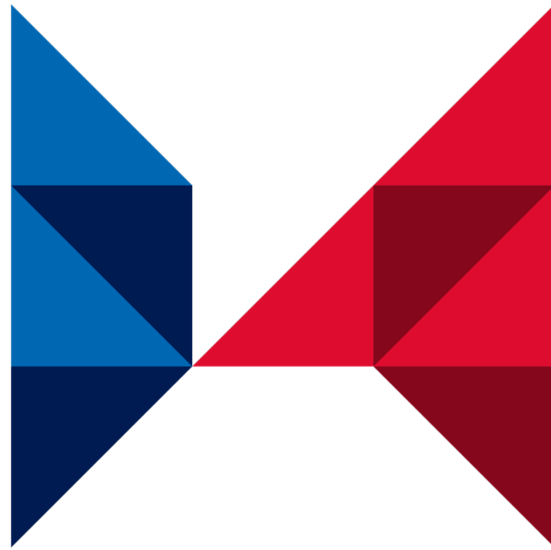


# CODE OF CONDUCT



**HYPERWORKS  
PETROLEUM LIMITED**



# LETTER TO EMPLOYEES

Fellow Employees,

HPL is committed to maintaining the highest ethical standards in its business dealings. That commitment has helped build our brand and the reputation we enjoy with our customers, partners, employees and with the public. A stellar reputation is hard to earn and harder to keep. By using our Code of Conduct as a guide, we can strengthen our corporate culture and maintain our reputation in the construction industry and in our community.

Here at HPL, we believe that trust is key to the success of any business, and ethical conduct is the foundation on which trust is built. Each one of us has the opportunity every day to promote and support an ethical culture by dealing with our customers and partners with integrity, respecting co-workers, bringing forward concerns without fear of retaliation and holding each other accountable to make good ethical decisions.

In addition to this Code of Conduct, HPL provides you with many resources, such as training and feedback. Every employee, including the senior management team, participates in this training. In addition, HPL provides you with a fully confidential and anonymous medium for reporting any violations of the Code of Conduct, harassment or other misconduct.

Please know that I fully support our Ethics Compliance Program and am personally committed to our Code of Conduct and HPL's core values. HPL is well positioned for continued success. That success is founded upon our daily commitment to maintaining high ethical standards.

Best Regards



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FAWWAAZ HOSEIN  
DIRECTOR



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# INTRODUCTION

Hyperworks Petroleum Limited (“HPL” or the “Company”) maintain a published Code of Conduct which is based on a set of Core Values and Guiding Principles. HPL’s Core Values and Guiding Principles provide the foundation upon which the entire organization operates including the Company’s policies for handling sensitive issues and behaviour guidelines to ensure compliance.

## **Core Values**

HPL’s mission is captured in its motto, “Expanding Horizons, Advancing Frontiers.” This ensures conducting business with unquestionable integrity and uncompromising ethics. Our success is guided by these core values:

**Safety**—Our number one priority is the safety of our employees, subcontractors, owners and the general public. Safety coincides with production and quality, and is an integral part of our business.

**People**—Our relationships between our employees, partners and the communities in which we work are critical to the continued success of our business.

**Ingenuity**—We take pride in devising creative solutions for the most complex issues.

**Results**—We partner with our clients to deliver superior quality projects on time and on budget in a diligent, honest, reliable, efficient and collaborative manner.

**Success**—We enjoy a strong industry reputation as a result of sustained and disciplined growth that continues to advance stakeholder confidence.

We are committed to these values and to exhibiting the highest level of integrity and ethical behaviour in every facet of our work. Our goal at the end of each day is that our employees can say “I made it happen.”

This standard of conduct is expected of every employee, regardless of position, and is reinforced in the HPL’s Code of Conduct and Performance Management processes. Additionally, we hold each other accountable for our actions and expect every employee to report illegal, unethical and/or suspicious activity immediately. You can do this confidentially and without fear of retaliation through your supervisor, senior manager, a HPL compliance officer, or with whomever in management you feel most comfortable.



# INTRODUCTION

HPL supports accountability by providing an external hot line service for anonymous and confidential reporting of violations of the Code of Conduct or laws, harassment or other misconduct. Communication information is available to every current employee, to new employees upon commencement of employment, and at every project site and office location.

## Guiding Principles

The following provide the foundation upon which our organization operates:

I will deal with others honestly, respectfully and fairly.

I will act in a professional and ethical manner. I will maintain a positive attitude. When I compete for business, I will compete to win. I will not, however, take unfair or unethical advantage of others nor will I allow others to take unfair advantage of me or the Company.

