

CODE OF CONDUCT FOR BUSINESS PARTNERS

DONG Energy is one of the leading energy groups in northern Europe. We are headquartered in Denmark. We explore for and produce oil and natural gas, generate electricity and heat from our offshore wind farms and our power stations, and supply energy to residential and business customers every single day.

INTRODUCTION

For DONG Energy, integrity throughout our business is vital. We believe that acting responsibly is a fundamental basis in the way we do business and for creating long-term value to us and to our business partners. This entails being a responsible employer, having a high standard of integrity in our business relationships and acting with care for the societies and environments in which we operate.

We hold ourselves - and our business partners – to the highest standards of integrity and responsibility.

This **Code of Conduct for Business Partners** provides the foundation for our continuous engagement with business partners and dialogue in good faith on their ethical, social, and environmental performance. It outlines our expectations regarding basic compliance with applicable law, respect for labour and human rights, environmental management, and anti-corruption. We view the content of the Code as material and an integral part of our business relationship with individual business partners.

For the purpose of this code, “business partners” shall mean all individuals and organizations who have a contractual obligation to comply with the Code, including suppliers, contractors, agents, JV partners and consultants. The Code shall cover all employees, including permanent, temporary and agency-provided.

While we use this Code of Conduct to define our priorities, we use our **Responsible Partner Programme** to evaluate compliance, communicate with our partners and facilitate continuous improvements on responsible practices

DONG Energy implements a risk-based due diligence process to assess compliance with our Code of Conduct, identify any areas of non-compliance of our code, and highlight opportunities to promote improved performance. This includes systematic screening of new and existing business partners through background checks and

assessment of risks associated with the sector and countries of operation. If relevant, business partners are selected for an assessment of their performance against our expectations through self-assessment questionnaires and/or site assessments.

If areas of non-compliance are identified, the business partner and DONG Energy will collaborate and agree on an action plan of appropriate improvement measures. These shall mitigate and remedy the adverse impacts caused by the breaches and enable the business partner to identify and prevent similar occurrences in the future. We require our business partners to engage actively and without reservation in these activities.

We are aware that improving ethical, social and environmental performance requires time and resources. However, if a business partner, by intention or repeated negligence, fails to live up to this Code in a manner that is explicit and severe, or if the business partner demonstrates a continual refusal to engage in due diligence activities or lack of commitment to make progress on issues identified during an assessment, DONG Energy reserves the right to pursue a termination of the business relationship.

GENERAL EXPECTATIONS

As a signatory to the United Nations’ Global Compact DONG Energy is committed to continuous improvement in its four thematic areas: human rights, labour, environment, and anticorruption. We expect our business partners – whether fellow signatories or not – to share this fundamental principle.

Business partners are responsible for ensuring compliance with this Code of Conduct. In addition, if applicable, business partners are expected to apply appropriate due diligence measures to ensure that significant sub-suppliers to DONG Energy comply with this Code or a similar framework.

The UN Guiding Principles on Business and Human Rights provide a universally accepted framework for operational due diligence, which can be applied to identify, prevent, mitigate and remedy adverse impacts on the rights and principles expressed in this Code. As such, we recommend business partners to embed the content of this Code of Conduct into their own operations through the introduction of policies, management systems and grievance mechanisms appropriate to their sector and size.

We expect DONG Energy business partners to maintain awareness and comply with all applicable national laws, rules and regulations. If these are in contradiction with the specific expectations of this Code, business partners shall adhere to national regulation while seeking to honour the international rights and principles reflected in the following chapter, which follows the UN Global Compact thematic areas.

SPECIFIC EXPECTATIONS

Human rights including labour rights

We expect DONG Energy business partners to avoid and address adverse impacts on human and labour rights as listed in International Bill of Human Rights and the International Labour Organisation's declaration on Fundamental Principles and Rights at Work. The following highlights specific examples of minimum expectations of business partner performance (in alphabetical order).

Child labour

We expect that DONG Energy business partners prohibit the use of child labour and ensure that no person shall be employed at an age younger than 15 (or 14 where the law of the country permits) or younger than the age for completing compulsory education in the country of production if such age is higher than 15.

Business partners shall protect young workers of legal working age, up to the age of 18, from any type of employment or work which, by its nature or circumstances in which it is carried out, is likely to jeopardise their health, safety or morals, or interfere with their schooling needs.

If a child is found working, the business partner must act in the best interest of the child, and any measures taken should aim at improving the child's well-being.

