



DanaEnergy



Code of Conduct

The Code of Conduct represents our guiding principles and encompasses the rules and guidelines that each of us, as Dana Energy employees, are obliged to adhere to. We are committed to thoroughly reading and comprehending this handbook to ensure accurate understanding.

Chief Executive Officer's Message

At Dana Energy, we firmly believe that our international presence entails international commitments. We take pride in our reputation for delivering high-quality products and services while upholding integrity and business standards. Today, our legacy and reputation rely on individuals like you, who understand that no achievement is more significant than doing what is ethically right. Our determination to pursue the «right» path should never be compromised.

Dana Energy's «Code of Conduct» reinforces our core values of wisdom, integrity, commitment, respect, and safety. This document outlines the primary expectations of the organization and provides guidance on accessing the specifics of standards and procedures in various scenarios. The foundation of this document rests upon our shared beliefs, emphasizing the commitment to uphold these principles across all levels of the organization.

It is my hope that all Dana Energy employees prevent significant issues for both the company and their colleagues by not only reading and understanding but also fully embracing the principles outlined in this document. We anticipate you to raise questions and report any organizational matters that run counter to these standards. Our policy explicitly prohibits any form of retaliation against employees who bring forth such violations or concerns.

Every one of us bears the responsibility of aligning our daily business activities with the Code of Conduct. This aligns with the expectations of those with whom we conduct business. Our credibility and future success hinge on each individual's commitment to uphold the values outlined in this document. Through comprehending and adhering to these behavioral principles, we can consistently uphold our reputation as a company that stands by its core values while achieving favorable financial outcomes.

We extend our gratitude for your diligent efforts and unwavering commitment to upholding the reputation of the Dana Energy brand.

Mohammad Irvani
CEO



Following Our Principles and Values

At Dana Energy, we strongly uphold the values of trust, honesty, respect, teamwork, professionalism, and pride in our work. Our core values - safety, commitment, respect, honesty, and wisdom - serve as the fundamental pillars guiding our conduct across all dimensions of business. Individually and collectively, we are dedicated to generating value for all stakeholders and cultivating their trust as a dependable partner in the energy sector and as a proactive contributor to sustainable development.

Our unwavering commitment to integrity, honesty, and respect has been evident throughout our history and remains a cornerstone of our past and future success. We champion a culture that fosters ethical conduct, unwavering commitment to responsibilities, as well as the adherence to health, safety, security, environmental, and social responsibility protocols.

Wisdom, which forms the foundation of our organization's name, is the pivotal factor that positions us as forward-thinking pioneers and champions of excellence in the industry. We take great pride in our team's professional dedication to continual enhancement through the sharing of knowledge. Our advancement is only achievable when we embrace these values and acknowledge their impact on our performance, our colleagues, the industry, and society at large.

Our Guiding Principles

The Code of Conduct encapsulates our guiding principles and encompasses the rules and directives that each Dana Energy employee must adhere to. We are devoted to thoroughly reading this handbook and striving to comprehend accurately. Continuous training on these behavioral principles is integral to our commitment at Dana Energy, ensuring we uphold them appropriately. However, it's important to recognize that this document may not cover every intricate challenge or circumstance in detail, nor encompass all regulations, guidelines, and procedures.

Our values of wisdom, integrity, commitment, respect, and safety are embedded within these codes. The ensuing document outlines the behaviors essential for upholding the company's standards. This document equips us with the ability to make sound judgments when faced with ethical dilemmas, while also guiding us to the right individuals who can address our queries and concerns.

Our employees are the integral threads that bind the organization, fortify its esteemed reputation, and steer its success and advancement. As the very bedrock on which the organization was constructed, we shoulder the responsibility of preserving its invaluable legacy.

Our Responsibility

What are my main responsibilities in order to uphold the ethical principles of Dana Energy's business?

