guarding against misuse, loss, fraud or theft;
- Only authorize commitments, expenditure, borrowing or other financial transactions in line with their role and seniority as specified in local, regional and/or global financial and/or treasury authority schedules;
- Employees involved in hedging contracts or transactions must comply with the relevant man energy Standards.

Intellectual property

Employees **must**:

- Report to Human Resources department any suspected counterfeit products or any product, designing, communication or marketing practice that are suspected of infringing our copyright, trademarks, patents, design rights, domain names and/or other intellectual property rights;

When researching, developing or preparing to launch new brands, sub-brands, services, designs, inventions, communication, advertising and promotional materials, ensure all necessary checks and filings have occurred with respect to patents, designs and trademarks or other intellectual property rights;

- When undertaking collaborative work with third parties, ensure a contract is in place with appropriate clauses to protect Man Energy's intellectual property rights and ensure freedom to use results.

Must not

Employees **must not** remove Man Energy's physical assets/property from company premises without permission, or use them for inappropriate purposes.

ANTI-MONEY LAUNDERING

To protect Man Energy's reputation and avoid criminal liability, it is important not to become associated –however innocently–with the criminal activities of others. In particular, Man Energy and its employees must ensure man energy does not receive the proceeds of criminal activities, as this can amount to the criminal offence of money laundering.

This Code Policy sets out essential steps employees must take to avoid being implicated in money laundering.

Musts

Employees **must** immediately notify Human Resources Department if they have any suspicions about actual or potential money laundering activity.

Employees **must** look out for warning signs of money laundering, such as:

Supplier requests to:

- Pay funds to a bank account in the name of a different third party or outside the country of their operation;
- Make payments in a form outside the normal terms of business;
- Split payments to several bank accounts;
- Overpay.

Customer payments to Man Energy:

- From multiple bank accounts;
- From bank accounts overseas when not a foreign customer;
- Made in cash when normally made by cheque or electronically;
- Received from other third parties;

- Made in advance when not part of normal terms of business.

Employees involved in engaging or contracting with third parties such as new suppliers, customers and distributors must:

- Ensure that the third parties in question are subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening;
- Determine, with guidance from their line manager, which tools and processes should be used to facilitate appropriate screening and record-keeping;
- Carefully consider, where necessary in consultation with their line manager, screening outcomes before deciding whether to do business with the third-party.
- Finance managers who support Supply Chain Management and Customer Development must regularly monitor and/or review suppliers, customers and other third-party service providers to identify business activity or governance that could indicate money laundering is taking place.

Must nots

Employees **must not** simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put Man Energy and its employees at risk.



Respecting People

People should be treated with dignity, honesty and fairness. Man Energy and its employees celebrate the diversity of people, and respect people for who they are and what they bring. Man Energy wants to foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential.

OCCUPATIONAL HEALTH & SAFETY

Man Energy is committed to providing healthy and safe working conditions. Man Energy complies with all applicable legislation and regulations and aims to continuously improve health and safety performance.

Everyone at Man Energy has a role to play. Managers are responsible for the occupational health and safety of their reports and third parties under their control. As a condition of our employment, we all have a duty to work safely. This Code Policy outlines our individual and shared responsibilities for health and safety.

Musts

Employees and others working for Man Energy, and visitors to Man Energy **must** work and behave safely. They **must**:

- Comply with health and safety procedures and instructions relevant to their work and/or about which they have been trained or notified;
- Help ensure that those they work with, including contractors and visitors, are familiar with and follow applicable health and safety procedures and instructions;

Only undertake work that they are trained, competent, medically fit, sufficiently rested and alert enough to do;

- Make sure they know what to do if an emergency occurs at their place of work or at a site they are visiting; and
- Promptly report to the management any actual or near miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to correct, prevent or control those conditions immediately.

