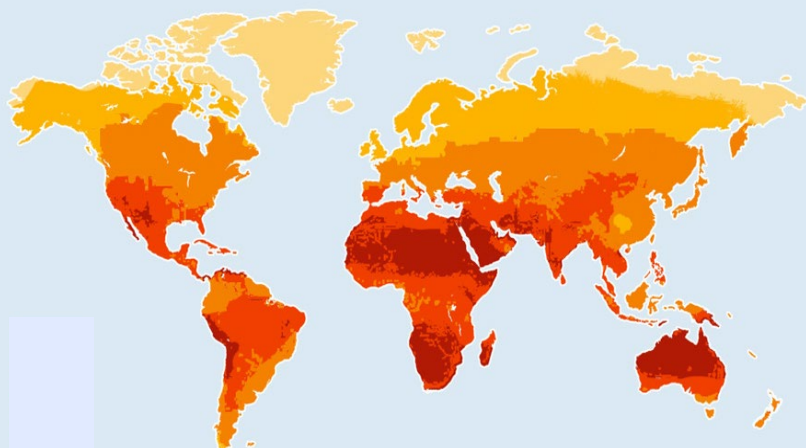


# Code of Business Conduct 2020

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الشواميخ للخدمات النفطية ش.م.ع.م.  
AlShawamikh Oil Services SAOC



# Our Commitment

## *A Promise We Make*

We believe that our first commitment is to the community that we serve consisting of our shareholders, board of directors, internal and external stakeholders which includes our employees, clients, suppliers, and relevant authorities. We have a shared responsibility towards the people of Oman, to operate our business with integrity and excellence, and to evolve into a world class organization with a local heart.

In meeting the needs of our customers and internal & external stakeholders, everything we do must be of high quality. We must constantly strive to provide value, minimize costs and maintain reliability.

Our customers shall be treated fairly, and our products and services shall be provided to our customers in an efficient and safe manner.

Our business partners, shareholders and the managing board members must have an opportunity to make a fair profit from our business and govern us in a transparent way.

We are responsible to our employees who work hard to fly the flag of Alshawamikh Oil Services SAOC (AOS) with pride.

We aim to provide an inclusive work environment where each person is considered as an individual, to respect their diversity and dignity and recognize their merit.

Employees should enjoy a sense of security, fulfillment and purpose in their jobs. Compensation must be fair and adequate. Our working environment must be safe as safety is one of our Core Values.

We are committed to the health and well-being of our employees and to help them fulfill their family and personal responsibilities. Employees are empowered to make suggestions and complaints. For those who are qualified, we emphasize equal opportunity for employment, development and advancement.

**We strive to instill values** and develop highly capable leaders whose actions must be just and ethical. We are responsible to the communities in which we live and work in...



We support community incentives via our CSR initiatives and contribute to the growth and wealth of Oman via our ICV commitments.

We shall protect the environment and Oman's natural resources in all that we do.

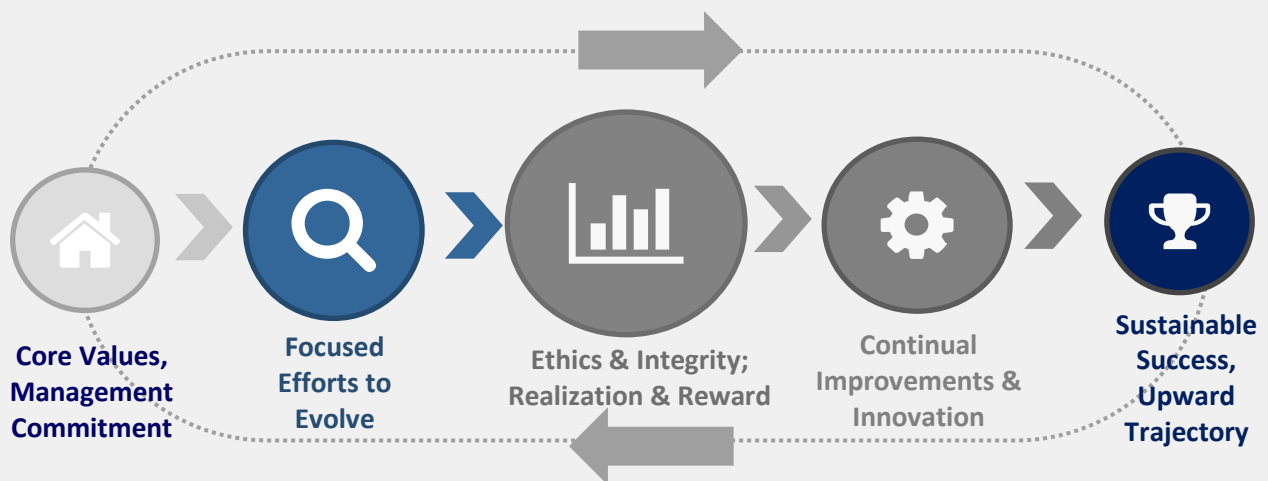
Our most crucial responsibility is to our shareholders. Our business must make a profit that we and they can be proud of. We must transform our organization from within.

