



ANTI-BRIBERY & CORRUPTION POLICY

1. Introduction

Salamander Energy Group (Salamander) is committed to compliance with all laws, regulations and standards which apply to our business activities.

We aim to treat all our stakeholders and those with whom we do business fairly and with integrity. We also recognise that bribery and corruption are a growing concern in both the private and public sectors.

Our policy on this is clear: we will not tolerate any form of bribery and corruption within our business activities, or within the business activities of those who perform services on our behalf.

The remainder of this document sets out that policy in more detail. The policy applies to all Salamander employees and consultants and extends to all third parties who may perform services on our behalf. The policy applies to all of our business dealings worldwide.

2. Policy

Bribery involves the giving or receiving by any person of a financial or non-financial benefit (e.g cash, gifts, rewards, or agreeing to do (or not do) particular things), either directly or indirectly, as an inducement to act improperly, or to influence public officials so as to gain unfair advantage in business. Making facilitation payments is a form of bribery. It is a criminal offence in the UK and many other countries. Some of those laws apply to our activities (and those of people acting on our behalf) anywhere in the world. For that reason, we will comply with all laws prohibiting bribery and corruption in all the jurisdictions in which we operate.

Our employees and consultants are prohibited from offering or giving and from accepting or receiving, directly or indirectly, a bribe in any form. We do not tolerate any similar activity from third parties (such as agents, intermediaries or service providers) acting on our behalf.

Our employees and consultants are prohibited from offering or giving and from accepting or receiving any material gifts or hospitality. Our full policy on the acceptance or offer of hospitality or gifts is contained in the 'Gifts and Hospitality Policy'.

We do not make direct or indirect contributions to political parties.

3. Responsibilities

The Salamander Energy plc Board has overall responsibility for ensuring that this policy complies with our ethical and legal obligations and the Chief Financial Officer is the main board director with primary responsibility for implementing this policy.

The General Managers for Indonesia, Thailand and Vietnam and the Group Financial Controller in the United Kingdom will be responsible for establishing appropriate responsibilities and operating procedures within their regional operations in order to give effect to this policy, as well as to the related policies on (i) gifts and hospitality and (ii) whistle-blowing.

4. Raising concerns and seeking guidance

The prevention, detection and reporting of bribery is the responsibility of all employees and consultants throughout our operations.

If and when an instance of bribery is identified or suspected, it should be reported in accordance with our Whistle-Blowing Policy. That policy contains details of who to contact should there be any concerns or doubts as to whether a potential act constitutes bribery. Employees and consultants should never attempt to conduct investigations, interviews or interrogations relation to any suspected wrong-doing personally. If any instance of bribery or corruption is identified, we will take appropriate steps to address the issue, in line with the procedures described in the Whistle-Blowing Policy.

5. Training and communications

Employees and consultants will receive appropriate training on how to implement this policy in the scope of their employment.

We will also communicate this policy to our agents, service providers, contractors and wider stakeholders. Where appropriate, we will also seek to include contractual obligations in our agreements with third parties, which oblige them to agree to comply with this Anti-Bribery & Corruption Policy (or with their own policy if it provides an equivalent level of protection).

6. Dealing with third parties

Appropriate due diligence must be conducted on third parties before entering into agreements with them, in particular where those third parties might be seen as acting or providing services on our behalf. Further, contractual protections in arrangements with third parties should be sought where appropriate, including termination rights if the third party breaches anti-bribery laws and/or the terms of this policy. The appropriate due diligence and contractual protection must correspond with the procedures laid down in the Anti-Bribery & Corruption Due Diligence and Dealing with Third Parties Procedure in force from time to time.

7. Monitoring and review

The Audit Committee will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. The Audit Committee will also update the Salamander Energy plc Board on at least a quarterly basis, or as often as is appropriate should any issues arise.

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