All line managers have overall operational responsibility for health and safety at their location and **must**:

- Establish and maintain an appropriate health and safety at work management system for their site, including the appointment of committees, managers, competent experts and a system for gathering employees 'concerns/input;
- Identify health and safety hazards and manage/control risks arising from the site's routine and planned operations, activities and services;

Regularly review and comply with all applicable local health and safety legislation, including relevant mandatory man energy requirements;

- Develop site-specific health and safety improvement objectives and monitor performance, including an annual review of the management system's effectiveness and adequacy;
- Report mandatory Key Performance Indicators (KPIs) via man energy online system;
- Report all incidents, accidents and near misses in line with the Serious SHE Occurrences Standard, including thorough investigation, follow-up and communication of lessons learned;
- Maintain, communicate and test site emergency plans;
- Ensure all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities.

HSE Manager must take responsibility for health and safety matters for all sites in order to meet legal regulatory

requirements, site leaders must liaise with the HSE Manager to agree the health and safety at work management system and the approach required to ensure appropriate ongoing review.

Must nots

Employees and others working for Man Energy, and visitors to sites, **must not**:

- Undertake work or related activity, such as driving, when under the influence of alcohol or drugs, or when using medication improperly;
- Carry on with any work that becomes unsafe or unhealthy;
- Assume someone else will report a risk or concern.

RESPECT, DIGNITY & FAIR TREATMENT

Business can only flourish in societies where human rights are respected, upheld and advanced. Man Energy recognizes that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

There is both a business and a moral case for ensuring that human rights are upheld across Man Energy's operations and value chain. Man Energy is committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, and no unlawful discrimination or victimization.

This Code Policy sets out what Man Energy and its employees must do to ensure that all workplaces maintain such an environment.

Musts

Employees must:

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs; and
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit.

Companies must:

- Ensure all employees' work is conducted on the basis of freely agreed and documented terms of employment, clearly understood by and made available to relevant employees and others working for Man Energy;
- Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and adhered to. Other than legally mandated deductions, all other deductions from wages require the express and written consent of the employee;
- Respect employees' rights to join or not to join a legally recognized trade union, or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions, labor management relations and matters of mutual concern, to the extent practicable taking national laws into consideration;
- Comply with legal requirements in relation to short-term, casual or agency employees;
- Maintain a clear and transparent system of employee and management communication that enables employees



to consult and have an effective dialogue with management;

- Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity, with their line manager or an independent manager –without fear of retaliation.

Must nots

Employees must not:

- Engage in any direct behavior that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views;

- Engage in any indirect behavior which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicitly nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumors;

- Work more than the regular and overtime hours allowed by the laws of the country where they are employed. All overtime work will be on a voluntary basis.

Companies must not:

- Use, or permit to be used, forced or compulsory or trafficked labor. We have a zero tolerance of forced labor;
- Use child labor, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher.

- When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are permitted), require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to attend school.

Safeguarding Information

Information is essential to our success: it fuels our research, keeps us in touch with consumer needs and helps us work effectively together. If used inappropriately, information can cause considerable damage to our business.

PROTECTING COMPANY'S INFORMATION

Information is one of Man Energy's most valuable business assets: Man Energy is committed to safeguarding and protecting our information and any other information entrusted to us.

Information within Man Energy is held in many different formats, including on paper, electronically in documents or in IT applications & systems. Our requirements to protect information apply to all formats. Man Energy has data classification standards which define how information within companies must be classified, handled and protected.

Musts

When handling companies's information employees **must** ensure that:

- They understand the nature and classification of the information, understand and adhere to the handling requirements for information in the Information Handling Standard and take personal responsibility for the proper use, circulation, retention, protection and disposal of companies's information;
- They only distribute or share companies's information on a need to know basis, ensuring that only man energy employees or others working for Man Energy, or authorized third parties, with a genuine business need, have access to the information;
- They take care not to disclose Man Energy's information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace;
- They comply with the proper use of company Information Technology and only share Man Energy information using Company-approved Information Technology such as erp, company email, company cloud system.

Must nots

When handling companies's information employees **must not**:

- Disclose companies's information externally to third parties unless in accordance with companies's information classification and handling standards; or
- Use companies's information for anything other than legitimate business purposes or as required by law.

Personal data relating to employees, consumers and other individuals is subject to specific laws and regulations in most countries and requires special handling.

If in doubt about how to handle any company information, restricted or otherwise, employees must seek advice from their line manager, Human Resources Officer.

