

CODE OF BUSINESS CONDUCT (the “Code”) AND CORPORATE SOCIAL RESPONSIBILITY OF ROCKHOPPER EXPLORATION PLC AND SUBSIDIARIES (“Rockhopper”)

Rockhopper is committed to behaving responsibly in its business dealings. All employees, directors and consultants (‘personnel’) are required to have regard to Rockhopper’s Code in their day to day business behaviour and any breach of the Code will be treated very seriously. The Code sets out the standards and policies which apply.

Rockhopper’s Italian subsidiary, Rockhopper Italia SpA, has a local Code of Ethics which applies to its personnel in addition to the Rockhopper Code.

1. Legal compliance

Rockhopper and its personnel are required to comply with the relevant laws in the countries in which it operates and to have regard to regulations and standards which apply to Rockhopper’s business.

2. Anti-Corruption and Bribery Policy

Rockhopper expects all personnel to conduct their business dealings honestly and with integrity. Rockhopper has adopted an Anti-Corruption and Bribery Policy and has put in place procedures designed to counter bribery and corruption. In accordance with the laws with which it is obliged to comply, Rockhopper prohibits bribery and facilitation payments must be avoided unless there is a perceived risk to persons or property. Any gifts or hospitality given or received must be reasonable and appropriate in the circumstances and must not cause a conflict of interest.

3. Corporate Governance

Rockhopper’s Board of Directors seeks to apply the highest corporate governance standards and its policy is to apply best practice and adhere to the UK Corporate Governance Code as far as practical.

4. Employees

Rockhopper recruits and promotes employees on the basis of their ability for the job and does not tolerate discrimination based on race, religion, gender, sexual orientation or age.

5. Health, safety and environment

Rockhopper seeks to provide a safe and healthy working environment and observes health and safety standards, laws and regulations in the countries in which it operates. Rockhopper ensures that personnel receive appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner. Rockhopper acts with care and sensitivity towards the local environment in which it operates and aims to minimise any adverse effects that its activities have on the environment.

6. Relationships with business partners

Rockhopper seeks to establish productive relationships with suppliers, customers and business partners and to conduct activities with respect and integrity.

7. Relationships with communities

Rockhopper seeks to operate responsibly and with regard to local communities. Rockhopper will aim to ensure that those countries and communities where we do business benefit from our presence.

8. Conflicts of interest

Personnel are required to disclose any direct or indirect interest in any of our suppliers, customers or competitors which could conflict with Rockhopper’s best interests and to avoid any actual or potential conflicts of interest. Personnel are expected to act solely for Rockhopper’s benefit.

9. Business information and public communications

Personnel may only use information received in the course of business dealings for the purpose for which it is intended or normally used and never for personal gain. Personnel are required to abide by the internal procedures for the publication of information regarding Rockhopper.

Personnel are required to abide by Rockhopper's Share Dealing Code.

10. Whistleblowing

Personnel are encouraged to report any actual or suspected breaches of the Code, the Anti-Corruption and Bribery Policy and any legal or regulatory breaches. There will be no detrimental treatment of an individual as a result of that person raising an issue and all efforts will be made to protect the confidentiality of individuals who do raise concerns.

11. Political contributions

Rockhopper does not make contributions to any political party.