Our emphasis will be to develop innovatively and invest for the future. Our financials shall be in line with shareholder expectations and beyond.

We must prepare ourselves to stay afloat in adverse times. Our infrastructure and facilities/equipment must be upgraded to be in sync with developments.

A culture of care, internal process improvements, cost minimization, operations integrity, capacity enhancement, and a renewed focus on business development: If we operate according to these principles, our shareholders will be sweetly rewarded.

At AOS, we hope that our Core Values transcend barriers and that our Code of Business Conduct serves as a familiar guideline to our AOS family and the community we serve, one that is taken to heart and implemented at every echelon of the organization.



## A Message from Our Chief Executive Officer

*In our organization, **ethics and integrity** are inseparable parts of our day to day activities. We live and breathe values that strengthen our position as a leading local community company in Oman.*

*My commitment to you as CEO is to ensure that our business is enabled in an ethical, value-driven manner in order to realize tangible benefits to our Board members, shareholders, employees, clients, other relevant parties and the community in general.*

*This **Code of Business Conduct** represents the norm, ethics, and behaviour standards adopted by our company. Its principles should guide each and every one of us in the Alshawamikh Oil Services SAOC (AOS) family, regardless of position, role and seniority. Ethical behaviour reflects the core spirit of our organization.*

*I seek your support to constantly clarify on ethics and your personal code of conduct through frequent dialogues with management and your teams. In the event of any doubt, seek help. As I commit to this Code, I implore each and every one of us to make it part of the fabric of AOS and continually reaffirm its values in our daily lives.*

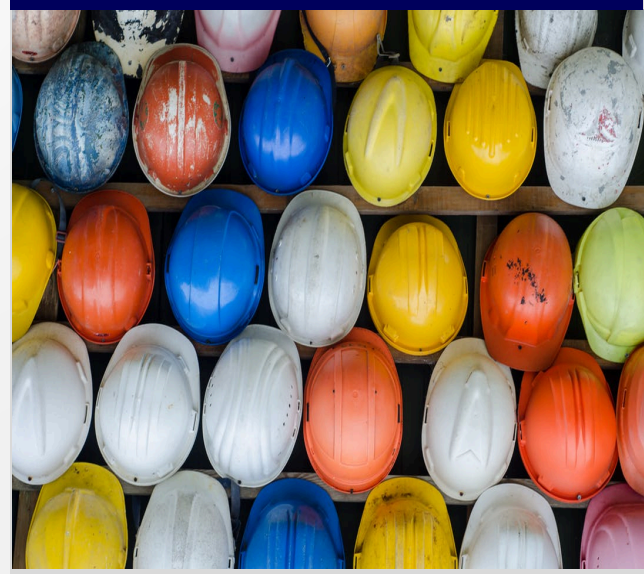


Dr. Aflah Al Hadhrami  
Chief Executive Officer

**“Our Core Values** form the Compass for  
**Our Steer. This Code of Business Conduct is**  
**the Guideline for our Collective Success!”**

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# Introduction

## What is the Code of Business Conduct?

To continue to operate and maintain our reputation, we must each learn, understand and comply with our Code. Complying with our Code is about creating an open and honest environment of ethics where we can achieve our best work with integrity.

