

# **Tethys Petroleum Limited**

## **Anti-Bribery Policy**



### **Introduction**

Tethys Petroleum Limited (“TPL”) values its reputation for ethical behaviour. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. TPL’s aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all relevant employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting appropriate authorities in any resultant actions;
- Taking firm and vigorous action against any individual(s) involved in bribery.

### **Policy**

TPL prohibits the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on TPL behalf in order to gain any commercial, contractual or regulatory advantage for TPL in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

### **Further Clarification**

TPL recognises that market practice varies across the global regions in which it conducts business and what is normal and acceptable in one place may not be the same in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which may not be solely in the interests of TPL or of the person or body employing them or whom they represent.

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This policy is not meant to prohibit the following practices providing they are customary in a particular market are proportionate and are properly recorded:

- normal and appropriate hospitality;
- the giving of appropriate gifts on a festival or at another special time;
- the use of any recognised fast-track process which is available to all on payment of a fee;
- the offer of resources to assist the person or body to make decisions more efficiently;
- normal and commensurate commissions, lobby payments, consultancy fees, etc, made against appropriate contracts and/or invoices.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the TPL Executive Board before proceeding.

### **Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group.

### **Third Party Responsibility**

The prevention, detection and reporting of bribery is the responsibility of any agent or other person or body acting on TPL behalf.