I will recognize and value the employees of the Company with whom I work. I will expect every employee to give his/her absolute best effort on each assignment. In return, I will do everything reasonably possible to help other employees develop their skills, take ownership of their jobs, and maximize their rewards and personal job satisfaction.

I will show respect for the differences of others.

I will only criticize the work of others constructively and only when I can offer legitimate help or alternatives.

I will solicit and openly listen to the ideas of others. I will always be receptive to new ways of doing things.

I will do everything I can to help the Company become a leader in its industry.

I will promote a partnership philosophy with other employees, owners, business partners and vendors.

I will conduct myself consistently and professionally in ways that will establish and maintain a positive image of the Company within its industry and our community.



# DISCLOSURE

## **THIS HANDBOOK SHALL BE USED AS A GUIDELINE ONLY**

This handbook represents a brief summary of some of the more important Company ethical guidelines. It is not all-inclusive and should be used only as a guideline. This edition replaces all previously issued editions.

The Company retains the right to modify, suspend, interpret or cancel in whole or in part at any time with or without notice, any or all of these guidelines.

The language used in this handbook and any verbal statements made by management are not intended to constitute a contract of employment, either express or implied, nor are they a guarantee of employment for a specific duration.

This handbook works in tandem with the General Human Resource Policy and Disciplinary Procedure. Both of which are freely available for viewing on request from the Human Resources Department.

## **EMPLOYMENT-AT-WILL**

Employees and the Company have the identical right to terminate employment at any time, with or without notice or cause.

## **THIS IS NOT A CONTRACT**

Questions regarding this manual should be directed to:

Human Resources Department  
Hyperworks Petroleum Limited  
Email: [info@hyperworksgroup.com](mailto:info@hyperworksgroup.com)



# EMPLOYEE RESPONSIBILITY

Managers at all levels are expected to disseminate the Code of Conduct to employees and insist on the application of these principles in conducting day-to-day business operations.

Each employee of the Company is responsible for:

- Becoming thoroughly familiar with and complying with the Code of Conduct;
- Resolving any doubts or questions about the Code of Conduct with his or her supervisor;
- Acknowledging receipt of this Code of Conduct by completing the attached acknowledgement; and
- Reporting to his or her supervisor any situation or activity which violates, or which appears to violate, this Code of Conduct.

References in this manual to the Business Unit Leader means the President and/or Directors in which an employee works, or the executive manager of the department of which an employee is a member. The Business Unit Leader may designate and authorize managers to give certain approvals required in this manual.



Questions regarding approvals should be directed to the Business Unit Leader or the Manager of Human Resources.



# COMPLIANCE WITH LAWS

## **Core Conduct**

The Company will comply fully with all laws and regulations of the Republic of Trinidad and Tobago, as well as the applicable laws of each foreign country in which it operates.

## **Intent**

To help achieve the Company's objective of establishing and maintaining a reputation as a lawful corporate citizen, and to protect the Company and each employee from criminal or civil prosecution.

## **Guidelines**

Questions regarding the legality of any proposed action should be referred to Corporate Counsel for research and review by appropriate legal resources in the subject area or applicable jurisdiction in which such questions arise.

HPL has adopted the U.S approach to Foreign Corrupt Practices, making it illegal for any company to offer, promise to pay, to make payments or otherwise provide a benefit, or anything of value, directly or indirectly, to a foreign official or foreign political party for the purpose of obtaining or retaining business.



When doing business in or with a foreign country, employees should examine carefully the purpose and legality of any payments or benefits given to public officials or their agents in connection with a project.





# FAMILY RELATIONSHIPS

## **Core Conduct**

When doing business for the Company with outside vendors or subcontractors, where a family member is employed, the employee should not participate in any activity which would be perceived as favouritism.

## **Intent**

To help achieve the Company's objective of establishing and maintaining a reputation for fairness, with preference being given only where it is most beneficial to the Company.

## **Guidelines**

If an employee wishes to do business for the Company with a company in which his/her immediate family or other relative is employed, he/she must first disclose the relationship and obtain the approval of his/her Business Unit Leader.

No preference will be given any relative or family member which is not in the best interest of the Company.

All members of the business community with whom the Company does business will be given equal opportunity for the Company's business; those whose products and services best serve the Company's interest will be selected without regard to family relationship status.



