

SALAMANDER ENERGY PLC

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THE CODE OF BUSINESS CONDUCT

Managers are responsible for ensuring that the basic principles of this Code are understood and put into practice in their areas of operation, but every employee and consultant is held accountable for complying with the Code in a responsible manner.

Although local operations within the Salamander Energy group may have additional business conduct requirements, every employee and consultant is required to apply this Code of Business Conduct in their day to day business behaviour.

BASIC PRINCIPLES GUIDING OUR APPROACH TO DOING BUSINESS

1. Legal compliance

Our business methods will always be legal. We are committed to compliance with those laws, regulations and standards which apply to our business activities.

2. Business dealings

We expect all our employees and consultants to conduct their business dealings honestly, openly, fairly and safely and expect the same of all those with whom we do business.

3. Commitment to employees and consultants

We will respect the rights and dignity of all our employees and consultants.

We are committed to creating a challenging environment of empowerment and development, generating both a common sense of purpose and pride in working for the group. We will seek to realise the potential of employees and consultants, recognise individual and team contributions and reward competitively relative to our success.

4. Equal opportunities

We will provide a working environment in which employees and consultants are recruited and promoted fairly on the basis of their ability for the job. We will prevent discrimination based on race, religion, gender, sexual orientation and age and will not tolerate sexual, physical or mental harassment.

5. Working environment

We are committed to providing a safe and healthy working environment in which all incidents of personal injury and industry-related diseases are regarded as preventable.

We will ensure in all our activities and operations that employees, consultants and visitors are well informed, receiving appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner.

6. Relationships with business partners

We will seek to establish productive relationships with suppliers, customers and business partners, conducting our activities with integrity.

7. Relationships with communities

We will operate as a responsible member of the communities of which we are a part, exercising care and sensitivity towards the environment. We will show respect for human dignity and internationally recognised human rights wherever we operate.

We will strive to ensure that those countries and communities where we do business benefit from our presence and will aim to minimise any adverse effects our activities may have on the environment.

8. Gifts and entertainment

No one may seek, receive, offer or give any material gifts or benefits. Gifts of money will never be given or accepted. Reasonable hospitality and small tokens may be given or accepted provided they do not place the recipient under any obligation, are not recurring or systematic, are not capable of being misconstrued and could be reciprocated at the same level. Any gift of more than nominal value or any abnormal level of hospitality must be reported to the recipient's general manager and dealt with in accordance with the Gifts and Hospitality Policy.

9. Bribes and facilitation payments

We do not allow the giving of gifts or benefits including payment of any kind in order to influence individuals to award business opportunities to us or make business decisions in our favour.

In some countries, facilitation payments are sought to expedite or effect routine services or administrative actions provided or performed by those individuals. We will not tolerate making payments or providing benefits of any kind as a matter of policy.

This policy equally applies to agents and third parties who are employed by us to represent us or to provide services to us or on our behalf.

Commissions, fees and retainers for agents' and consultants' services must be commensurate with the service provided and must be properly recorded in our accounts. Ad valorem or percentage fees for agents should be avoided. Adequate monitoring of contractor's and agent's performance should be in place to ensure that our requirements as to business conduct, anti-bribery and corruption compliance and ensuring our reputation is maintained.

10. Misuse of company property

Our property and employees' and consultants' time must be used solely for the group's legitimate business and not for personal gain. Employees and consultants are

responsible for the protection of all company property and for taking reasonable steps to prevent its theft or misuse.

Individuals' private business may not be conducted in a manner which makes inappropriate or unreasonable use of company premises and stationery or communication and internet facilities.

11. Share Dealing

All employees and consultants must familiarise themselves with and abide by our Share Dealing Code.

12. Conflicts of interest

Employees and consultants must not, without prior written consent from their manager, have any direct or indirect interest in any of our suppliers, customers or competitors which conflicts with (or could appear to conflict with) the best interests of the group. Employees and consultants are expected to act solely for the benefit of the group and not be influenced by a personal interest which may result from other individual or business concerns.

Employees and consultants must communicate all conflicts of interest, whether actual or perceived, to their manager at the earliest opportunity and remove themselves from any discussion or activity involving such conflict.

13. Business information and public communications

Employees and consultants will use information received in the course of business dealings only for the purpose for which it is intended or normally used and never for personal gain.

Confidential corporate information must not be disclosed other than for legitimate business purposes and with appropriate safeguards.

We will seek to ensure that in all our advertising and other public communications, untruths, concealment, misleading impressions and overstatement are avoided.

In all circumstances, it is required that anyone who intends to publish any public communication on behalf of the Salamander Energy group, must obtain the prior authority of their general manager. Only the Chief Executive and the Head of Corporate Affairs are authorised to speak on behalf of the Salamander Energy group as a whole.

14. Political contributions

We do not intend to make contributions to any political party. Any such proposal must be put to the Chief Executive and the PLC Board for prior approval before it is paid.

15. Speaking up

Employees or consultants who know, or have genuine suspicions, of:

- any breaches of this Code of Business Conduct, or

- any legal or regulatory or other violation in relation to work-related issues,

should refer to the our Whistle-blowing Policy for guidance on how to report such matters.

There will be no detriment to an individual as a result of that person raising an actual or suspected breach of this Code. Individuals will not be blamed for speaking up nor for failure to speak up earlier, and we will make all proper efforts to protect the confidentiality of individuals who do raise concerns and keep them informed of developments as appropriate. Any attempt to deter individuals from raising concerns, or any subsequent retaliation against individuals who speak up publicly, will be treated as a serious disciplinary offence.

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