

OUR PURPOSE

It is important to all of us working in Genel that we are measured not just by what we achieve but also by the way in which we achieve it. Our purpose is to be a socially responsible contributor to the global energy mix. We will achieve this purpose by living our values in everything we do.

OUR VALUES

We have defined a clear set of values that capture the heart and spirit of the Company, providing an anchor charter that each employee can work by and be proud of. Genel is a company that cares – about our employees, about the environment, about doing things in a better way and making a tangible difference to people's lives in the areas in which we operate.

The values are practical and aligned with Genel's goals – they are values that we live and work by on a daily basis that guide the direction in which the Company is going. As we adhere to these values, it is our belief that the strategic goals of the business will be delivered.

We look to attract staff who share our values - the right people, delivering the right actions, in the right way. They are values that all employees will adhere to at all times.

INTEGRITY

- Dealing with each other and all our stakeholders in an honest and transparent way is vital to having a motivated and aligned workforce, and all people being prepared to do the right thing in all situations leads to a positive corporate reputation garnering trust and supporting our activities, providing the social licence to operate, and driving investor support

RESPECT

- Respecting people, valuing employees of all cultures and levels of seniority, developing an inclusive environment which motivates people, and treating partners, local communities, and all other stakeholders in a way that builds relationships and helps drive the delivery of common goals
- Respecting the environment, minimising the impact of our operations and protecting biodiversity is also necessary to retaining the social licence to operate

ACCOUNTABILITY

- Accountability means taking ownership of our tasks, identifying solutions to challenges and following through to ensure delivery of results
- A culture of accountability and responsibility in which people take pride in their daily work, supports the safe delivery of objectives and drives the quality of our work

COLLABORATION

- Working as a team with a collaborative and constructive mindset, both internally and externally, maximising synergies, welcoming challenge as much as support, giving time to improve other people's products, sharing information, increases the quality of outputs across the business and boosts motivation

INGENUITY

- Ingenuity is where Genel can set itself apart. A culture of a curious and open-minded workforce, bold, inquisitive and with a learning mindset, ready to challenge accepted ways of doing things can open up new opportunities, find better solutions to situations and drive profitability

OUR COMMITMENTS

Infusing our corporate values in all decisions that we make both individually and as a business will help deliver our strategic goals in a way that can make each individual proud. All staff have a responsibility to adhere to these values, and their practical implications as set out below.

WHO THIS APPLIES TO

Unless otherwise indicated, this code applies to all employees (part or fixed-term), officers, directors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as ‘employees’ or “staff” in this document). They do not form part of the terms of employee contracts.

COMPLIANCE

Should our employees fail to comply with our code of conduct, disciplinary action in accordance with our disciplinary policy will be taken which could lead to action up to and including termination of employment.

1. A culture of fairness and respect	
Corporate Commitment	Employee Commitment
<ul style="list-style-type: none"> • We commit to creating a workplace that values the diversity and inclusion of our workforce where everyone is treated fairly and with respect, in a spirit of collaboration, openness, and entrepreneurialism. • We also commit to behaving with respect, integrity and working collaboratively in all our dealings with our joint-venture partners, suppliers, communities, host governments and all other stakeholders. • We respect the confidentiality of employees’ personal information and will not disclose any personal information relating to an individual unless it is required by law, to fulfil our obligations as an employer or where explicit consent has been given by the individual concerned. We also respect all laws related to data protection in our countries of operation. 	<ul style="list-style-type: none"> • To be accountable for working by the Genel values. • You commit to being intolerant of abuse or harassment in any form, whether this is directed at you personally or any of our workforce, joint-venture partners or any other third-parties we engage with. This includes any sexual, racial, disability or age-related discrimination, harassment or intimidation, including statements, insults, jokes, unwanted physical contact or culturally offensive materials. • You commit to not making decisions or taking actions based on any attributes unrelated to job performance, conduct and/or business operations. These include race, ethnicity, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation and family responsibilities. • If you are a supervisor or manager of our workforce, you commit that all decisions you will make in relation to employee development and progression will be based on proper evaluation that is directly related to work performance and behaviour, and

that all of your reports will be rewarded appropriately, based only upon their performance.

2. Providing a safe, secure, and healthy workplace

Corporate Commitment

- We commit to creating a safe, secure and healthy workplace for our employees and contractors to prevent work-related injury or illness.
- We commit to providing facilities, equipment, management systems, processes, procedures and resources that enable safe operations and reduce the risk to as low as reasonably practicable (ALARP).
- We commit to providing regular HSE training to the workforce to enable them to work safely with a high degree of reliability.
- We commit to empowering the workforce to prevent unsafe work.

