

PETROFAC LIMITED

NON-RETALIATION POLICY

Vision

At Petrofac, we rely on our employees and business partners to live our values and uphold our reputation for delivering our projects safely, reliably, and ethically. As such, Petrofac, not only encourages but expects our employees and business partners to report any concerns they might have that our values, our policies or the Petrofac Code of Conduct (the “Code”) are not being followed.

Therefore, Petrofac is committed to promoting a work environment where employees and others feel safe to engage in frank and honest communication, including raising concerns at any time and Speaking Up without fearing retaliation and without being subject to any form of intimidation- or retaliation- for reporting potential violations or participating in an investigation pertaining to alleged violations of laws, the Code, policies, standards or procedures.

Commitment

The Petrofac Board of Directors has ultimate responsibility for the promotion of an environment and a company culture that encourages open and honest communication without fearing retaliation.

Petrofac and its business units are therefore committed to:

- maintaining a strong Speak Up culture where employees are encouraged and recognized for raising concerns and where retaliation will not be tolerated;
- promoting a work environment in which employees take personal responsibility by owning, discussing, reporting potential violations and recording matters covered by the Code or local laws and regulations;
- maintaining effective and transparent processes for periodically reviewing and assessing the Speak Up culture in their respective organizations; and
- identifying and managing/reducing risks pertaining to the implementation of this Non-Retaliation policy.

Objectives

To meet this commitment at a Group level, Petrofac will:

- review and openly discuss with the business units and internal stakeholders their Speak Up Culture reports and metrics;
- mandate the implementation of a systematic approach to help the businesses improve their Speak Up culture; and
- periodically review the suitability and effectiveness of this policy, our systems, targets and objectives.

Each Petrofac business unit will:

- develop and maintain business unit and functional level systematic approach to support the effective implementation of this policy including but not limited to: the review and assessment of the Speak Up culture in their respective organizations; the identification and management of the risks pertaining to this policy; holding accountable line management for the promotion of a healthy Speak Up culture and providing suitable resources for the same.

Responsibility and implementation

Responsibility for compliance with this policy is a line responsibility that starts with the Group Chief Executive and flows down through the line management. Every leader at Petrofac is responsible for proactively promoting a healthy Speak Up culture where retaliation is strictly prohibited. Every employee at Petrofac is responsible for making themselves aware of the Code and its requirements and to proactively play their role and speak up if they have any concerns.

This policy applies to all operating companies and service lines within Petrofac Limited and all partnerships or Joint Ventures over which we have management control.



Sami Iskander
Group Chief Executive