

HARDY OIL AND GAS PLC

2013

CODE OF BUSINESS CONDUCT

Version 1.0

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A PERSONAL MESSAGE FROM CHIEF EXECUTIVE OFFICER

Dear Colleagues,

I am pleased to introduce this new edition of the Hardy Oil and Gas plc (“Hardy”) Code of Business Conduct (“the Code”). The Code is effective from the above date and replaces all earlier versions.

Our reputation with our investors, partners and those communities of which we are part is based upon our collective behaviour as a company. Everyone who works for, or on behalf of, Hardy contributes to our good reputation and success.

I expect our employees and all those who work on our behalf to exercise good judgement and common sense while carrying out our business activities. Each one of us is personally responsible for following the Code and ensuring that our day-to-day business activities are conducted safely and in a fair, honest and ethical manner.

Those of you who are managers assume an additional responsibility to develop a working environment which encourages compliance and the adoption of good business practice.

You must lead by example and ensure that those who report to you understand the Code and follow it in their work for Hardy.

I encourage everyone to promptly report any concerns you may have about our business practices or where you know or suspect that the Code has been breached. Concerns can be raised with your own line manager or via the Senior Non Executive Director (peter.milne@hardyoil.com). Hardy will not tolerate retaliation against employees who raise concerns in good faith.

Finally, I ask you all to take the time to read the Code carefully, share it with those who work with us and refer any questions to your line manager.

Yours sincerely,

Ian MacKenzie
Chief Executive Officer
Hardy Oil and Gas plc
22 January 2013

HOW THIS CODE APPLIES TO YOU

How to use this Code

The Code clearly sets out our expectations and you should ensure that you understand how it applies to you and your work activities. There will be additional regulations, policies and other procedural requirements that you will need to follow and you should ensure that you are aware of these. The Code cannot describe every possible scenario but it does provide guidance on the various topics.

Who does this Code apply to?

The Code applies to the Board of Directors, all full or part time staff ('Employees') and contract, agency or temporary staff ('Contract Staff'). Additionally, all third party contractors, agents, advisors, consultants or other business associates ("Industry Partners") must follow the principles of the Code when they work with, or on behalf of Hardy.

In joint ventures where Hardy is the operator then the Code applies to all of the activities. Where Hardy is not the operator then best efforts must be taken to influence the adoption of equivalent practices and high standards of integrity prior to, and during, the operation of the joint venture.

Advice and Guidance

Where you are unclear on any aspect of the Code or you are unsure of the right action to take in a situation then always seek help. Advice can be obtained from many sources including your line manager, or an Executive Officer.

KEY REQUIREMENT - Always seek help if you are not sure of what action to take.

Personal Responsibility

As an Employee of Hardy it is your personal responsibility to act in accordance with the requirements set out in the Code. Please read the Code carefully and refer to it when you are uncertain of the correct action to take. You must understand, promote and apply the Code to your conduct and work with Hardy.

If you suspect or become aware of any violation of the Code or have concerns that some activities carried out by others may breach the Code, you should report your concern. If you ignore or condone breaches of the Code then you are not acting in the best interests of Hardy. We welcome and encourage reporting of any concerns you have about Hardy activities or practices which are, or appear to be, in breach of the Code.

KEY REQUIREMENT - Everybody has a responsibility for compliance and promoting the Code.

The Duty of Managers

Those of you who are managers have an additional responsibility to ensure that the Code is applied to our business and in particular, you must ensure that:

- all staff who report to you have a copy of the Code and have been trained in its application;
- you support staff who, in good faith, raise questions or concerns;

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- you demonstrate your personal commitment to the Code and lead by example;
- you monitor the application of the Code and ensure consistent enforcement;
- you ensure that all reports of violations are appropriately investigated;
- business processes in your area of responsibility comply with the Code.

KEY REQUIREMENT - Managers must lead by example.

Breaches of the Code

Failure to comply with the Code may lead to disciplinary action up to and including dismissal or, in the case of Contract Staff or Industry Partners, cancellation of contract.

Monitoring and Audit

The Chief Executive will oversee the monitoring of the application of the Code. Hardy's executive officers will monitor progress and the effectiveness of the compliance programme and will report periodically on the status of implementation and compliance to the Board of Directors.

WE COMPLY WITH ALL APPLICABLE LAWS

Compliance with Laws

We comply with all applicable local and international laws within the countries where we do business. Where differences exist between the standard of the law or regulations and the requirements of the Code the higher standard will be applied. Where laws conflict or you are unsure of the correct action to take you should consult with your line manager.