# MEDIA RELATIONSHIPS

## **Core Conduct**

When in contact with the media, employees of the Company should not make statements about the Company that are outside the bounds of their particular business area. As a general rule, all statements to media should be made only by a designated spokesperson of the Company.

## **Intent**

To help achieve the Company's objective of establishing and maintaining a reputation as a good corporate citizen and a leader in its industry by not communicating to the media any information which is confidential, incorrect or which could be incorrectly interpreted and published as such.

## **Guidelines**

Do not make statements to the media about the Company that are outside the bounds of your particular business area and expertise.

Do not comment on Company business plans until decisions have been made and cleared for public disclosure.

Do not disclose the travel plans of senior executives, as this could lead to speculation regarding Company business plans.



As a general rule, all statements to the media should be made only by a designated spokesperson of the Company.



For additional information on media relations, contact the HR Department in the Corporate Office.



# FINANCIAL RECORDS, REPORTS AND CONTROLS

## **Core Conduct**

No employee of the Company may participate in making any misstatement regarding the Company's accounts, financial records, reports or controls.

## **Intent**

To safeguard the Company's assets, as well as, to protect each employee of the Company by maintaining high standards of accuracy, integrity and completeness in its financial records and reporting.

## **Guidelines**

Accounts and records shall be maintained and financial reports shall be prepared in a manner which conforms with generally accepted accounting principles and legal requirements for accounting and financial reporting.

All funds, liabilities and assets are to be clearly and accurately disclosed in the Company's records.

No false, misleading or artificial entry shall be made in any of the Company's records.

No payments shall be made by or on behalf of the Company for any purpose other than those described in Company documents and records supporting such payments.

No funds or other assets shall be maintained for any illegal or unethical purpose.



# RELEASE OF FINANCIAL INFORMATION

## **Core Conduct**

All employees of the Company are expected to maintain confidentiality with regard to financial information which they acquire in the course of performing their jobs. Knowledge of such information is a trust to be honoured by each employee.

## **Intent**

To safeguard the Company's assets, as well as, to protect each employee of the Company by maintaining high standards of integrity and confidentiality of the Company's financial records and information.

## **Guidelines**

Employees may not disclose any information relating to the financial records of the Company to anyone outside the Company or to anyone who does not have a legitimate business right to such information, without Business Unit Leader or Chief Financial Officer approval.



# FALSE OR DECEPTIVE CLAIMS AND ESTIMATES

## **Core Conduct**

All employees of the Company are strictly prohibited from knowingly submitting or endorsing the submission of any payment applications, claims or estimates that are false, fictitious or fraudulent. This includes not only payment applications, claims, or estimates for the Company, but false or fraudulent payment applications, claims or estimates knowingly submitted by the Company on behalf of a subcontractor or supplier.

## **Intent**

To help achieve the Company's objective of establishing and maintaining a reputation as a good corporate citizen and a leader in its industry by not allowing any dissemination of false or deceptive claims or estimates.

## **Guidelines**

On both public and private projects, the Company shall submit true and accurate payment applications, claims or estimates, including those submitted by the Company on behalf of a subcontractor or supplier.

Understand that violation of this policy would be in breach of an employee's employment contract, which pertains not only to Government projects that are managed by State agencies but also to any projects that are financed directly or indirectly by the Government.



The Company will not engage in unlawful or unethical anti-trust practices, such as bid rigging, complementary bidding or price fixing to exclude, restrict or distort competition.



## **Core Conduct**

All employees of the Company are responsible for adhering to copyright laws protecting computer software, publications and other printed materials from being duplicated.

## **Intent**

To safeguard the Company's assets, as well as, to protect each employee of the Company by adhering to copyright laws and license agreements with regard to duplicating printed materials or computer software.

## **Guidelines**

Employees of the Company are strictly prohibited from copying any company-acquired computer software programs unless specifically authorized to do so by the license agreement.



Copyrighted printed materials are also protected by law. Unless you obtain permission do not photocopy copyrighted material.



## **Core Conduct**

Any employee of the Company who designs, creates or produces inventions, new discoveries, new methods, etc. on paid Company time and/or using Company resources recognizes that these are the property of the Company.

## **Intent**

To clearly establish the expectation of the Company regarding ownership of discoveries, inventions, new methods, etc.

## **Guidelines**

All employees of the Company are encouraged to seek new and better ways of conducting business; however, employees must realize that such inventions, discoveries, methods, etc. are Company property and may not be marketed or used for non-Company purposes without the approval of the President/Directors.



