

## ATLANTIC BUSINESS PRINCIPLES

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**THESE PRINCIPLES ARE APPLICABLE TO EACH EMPLOYEE WITHIN THE ATLANTIC GROUP OF COMPANIES AND TO DIRECTORS AND OFFICERS**

### STATEMENT OF PRINCIPLES

These principles set the standard of ethical business conduct for the Atlantic Group of Companies and its employees.

Atlantic is a commercial organisation operating in and subject to the forces of the private sector. It pursues corporate opportunities that provide an appropriate return for its investors in order to discharge its responsibilities and to remain in business. Atlantic's investment criteria are primarily economic, but take proper account of social and environmental considerations. We recognise that many of Atlantic's activities will be subject to regulation. We work constructively with governmental and regulatory authorities to ensure that such regulation is conducive to the highest standards of environmental performance, safety and operational integrity, and balances the interests of investors and other stakeholders.

We:

- are dedicated first and foremost to the safety of people and operations.
- are driven to succeed and to improve.
- do all of this by attracting and developing great people.

Atlantic is committed to upholding the highest standards of ethical conduct. Its commitment to these Principles is the foundation on which it builds and conducts its business.

We:

- respect the rule of law, conduct our business with integrity, and show respect for human dignity and the rights of the individual wherever we do business.
- create mutual advantage in all our relationships so that people will trust us and want to do business with us.
- demonstrate respect for the natural environment and work towards our goals of no accidents and no harm to people.
- manage our financial performance to maximize long-term value for our shareholders.

## PRINCIPLES

### **PERSONAL CONDUCT**

We expect the highest standards of personal conduct. Honesty, integrity and fairness form the cornerstones of relationships inside and outside Atlantic. Corruption in any form is unacceptable. Undeclared offers or payments will not be accepted, solicited, or made.

Each employee of Atlantic is required to avoid any conflicts of interest between personal activities and the business of Atlantic. Each employee is required to make proper use of company assets. Fraud and theft of any sort are unacceptable. Prevention of fraud and theft is the responsibility of each employee. While it is recognised that limited corporate hospitality is given and received as part of building normal business relationships, employees should avoid accepting hospitality or gifts which place them under an obligation.

In this regard, proper and full records are made of all transactions made by or on behalf of Atlantic.

### **WORK ENVIRONMENT**

The welfare of employees is an essential principle for Atlantic. We aim to provide all our employees with competitive terms of employment. All employees will be encouraged to play a full part in personal career development through progressive human resource and training arrangements. We recognise the value of diversity. We recruit and promote employees on merit. We are committed to operating in accordance with the national labour laws.

We seek continuously to improve our relationship with our employees. We are committed to equal opportunities and the avoidance of discrimination. We are committed to the management of a grievance procedure.

### **NON-HARASSMENT**

The Company has a strong commitment to providing a work environment that is free of harassment of any kind. Consistent with this commitment, it is against Company policy for any employee or visitor on the Company's premises to engage in any form of harassment on the basis of race, creed, sex, sexual orientation or disability. Personnel at all levels of the Company have the responsibility to avoid any act or action, impede or explicit that may suggest harassment in any form.

### **CORPORATE CONDUCT**

We comply with all applicable legal, regulatory and licence requirements in the countries where we do business. We aim to co-operate fully with government and regulatory bodies, and we comply with applicable competition law when carrying out our business operations. We apply high standards of corporate governance to the operation of all companies within the Atlantic Group of Companies.

In its public communications Atlantic seeks to provide timely disclosure which is full, fair, accurate and easily understandable. We do not engage in party politics or make donations to political parties or candidates. We use our corporate influence properly.

### **COMMUNITY RELATIONS**

We recognise that continuous consultation with communities is essential to building effective relationships. The Company is committed to communication with communities in the event of problems at its facilities, to advise on the nature of any incident and to address residents' concerns.

The Company will support communities where it operates through a social investment programme which seeks to address communities' needs for infrastructure improvements, educational opportunities and financial support for sustainable business enterprises.

The Company encourages its employees to participate in community and civic affairs. We are committed to recruiting employees from the surrounding communities and the national community and encourage our suppliers and contractors to do likewise.

### **HUMAN RIGHTS**

We conduct our business as a responsible corporate citizen. We support the Universal Declaration of Human Rights and aim to apply its principles throughout our business operations.

### **HEALTH, SAFETY, SECURITY AND ENVIRONMENT**

Atlantic is committed to the protection of the health, safety and security of its employees and the residents of communities in which it operates and to the conservation of the environment.

To meet these objectives, we conduct our operations using sound HSSE management systems which reflect best industry practice, and we seek to deliver continual improvement by ensuring that lessons are learned. HSSE performance is a core value in our business and all employees are accountable for its delivery. We are committed to promoting an accident free workplace and we have adopted a zero tolerance policy for incidents and accidents. A safe and secure work environment is fundamental to business success and we seek to protect our personnel, physical assets, information and company reputation from harm.

### **COMMUNICATION**

Atlantic recognises the vital role that clear and effective communication plays in sustaining business relationships and promoting public and employee confidence in Atlantic's activities. Openness and transparency of communications, appropriate to the expectations of respective audiences, is a key business goal, subject to the demands of commercial confidentiality.

### **THIRD PARTIES**

Business integrity is a key standard for the selection and retention of those who represent and work for Atlantic. Agents, representatives, consultants or third-party contractors must signify their willingness to accept and comply with Atlantic's policies and procedures, and they will only be retained on terms that are consistent with Atlantic's Business Principles and related policies.

**CUSTOMERS**

Atlantic aims to deliver customer satisfaction by developing and maintaining mutually profitable and lasting relationships with customers, offering value in terms of timeliness, reliability, safety and quality and responding to customers' needs through continuous innovation.

**IMPLEMENTATION OF THESE PRINCIPLES**

These principles are fundamental to the conduct of our business and must not be compromised. Everyone within Atlantic is responsible for observing the code and procedures instituted to ensure compliance. Managers are specifically responsible for these standards and for ensuring they are applied throughout Atlantic. All corporate decisions will be made in line with these principles.

To ensure compliance Atlantic will:

- provide direction and training to enable employees to protect and make proper use of Atlantic's assets in conducting business appropriately.
- ensure that disciplinary policies and procedures are in place and communicated to all employees so that they are aware of their personal obligations.
- where breaches are evident, discipline employees in accordance with the relevant procedures and prosecute and seek redress as appropriate.
- maintain a register of possible conflicts of interest to ensure transparency.
- maintain a register of gifts and entertainment.
- offer employees a secure and confidential means of providing feedback to management without fear of reprisal.
- encourage in our business partners the same level of commitment to the Atlantic Business Principles and related policies.