Executive Officers with responsibility for operations in a country must ensure that our business processes are in compliance with the law.

Trading in Shares

Buying or selling publicly traded shares where you are aware of “inside” information which is not yet publicly disclosed, or passing such information to others, is called insider trading and is illegal and prohibited by Hardy. This applies whether share transaction is made directly or through another person.

There are periods when dealings in Hardy Oil and Gas plc shares by Employees or Contract Staff are not permitted. If you are in any doubt as to your ability to trade or deal in the shares of Hardy Oil and Gas plc you should contact the Treasurer or Chief Executive Officer.

Trade Restrictions and Export Controls

Some countries impose restrictions on exports and other business dealings with other countries, entities and individuals. The laws and regulations governing these restrictions are complex and subject to change. If you are responsible for the export or re-export of any items, (including equipment, materials, software or services), you must be aware of these restrictions and ensure they are complied with.

KEY REQUIREMENT - Ensure that you are aware of the laws which are applicable to your area of business.

WE ARE COMMITTED TO HIGH ENVIRONMENT, HEALTH AND SAFETY STANDARDS

The health and safety of people and the protection of the natural environment in which we operate are critical business considerations for Hardy. We apply significant effort in managing our environment, health and safety (EHS) risks and achieving our (EHS) objectives.

Environment

We work with respect for the environment in which we operate and we identify access and manage our environmental risks. At all times we seek to engage openly and honestly with our stakeholders, and particularly with those people affected by our operations.

We meet applicable legal standards for all aspects of environmental management and if they are considered inadequate, we apply responsible standards.

Health and Safety

We are committed to achieving high standards of health and safety performance as we believe that all accidents, occupational illnesses and injuries are preventable. Our priority is to ensure that all our people – regardless of where they work or what they do – return home safe and well at the end of every working day.

Health and safety practices are governed by EHS policies which apply to all personnel and, in addition, businesses may create local procedures which you should follow. Hardy provides a safe place to work and you have a personal responsibility to ensure that you are competent and appropriately trained to undertake your work activities.

You must:

- immediately stop any work that appears to be unsafe;
- comply with the requirements of our environmental, health and safety procedures, and assist those working with you to do the same;
- ensure you identify, assess and take steps to control EHS hazards associated with your work;
- use the personal protective equipment required for the task you are undertaking;
- handle, transport and arrange for the disposal of raw materials, products and wastes in a safe, environmentally and socially responsible manner;
- engage regularly, openly and honestly with our stakeholders, and particularly those people affected by our operations, and take their views into account in our decision-making;
- make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures;
- report to your manager any accident, injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment so that appropriate action can be taken to prevent, correct or control those conditions.

KEY REQUIREMENT - You should always follow the Hardy Safety Rules.

You must not:

- undertake work unless you are trained, competent, medically fit and sufficiently rested and alert to do so;

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- undertake work when your performance is impaired by alcohol or other drugs, legal or illegal, prescribed or otherwise;
- ignore a potential or actual EHS incident or assume that someone else will report it.

Security

Protecting the security of our people and workplaces is critical. Employees must understand and follow security procedures and promptly report any circumstances that appear to represent a threat to the safety of themselves, other people or our assets.

KEY REQUIREMENT - STOP any work that becomes unsafe.

WE TREAT EMPLOYEES, INDUSTRY PARTNERS AND LOCAL COMMUNITIES FAIRLY AND WITH RESPECT

Fair Employment Practices

We are committed to eliminating discrimination and encouraging diversity amongst our workforce. We treat all of our Employees, whether full time, part time or temporary, fairly and with respect. Decisions related to recruitment selection, development or promotion are based upon merit and must not be influenced by factors such as gender, marital status, race, ethnic origin, colour, nationality, disability, religion, sexual orientation or age.

Workplace Conduct

We will not tolerate abuse or harassment of any kind whether directed at Employees, Contract Staff, Industry Partners or others. Harassment includes any unwanted conduct that has the effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

You must not:

- engage in sexual harassment – i.e. unwelcome sexual advances, requests for sexual favours, physical contact or repeated sexual suggestions;
- behave in any way that could be viewed as offensive, intimidating, malicious or insulting;
- create or support a hostile or intimidating work environment including one in which Employees may feel forced to engage in inappropriate work practices in order to be accepted;
- humiliate, denigrate or injure another person;
- make racial, ethnic, religious, age-related, or sexual jokes or insults;
- distribute or display offensive material, including inappropriate images.