- **Awareness and Compliance:** Be aware of and adhere to organizational and professional policies, rules, and regulations.
- **Legal Requirements:** Develop and maintain business operations based on the highest level of legal requirements and standards.
- **Immediate Reporting:** Promptly report issues and cases that fall outside the defined boundaries of ethical behavior, whether definite or suspicious encounters. Whenever you need further guidance or are uncertain, consult your direct manager, the relevant vice president, or the vice president of human resources.

We believe that managers, like other employees, are required to comply with the ethical principles of our business and have additional responsibilities. Those responsible for managing or supervising employees are expected to:

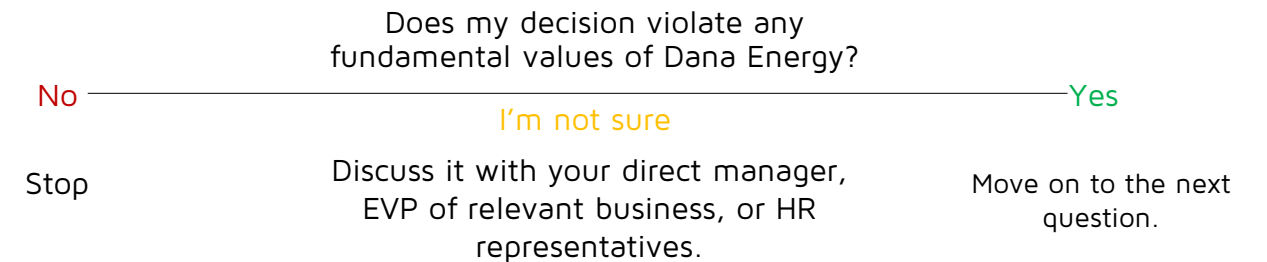
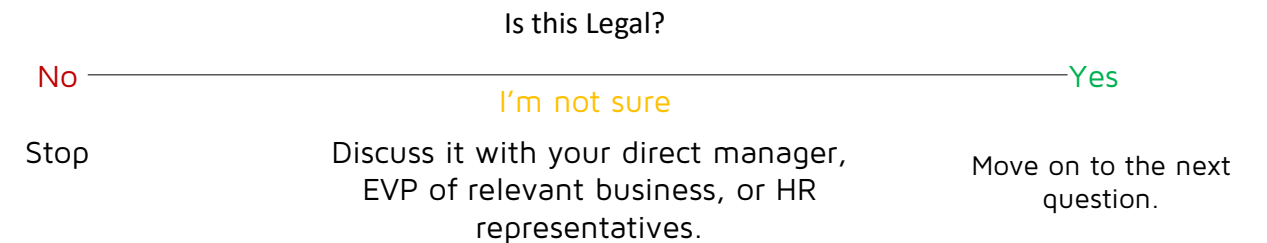
- **Role Modeling:** Act as role models, striving to promote behavioral principles.
- **Support Ethical Behavior:** Support and participate in ethical behavior and compliance with laws.
- **Fair Treatment:** Treat each employee with fairness and respect.
- **Shared Responsibility:** Encourage each team member to consider themselves responsible for ethical performance.
- **Continuous Implementation:** Continuously work to implement ethical principles.
- **Clear Communication:** Ensure all team members understand these principles and can adapt to the organization's expectations.
- **Guidance:** Be a guide for employees to recognize and report violations.
- **Open Communication:** Foster a close, sincere, and respectful relationship with employees through various communication channels, including face-to-face when possible.
- **Listening:** Listen to employee questions and concerns, following the open-door policy.
- **Protection:** Safeguard employees against retaliatory actions.
- **Addressing Violations:** If a violation occurs, identify and address its root cause to prevent similar occurrences.
- **Encouraging Innovation:** Welcome employee suggestions and strive to implement efficient and productive ideas.
- **Respect for Boundaries:** Avoid compelling individuals under their supervision to work beyond regular working hours.