We are proud of how we overcome challenges and achieve our successes. Whenever we become aware of a violation of the Code, Company policy or the law, we will act to address the problem and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counseling and disciplinary actions up to and including termination of employment. You have a responsibility to speak up when you are in a situation or are aware of a situation that you believe may violate or lead to a violation of the Code, Company policy or the law.

## The Importance of Following the Code

All employees are required to understand and comply with the Code of Business Conduct, Company policies and laws that govern their activities. Together with other Company policies, the Code helps us make the right decisions and take the right actions, regardless of where we work or the type of work we do. We believe that every employee is a leader, regardless of job responsibilities, title or function.

By following our Code, each of us serves as a role model for our peers, business partners, customers and others. Managers have additional responsibilities to serve as a positive role model in every aspect and to help employees review, understand and apply the Code. Individuals and companies conducting business on our behalf must also follow our Code of Business Conduct, in addition to other relevant policies.

Applicable provisions of this Code should be included in the contracts of third-party suppliers, manufacturers, contractors, vendors and distributors.

A Declaration of Confidentiality must be signed by all parties involved in AOS.





## Manager's Responsibility

Act as a role model, demonstrating ethical behavior in the performance of your duties.

Make objective business-related decisions.

**Review the Code at least once a year with your employees.**

Help employees understand the Code and Company policies, and direct them to resources to help them live the Code every day.

Ensure employees are aware of, and properly trained on, the relevant laws, regulations and Company policies that govern the business activities in which they engage on the Company's behalf.

Create an environment that fosters and enables ethical behavior, where employees are comfortable speaking up without fear of retaliation.

Take seriously any concern raised by an employee that compromises the Code, and determine if the issue should be escalated. If so, escalate the matter as soon as possible.

Take corrective or preventive action when someone violates the Code.

Fully support any investigation.

## Employee's Responsibility

To fulfill our responsibilities, maintain and enhance our culture of care and reputation, we rely on our employees to help enforce the Code.

If you think there is a violation of the Code, or if you think an activity or behaviour could lead to a violation, it is your responsibility to speak up.

Whether you report anonymously or give your name, you should provide as many details as possible, so the issue can be addressed thoroughly and promptly.

In addition, you have a responsibility to cooperate in an investigation. AOS does not tolerate retaliation against anyone who raises a concern under this Code or assists with an investigation.

Any employee who engages in retaliation will face disciplinary action, which could include termination of employment.



## How to Make the Right Decisions

When faced with a difficult decision about business conduct, ask these questions:

- Is the conduct a violation of the Code of Business Conduct, Company policy or the law?
- Is the conduct in conflict with our Core Values & responsibilities?
- Will the conduct appear unethical to stakeholders outside AOS?
- Could the conduct harm my reputation or the reputation of AOS?
- If the answer to any of these questions is "YES," please ask for help.

### *What should I do?*

**Q:** A sales director from a competing company reached out to me to discuss the price of our respective products/services.

**A:** You should never discuss with competitors the price of our products, services or other proprietary information. If you receive a call from a competitor, or if someone unknown to you approaches you to discuss pricing, make it clear that you will not discuss the price of our products and services with competitors. Politely end the conversation and report the incident to your line manager or the legal representative.



*Each employee must speak up if he or she believes that our Company is not complying with a law or regulation*





## **Where Can I Go for Advice and Guidance on Our COBC?**

We have processes, guidance and procedures in place to help you. Take advantage of the breadth of capabilities, resources and expertise that exist in our Company including:

### **SENIOR LEADERSHIP IN YOUR DEPARTMENT**

are available to answer questions and are generally most familiar with the Company guidelines that apply to the business activities in your department.

### **HUMAN RESOURCES**

can explain and answer questions about employment policies, benefits, training & development, performance appraisals, and workplace issues.

### **LEGAL ADVISORS**

can help explain and interpret this Code and can provide guidance about how to conduct business on behalf of the Company, in compliance with the law.

### **FINANCE & ACCOUNTING**

can offer advice and guidance on our interactions with the board or shareholders from the viewpoint of financial compliance, and on the privacy and protection of sensitive financial information of our stakeholders.

### **QUALITY, HEALTH, SAFETY & ENVIRONMENTAL SUSTAINABILITY**

can explain and answer questions regarding the quality, safety, efficacy and regulatory compliance of our products and services including environmental, health and safety contractual requirements and compliance.