## **Core Conduct**

Proprietary and confidential information is generally information that is not publicly disclosed by the Company and should not be disclosed by any employee of the Company to any third parties without prior approval of the Company.

## **Intent**

To safeguard the Company's assets, whether it be intangible "know-how" or physical property, as well as to protect employees of the Company by strictly prohibiting disclosure of any proprietary or confidential information.

## **Guidelines**

Confidential information means all information and materials of the Company, its affiliates, and its customers, clients, vendors, consultants, and other parties with which the Company or its affiliates do business that is not generally known by or freely available to the public. Such information should not be disclosed outside the Company.

Confidential information may include, without limitation, information pertaining to work product, inventions, discoveries, concepts, ideas, know-how, plans, strategies, developments, technologies, computer programs, formulas, compilations, data, devices, designs, prototypes, drawings, diagrams, schematics, practices, processes, methods, products, procedures, manuals, techniques, personnel, staffing practices, bidding practices, customer, subcontractor and supplier lists and data, price lists, policies, records, forms, specifications, trade secrets, research, notes, analysis, reports, studies, budgets, projections, bids, costs, financial reports and information, financing materials, training programs, sales and marketing programs, plans and strategies, regulatory filings, and correspondence, whether or not expressed in tangible form, and in any format:

(a) relating to the Business of the Company; or

(b) otherwise relating to the Company's past, present, or future businesses, properties, research, products, or services.





# USE OF COMPANY PROPERTY OR EQUIPMENT

## **Core Conduct**

Preventing the loss, damage, misuse or theft of Company property is a personal responsibility expected of each employee of the Company.

## **Intent**

To safeguard the Company's assets, as well as to protect employees of the Company by regulating the use of Company property.

## **Guidelines**

Company property is to be used exclusively for conducting business and should not be used for personal purposes without authorization from the Business Unit Leader.



Theft of physical property is a violation of the Code of Conduct, whether it be for individual gain or otherwise. In addition, Company property should not be sold or given away without proper authorization.



# GIFTS, GRATUITIES AND ENTERTAINMENT

## **Core Conduct**

The Company specifically prohibits the offering or acceptance of any form of bribe, payoff, kickback or trade out of service. Employees must not offer or accept gifts, gratuities or entertainment—other than gifts or entertainment of nominal value—to or from any competitor, customer or supplier.

## **Intent**

To ensure that the Company does not participate in any form of unethical conduct by giving or receiving of gifts which would make it or its employee obligated, or have the appearance of being obligated, to other business interests.

## **Guidelines**

Employees of the Company must not give, or accept any gifts or favours from any competitor, customer or supplier other than a gift of nominal value which is consistent with ordinary business courtesy or practice. Lavish entertainment or substantial favours should not be offered or accepted. Employees should use reasonable business judgment when considering the frequency of such gifts and entertainment.

The Company has defined “nominal” as \$250.00 or less. Gifts or entertainment in excess of \$250.00 in value must be approved by the Business Unit Leader. Gifts or entertainment in excess of \$250.00 must be approved by the President/Directors.

Social relationships with competitors, customers, or suppliers are acceptable and are encouraged, as long as care is taken that the social relationship does not improperly influence the business relationship or give the appearance of doing so.



Gifts or entertainment must not be accepted where doing so might result in an obligation or the appearance of an obligation to conduct business with the donor in a manner other than an independent relationship.



# BUSINESS AND ENTERTAINMENT EXPENSES

## **Core Conduct**

The Company shall reimburse its employees only for actual, reasonable and proper expenditures incurred in the conduct of Company business.

## **Intent**

To ensure that employees are reimbursed only for actual, reasonable, and proper expenses in a manner that makes the employee financially “whole” without either gain or loss.

## **Guidelines**

Employees of the Company are responsible for exercising care and good judgment when incurring expenses for the entertainment of customers and other associates. Entertainment extended on behalf of the Company shall be reasonable and proper and have the purpose of establishing, enhancing, or preserving constructive business relationships and not for the purpose of gaining an unfair or unethical advantage.



Expenses relating to members of the employee’s family generally shall not be reimbursed. However, with Business Unit Leader authorization, reasonable expenses may be reimbursed in the instances where the presence of an employee’s family member serves a bona fide business purpose.



# CONFLICTS OF INTEREST

## **Core Conduct**

Employees of the Company have an obligation to demonstrate loyalty to the Company and to conduct business within guidelines that prohibit actual or potential conflicts of interest.

## **Intent**

To ensure that decisions that affect the Company are made considering the best interests of the Company, and are not influenced by external or personal interests.