Privacy of Personal Information

We will maintain the confidentiality of all Employee personal information. Access to Employee personal information is restricted to Hardy Employees who are authorised and who have a business need for that information.

WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS

Illegal Payments - Bribery and Corruption

Hardy conducts its business honestly and transparently and does not seek to exercise improper influence on any individual or entity. We are subject to domestic and international anti-bribery and corruption laws which target bribes in relation to both commercial entities and public officials.

We do not offer or give, nor request or receive, any bribe of any description or value to obtain or retain business, to reward the improper performance of someone's duties or for any other purpose. This applies to everyone who works for, or provides services to, Hardy.

Although bribes are usually associated with money they can also be disguised in other forms such as the offer of a job for an individual or family member, travel, accommodation, use of assets or preferential terms on a product or service. Exercising poor judgment with respect to giving or receiving gifts and hospitality could also result in a breach of the law with serious consequences for individuals and the Company.

You must report any suspicion of bribery immediately. The reporting options are provided in the Code.

KEY REQUIREMENT - The giving or receiving of bribes of any description, regardless of amount, is prohibited. This applies to Employees, Contract Staff or Industry Partners working on our behalf.

Facilitation Payments

Facilitation payments are small value payments made to public officials to speed up a routine administrative process to which the person is entitled. Examples are a payment to expedite the issue of a visa, to obtain an official stamp or signature on a document, to enable goods to clear customs or jump a queue. The UK and many other countries prohibit facilitation payments and **Hardy does not permit such payments to be made either directly or by those who work on our behalf**. If you are asked to make a payment then you should refuse and report it to your line manager and email the details to (admin@hardyoil.com) where it will be treated in confidence. If under exceptional circumstances a facilitation payment is made under duress, such as where your health or safety is at risk, then this should be immediately reported to your line manager and an executive officer.

KEY REQUIREMENT - Report requests for facilitation payments as it enables us to understand where the risks are and to help others to say 'no'.

Gifts and Hospitality Policy

Bona fide hospitality and promotional or other business expenditure which seeks to improve Hardy's reputation, to better present its capability and services or establish cordial relations are recognised as an established and important part of doing business.

Reasonable and proportionate gifts and hospitality intended for these purposes is not prohibited. However, inappropriate, frequent or lavish gifts or hospitality can result in an actual or perceived conflict of interest, the development of an obligation on the part of the recipient or could be considered as bribery.

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It is not possible to describe every possible situation which may arise so you must always exercise common sense and good judgement when considering whether it is acceptable to give or receive a gift or hospitality. Where there is any doubt then you should consult with your line manager or an executive director.

You must not:

- request or solicit gifts or hospitality from an individual or organisation;
- give or receive gifts or hospitality when engaged in a bidding process;
- give or accept cash or cash equivalents (eg. gift vouchers or loans);
- provide or accept any gift or hospitality that is inappropriate, indecent, illegal or could cause reputation damage to Hardy;
- pay for any gift or hospitality personally to avoid the approval process or recording requirements.

You must ensure that any gift or hospitality:

- is for a bona fide business purpose;
- is given or received openly and transparently;
- complies with applicable laws;
- complies with the rules of the receiving organisation;
- is not given or received frequently between the same individuals;
- is properly recorded.

The Hardy Gifts and Hospitality Policy provides a decision making process, sets out the rules that must be followed prior to giving or accepting a gift or hospitality and defines the approval and recording requirements.

Note that additional rules apply for gifts and hospitality provided to Public Officials and you should familiarise yourself with these.

Policy for gifts and hospitality

Subject to your manager's approval, gifts and hospitality may be acceptable provided that the requirements of the Gifts and Hospitality Policy are met and values are less than £50 (gift) and £150 (hospitality). Above these limits, or if it is a frequent occurrence, executive officer approval is required. All gifts and hospitality in excess of £50 must be recorded on the Hardy Gifts and Hospitality register.

KEY REQUIREMENT - Businesses may apply more restrictive approval limits to suit local culture and conditions and staff should ensure that they are aware of the local requirements that apply to them.

Expenditure related to Public Officials

There are many circumstances where we may incur legitimate expenditure related to Public Officials. This includes expenditure which seeks to improve Hardy's reputation, to better present its capability and services or establish cordial relations. However, under the UK Bribery Act and many other local and international laws, the offer, promise or giving of any financial or other advantage to a Public Official with the intent of obtaining or retaining business is an offence (a bribe) which carries severe penalties for individuals and companies.