COMPETITORS' INFORMATION & INTELLECTUAL PROPERTY

Man Energy respects the intellectual property and confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public



domain and has value.

To promote fair competition, Man Energy gathers and uses competitors' information that is in the public domain, for example, from newspapers, the internet and company filings. Accepting or using competitors' confidential information risks being a serious infringement of competition laws and/ or trade secrets/intellectual property laws, leading to significant penalties for Man Energy and individuals.

This Code Policy outlines what employees must do to respect the confidentiality of other companies' information.

Musts

Employees **must**:

- Check the latest internal training and guidance to understand what are legitimate sources of data;
- Only gather and use competitors' information that is known to be legitimate;
- Clearly record the sources of data in all communications so their legitimacy is beyond doubt;
- If they acquire a competitor's confidential information unintentionally, they **must** notify line manager immediately.

Must nots

Employees **must not**:

- Knowingly infringe the valid patents, design rights, trade marks, copyright and other intellectual property rights of any third party;
- Seek to obtain competitors' confidential information. Where employees acquire a competitor's confidential information unintentionally, they **must not** use it or forward it to anyone except Legal Advisor in Human Resources department.

PERSONAL DATA & PRIVACY

Man Energy respects the privacy of all individuals and the confidentiality of any personal data Man Energy holds about them. This Code Policy sets out what steps employees must take to ensure personal data is handled appropriately.

Musts

When collecting, using or storing personal data, employees **must ensure that**:

- They obtain from the individual the level of consent required by local laws, including where personal data is obtained from third parties;
- They only collect data that is adequate, relevant and used solely for the purpose for which it is collected;
- They use personal data in accordance with the relevant published Privacy Notice as may be required by local law;
- They keep personal data up to date: inaccurate data must be corrected and records of any changes must be maintained;
- They keep personal data confidential and secure with paper copies also stored securely.

Must nots

When collecting, using or storing personal data, employees **must not**:

- Retain personal data for longer than necessary to achieve the business objective or meet minimum legal requirements (including data retention or national security laws);
- Share it, internally or externally, unless this is relevant to the purpose for which personal data is collected. The individual must be made aware of any third-party access to the data which may include access from a location outside the country in which the personal data is collected;
- Transfer data outside the country in which it is collected, even within Man Energy, without advice from Human

Resources Department, as there may be legal restrictions/requirements relating to the transfer (e.g. prior explicit consent may be required).

Man Energy may, to the extent permitted by law, log, monitor, record, inspect and/or remove material to comply with legitimate requests to disclose such material to local law enforcement, regulatory agencies or judicial authorities.

USE OF INFORMATION TECHNOLOGY

This Code Policy explains how employees should use company IT Equipment and company IT Systems responsibly and securely, in compliance with all relevant laws and regulations.

When using company IT Equipment, employees must ensure it is used appropriately and protected from damage.

Employees are permitted to use company IT Equipment for personal use if this does not cause material impact to man energy. Material impact includes excessive storage, network usage, mobile data usage, or voice utilization.

All information stored on company IT Systems and company IT Equipment is not private and may be monitored, inspected or removed by Man Energy, regardless of whether it is work-related or 'personal'.

Man Energy may log, monitor and inspect activity on company IT Systems and company IT Equipment to the extent permitted by law, to ensure this policy is being followed.

MUSTS

When using Man Energy's IT, employees **must**:

- Use a password or PIN to lock unattended company IT Equipment, or any Personal Device used to access company Information.
- Immediately report the loss or theft of any company IT Equipment, or any Personal Device used to store company Information. This should be reported to the Human Resources Department.
- Ensure any removable IT Equipment is secured when left in the office overnight or locked away or out of sight when left unattended at home, in a hotel or in a vehicle.
- Comply with copyright law and respect all applicable licenses for any graphics, documents, media and other materials stored on company IT Systems or company IT Equipment.
- Relinquish access to company IT Systems and company Information when leaving Man Energy, including any company Information held on a Personal Device.
- Follow the appropriate IT request process to install any software or applications on their company IT Equipment.