Employee Commitment

- You commit to a culture of personal responsibility and accountability for HSE performance.
- You commit to not put operational performance ahead of the safety, security and health of our employees and contractors or the communities in which we work.
- You commit to comply with our Health, Safety, Security and Environment Policy.
- You commit to:
 - a. constantly assessing and managing risks;
 - b. implementing and monitoring controls to prevent and mitigate the consequences of those risks;
 - c. investigating and learning from any incidents and near misses;
 - d. planning for potential emergencies;
 - e. having appropriate resources in place; and
 - f. operating with integrity and respect using the systems and processes provided by Genel.

3. Behaving lawfully and ethically

Corporate Commitment

- We are committed to conducting our business in accordance with the more stringent of the local laws and regulations of each jurisdiction where we operate. We will provide policies, procedures and systems to support the lawful conduct of our business and to provide training for the workforce to enable execution of their work lawfully and ethically.
- We commit to a workplace where bribery is not tolerated in any form - whether by an employee, contractor or any other third

Employee Commitment

- You commit to conducting yourself with integrity, honesty, and respect.
- You commit to complying with Genel's anti-bribery policy and procedures.
- You commit to not winning or seeking to maintain business by acting illegally.
- You commit to being vigilant in identifying any actual or potential conflicts of interest between personal interests and the business interests of Genel. A conflict of interest occurs when personal or family interests

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party acting on our behalf. This includes a prohibition on facilitation payments to any third party.

- We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains.

interfere with the ability to make sound business decisions on behalf of Genel. If you become aware of an actual or potential conflict of interest you must follow our Conflicts of Interest Policy and disclose this to your Line Manager, Head of Function or an Executive Director as applicable.

- You commit to not accepting or providing gifts which could, or could be perceived as, provide inappropriate influence over the recipient – whether in the form of goods, services, personal favours or entertainment. You must not give or receive any gift that may compromise the reputation of Genel.
- You commit to not giving corporate donations to political causes, political parties or their campaigns without the approval of Genel Energy plc’s Board.

4. Respecting human rights

Corporate Commitment

- Genel seeks to conduct its business in a manner that respects the human rights and the dignity of people. We support and respect the protection of internationally recognised human rights in our areas of operation. Our Human Rights Policy and Anti-slavery and Human Trafficking Policy and Equal Opportunities Procedure provide further details of this commitment.
- No member of staff should be treated to their detriment for having, in good faith, reported suspected human rights abuse.

Employee Commitment

- You commit to report any suspected human rights abuse in our operations or in those of our business partners via the means set out in our Whistleblowing Policy.
- You commit to uphold and promote human rights amongst our employees, contractor staff, counterparts and suppliers. You must not use underage, forced or compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children. All those who work for us are expected to meet this commitment.
- If you are involved in management or recruitment we do not discriminate against staff on the basis of age, disability, gender, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, gender, sexual orientation or gender reassignment (protected characteristics).

5. Respecting the environment

Corporate Commitment

- We are committed to high environmental standards, minimising emissions and resource use, and will not compromise our

Employee Commitment

- You commit that all strategic and operational decisions will be guided by international environmental practices, in

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<p>environmental values for profit or production. Our operations will be managed in accordance with our policy of minimising our environmental footprint and protecting biodiversity.</p> <ul style="list-style-type: none"> • We commit to operating our business in accordance with ESHIA guidelines and protocols and to providing consistent and regular environmental awareness training for the workforce. • Evaluate climate change risks associated with our operations and viable mitigation opportunities. 	<p>addition to local requirements and expectations.</p> <ul style="list-style-type: none"> • You commit to identifying, assessing and managing the environmental risks of our operations to minimise the impact of our operations on the natural environment and local communities.
6. Working with our counterparts	
Corporate Commitment	Employee Commitment
<ul style="list-style-type: none"> • We commit to working collaboratively with third parties who reflect our values and operate in accordance with the principles of this Code – their ability and willingness to do so must be an integral part of their appointment to work with us. This includes ensuring that they operate in compliance with all applicable local laws and are aligned with the same ethical standards that we support. 	<ul style="list-style-type: none"> • Where you believe our counterparts may be falling short of our Code’s principles, you commit to working with them to improve standards. You commit to closely monitoring our counterparts where there may be enhanced risks, for example in engagements with government officials, identifying inadequate or unsuitable working conditions and actual/possible conflicts of interest and making them aware of our expectations. • Where there is a concern with a counterpart’s way of working or working environment, you commit to bringing this promptly to the attention of a member of Genel’s senior management team. • Where you are working with vulnerable groups (for example children and refugees), you commit to ensuring that they are treated with dignity and respect and consistent with appropriate safeguarding and legal requirements at all times respecting their human rights and applying the highest ethical standards.
7. Market disclosure and preventing insider dealing	
Corporate Commitment	Employee Commitment
<ul style="list-style-type: none"> • We commit to reporting on our business in a transparent, accurate and timely manner. • Insider dealing is strictly prohibited by law. We commit to providing the governance, systems and processes to identify if the Company is in possession of inside 	<ul style="list-style-type: none"> • You commit to ensuring that all financial and non-financial information created and retained within the Group is complete and accurate so that we can provide timely and accurate information to external stakeholders.