## **Guidelines**

The Company encourages employees to participate in community, charitable and other outside activities that do not conflict with normal work responsibilities.

Employees of the Company are prohibited from participating in any activity or association that creates or appears to create a conflict between the employee's personal or financial interests and the Company's business interests. Employees of the Company should not maintain any financial interests in competitors, suppliers and clients that would cause the employee to maintain divided loyalties, or have the appearance of divided loyalties.

Except with the prior approval of the Business Unit Leader, outside work interests or activities (whether political, charitable, personal, or otherwise) should not:

- Be done during work hours;
- Adversely affect the quality of the employee's work or have a potential impact on the employee's business decisions;
- Involve any use of Company equipment, facilities, or supplies;
- Involve any action that can prevent the company from losing business or defaming the business;
- Imply the Company's sponsorship or support (for example, through the use of the Company's stationery for personal purposes).



Employees of the Company should not solicit or perform work in competition with the Company. This also means that outside work cannot be performed on the Company's time and the Company's resources cannot be used to assist in performing such work.



## **Core Conduct**

Employees of the Company are prohibited from using any inside information or position in the Company to their own investment advantage or for personal gain.

## **Intent**

To protect the Company and its employees by ensuring that all business decisions are made for legitimate business reasons and are in the best interest of the Company.

## **Guidelines**

Activities that could result in personal gain include situations where an employee or relative receives kickbacks, bribes, substantial gifts or special consideration as a result of any transaction or business dealings involving the Company. Third parties, such as brokers or agents, must not be used to circumvent this guideline.

Any information pertaining to or obtained from the Company shall not be sold or disclosed to third parties for personal gain.

Employees must never take advantage or help anyone else to take advantage of non-public information about HPL, any affiliate of HPL, the Company, or any other firm with which the Company does business or has other relationships. In particular, an employee must never purchase or sell securities of HPL or any other firm while the Employee is aware of material non-public information about HPL or such other firm. Information is viewed as material if it would influence a reasonable investor's decision to buy, sell, or continue to hold securities or make other investment decisions.



## **Core Conduct**

Individual participation in the political process or making campaign contributions is encouraged by the Company; however, no contributions such as Company time or Company money should be given without authorization from the Business Unit Leader or CEO. Employees must also avoid conflicts of interest that may arise when an employee of the Company is active in political, public or charitable service.

## **Intent**

To ensure that an employee's political, personal or charitable interests are not influenced through the use of Company funds, assets, or equipment. Also, to help achieve the Company's objective of maintaining separation between Company business and private enterprise.

## **Guidelines**

If an employee of the Company runs for political/ public office, serves as a public official, or works for a charitable or non-profit organization, he or she cannot be paid by the Company for any time spent on those activities.

Employees of the Company may not include, either directly or indirectly, any political or charitable contributions on their expense accounts or in any other way cause the Company to reimburse them for such expense.

Conflicts of interest, or even the appearance of such, must be avoided and therefore if any comments or statements are made by any employee of the Company relating to political or public issues; it must be made clear that the comments are the individual's and not made on behalf of the Company.



Contributions to charitable or community service organizations or to local community activities in amounts up to \$5,000 must be approved by the Business Unit Leader. Contributions in amounts over \$5,000 must be approved by the President/Directors.

The Company may elect to make political contributions, where legal, or to take public positions on issues or legislation relating to its operations or in the public interest. Such actions may be authorized only by the President/Directors.



# ANTI-DISCRIMINATION AND HARASSMENT

## **Core Conduct**

The Company is dedicated to principles of equal employment opportunities and anti-discrimination. The Company strongly opposes and prohibits harassment of any kind, including sexual harassment and inappropriate sexual conduct, which has the effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

## **Intent**

To protect the Company and each employee by establishing and maintaining a safe and productive work environment, and to help maintain the Company's reputation as an equal opportunity employer and a lawful corporate citizen.

## **Guidelines**

### ***Company-Wide:***

The Company does not discriminate against applicants or employees because of race, colour, religion, national origin, sex, age (over 40), disability, veteran status, sexual orientation, domestic partners or any other status.

The Company will not tolerate and prohibits conduct which is contrary to applicable human rights legislation.

The Company prohibits harassment of any kind, including sexual harassment and inappropriate sexual conduct, which has the effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.



Sexual harassment either directly or indirectly through the discussion of any employee internally or externally inappropriately via company's property or where falsifiable evidence is produced regarding same, constitutes a direct breach of work ethics and gross misconduct and will be considered as sexual harassment.