### **SUPPLY CHAIN MANAGEMENT**

can explain and answer questions regarding procurement and supply chain processes including clarifications on vendor and supplier relationships.

### **INFORMATION SECURITY & INTELLECTUAL PROPERTY MANAGEMENT**

protect employees' data and information, company intellectual assets and records within Alshawamikh Oil Services SAOC.



# How We Conduct Our Business

## Every Employee's Duty

Every employee is responsible for being familiar with and following the relevant laws, regulations and Company policies and procedures that govern the business activities in which the employee engages.

We aspire to the highest standards and level of integrity for each of our business activities:

- Complying with the laws, standards and regulations that apply to our products and processes
- Protecting confidentiality and complying with data protection laws
- Complying with the laws and regulations that cover gaining marketing authorization to sell our products/services, and interacting with regulators and other government officials
- Adhering to the applicable manufacturing, packaging, distribution and export laws and regulations for our industry, and to laws and regulations in the countries where we do business
- Following all laws and regulations regarding the promotion, marketing and sales of our products/services, including ensuring that what we say is truthful, not misleading, and is consistent with regulatory approvals
- Complying with the laws relating to quality and safety



*Statutory & Regulatory Requirements are our enablers. We abide by them. No Exceptions.*



## Anti-corruption and Anti-bribery

AOS takes a strong stance against corruption and bribery consistent with the anti-bribery and anti-corruption laws that exist in many countries around the world.

We demand the same from our business partners. We strictly prohibit bribes, fraudulent conduct, kickbacks, illegal payments and any other offer of items of value that may inappropriately influence or secure an improper advantage with a government official or customer. We do not practice selective merchandising between vendors and suppliers.

At AOS, we closely interact with government regulators, non-governmental organizations and inspection authorities. It is our duty to follow local and internationally applicable laws and ethical standards prohibiting bribery and corruption. Value transfers to third parties are at fair market value for services rendered and there must be a legitimate need for the goods and services. Grants and donations may only be provided if AOS does not receive anything of value in return and it should usually be part of our approved CSR or ICV campaigns.

Where and with whom we conduct business may vary, but our approach is consistent: We treat business partners, competitors and other stakeholders and decision-makers with respect. We strive to work with third parties who also value and demonstrate high ethical standards in their business practices.

For additional guidance, consult your Management.

## Antitrust and Competition

Antitrust and competition laws promote fair competition and protect customers from unfair business practices. These laws frequently address illegal agreements between companies, such as price fixing, as well as other unfair trade practices that restrict competition. We comply fully with all applicable antitrust and competition laws. We are responsible for dealing fairly with customers, suppliers, competitors and other third parties. This means our employees avoid taking unfair advantage through manipulation, concealment or misrepresentation of key facts, or other unfair practices.

For questions on antitrust and competition laws, contact the Legal Advisor.



## Political Activism

AOS is committed to citizenship and community involvement but we steer away from choosing sides in political activities. All political and lobbying activities as well as meetings with government officials should be coordinated and aligned with policy.

We do not encourage employees to engage in political activity to support political groups, government officials or candidates. If conducted, any such activity must be voluntary and performed in the employee's own time, at the employee's own expense. It must be clear that the employee is acting independently and not as a representative of AOS.

## Human Rights

Our Core Values dictate that we operate as good global citizens. Our commitment to respecting human rights across our value chain—from our own employees to our supply chain to the communities in which we live and work is demonstrated through all levels of the organization.

## Fair Purchasing

Our Company purchases many items necessary to support our business. When making these and other purchases, we must act impartially toward vendors, suppliers and other service providers. Employees are required to follow the Company's procurement and purchasing policies.

Refer to the Conflicts of Interest section of this Code of Business Conduct for further guidance on accepting gifts and entertainment from, and having personal relationships with, vendors, suppliers and service providers.





## Sustainability & Environmental Protection

Our sustainability programs help us reduce environmental impacts from our operations, products and services; manage environmental risks; and pursue sustainability initiatives such as reducing waste and conserving energy.