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Who is a Public official? - A Public Official includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind of a country or territory outside the UK. It also includes any person who performs public functions in any branch of the national, local or municipal government or who exercises a public function for any public agency or enterprise of such a country or territory.

The above includes Employees of National Oil Companies, State owned companies, suppliers or joint ventures, government ministries, immigration, customs and politicians or political candidates.

You must ensure that any gift, hospitality or other expenditure related to a Public Official cannot be considered as a bribe. This applies even under circumstances where there is a contractual requirement to incur expenditure such as the provision of training or technical/operational meetings.

You are expected, and it is your personal responsibility, to use your good judgment. You must ensure that any expenditure on Public Officials is properly authorised and is transparent, ethical and in compliance with local and international laws, the Code and any other policies that have been implemented.

Working with Industry Partners

We regularly work with joint venture partners, local and international contracting companies, suppliers and individuals ("Industry Partners"). These can create a liability for Hardy if they behave inappropriately or pay bribes (which includes facilitation or 'grease' payments), while working for us. We must ensure that all of our Industry Partners are aware of the Code and act in accordance with it. Authorising, allowing, or tolerating an Industry Partner to pay a bribe on behalf of Hardy is unlawful, and a breach of the Code.

We endeavour to choose Industry Partners who have equivalent anti-bribery and ethical standards and who similarly expect the same in their own contractual relationships. Contractual terms with Industry Partners should contain anti-bribery statements and in high risk activities you should consider how best to monitor their performance to provide assurance that they are adhering to contractual requirements.

KEY REQUIREMENT - Ensure that any expenditure related to a Public Official is for a genuine business purpose, is properly authorised, reasonable and transparently recorded.

Due Diligence

Due Diligence is an important process in determining factors such as legality, reputation, experience, business integrity, technical and commercial capability and track record and can be applied to a prospective Employee, Contract Staff member or an Industry Partner. It is also used to determine potential liabilities which may result from an acquisition or a merger.

We carry out risk based due diligence which includes the consideration of bribery risk. The level and complexity of the due diligence which is carried out is proportional to the perceived risk and may range from no due diligence (low risk) to extensive enquiries (high risk).

Where an individual or Industry Partner is likely to interact with Public Officials then this can increase the risk and extra care must be taken to ensure that they have high ethical standards and unwavering business integrity.

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If you are responsible for selecting an individual or Industry Partner you should:

- consider the risks involved to assess whether due diligence is required;
- ensure that any due diligence carried out is documented.

Monitoring of Industry Partners

We endeavour to monitor the activities and performance of our Industry Partners in line with the perceived risks. This includes ensuring that the law is complied with and high ethical standards are maintained at all times. Where the activity is perceived as higher risk we exercise greater oversight and require further assurance that work processes and methods are in compliance with the law and our ethical standards.

Higher risk activities may include those which involve an interface with Public Officials or take place in a country or sector where bribery or serious corruption is known to be prevalent.

If you are responsible for managing an Industry Partner where you consider the risks to be high then you should:

- proactively monitor compliance with contractual terms and ensure that they meet any reporting requirements;
- encourage the Industry Partner to raise any ethical challenges and work with them to resolve the issue;
- periodically remind the Industry Partner of their obligations;
- immediately report any activity or behaviour that breaches the law or the Code.

OUR COMMITMENT TO CORPORATE RESPONSIBILITY

Hardy behaves responsibly in all aspects of our business to create an environment that helps us to successfully deliver our business plans, continue our growth strategy, and contribute to social and economic development in the countries in which we operate. We are committed to:

- delivering returns for our shareholders and providers of capital to the business;
- managing our business ethically and with integrity;
- engaging and responding in a genuine way with all our stakeholders;
- keeping our people safe and minimising our impact on the environment;
- being a rewarding, challenging and great place to work;
- building long-term sustainable supplier relationships;
- creating real opportunities for local people and local enterprise development;
- working with and supporting our local communities.

Human Rights

Hardy supports and respects the protection of internationally recognised Human Rights in our areas of operation. We uphold and promote Human Rights within our sphere of influence which can include, but is not limited to, Employees, Contract Staff, Industry Partners and suppliers.