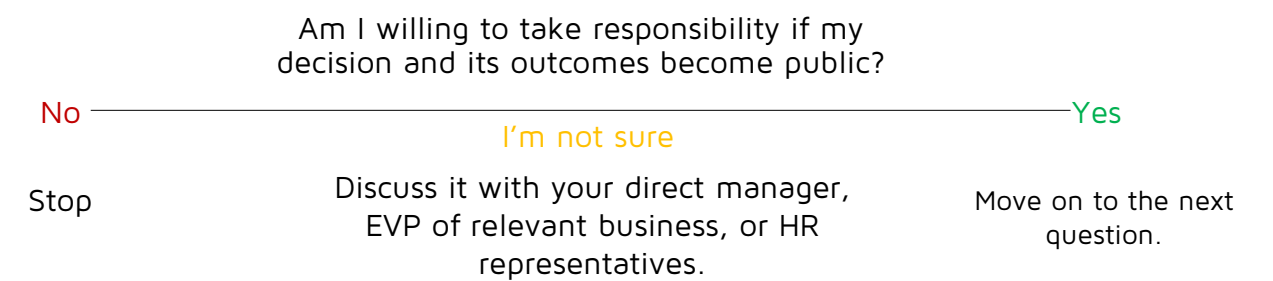
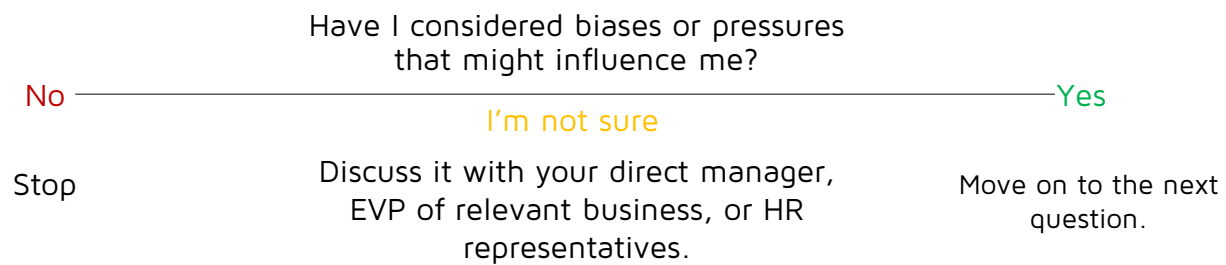
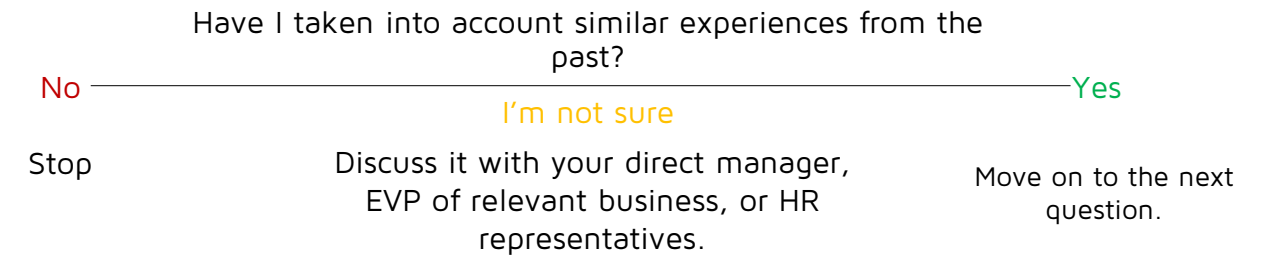
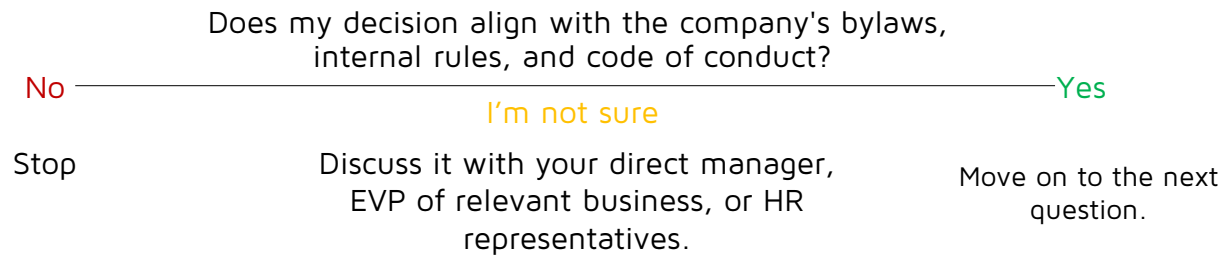
Ethical Decision Making