Employees are required to adhere to Company-wide programs, and to be familiar and comply with environmental laws and regulations that relate to our specific work responsibilities.

## Privacy

In conducting business, we collect and store personal information about employees, business partners such as addresses, birth dates and financial, medical and other information.

When we collect and process personal information, we must comply with applicable laws and Company privacy policies.

Personal information should be collected only for legitimate business purposes, shared only with those who are permitted access, protected in accordance with security policies and retained only for as long as necessary.

We must ensure that third parties with access to personal information are contractually obligated to protect it in accordance with applicable data security standards and that they pledge conformance through signatory appended on the Declaration of Confidentiality document.



# Financial Integrity and Protecting Our Assets

## WHAT it means

We keep complete and accurate financial records that represent the condition and results of the Company. We protect our Company's property, assets and confidential information.

## WHY it matters

Financial integrity helps us maintain the trust and confidence we've built with shareholders, the government, employees and other shareholders.

*Our Final  
Responsibility Is to Our  
Shareholders,  
Stakeholders & The  
Nation*

## HOW we do it

Multiple controls are in place to protect and preserve our financial integrity. Every employee, regardless of title or function, is responsible for following the policies and procedures that involve Company funds, the reporting of financial and non-financial results, and the use of Company property and assets.





## Accuracy of Company Records and Public Reports

In all our dealings, we must keep accurate records that maintain the integrity of the Company's financial reporting, support internal decision-making and strengthen our reputation with shareholders.

Laws require us to be honest and accurate in our financial records so that they appropriately reflect our business transactions. In addition, we are required to develop and maintain an adequate system of internal accounting controls.

Many people rely on us to report financial information truthfully, completely, and in a timely fashion; among them are government regulatory agencies and ratings agencies.

Inaccurate financial reporting could undermine shareholder confidence, impact our reputation and subject the Company to fines and penalties.



### *Examples of how we build financial integrity into our work processes:*

- *We sell and purchase products and services based on quality, price and service.*
- *We record sales and expenses during the appropriate accounting period in accordance with generally accepted accounting principles.*
- *We prohibit the use of Company funds, assets or information for any illegal purpose, including the purchase of privileges or special benefits through bribes, illegal political contributions or other illicit payments.*
- *We keep accurate Company records and do not make false or artificial entries for any reason.*

