


Anti-Bribery and Corruption Policy				
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## ANTI-BRIBERY AND CORRUPTION POLICY

### INTERNAL Support channel

If you have any questions regarding the correct course of action you can contact the Risk & Controls and Legal teams by emailing [ABCcompliance@golar.com](mailto:ABCcompliance@golar.com)

The ABCcompliance email address should also be used to notify the Risk & Controls and Legal teams of:

- Any planned interactions with Government Officials
- All gifts and hospitality (including travel and lodging) provided to Government Officials
- Any charitable donations to be made in high risk countries
- Any facilitation payment requests
- Any personal protection payments made

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# ANTI-BRIBERY AND CORRUPTION POLICY

Statement from the CEO of Golar LNG Limited:

*"We believe that a commitment to honesty, ethical conduct, and integrity is a valuable asset that builds trust with our employees, customers, suppliers, shareholders, and the communities in which we operate.*

*The nature of our business means we often interact with Government Officials and operate in countries with a high risk of corruption; therefore, it is crucial that all employees are aware of and understand the guidance set out in this Policy.*

*By following this Policy and contributing to the prevention and detection of bribery and corruption you can help avoid personal criminal liability and protect the Company from significant fines and loss of our license to operate.*

*I encourage you to seek advice and support if you are unsure about a course of action or feel under pressure to breach this Policy in any way. Additionally, our Speak Up Policy provides guidance on how you can raise a significant issue or concern relating to suspected or actual violations of internal policies."*

## 1 Purpose

Bribery and corruption undermine the rule of law and the principle of fair competition and causes significant damage to the societies in which we operate and to the proper functioning of the international energy market. Golar LNG Limited ("the Company") is committed to playing its part in supporting an ethical marketplace, free from corruption.

### 1.1 Zero tolerance of bribery and corruption

The Company is committed to instilling a strong anti-corruption culture and to upholding all laws relevant to countering bribery and corruption. This includes, but is not limited to, the US Foreign and Corrupt Practices Act ("FCPA") and the UK Bribery Act 2010 ("Bribery Act"). To the extent that applicable laws or regulations have stricter requirements, they will overtake the requirements in this Policy.


**The Company expressly prohibits the offering, giving, solicitation, or acceptance of any bribe, whether cash or any other inducement.**

<b>What is a bribe?</b>	<p>An inducement or reward offered, promised, or provided in order to influence a person to act improperly.</p> <p>A bribe may take the form of cash or cash equivalents, travel, entertainment, sponsorship of conferences, tickets to concerts or sporting events, free goods, internships or other job opportunities, or other benefits.</p>
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Corruption does not necessarily involve money. Anything of value, including gifts, meals, travel, charitable donations or entertainment, may be considered a bribe under certain circumstances. There is no minimum monetary value threshold that can constitute an improper payment or gift. It can be any amount or item of any value if it is given with the intent that it will improperly influence a decision.

This applies to payments to or from any person or company, by any Company personnel or third party, anywhere in the world. Companies and individuals can be charged with a crime even if the payment was made outside of the country in which the company or individual is based.

Bribery by any Company Personnel or third party in order to gain any commercial, contractual or regulatory

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advantage for the Company potentially exposes the Company and the individuals involved to criminal prosecution.

Extra care and due diligence should be taken in all interactions with Government Officials, which can include employees of state-owned or state-controlled commercial enterprises. State control is dependent on a range of factors and not just the % of ownership. If there is any State involvement in the enterprises we are interacting with, extra care should be taken and the Risk & Controls personnel should be involved to determine the necessary controls to have in place.

But to be clear, the Company prohibits all forms of bribery and corruption in all of our business dealings, not just in dealings with public sector officials.

## 2 Who does this policy apply to?

This Anti-Bribery and Corruption (“ABC”) Policy (“this Policy”) applies to all employees (whether contractors, fixed term or permanent, interns, seconded staff), directors, officers (all referred to as “Company Personnel”) and “third parties”. Third parties in this context includes agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and corporate bodies) associated with or doing business with the Company.

The policy covers all activities conducted anywhere in the world.

