



TRIDENT ENERGY L.P.
(“Company”)
CODE OF CONDUCT

INTRODUCTION AND APPLICATION

This code of conduct (“**Code**”) has been adopted by the board of directors of the Company and expresses the commitment of the Company and its affiliates (“**Trident Group**”) to our Core Values.

Compliance with this Code will be led by the CEO, CFO and COO (“**Senior Management**”) and the General Counsel but it is the responsibility of each Trident Group employee, contractor and director (“**Employee**”) to ensure that the Code and the Core Values are upheld.

All Employees are expected to comply with all provisions of this Code. This Code must be followed, and the spirit of our Core Values must be reflected in all the Trident Group’s business activities and decision making.

Any suspected or actual violations of this Code or should be reported as soon as possible. Please see the section on Reporting and Whistleblowing below.

Any violations of the Code will be dealt with immediately and may result in disciplinary action including dismissal or removal from office. Violations of this Code that involve illegal behaviour will be reported to the appropriate authorities. See the section on Investigations and Disciplinary Action below.

This Code should also be considered as a guide for every person and organisation who works on behalf of the Trident Group (“**Representatives**”). Where this Code refers to a “line manager” in the context of Representatives, this shall be read to mean the relevant Employee who has primary carriage of the contract or arrangement under which the Representative is engaged to act for or on behalf of the Trident Group.

OUR CORE VALUES

This Code is based on the following **Core Values**, which are at the heart of everything we do:

1. We conduct our business to high ethical standards and comply with all applicable laws and regulations of the countries in which we operate.
2. We foster a culture based on honesty, integrity, professionalism, respect and fairness.
3. We are committed to safe, reliable and environmentally sound operations.
4. We respect the environment and the communities that are affected by our work and we seek to prevent or minimise adverse impacts on them.

This Code provides more detailed guidance below on certain topics. The guidance on each topic is driven by the Core Values.

COMPLIANCE WITH THE LAW, RULES AND REGULATIONS

We are fully committed to complying with all applicable laws, rules and regulations of the countries in which we operate. However, compliance with the letter of the law is not enough – we are also committed to complying with the spirit of the law and to acting ethically in all circumstances.

Trident Group's policies and procedures are designed to encourage a high standard of ethical behaviour that complies with the laws, rules and regulations applicable to our business. Employees and Representatives must always comply with the law when undertaking activities for or on behalf of the Trident Group.

If you believe that any practices are illegal or unethical these should be reported immediately in accordance with the Reporting and Whistleblowing section below.

PEOPLE

We treat people with fairness, respect and dignity. We are committed to providing a positive and professional working environment recognised for its equality and diversity for all our Employees and will work with Employees to develop their potential.

We do not discriminate on the basis of any criteria including race, sex, sexual orientation, religion, disability, national or ethnic origin, age or any other characteristic that results in compromising the principle of equality. Many of these are prohibited by law. We do not tolerate discrimination by our Employees or by our Representatives, and we do not tolerate harassment, bullying or any other actions that contradict our Core Values.

We have detailed policies and procedures with respect to HR matters, which must be adhered to by all Employees.

We encourage reporting of all incidents of workplace discrimination, harassment and behaviour that contradicts our Core Values. Reports can be made to anyone within the Trident Group in accordance with the Reporting and Whistleblowing section below.

HEALTH AND SAFETY

We believe that all injuries are preventable. We are committed to providing a safe and secure work environment and require all our Employees and Representatives to play their part in ensuring the health and safety of all persons impacted by our business.

We comply with all applicable health and safety laws and regulations and with best practice in our industry.

We actively encourage reporting of unsafe practices immediately. When an Employee or a Representative perceives condition or behaviour that poses imminent danger to person(s), equipment or environment, he or she must immediately initiate a stop work intervention with the person(s) potentially at risk.