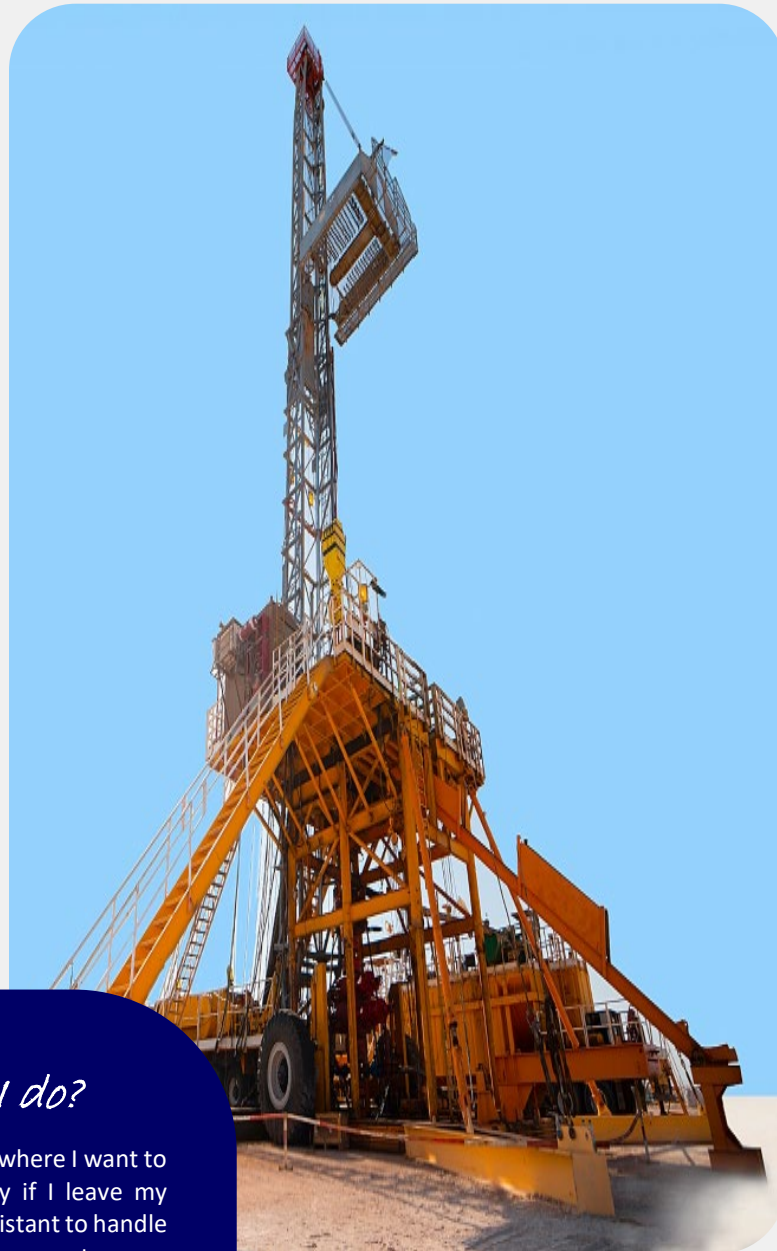


## Use of Company Assets

We rely on Company assets to support our work every day. Computers, mobile devices, vehicles, facilities, machinery, raw materials, inventory, supplies and other assets are placed in our care and should be used only for legal, appropriate reasons.

When working with Company information or technology tools (such as laptops, email, apps, databases, etc.), employees should set up complex passwords that cannot be easily guessed and should never share passwords.

Company information should not be stored with unapproved internet or cloud services that may not be protected and may be accessed by unauthorized people.



### *What should I do?*

**Question:** I am taking a vacation where I want to completely disconnect. Is it okay if I leave my laptop with my administrative assistant to handle any approvals in the various Company systems on my behalf? I trust this person completely, so I don't mind sharing my password.

**Answer:** No. Employees should never give their personal password to anyone. If you bypass these controls you are undermining the security of our systems, avoiding your own responsibilities and putting your assistant in a position of also violating Company policy.



# Preserving Our Assets

## Intellectual Property and Confidential Business Information

The intellectual property confidential information of the Company are irreplaceable assets. We must secure and protect the use of these valuable assets.

Intellectual property includes copyrights, trademarks, product and package designs, brand names and logos, research and development and trade secrets.

At all times, employees should take precautions to protect the confidential business information of the Company. Employees should avoid talking about or sharing such information in public places or social media.

### EXAMPLES OF CONFIDENTIAL BUSINESS INFORMATION

- *Detailed sales information*
- *Business performance targets*
- *Product/service strategies*
- *Pending personnel announcements*

## Respect for Trade Secrets and Confidential Information

We respect the trade secrets and confidential information of other companies and individuals. We collect information from the public domain and do not permit the inappropriate collection of others' proprietary information.

To gather information about a competitor, seek out public sources, such as the media, trade literature, the internet, or other public documents. Avoid discussions of competitive information with employees of competitors in all circumstances, including at professional association or industry meetings. Be truthful, and never misrepresent who you are or where you work to learn about competitors.

# Treatment of Our Employees

## WHAT it means

We treat each other with dignity and respect. Each of us deserves an inclusive workplace where we are fairly compensated and can do our best work.

## WHY it matters

Different thoughts, abilities, experiences and individual characteristics make our work environment richer and lead to better business decisions and results.

## HOW we do it

Our Code of Business Conduct reflects the principles that define how we treat each other, keep our workspaces safe and healthy, create a sense of belonging and provide equal opportunities for our workforce.





## Engaging our Workforce

At AOS, we believe in the power of people and value a globally diverse and inclusive culture, rooted in the ethical behaviors, respect and integrity inherent in our credo. An engaged, high performing and diverse workforce will better understand and address the challenges we face in our mission and vision to grow and add value to our stakeholders and shareholders. Please share any ideas you have for improvements and we will ensure we review and analyze them for possible implementation. We need to continually improve and the only way to do that is through listening to our employees.