## 3 Your responsibilities

It is the responsibility of all applicable parties, defined under section 2:

- To ensure that this Policy is read, understood, and complied with;
- To prevent, detect and Speak Up about any acts or suspected acts of bribery or corruption;
- To avoid any activity that might lead to or give the appearance of impropriety or suggest a breach of this Policy;
- To raise any “red flags” (such as a third party’s refusal to certify compliance, a third party who is close friends with a government official etc) to the Risk & Controls and Legal teams; and

When in doubt about a particular course of conduct, seek guidance. The Company has a variety of people available to assist you as follows:


- Risk & Controls and Legal teams
- Senior Management

## 4 Policy statement

### 4.1 Interaction with governments

Sometimes it is necessary for the Company to interact with Government Officials. The Company promotes transparent and lawful interaction with Government Officials. A Government Official includes a wide variety of positions and roles, including:

- officers and employees of any local, municipal, provincial, state, federal or foreign government, of any department, agency or instrumentality of a government;
- any person acting in an official capacity for or on behalf of any of the above groups;

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- official or employee of a company wholly or partially owned by a government (for example, state owned gas companies);
- officer or employee of a public international organization, such as the United Nations or World Bank;
- any political party or party official;
- any candidate for political office; or
- an immediate family member (meaning spouse, dependent child, parent or household member) of any of the foregoing.

The Risk & Controls personnel should be informed in advance of any meeting with Government Officials. The Risk & Controls personnel should be updated on the progress of the discussions to ensure controls are implemented when necessary.

All Payments, Gifts, meals, entertainment, charitable contributions, and/or travel and lodging given or extended by Company Personnel or the Company to Government Officials must be communicated to the Risk & Controls personnel in advance, or soon after the fact if it was an unplanned expense. You should email the Risk & Controls personnel, detailing the nature of the transaction, the value, and the business rationale, such as:

- the costs incurred were directly related to the promotion, demonstration, or explanation of Company's plans, assets, or services or
- the Company has a contractual obligation.

The Risk & Controls personnel will maintain a gifts and hospitality register for Government Officials and assist in implementing controls when needed.

#### 4.2 Working with third parties

Golar is responsible for parties acting on behalf of the Company.

Company Personnel may not make payments to a third party (all parties not the Company or Company Personnel) when they know, or have reason to believe, that such payment will be passed to a Government Official to improperly influence the decision-making authority of that individual. Simply put, neither the Company nor Company Personnel may use an agent or third party to make any payment the Company is not permitted to make directly.


You should:

- Carry out the relevant internal procedures before engaging with the third party. Applicable procedures (found in Docmap) may be:
  - Ethical due diligence procedure
  - Engaging Commercial Agents procedure
- Notify third parties about the Company's stand against corruption, including by sharing a copy of this Policy.
- Include appropriate provisions in contracts indicating that the third party will comply with the FCPA and the Bribery Act and will agree to other anti-corruption compliance obligations within any written contracts.

#### 4.3 Contributions and donations

##### (i) Political:

The Company does not make contributions of any kind to political parties or candidates for political office.

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Company Personnel shall not use their own funds to make political contributions for any purpose connected at the time of the contribution or intended to be connected in any way to Company business. Company Personnel shall under no circumstances use Company funds to make direct or indirect Payments or Gifts, whether in the form of money or any other thing of value, to a political party, a member of a political party, or candidate for public office. The Company will not reimburse you for any expenses that are linked to political activities or making a personal political contribution. Political contributions include more than cash contributions. They also include any other item of value, such as volunteer time, a gift or any other form of payment.

(ii) Charitable:

No charitable donations will be made by the Company for the purpose of gaining any commercial advantage. Care and due diligence should be exercised to ensure that any charitable donations are not used as a form of bribery. As with all financial expenditure, the correct internal approvals should be received before a donation is made.

For charitable donations made in countries with a higher risk of corruption (listed in the High Risk Country Anti-Bribery & Corruption procedures, Appendix A, in Docmap), or where the donation is at the request or benefit of Government Officials, the Risk & Controls personnel should be involved prior to approval of the donation.