BUSINESS INTEGRITY AND ANTI-BRIBERY

Integrity, honesty and fairness are fundamental to the way we conduct our business and we will not tolerate bribery or corruption in any form, including facilitation payments. The Trident Group undertakes its business in a manner that is fully compliant with the spirit and the letter



of the Bribery Act 2010 (UK), the US Foreign Corrupt Practices Act and relevant local legislation. All Employees and Representatives must comply with such legislation.

We have in place and will maintain a robust compliance program for all Employees, which is set out in our separate Anti-Bribery and Corruption Policy and Manual. Our Anti-Bribery and Corruption Policy and Manual provides detailed guidance on the following topics:

- Bribery and corruption
- Gifts and hospitality
- Contracting with counterparties / procurement, including contracting with Government intermediaries
- Conflicts of Interest (see further below)
- Business Development and Joint Ventures
- Facilitation Payments
- Political Payments
- Funding Social Investments, Charitable Contributions and Sponsorships
- Recruitment
- Reporting and Recording

All Employees regularly receive training on bribery and corruption issues.

We have an open and honest approach regarding ethical issues and encourage open discussion to ensure that we make the right decision in respect of difficult ethical decisions. All Employees and Representatives are actively encouraged to raise any questions with their line manager, Senior Management or the General Counsel.

In addition, all Employees and Representatives must report any suspected bribery or corruption in accordance with the Reporting and Whistleblowing section below.

ANTI-MONEY LAUNDERING

We are committed to ensuring that adequate due diligence has been undertaken to confirm that persons and entities we contract with are not involved in illegal or illegitimate activities or activities that do not comply with our Core Values.

If you are suspicious of any activity or concerned that Trident Group or its Representatives is at risk of dealing with the proceeds of crime you should report it in accordance with the Reporting and Whistleblowing section below, before proceeding with the proposed payment or activity.

PREVENTING THE FACILITATION OF TAX EVASION

We are committed to ensuring that tax evasion and the facilitation of tax evasion are not being committed in the conduct of our business. We therefore expect those who provide services to us or those who work on our behalf, to have the same commitment, wherever they are in the world. Failure to do so can have severe consequences for Trident Group and for those with whom we do business. In line with our policies, no one conducting business with, for, or on behalf of Trident Group should be involved in tax evasion or the facilitation of tax evasion.

CONFLICTS OF INTEREST



All Employees of the Trident Group have an obligation to act in the best interests of the Trident Group. All Representatives must avoid conflicts of interest between their private activities and the conduct of company business.

Employees and Representatives must declare to the General Counsel any actual, potential or perceived conflicts of interest.

Detailed guidance on conflicts of interest is available to Employees in our separate Anti-Bribery and Corruption Policy and Manual.

BOOKS, RECORDS AND ACCOUNTING PRACTICES

All business transactions on behalf of a Trident Energy company must be reflected accurately and fairly in reasonable detail in the accounts of the relevant Trident Group company in accordance with accounting standards applicable from time to time. True and correct records of all transactions must be maintained and must be supported by appropriate documentation, in accordance with international best practice applicable to our industry.

Employees must comply with Trident's internal policies and regulatory requirements in respect of internal controls over financial reporting. Any actual or suspected breach of these requirements should be reported to in accordance with the Reporting and Whistleblowing section below.

GOVERNANCE

Good governance and transparency are core to everything we do. Employees must follow Trident Group's policies and procedures at all times, including when entering into legal or financial commitments. Employees must ensure that all arrangements are adequately documented.

The use of Trident Group resources or funds for illegal purposes or in a manner that is inconsistent with our Core Values is strictly prohibited. Employees and Representatives involved in authorisation / approval or making of payments should not do so if they know or have reason to suspect that such payments may be used for illegal purposes or for purposes that are inconsistent with our Core Values.

Any actual or suspected breach of these requirements should be reported in accordance with the Reporting and Whistleblowing section below.

ENVIRONMENT

We make a positive contribution to the protection of the environment. We go beyond compliance with local environmental regulation to meet internationally accepted best practice.