Must nots

When using company's IT, **employees must not**:

- Try to disable, defeat or circumvent company security controls, including but not limited to firewalls, browser configuration, anti-virus and the deletion of system logs.
- Use company IT Systems or company IT Equipment to Intentionally access, store, send, post or publish material that is:
 - Pornographic, sexually explicit, indecent or obscene, or,
 - Promotes violence, hatred, terrorism or intolerance, or,
 - Is in breach of local, national or international laws.
- Use company IT Systems or company IT Equipment to:
 - Intentionally defame, slander or lower the reputation of any person or entity or their goods or services.
 - Run or engage in any form of private business.



- Expose company information by:
 - Using non-public company Information for anything other than company business.
 - Forwarding emails containing non-public company Information to personal email accounts.
 - Storing or synchronizing company Information to Personal Devices unless the security controls on such devices are managed by man energy.
 - Sharing man energy access credentials with anyone else, including work colleagues (unless formally approved by Information Security), friends and family.
 - Using their man energy password for non-company IT Systems.
 - Using their company email address for non-business or non-professional related web sites or systems.
 - Intentionally accessing company IT Systems or company Information that is not intended for them.

Engaging Externally

Throughout our value chain, from innovation through to our consumers, Man Energy and its employees need to demonstrate the same ethical standards when engaging with others externally as when dealing with colleagues.

RESPONSIBLE INNOVATION

Innovation is fundamental to Man Energy's business success and a core part of our global strategy. The integrity and objectivity of our Science are a key foundation for our approach to responsible innovation.

Safety is non-negotiable.

Man Energy conducts responsible, safe and sustainable technical development and innovation, which fully respects the concerns of our clients and society. In meeting clients needs, Man Energy's innovations are based on sound science and technology, and reflect high standards and ethical principles.

Man Energy has global standards that apply to all development and innovation, including on: the safe and sustainable design of new products, processes and packaging; product and brand development; open innovation collaborations; and publication of our scientific research.

Musts

All employees involved in designing, engineering and innovation activity **must comply** with all standards relevant to their area of work, notably in order to:

- Ensure that risks for client safety, occupational safety and the environment are suitably assessed and managed;
- Ensure appropriate specifications of raw materials, products and packaging;
- Ensure research on human subjects is conducted to the highest ethical standards;
- Ensure the integrity, robustness, objectivity and transparency of all development and collaborations with external partners;
- Maintain and make accessible records of all development, including protocols and data, and their interpretation and decisions made;
- Raise any concerns about actual or potential non-compliance with this Code Policy with their line manager or their relevant business partner in R&D.

Must nots

Employees **must not**:

- Deliver presentations or publications that have not been approved via internal clearance procedures;
- Collaborate with third parties outside a structured and approved contractual framework.

RESPONSIBLE MARKETING

Man Energy is committed to developing, producing, marketing and selling all its products and services responsibly.

Man Energy can and should conduct marketing activities in line with societal expectations.

This Code Policy sets out global minimum standards that apply to all of man energy's marketing activities everywhere. This covers but is not limited to: brand names, packaging and labelling; consumer planning and



market research; trade advertising; sales materials; brand merchandising and sponsorship; all forms of advertising including television, radio, print, digital media, promotional activities and events, product placements, 'advergaming' –whether created by Man Energy, agencies, crowdsourcing or other third parties.

Musts

Integrity, responsibility and transparency

Employees who are involved in Man Energy marketing activities **must**:

- At all times, respect applicable marketing laws;
- Describe our products/services and their effects truthfully, accurately and transparently, with appropriate factual and, where relevant, nutritional information;
- Ensure there is sufficient information for clients and clients to understand how to use our products and services;
- Ensure our marketing is based on adequate support for the claims man energy makes;
- Comply with our principles and standards on marketing, including (but not limited to) those with respect to children, women and social media;
- Be mindful of the environmental implications of marketing activity, in such areas as new product development, marketing activation plans, packaging and content recycling.

Freedom of choice

Employees involved in Man Energy marketing activities **must** show respect for people who choose not to buy our products and services, and ensure there is sufficient information about our products and services for clients to make informed choices.