#### 4.4 Sponsorship

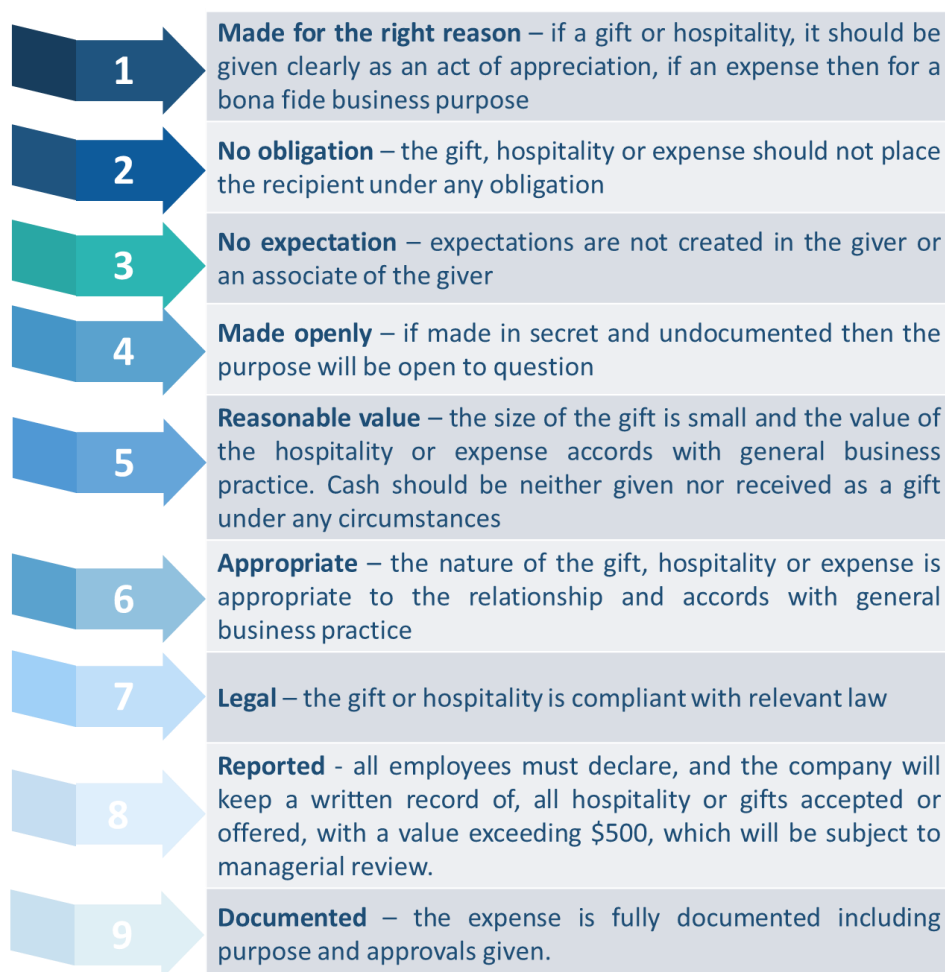
The Company is proud to sponsor various community and other events. However, any sponsorship should always be reasonable, made in good faith without the expectation of anything in return or the intention of influencing the behaviour or decision-making of others.

#### 4.5 Gifts and hospitality

Gifts and hospitality can, when excessive or inappropriate, constitute a bribe. Therefore, care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality.

Genuine hospitality or similar business expenditure that is reasonable and proportionate is allowed. The following criteria should be used to test if gifts, hospitality, or expenses comply with this Policy:

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All such courtesies should be directly related to legitimate business discussions or regarding the demonstration, promotion, or explanation of the Company's plans, assets, or services, or a contractual obligation involving the Company's plans, assets, or services.

If any Company Personnel are in any doubt as to whether a gift, hospitality, or expense complies with this Policy, the matter should be referred to their line manager in the first instance. Third parties should consult with their normal point of contact within the Company concerning the propriety of any gift, hospitality, or expense.