Making decisions based on ethical principles is a crucial pillar for the success of our organization. Some decisions are straightforward, making the decision-making process easy, while others are more challenging. When facing difficult situations, asking the following questions can guide decisions aligned with ethical principles.

For a decision to be considered «ethical,» consider answering the following questions:

1. **Is this Legal?** If unsure about the rules in a specific situation, consult your direct manager or the EVP of the relevant business.
2. **Value Alignment:** Does my decision violate any fundamental values of Dana Energy?
3. **Rule Adherence:** Does my decision align with the company's bylaws, internal rules, and code of conduct?
4. **Awareness of Bias:** Have I considered biases or pressures that might influence me?
5. **Past Experiences:** Have I taken into account similar experiences from the past?
6. **Public Consequences:** Am I willing to take responsibility if my decision and its outcomes become public?





Violation of Principles and Reporting

Failure to adhere to our principles will result in disciplinary consequences commensurate with the violation, which can extend to the termination of the responsible individual. We all share the responsibility of reporting any suspected or actual instances of unethical behavior using the appropriate channels. In the event of observing a breach of business principles, what should be your initial action?

- First, consult your direct manager.
- If necessary, escalate the matter to the relevant deputy.
- As a last resort, reach out to the Professional Ethics Committee (information about committee members can be found on page 36 of this booklet).
- Utilize the Dana Energy Hotline.

Question and Answer:

Q: I've witnessed a situation that appears to violate the code of conduct. Should I report this even if I'm not entirely sure there's a problem?

A: All employees are obligated to promptly report any potential breaches of company rules to their supervisors or designated contacts within the organization. While reporting to managers is usually the preferred route, colleagues can also utilize the Dana Energy Hotline if necessary. Your report will be treated with seriousness and careful consideration. It's advisable to report a suspected issue, even if it might not appear significant, rather than overlook a potential violation of company rules or legal standards.

Q: If I encounter a situation that seems suspicious, should I first talk to my direct manager or directly contact the Dana Energy Hotline?

A: If you have the means to address the matter by discussing it with your direct manager or HR representatives, there's no immediate need to contact the Dana Energy Hotline. The Hotline is an alternative for individuals who, for various reasons, might not feel comfortable approaching their manager or HR representative.

Our Business Ethics

The fundamental principles that guide our business at all levels of activities and communications are as follows:

- Behaving with sincerity, respect, honesty, and, when necessary, frankness (mutually).
- Upholding fairness and justice and adhering to them.
- Compliance with laws, respect for regulations, and adherence to guidelines.
- Respect for privacy, preservation of trust, and confidentiality.
- Adherence to personal and environmental hygiene.
- Engagement and loyalty to the organization and profession.
- Considering individual and collective benefits, refraining from unethical transactions.
- Upholding responsibility, accountability, and constructive criticism.
- Valuing individual and collective efforts, avoiding comparisons.

Our business principles are rooted in a combination of national and international laws and frameworks. These requirements shape our behavior and contribute to fostering a

healthy work environment. Dana Energy's capacity to create value for its stakeholders rests upon maintaining high standards and fostering open dialogue on ethical and behavioral matters both internally and externally.

