

PHAROS

E N E R G Y

Social Responsibility Policy

Pharos Energy plc is committed to conducting its business in an honest and ethical manner. We expect that our contractors, suppliers and agents will conduct themselves in the same manner. We will strive to be honest and fair in our relationships with others. We value our relationships with our business partners, host governments and local communities where we operate. Our employees strive to conform to the spirit and intent, as well as the technical requirements, of all contracts we enter into and all laws, regulations and rules that govern us.

To achieve this business ethic, we utilise a Health, Safety, Environmental, Social and Security (HSES) management system that ensures we:

- Remain honest and fair in all of our business relationships, and value our relationships with our business partners, host governments and local communities where we operate.
- Manage conflicts of interest appropriately, respect confidential information, manage hospitality, gifts and entertainment, manage facilitation payments and ensure consistency in Pharos' political donations strategy.
- Strive to conform to the spirit and intent, as well as the technical requirements, of all contracts we enter into and all laws, regulations and rules that govern us.
- Do not make illegal or improper payments or participate in any corrupt business practices.
- Strive to prevent any persons engaged to perform services for or on Pharos' behalf from committing bribery in order to gain a business advantage for us.
- Honour internationally accepted labour standards (ILO) and support and respect the protection of human rights in accordance with the Universal Declaration of Human Rights, within our sphere of influence.
- Support and respect the indigenous rights of communities within our host countries.
- Undertake meaningful consultation and engagement with all of our stakeholders and attempt to integrate our business activities with local communities as a good corporate citizen.
- Provide meaningful opportunities for technical cooperation, training and capacity building within any host country in which we operate.

These will be our guiding principles in all our endeavours. This policy applies to all Pharos' operations and personnel worldwide.



Ed Story

President and Chief Executive Officer

October 2019