**You are required to declare all hospitality or gifts accepted or offered where the value exceeds \$500 (either as a one-off or in a series of gifts over the course of six months). Any such instances should be declared to the HR Manager who oversees your location.** If the hospitality and gifts are to be given to a Government Official, the Risk & Controls personnel must also be notified, as described under section 4.1. All declarations must be accurate and complete and supported by truthful receipts, business justifications, and other supporting documentation.

#### 4.6 Travel and Lodging.

Travel and Lodging expenses must be pre-approved in writing by the CEO and/or CFO before agreed with a third party. When the travel and lodging is to be provided to a Government Official the Risk & Controls and Legal teams should also be consulted.

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Any travel and lodging must be reasonable, bona fide and directly related to the demonstration, promotion or explanation of the Company's facilities, plans, assets or services or for the execution or performance of a Company contractual obligation.

The Company shall attempt to prepay for the accommodations and airfare directly with the service providers. Where this is not possible, receipts should be obtained to support the amount reimbursed for any travel and lodging.

There must be an appropriate balance between the business meeting or event and other activities provided and the legitimate business purpose shall be fully documented (e.g. the invitation letter). The travel/hospitality booked should not exceed our internal standards.

#### 4.7 Facilitation payments

<b>What is a facilitation payment?</b>	Small payments made to low-level public officials to secure or speed up routine actions to which the Company is entitled, such as issuing permits, immigration controls, providing services or releasing goods held in customs. Facilitation payments include gifts and hospitality as well as cash payments.
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Facilitation payments constitute bribes and **may not be made at any time** irrespective of prevailing business customs in certain territories. The Company will work to ensure that Company Personnel and third parties do not make facilitation payments on the Company's behalf.

A log of all facilitation payment requests should be kept and reported to the Risk Controls and Legal teams.

#### 4.8 Personal protection payments

Demands for inappropriate payments may be accompanied by threat of physical harm. Our Company recognizes a very limited exception for situations involving duress or threats to the health, liberty and safety of any person.


You must put safety first, so if necessary, make the payment and then report to the Legal Department as soon as possible. Such report must include the date and time of the payment and threat, the name of the individuals involved and their employer, the amount and form of the payment, the nature of the threat, and any other pertinent details.

#### 4.9 Fraud

Fraud can take many forms, for example, theft, embezzlement, misrepresentation and falsification of records. It is a crime and exposes the Company to significant financial, legal and reputational risks. In case of fraud, our Company may pass the information to law enforcement agencies to determine whether criminal charges could be warranted.

Actions constituting fraud include but are not limited to misappropriation of funds or other assets, impropriety in the handling or reporting of money, or seeking anything of material value from contractors or vendors, etc. with the intent or result of personal gain.

- You must be alert for any indication of fraud by anyone – including those senior to you. If you detect or suspect fraud, report the incident immediately.
- Do not process payment requests without the required internal authorizations and do not break a debt into multiple, smaller payments to avoid authorizations.

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- Only designated individuals should input and change bank details for employees and suppliers. Any change in bank details should be verified appropriately before a change is made.

## 5 Training requirements

The Company requires that all employees complete training, or read and sign a declaration, on this Policy as part of the induction process and periodically thereafter.

Training may also be provided to certain individuals that present a higher bribery risk (e.g. individuals that represent the Company, such as in sales negotiations and interacting with public officials).

## 6 Monitoring and compliance

All employees and third parties are responsible for the success of this Policy and should ensure that they use the guidance provided to identify and report any potential bribery or corruption risks.

The Company will monitor the effectiveness and review the implementation of this Policy regularly to ensure its suitability, adequacy, and effectiveness.

## 7 Reporting of breaches

You must speak up **as soon as possible** if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. You can report concerns to your line manager (or if a third party your regular contact at Golar), the Legal team, HR or Senior Management. If you do not feel comfortable in reporting internally, you should refer to and follow the Speak Up Policy, including use of our anonymous reporting hotline ([www.golarlng.ethicspoint.com](http://www.golarlng.ethicspoint.com)).

Under no circumstances shall a person who reports a suspicion of bribery be subject to victimization for making a report in good faith, whether or not the suspicion turns out to be justified.