information and control employee dealing in Genel Energy shares and other securities.

- You commit to dealing with exchanges and regulatory authorities in accordance with accepted principles of disclosure.
- You commit to not engaging in transactions in Genel Energy shares and other securities while in possession of inside information. “Inside information” is “information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.” Such information includes, but is not restricted to:
 - Major business initiatives such as contemplated acquisitions or divestments, or other significant commercial agreements;
 - Successful (or unsuccessful) exploration wells; and
 - Information concerning earnings or other financial information.
- You commit to ensuring that you do not communicate such information to third parties who may use inside information to purchase or sell Genel Energy shares and other securities. These restrictions also apply to shares and other securities of other companies if an employee learns of inside information in the course of their work.

8. Responsible community engagement and investment

Corporate Commitment

Employee Commitment

- **We commit to treating the communities in which we operate with respect.**
- **Our social investment and engagement programmes are guided by four key goals:**
 - 1. Sustainable economic development.**
 - 2. Meaningful community relations.**
 - 3. Capacity building through education and training.**
 - 4. Community health.**

- You commit to engaging with local community leaders and government representatives with respect to identify and objectively meet community needs.
- You commit that the community programmes and activities you undertake on behalf of the Company will be transparent, with clear linkages to the development goals of each region and country in which we operate, and that they are assessed for their

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| <ul style="list-style-type: none"> • We commit to our CSR policy and procedure being compliant with the ISO26000 Guidance on Social Responsibility standard. • We commit to provide academic scholarships and sponsorships that support capacity building through education. | <p>effectiveness and monitored to ensure any funds are spent for the purposes made.</p> <ul style="list-style-type: none"> • In times of special need and for specific assets, you commit to making targeted investments and donations on behalf of the Company and where possible to make these via organisations that align with our values of integrity and respect in their own operations. |
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9. Our Assets

Corporate Commitment

- We commit to protecting the Company's physical and intangible assets for the benefit of its shareholders.

Employee Commitment

- You commit to not using company assets for personal use or providing them to third parties for their use unless specifically authorised, or permitted to do so by Genel's policies and procedures.
- You commit to ensuring that all our equipment and any equipment provided for Genel Energy's use by third parties, is treated with respect and care.
- You commit to ensuring that company data/intellectual property is not (i) disclosed to third parties unless under the terms of a confidentiality/non-disclosure agreement or (ii) used for any other purposes than the benefit of the Company.

10. Duty to speak up and report

Corporate Commitment

- In the spirit of the openness and accountability we wish to foster across the business, we commit to providing a secure, safe and healthy workplace and we positively encourage all employees and contractor staff to raise any work-related concerns with their supervisor, HR, Legal or any member of the senior management team. Our doors are always open.
- We commit to supporting staff who raise genuine concerns in good faith and to take action against any individual who threatens or retaliates against a member of staff for raising a concern in good faith. No member of staff will be treated to their detriment if they raise concerns in good faith.

Employee Commitment

- You commit to speaking up when you see something that does not sound, look or feel right to you. You can do this via various mechanisms including speaking to your line manager or using one of Genel's policies (such as the grievance policy or whistleblowing policy).
- You commit not to treat any member of staff or other third party who raises a concern detrimentally to subject them to any form of retaliation.

- We commit to providing a confidential reporting service administered by a third party to enable safe reporting, if employees and contractors do not want to raise issues directly. In the event of a concern or allegation we commit to carry out an initial assessment and will investigate in accordance with Genel's Investigation Procedure. If the allegations result in proof of a breach, we commit to taking disciplinary action up to and including dismissal.