Must nots

Employees **must not**:

- Alter images used in marketing communications in such a way that advertising is rendered misleading;
- Misuse technical data or use scientific terminology or vocabulary in such a way as falsely to suggest that a claim has scientific validity;
- Associate our products or services with or feature within any Man Energy marketing themes, figures or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability or minority group;
- Advertise in any media known for promoting violence, pornography or insulting behavior.

PRODUCT QUALITY

Man Energy's reputation is founded on delighting our clients and customers with consistently great quality that meets or exceeds their needs and expectations. Our aim is to be the most trusted and preferred client choice on every occasion.

Man Energy is committed to achieving this goal by meeting or exceeding all legal and regulatory requirements and through the rigorous application of our Quality Management System. The quality experience for our clients depends upon all employees understanding their roles and responsibilities and ensuring that they adhere to Man Energy's quality standards, business processes and regulatory requirements at all times.

Man Energy will take prompt and timely action wherever and whenever we encounter products which don't meet our standards or those required in the market place. We will continuously improve product quality experiences by using the insights gained from our performance measures and from customer feedback.

This Code Policy applies to all aspects of product quality including safety, design, formulation, raw materials,

primary/secondary/tertiary packaging, manufacture, storage, transport, display, marketing, communication, sales and disposal of Man Energy products –at Man Energy, third-party or business partner facilities.

Musts

Employees **must**:

- Apply effective processes to measure and record product and process performance and, where appropriate, take effective preventative steps or corrective action to assure great product quality experiences for our consumers; and
- Promptly discuss concerns with line management and take steps to address any information regarding a potential or actual product quality, regulatory or safety issue.

Must nots

Employees **must not**:

- Knowingly produce or distribute products, including promotional items, or services that could adversely impact employees' or clients' health, endanger customers or adversely impact Man Energy's brand reputation;
- Take decisions about quality without sufficient knowledge or authority; or
- Respond to customers about the quality or safety of products without authorization to do so.

RESPONSIBLE SOURCING

Man Energy expects its business partners to adhere to values and principles consistent with our own. Man Energy is developing new business practices to grow our company and communities, by doing business in a manner that improves lives of workers across our supply chain, their communities and the environment, consistent with the Sustainable Living principle.

Our requirements of suppliers (companies that supply Man Energy with goods and/or services, across both production and non-production areas of our business) are set out in our Responsible Sourcing Policy (RSP). Man Energy's reputation could suffer significant damage if suppliers fail to comply with these requirements.

The RSP affirms the following Fundamental Principles:

- 1.Business is conducted lawfully and with integrity
- 2.Work is conducted on the basis of freely agreed and documented terms of employment
- 3.All workers are treated equally and with respect and dignity
- 4.Work is conducted on a voluntary basis
- 5.All workers are of an appropriate age
- 6.All workers are paid fair wages
- 7.Working hours for all workers are reasonable
- 8.All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively
- 9.All workers' health and safety are protected at work
- 10.All workers have access to fair procedures and remedies
- 11.Land rights of communities, including indigenous peoples, will be protected and promoted
- 12.Business is conducted in a manner which embraces sustainability and reduces environmental impact.

All Man Energy Purchasing Agreements/Contracts or Services Agreements specify that suppliers must acknowledge adherence to our RSP as a condition of supply.

This Code Policy sets out responsibilities of employees who engage with suppliers.



Musts

Employees who contract and/or work with Man Energy's suppliers **must**:

- Read and understand the Fundamental Principles and consult their line manager if they have any questions;
- Notify their line manager if they know or suspect that suppliers are not meeting relevant RSP requirements within the Responsible Sourcing Policy;
- Ensure that any shortlists or tendering processes for new suppliers for which they are responsible consider potential suppliers' credentials in areas covered by the RSP.

Must nots

Employees who contract and/or work with Man Energy's suppliers **must not** agree to any contractual changes or exclusions with respect to the RSP without consulting their line manager and legal advisor in human resources department.

FAIR COMPETITION

Competition laws prohibit anti-competitive agreements (or cartels) between competitors. Many national laws also prohibit abuses of dominant position and include specific rules relating to agreements with distributors and other customers. Investigations by competition authorities may result in significant fines and costs, and damage our reputation. Criminal sanctions may also apply.

