

SPIECAPAG UK LIMITED
STATEMENT OF ETHICS

SPIECAPAG UK LIMITED is one of the UK's leading providers of downstream services to the UK oil and gas industry. We pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation.

The management of **SPIECAPAG UK LIMITED** condemn corruption in all its forms and we will not tolerate it in our business or in those we do business with. From the confines of our working environments, it is sometimes difficult to grasp the scale of the damage that bribery does to societies. It is not a victimless crime; far from it:

"Corruption ... undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries - big and small, rich and poor...corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic under-performance and a major obstacle to poverty alleviation and development."
(Kofi Annan, former UN Secretary General)

Our Code of Conduct sets out in detail how you should behave and what you should do if you are confronted with corruption. We expect that all of you will embrace the Code and its values and use them in all aspects of your day-to-day work.

The Code is for your benefit as much as for **SPIECAPAG's**. If convicted of a bribery offence, **SPIECAPAG** might get a significant fine and suffer lasting reputational damage.

If you are convicted of a bribery offence, you could face up to ten years in prison. The potential harm done by bribery, both to **SPIECAPAG** and to you, is long term and hugely outweighs any potential short term gain. Bribery is just not worth the risk.

If you have any doubts about anything at all, refer to the Code of Conduct or you can speak to the **Managing Director** in complete confidence. The management and I are committed to eradicating corruption and we will stand by you in acting ethically.

Remember, take the **RIGHT** approach, and we can eradicate corruption together:

- **Responsibility.** You are responsible for your actions. If you break the law, you will have to face the consequences - which could mean a fine, imprisonment, or both.



- **I**ntegrity. Don't compromise your integrity. If you think something is wrong, **ALWAYS** report it. If you aren't sure, consult the Code of Conduct. Don't ever let yourself be forced into doing something you know or suspect is wrong.
- **G**enuineness. Always pay genuine prices for genuine goods and services. Never pay over the odds. Agents who ask for especially large fees or commissions may do so in order to pay bribes on your behalf. If this happens, you will be responsible. Excessive payments are obvious and will always be uncovered.
- **H**onesty. Act honestly and in good faith at all times and in all aspects of your work.
- **T**ransparency. Keep accurate records (including all invoices and receipts) of everything that you do, especially in relation to the payments you make and what they are for. Full and accurate records demonstrate complete transparency and that you have nothing to hide.

Don't bribe. Do the **RIGHT** thing.



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Steve Hancock

MANAGING DIRECTOR

SPIECAPAG UK LIMITED