Child Labour

Hardy does not use underage, forced or compulsory labour and everybody who works for Hardy is expected to be aware of this and abide by this commitment. If you become aware of, or suspect that this commitment is being breached by any individual or Industry Partner

working for, or on behalf of, Hardy then you must immediately report it to your line manager for appropriate action to be taken.

Social Enterprise, Capacity Building and Charitable Donations

Hardy may support local and community social enterprise (SE) projects and education and capacity building initiatives and when appropriate make charitable donations to appropriate and relevant causes.

It is important that the benefits of these initiatives reach the intended organisations and the value to communities is maximised. There are circumstances where funding or a charitable donation could be misappropriated or interpreted as a bribe. In order to prevent this, appropriate due diligence should be carried out to ensure that the recipients are bona fide and to provide assurance that the funding or donation will be used for its intended, legitimate purpose.

In many cases, the donation of cash is best avoided and rather Hardy should provide goods and services where the Company can monitor the proper and legitimate use of funds.

All social enterprise, capacity building or charity funding should:

- be clearly documented and transparent;
- be made to legitimate organisations;
- identify the beneficiaries;
- be properly approved in advance;
- be monitored to ensure that they are used as agreed.

Political Contributions and Activities

We do not make any political contributions, (whether of money, property, materials or services), to political candidates, parties, committees or their representatives, and we do not participate in any intervention in the political process of host countries. You may choose personally to become involved in political activities as long as you undertake these on your own behalf, in your own time, and using your own resources.

WE ENSURE ALL DOCUMENTATION, INCLUDING FINANCIAL ACCOUNTS AND RECORDS, ARE ACCURATE, COMPLETE AND TRUTHFUL

Accuracy of Accounts and Records

Truthful and accurate information, whether financial or non-financial in nature, is essential to support sound business decisions, to meet our legal and regulatory obligations and meet our responsibilities to all of our stakeholders.

We maintain internal accounting controls and ensure that books, records and accounts reflect accurately, transparently and in sufficient detail, all transactions in connection with our business.

You must:

- comply with all relevant laws and external and company reporting requirements;
- ensure that all transactions are honestly and accurately recorded;
- cooperate with our external auditors when requested for information.

You must not:

- deliberately falsify information or data in any media;
- operate outside of the limits of your delegated authority.

Cash Transactions

Cash transactions should be kept to a minimum as the use of cash has the potential to result in breaches of accounting regulations, illegal transactions, money laundering, and fraud. Wherever possible, cash transactions should be avoided. Where it is unavoidable, cash transactions or petty cash facilities must be approved by management with all transactions being properly and transparently accounted for.

KEY REQUIREMENT - All financial transactions must be accurately and transparently recorded in line with generally accepted accounting principles.

Money Laundering

Money laundering is a term used to describe methods of hiding or disguising the proceeds of illegal transactions. There are stringent international laws targeting those who engage in or assist with such transactions. We fully support anti-money laundering policies.

If you are ever asked to make a payment in cash, in a currency or to a bank or beneficiary not previously authorised or you are uncomfortable about any aspect of a financial transaction then always seek advice from your line manager or an executive officer prior to taking any action.

WE PROTECT OUR ASSETS AND RESPECT THE ASSETS OF OTHERS

Protection and Use of Company Assets

Our data and other company information, office equipment, tools, vehicles, supplies, facilities, and services must be used only for authorised purposes, and you must maintain, account for, use and dispose of them properly. Unauthorised removal or destruction of Hardy assets is strictly prohibited.

Intellectual Property

Our intellectual property, (such as physical or electronic data, reports, confidential business information, inventions, designs, logos and copyright materials), is a valuable company asset and you must be careful to protect it and use it properly. We also respect the intellectual property of others and when it is in our care we protect it in the same manner as our own.

Confidentiality

You must ensure that confidential information is properly protected from unauthorised access and use at all times. Unauthorised disclosure of confidential information can lead to loss of competitive advantage and in some circumstances can break the law. Protection of confidentiality extends to physical documents, information stored electronically and information that is verbally transmitted.

You should presume that all information regarding our activities, including geological data, reports, research and development work conducted by us or on our behalf is confidential, except to the extent it has already been made available to the public without restriction.

Other examples of confidential information include non-public information on business acquisitions or disposals, business plans, major changes in management or company structure, financial information and Employee personal information. The duty to keep this information confidential continues even after your employment with Hardy ends. Any confidential information which is provided to us by a business partner must also be treated in the same manner as our own.