## **Core Conduct**

Because each employee must comply with the Code of Conduct, employees are responsible for reporting any violation of company policy or local laws, rules, or regulations which such employee believes, in good faith, has occurred or may occur to his or her supervisor, to any member of management, to Human Resources, or to the Directors. The Company prohibits retaliation against any employee for filing a complaint under this policy or for assisting in a complaint investigation.

## **Intent**

To ensure that this Code of Conduct is fairly and uniformly enforced across all departments and professional boundaries within the Company.

## **Guidelines**

Any employee of the Company who is requested to take any action that is, or may be contrary to this Code of Conduct or any law or regulation, will promptly report such information.

Any employee of the Company who acquires information that gives the employee any reason to believe that any employee is engaged in conduct forbidden by this Code of Conduct, will promptly report such information.

Each manager or supervisor is responsible for applying the principles of this Code of Conduct within their department. Any manager or supervisor receiving a report of any violation of this Code of Conduct will promptly report such information.



There shall be no retaliation against an employee for truthfully reporting misconduct. The Company will use all reasonable and prudent means to protect the anonymity of communications and reports of violations or potential violations to the fullest extent possible





# DISCIPLINE

## **Core Conduct**

It is essential that each employee of the Company be committed to the implementation and adherence to the Company's Code of Conduct. Any violations of this Code of Conduct will result in appropriate disciplinary action as warranted by the circumstances.

## **Intent**

To ensure that this Code of Conduct is fairly and uniformly enforced across all departments and professional boundaries within the Company.

## **Guidelines**

Appropriate disciplinary action will be taken as warranted by the circumstances for any violation of this Code of Conduct.

Disciplinary action may be taken, not only against individuals who authorize or participate directly in a violation, but also against employees who fail to report a violation or who withhold relevant information.

Disciplinary action may include termination of employment and/or pursuit of the Company's right to reimbursement for any damages the Company may have suffered, civil prosecution, and/or referral for criminal prosecution.

The Company will not authorize any employee to commit an act which is illegal or which violates this Code of Conduct.

Without limitation, actions or behaviours which violate this Code of Conduct will never be justified or excused because an employee claims they were directed to do so by management or other employee(s).

Employees who do not act in good faith and who misuse or abuse the rights and responsibilities outlined in this Code of Conduct by knowingly submitting a false or malicious report will be disciplined.



[A copy of the disciplinary procedure can be requested for viewing from each department head or if unavailable, can be requested from the Human Resources department.](#)



# GROSS MISCONDUCT

## Core Conduct

An allegation of gross misconduct is extremely serious and is not made lightly. Gross misconduct is regarded as a fundamental breach of contract that makes it impossible for the company to continue employing the employee. Where an employee is dismissed for gross misconduct, the dismissal is normally summary, i.e. without notice.

## Intent

To ensure that this Code of Conduct is fairly and uniformly enforced across all departments and professional boundaries within the Company in the protection of same.

## Guidelines

Examples of acts which may constitute gross misconduct include:

1. serious negligence which causes unacceptable loss, damage or injury;
2. serious violation of health and safety rules;
3. sexual harassment as previously mentioned in this document;
4. serious bullying or harassment;
5. physical violence or intimidation;
6. deliberate and serious damage to property;
7. theft, fraud, corruption and deliberate falsification of records;
8. breach of the Bribery Act and any serious breach of the anti-bribery and anti-corruption policy;
9. Inciting or colluding with employees in activities that negatively affect productivity or holding the company at ransom for personal benefit.
10. serious incapability whilst on duty brought on by consumption of alcohol or illegal drugs;
11. failure to disclose a sexual, familial or other significant relationship with an employee of the company in circumstances where there is a professional responsibility for the employee and the potential for corruption and/or discrimination exists.
12. failure to disclose a sexual, familial or other significant relationship with an employee of the company in circumstances where there is the potential for corruption and/or control over promotion or reward for that employee.

The above examples are neither exhaustive nor exclusive.



Where there are actions not explicitly listed above that warrant treatment under gross misconduct, detailed justification of same will be provided to employees.



# ACKNOWLEDGEMENT OF RECEIPT

I have received a copy of the Code of Conduct manual and I understand that I am to become familiar with its contents and agree to abide by its terms.

Sign and return this acknowledgement to the Human Resources Department in the Corporate Office.

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**PRINT NAME**

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**SIGNATURE**

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**DATE**

**NOTES:**

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## **HYPERWORKS PETROLEUM LIMITED**

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