## Non-discrimination and Non-harassment

We must be treated fairly and be respected for our contributions. Our Company provides equal opportunities for employment. We base employment decisions on merit, and consider qualifications, skills and achievements. We do not tolerate discrimination based on characteristics such as age, gender, race, ethnic background, national origin or religious beliefs. We also do not tolerate harassment or bullying. Severe disciplinary issues will be treated with urgency and may lead to issuance of warning letters or termination. There is absolutely no room for complacency on this as it is one of our Core Values in AOS.

## Safe and Healthy Work Environment

At AOS, we are committed to providing a safe and healthy workplace for employees, contractors and visitors working within, or visiting, our facilities.

All employees are responsible for keeping safety and health top of mind, and should:

- Promptly report unsafe or hazardous conditions to supervisors.
- Comply with all Company policies, standards and procedures relating to workplace health and safety.
- Comply with all applicable workplace health and safety laws and regulations.

### *What should I do?*

**Question:** My team is behind schedule on finishing a project and our client is depending on us to meet the deadline. We've found ways to achieve the goal by skipping a couple of safety procedures. If we are careful, is it okay to speed up the process to meet the business deliverable?

**Answer:** Safety procedures are in place to keep you safe and to protect the integrity of our products and the health of those who use them. Skipping safety procedures is not allowed! Zero Harm





## Social Media Use Guidelines

Social media includes any digital communication channels that allow individuals to create and share content and post comments.

Employees must comply with all Company policies in their use of social media and related Company content and assets. Our policies apply to communications related to job responsibilities and to personal communications that may impact the Company. In personal activities on social media, employees should be respectful and recognize that their conduct may impact the way others view who we are and what we stand for as a Company.

Employees should include a proper disclosure statement when speaking about the Company and/or our products and services. Permissions must be secured, and releases obtained, when images or video of others are to be featured.

Be alert to reporting obligations, including adverse event reporting procedures and AOS confidential information. Employees should be mindful of the content created, shared and posted, remembering that the internet is a public place.



Always use good judgment when engaging in social media activity. Be aware of the difference between social communication and business communication, as most social media platforms and mobile applications are not approved for business-related communication between colleagues.

When unsure, seek clarification from your line manager.





# Conflict of Interest Policy

## WHAT it means

A conflict of interest is a conflict between our personal interests and the interests of AOS or a customer. A conflict may arise if we have personal, social, financial, political or other interests that could interfere with our responsibilities as AOS employees.

## WHY it matters

The way we conduct ourselves in AOS business activities has an impact on our reputations and the trust we maintain with stakeholders. By recognizing and taking proactive steps to prevent conflict of interest, we send a clear message about our Company's integrity and determination to do what's right.

## HOW we do it

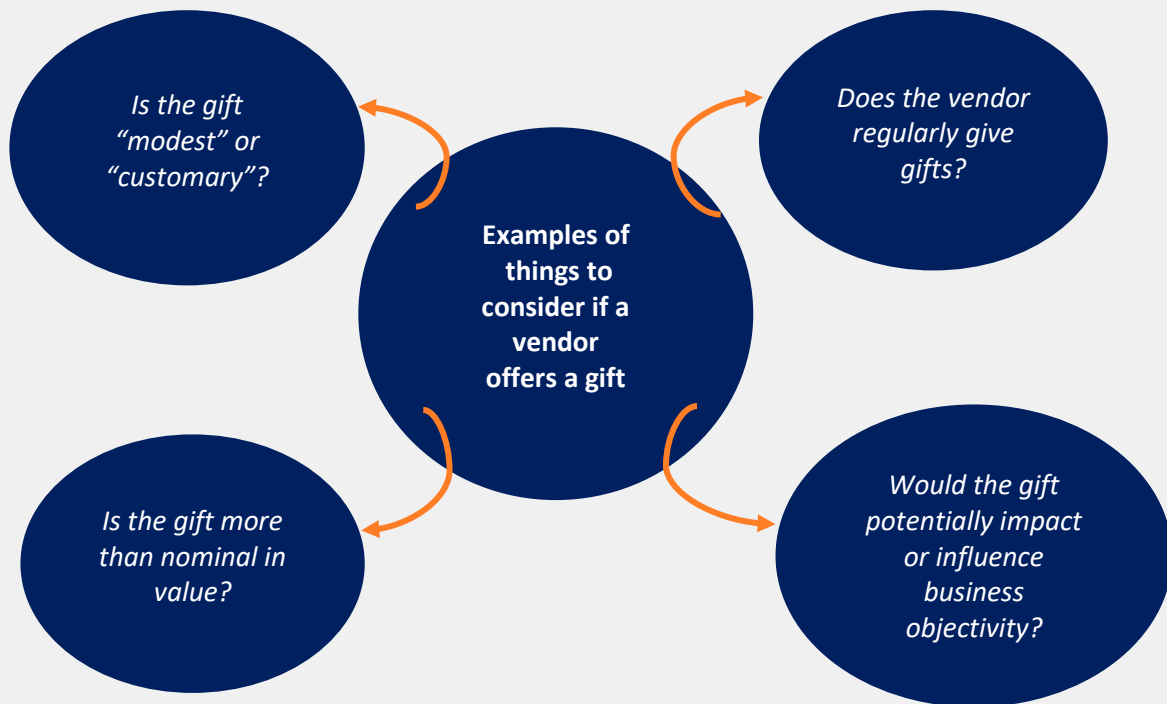
Our business decisions are based on the best interest of the Company and not for personal benefits. We require all employees to proactively disclose actual or perceived conflicts of interest. If employees are unclear whether an activity causes conflict of interest, they are required to talk to their line manager or HR.