Man Energy believes in vigorous yet fair competition and supports the development of appropriate competition laws. Man Energy and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations. Man Energy prohibits participation in cartels in all countries, even those that do not have competition law.

This Code Policy sets out what employees must do to ensure Man Energy upholds fair competition.

Musts

Market Heads **must** ensure that:

- Legal prohibitions and requirements that apply to employees in the markets for which they are responsible have been identified and documented with support from Legal advisor in human resources department and are understood by all employees;
- Communication and training programmes addressing relevant competition law prohibitions and requirements have been approved by Legal advisor in human resources department and implemented, including tailored programmes for specific and/or 'high risk' groups of employees and others working for man energy.

Employees **must**:

- Follow requirements regarding competition law compliance for the markets in which they operate and undertake all relevant training required;
- Consult Legal advisor in human resources department immediately if they are unsure about the legality of any activity;
- Where possible, always consult the line manager or legal advisor before meeting a competitor or discussing or agreeing anything about which they have concerns;
- Take care that participation in industry or trade associations events and related contacts are not used for anti-competitive purposes; this also applies to less formal meetings or events that involve competitors;
- Before taking part in a trade association or industry event, ensure all **mandatory requirements** set out in the man energy Standard on Trade Association Memberships have been complied with;

- Object immediately if inappropriate topics are raised in any industry or trade association discussion and leave immediately –and noticeably –if any inappropriate discussion continues;
- Report incidents of inappropriate discussions immediately to their line manager.

Must nots

Employees **must not** participate in cartels. In particular, they **must not discuss** or agree any of the following, directly or indirectly, with competitors:

- The price or terms of sale for products and/or services
- The price or terms to be demanded from suppliers
- The co-ordination or allocation of bids or quotes
- Limitations on production or sales
- The division or allocation of geographic markets, customers or product lines
- Boycotts or refusals to deal with certain competitors, customers or suppliers.

Legitimate joint purchasing arrangements, production, research and development and standardization agreements that have received prior written approval excluded from the above.

Co-operating with competition authorities

Man Energy co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contact with competition authorities (including, where relevant, national courts) are coordinated by Legal advisor in human resources department.

Glossary

Code Support Line

Confidential online and telephone service, allowing the user to raise a concern about an actual or potential breach of the Code or Code Policies, to ask a question if clarification is needed and to check back on the status of a concern raised or a question asked. The Service is available at staff club: <https://man.energy/careers.html>

Competitor's confidential information

Non-public information about a competitor's product or the way in which a competitor carries out its business. Confidential information covers a broad sweep of activities, including current or future prices; pricing terms (e.g. discounts); buying prices, costs and supplier information business or financial strategies and plans (e.g. mergers, acquisitions and divestments); marketing, promotional and sales plans; financial results before any formal announcement; R&D work (strategies, designs, formulae, drawings, technical information, manuals and instructions, product specifications and samples of products that have not been launched or revealed publicly); and proprietary software.

Employee

A person employed by Man Energy under one of a variety of contracts. The term covers all employees, whether full-time, part-time, fixed-term, permanent or trainees.

Additionally, in this document, the term is used to cover other persons working for Man Energy as follows: contractors, temporary staff, secondees, work experience placements; those with a statutory Director role or equivalent responsibilities; employees of joint ventures and approved third-party labor providers where Man Energy has direct management control; and employees of new acquisitions.

Facilitation payment

Unofficial payment –in effect a bribe–made to a public official to secure or speed up the performance of a routine action that the official is required to provide anyway. Facilitation payments are illegal in most countries, although a small number provide exceptions in certain circumstances. Also referred to as a 'facilitating', 'speed' or 'grease' payment.

Family member

A relative, by blood or by marriage (or similar informal relationship), notably a spouse, live-in partner, parent or child. The term includes sibling, step- or adopted child, step-parent, grandparent, uncle, aunt, cousin, grandchild or any relative who has lived with you for the past 12 months or more.

Improper advantages

The offer or gift of anything of any value, including nominal cash amounts, which may be perceived as intended to cause the recipient to behave contrary to customary ethical expectations. Includes money, services (including favors), discounts, use of resources, loans, credit, the promise of future advantages (including future employment or internships), and gifts or hospitality.