Community relations

DONG Energy business partners shall engage and consult with potentially affected local communities, including indigenous peoples, and avoid causing or contributing to negative impacts on their human rights. This may include impacts on culture, the environment, natural resources, land, infrastructure, or other factors that are important to the fulfilment of human rights for local communities including their health and livelihoods.

Discrimination

We expect DONG Energy business partners to treat employees fairly and provide a workplace free from discrimination in hiring, compensation, access to training, promotion, termination, retirement, working conditions, job assignments, benefits, and discipline based on personal characteristics.

Freedom of association and the right to collective bargaining DONG Energy business partners shall respect employees' and other workers' rights to join or refrain from joining any lawful workers' association or collective bargaining association of their choice, or, when restricted, alternative forms of independent and free workers representation.

Business partners shall not discriminate against worker representatives and employees who choose to affiliate or not affiliate.

Harassment, abuse and disciplinary measures

Employees shall be treated with dignity and respect. We expect DONG Energy business partners to prohibit the use of corporal punishment and any form of coercion, abuse or harassment. Business partners may perform disciplinary actions that have been duly communicated to all employees and any disciplinary action shall be recorded and acknowledged by the affected employee in writing. Business partners shall prohibit the use of monetary fines.

Health and safety

We expect the DONG Energy business partners to provide safe and healthy working conditions and take appropriate precautionary measures to protect employees from work related hazards and anticipated dangers in the workplace.

Business partners shall abide with all applicable local laws and regulations to prevent accidents and injury to health arising out of, linked with, or occurring in the course of, work or as a result of the operation of employer facilities.

We expect business partners to continuously improve working conditions and reduce workplace related risks and hazards by for example, introducing a written safety program, ensuring management responsibility for health and safety matters, setting targets, and conducting appropriate training.

Hiring practices and forced labour

We expect DONG Energy business partners to provide all employees with written employment contracts outlining the conditions of employment in a language understood by the employee.

We expect DONG Energy business partners to apply appropriate measures for preventing direct and/or indirect involvement in human trafficking and prohibit all forms of forced, bonded or indentured

labour, involuntary prison labour. This applies to all workers, whether hired directly, by a contractor or recruited through a labour broker.

Employees shall be permitted to terminate employment after reasonable notice and business partners shall not retain original identification documents, deposits or financial guarantees or withhold wages outside of a legal contractual agreement.

Remuneration

DONG Energy business partners shall abide with all wage and benefit laws and regulations, including those pertaining to minimum wages, overtime wages, sick leave, piece rates and other elements of compensation. Business partners shall also abide by lawful collective agreements on wages and benefits. At time of wage payment, business partners shall issue each employee a wage statement specifying at minimum all hours worked during that pay period and the rate of compensation.

Security arrangements

We expect DONG Energy business partners to safeguard personnel and property in accordance with relevant human rights principles and in a manner that avoids or minimises risk of harm to workers and communities.

Working hours

We expect DONG Energy business to prevent employees from working more than the lesser of 60 hours per week including overtime, or the applicable limits on regular and overtime hours set by law or collective agreements.

Workers shall be entitled to rest breaks in accordance with the law and to at least one day off in every consecutive seven-day period.

Employees with unusual working conditions may be exempt from this general requirement when covered by specific national or international legislation. However, over the course of 12 consecutive weeks, any employee shall not be required on average to work more than 60 hours per week, including overtime.

Environment

We expect DONG Energy business partners to carry out operations with care for the environment, comply with all relevant local and national environmental regulations and maintain all applicable licenses, registrations or permits. Business partners shall strive to minimise adverse impacts on the environment, human health and livelihoods, including through the establishment of control mechanisms for the

prevention of pollution from hazardous substances, waste and effluents, and air emissions. DONG Energy business partners shall protect biodiversity and promote the sustainable and efficient use of land, natural resources, and energy.

DONG Energy business partners shall provide access to emergency response, including environmental, fire, and conditions of abnormal emission and dispersion, exceeding air quality criteria. Business partners shall provide access to immediate measures to protect human health and the environment.

Anti-corruption

DONG Energy promotes integrity and ethics in all aspects of its activities and maintains a zero tolerance policy on corruption. We expect that our partners do not engage in any form of corrupt practices, including extortion, fraud, or bribery whether direct or indirect.

We expect DONG Energy business partners to maintain adequate procedures for preventing any of its employees, suppliers, agents or other business partners from undertaking any conduct that in any way would give rise to an offense under applicable anti-corruption laws, rules and regulations.

We expect DONG Energy business partners to ensure that business is conducted in a manner that does not violate UN, EU, UK or US trade sanctions and to inform DONG Energy should they ever become subject to international sanctions.

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