## Gifts, Entertainment, Hospitality, Travel

Suppliers, vendors and others who do business with us are vital to our Company's success. To keep our relationships with them honest and objective, we avoid conflicts of interest.

Conflicts of interest can occur when an employee solicits or accepts gifts, payments, loans, services or any form of compensation from suppliers, customers, competitors or others is seeking to do business with our Company.

Employees should only accept gifts, entertainment, hospitality, travel or other items of value from suppliers, vendors or other contractors where they are modest, are not cash or cash equivalents, and do not influence business decisions. If unsure, seek clarification from your line manager prior to any actions.



## Personal Investments and Business Interests

We know financial health is important to our employees and their families. At times, employees may want to make business investments or take on an additional job to help build financial security. However, employees must take care to avoid any potential conflicts of interest if they do so and declare up front to management if they do have other affiliations.

## Family Members and Close Personal Relationships

Decisions are influenced by relationships with family members and close personal friends. It is essential to be vigilant about company business decisions that include close personal relationships.

**To prevent conflict of interest, employees should:**

- Avoid supervising or taking part in the promotion or hiring of a family member.
- Avoid holding a position with influence or access to performance appraisals, salary information of a family member.

If any of these situations or similar ones occur, an employee is required to inform the manager of the relationship. The manager will assess the situation, consult with management as needed, and may elect to transfer one of the employees to another available position where no conflict exists.



## Outside Board Memberships

Serving on external boards can present conflicts of interest and should be disclosed with managers. The only position where outside board memberships are actually encouraged and recommended is the CEO as it is a positive indicator of stakeholder confidence when the CEO is an active member of different boards. For other employees, before accepting membership to any boards, it is essential to understand one's legal responsibilities. Additionally, affiliations that carry the potential for distraction and conflict of interest should be avoided. All associations with external parties and membership on boards shall be declared in the Declaration of Understanding and attachments of the details of the associations shall be provided as necessary.

## Confidential Information

### Use of confidential information

All employees at AOS is responsible for the correct use of information. Unauthorized use or distribution of confidential information violates our code of conduct, and could be illegal. All nonpublic information should be considered inside information and should never be used for personal gain. All employees at AOS must sign a non-disclosure agreement as a condition for hiring.

At AOS, we believe in protecting information, whether it belongs to us or to others. It provides a solid foundation to our reputation and sustainability as a business.

We must not disclose or communicate information to third parties, except when required and authorized for business purposes. In all such cases, employees must inform their superior prior to any disclosure. All stakeholders outside of AOS, who receive confidential information, must sign a confidentiality agreement.

### Confidential information of Third parties

In AOS we respect the property rights and proprietary information of other companies. This means we never reveal the confidential information of our business partners, employees, contractors, suppliers or any information that is inadvertently revealed to us and subject to legal obligations.

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