We reduce to the minimum practicable any adverse effects of our operations on the environment.

It is the responsibility of all Employees and Representatives to ensure best practice environmental standards are maintained.

SOCIETY / COMMUNITIES



We respect the communities that could be affected by our work and we seek to prevent or minimise adverse impacts on them. We are committed to ensuring that affected communities benefit from our presence on an enduring basis.

We respect the traditions and local customs of the communities in which we work, and we expect our Employees and Representatives to do the same.

We support human rights within our areas of influence and are guided by the Universal Declaration of Human Rights to ensure human rights are upheld.

USE OF TRIDENT GROUP PROPERTY AND RESOURCES

Employees must not use Trident Group property and resources for personal gain and must not put themselves in a position of potential conflict of interest with the Trident Group, unless expressly authorised in writing by Senior Management.

Employees must act to protect the Trident Group against loss, theft and misuse of Trident Group property and resources and must report any suspected loss, theft or misuse in accordance with the Reporting and Whistleblowing section below.

CONFIDENTIALITY

Our confidential information is one of our most valuable assets and should be protected by all our Representatives. Confidential information should never be disclosed unless it is lawfully in the public domain or otherwise authorised for disclosure in accordance with Trident Group approved policies and with the protection of appropriate safeguards (eg confidentiality agreements) in place.

Employees owe a continuing duty to the Trident Group to keep confidential and sensitive information confidential, even after they cease being employed by the Trident Group. Employees must return all confidential information relating to the Trident Group upon leaving.

Similarly, we respect our own obligations of confidentiality and those of our Representatives. We expect our Employees and Representatives to abide by any obligations of confidentiality that they owe to others and we do not ask our Employees and Representatives to divulge to the Trident Group any confidential information of others, except where authorised to do so by the owners of such information.

TRIDENT GROUP POLICIES AND PROCEDURES

This Code sets out a number of key requirements for Employees and Representatives.

As well as this Code, Employees must comply with all the Trident Group's approved policies and procedures, which are made available upon starting your employment with the Trident Group or which are communicated to you during your employment or term of office as a director (as applicable).

REPORTING AND WHISTLEBLOWING

Any violations or suspected violations of this Code should be reported in a timely manner.

Reports can be oral or written, and should be made to:



- (i) your line manager,
- (ii) Senior Management,
- (iii) the General Counsel or
- (iv) the Head of Human Resources.

We will endeavour to maintain confidentiality of any reports, where requested, subject to applicable law, regulation or legal proceedings.

We have established a telephone and web reporting service operated by EthicsPoint, an independent company, which is available to be used to report certain matters of a sensitive nature or where an Employee does not feel comfortable using the reporting lines described above or wishes to make a report on an anonymous basis. The service operates 24 hours a day / 7 days per week and there are dedicated lines for all the main countries in which we operate. Contact details are available for all Employees including in Trident Energy's Whistleblowing Policy, on our intranet and are sign-posted in prominent locations throughout Trident Energy's main offices.

Retaliation in any form against a person involved in a complaint or a report or in respect of the investigation of a complaint is, in itself, a violation of this Code and may result in disciplinary action.

If our investigations conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

INVESTIGATIONS AND DISCIPLINARY ACTION

Suspected violations of this Code will be investigated, and violations will result in disciplinary action and/or may have consequences under your contract with the Trident Group.

The conduct of the investigation will depend on the nature of the matter, but due process will be followed.

Disciplinary action will be undertaken in accordance with applicable law and as determined by Senior Management and the Head of Human Resources and, if relevant, the General Counsel. The nature of the disciplinary action taken will depend on the nature of the matter and the findings of the investigation carried out. It may include suspension (including without pay), termination of employment/contract, demotion or transfer, legal proceedings and/or reporting of the incident to the police or appropriate regulatory authority.

AMENDMENTS

Any amendments to this Code will be provided to all employees, directors and applicable Representatives.

This Code has been approved by the Board of Directors.