KEY REQUIREMENT - Always ensure that you properly secure confidential information when unattended, use your screensaver and do not discuss confidential matters in public where others can listen to the conversation.

Conflicts of Interest

Hardy respects the privacy of its Employees and does not normally take an interest in personal conduct outside of work. However, when an Employee's personal, social, financial or political activities interfere or have the potential to interfere with the Employee's loyalty and objectivity toward Hardy, a 'conflict of interest' may exist.

If you become aware of any business, financial or other relationship with suppliers, business associates, competitors or even other Employees that might influence or appear to influence the exercise of their or our business judgment you must declare this in writing to your manager to enable the best course of action to be determined.

Possible Conflicts of Interest include:

- having a second job;

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- conducting Hardy business with a family member or an organisation with which a family member is connected;
- supervising a family member or someone with whom you have a close personal relationship or being in a position to influence their recruitment or terms and conditions of employment;
- having any significant economic interest with any company that does business or competes with us.

KEY REQUIREMENT - If you believe that you have a conflict of interest then you must report it in writing to your line manager.

External Communications

You must not make any public communication regarding Hardy or its business to the press, analysts, investor community or the media else unless authorised to do so. If you are contacted with a request for information then you should refer them to the Chief Executive Officer.

WE COMPETE FAIRLY

Competition / Anti Trust Law

Hardy competes fairly and honestly and we will only acquire information about our competitors by legal and ethical means.

Competition laws, known as anti-trust laws in some countries, regulate anti-competitive conduct and prohibit agreements or practices that restrict free trade and competition. Examples include price fixing, market sharing, limiting production or capacity or abuse by monopolising a market. The penalties for anti-competitive behaviour are severe and can be up to 10 per cent of the company's global turnover with prison sentences for offenders.

We co-operate with and contribute to the development of our industry by participating in related industry associations and during the normal course of business you may have contact with competitors in a wide variety of circumstances, including transactions involving oil and gas trading, trade associations, seminars and conferences, benchmarking, lobbying activity and forming joint ventures. You must be particularly careful when attending meetings with competitors to ensure that you do not discuss prohibited topics.

KEY REQUIREMENT - If your work involves dealings and meetings with competitors you must ensure you are fully briefed on the implications of competition law. If you are in any doubt how these laws apply to your work for Hardy you should obtain advice from your legal advisor.

WE REPORT ALL CONCERNS AND VIOLATIONS IN A SPIRIT OF OPENNESS AND TRANSPARENCY

We are committed to maintaining the highest standards of integrity, transparency and business conduct. If you know or suspect that someone within Hardy, or someone performing services for us, has breached the Code, or you have concerns about any aspect of our business practices, you must immediately report it.

If you are not sure whether to speak up you can ask yourself the following questions:

- does the action you are concerned about comply with our Code?
- is it legal?
- does it conform to our values?
- how would it appear if it was reported in a newspaper?
- would others consider it responsible - colleagues, family or Industry Partners?

What to Report

Examples of concerns which would certainly require you to speak up would be:

- where a criminal offence has been, or is likely to be, committed;
- where someone has failed to comply with a legal obligation;
- any disregard for health and safety including any breach of legislation;
- any act which may cause damage to the environment;
- any financial irregularity or suspicion of bribery or fraud;
- any action intended to conceal information regarding any of the above matters.

It is in all of our interests to raise concerns early to prevent an occurrence of a breach or to minimise the impact of something that has already happened. If you report a concern then you are doing the right thing and acting in the interests of Hardy. Any manager who is approached with a genuine concern or a reported breach must take appropriate action to ensure that it is dealt with properly and where necessary must take further advice or inform and executive officer to determine the best course of action.

KEY REQUIREMENT - If you are ever unsure of the action to take then ask for advice.

Company Commitment

Hardy will not tolerate retaliation in any form against an individual who reports in good faith even if the concern is later determined to be factually incorrect or untrue. We will treat all cases seriously, determine the facts and take any action that is required. Where necessary we will carry out a formal investigation with trained personnel and in the event of a breach of the law then we may inform relevant authorities or law enforcement agencies.

How to Report

Our aim is to provide a supportive culture where everyone who works for us will feel comfortable and empowered to raise an issue or concern without fear of retaliation. The most common method of reporting a concern is to discuss it with your line manager or an executive officer. If the matter is very serious or involves the Company's management then you can report it to the Senior Non-Executive Director (peter.milne@hardyoil.com).