We maintain relationships with international and domestic organizations concerning our operations, aiming to address their concerns. In situations where differences arise between the requirements or legal principles of involved parties, we uphold the higher standards.

The following business principles serve as a compass and foundation for our daily pursuits, aligning with objectives such as business sustainability, stakeholder profitability, and the unlocking of community potentials in our operational areas.

The Professional Ethics Committee is responsible for monitoring the practical implementation of these principles. Violations of these principles entail consequences as per legal stipulations. These principles emanate from our core values and are further informed by the following international documents:

- United Nations Convention against Corruption
- International Labor Organization Conventions
- United Nations Global Compact
- International Financial Reporting Standards (IFRS)
- United Nations Declaration of Human Rights

Three overarching priority principles underpin our decision-making:

- We actively seek the highest standards of safety, environmental protection, and quality in all our endeavors.
- Any breach of laws related to bribery and corruption within our organization will not be tolerated.
- We uphold human rights, valuing equality and diversity within our workplace.

Our Employees

The achievement of overarching goals and the development of the organization fundamentally hinge on the mutual trust fostered between the organization and its employees, as well as among the employees themselves. Dana Energy consistently upholds stringent standards for the conduct and character of its employees, who serve as ambassadors for the organization. Individuals are expected to adhere to rules and regulations and fulfill their assigned responsibilities in accordance with the established requirements and standards at Dana Energy.

Every level of the organization plays a distinctive role in cultivating and sustaining this trust. Well-defined and precise regulations, coupled with individual accountability and collective common sense among colleagues, serve as valuable cornerstones in building this trust.

Each member of the organization bears the responsibility of internalizing Dana Energy's values through the observance of proper principles and behavior, ensuring their daily conduct in the workplace aligns with the organization's «behavioral principles.»

Dana Energy anticipates that all employees will exhibit respectful and appropriate behavior in their interactions, whether at work or during work-related engagements. It is imperative for individuals to refrain from any actions that could lead to detrimental and adverse consequences for colleagues, the work environment, or Dana Energy.

Instances of such situations encompass any form of harassment, discrimination, or comparable behaviors that might be perceived as threatening or demeaning by fellow individuals within the organization. It's noteworthy that employees' behavior should always be congruent with prevailing customs and cultural values.

At Dana Energy, we exercise utmost caution when addressing matters related to colleagues' working conditions, respect for all individuals, the eradication of discrimination, and the preservation of employees' safety and well-being. We are steadfast in our commitment to upholding human rights at all times, respecting matters concerning the privacy and personal information of both our employees and other stakeholders, and recognizing our duty to safeguard them.

Diversity and Inclusion

Built on our core value of «respect,» we treat all individuals equitably and fairly, while expecting the same from all our collaborators. We highly value the distinct contributions of each person within the company, and we adopt equitable methods to support Dana Energy employees, ensuring that equal opportunities are accessible to all. We recognize that diverse teams, equipped with versatile skills, are often better positioned to achieve their objectives and generally outperform other teams. Therefore, we expect all our colleagues to:

- Play an active role in fostering a culture of «acceptance» and «caring for others,» striving to comprehend the needs of their peers.
- Contribute to creating more inclusive and diverse environments and experiences.
- Show respect for the diverse beliefs and opinions of fellow colleagues.
- Demonstrate respect for cultural differences.



Equality and Anti-Discrimination

Dana Energy upholds the dignity of all individuals and consistently demonstrates goodwill and commitment in establishing a favorable work environment that aligns with principles of equality and the appreciation of differences. Discrimination refers to any unjust behavior or action, exclusion, or preference based on race, ethnicity, gender, age, health or disability, religion, political orientation, nationality, origin, or other factors that contravene or disregard principles of equality.

Dana Energy unequivocally condemns any form of discriminatory behavior among its employees or related individuals. Special circumstances might justify the use of positive action to foster justice, equality, and respect for diversity, adhering to widely accepted standards. Positive action is a policy and strategy intended to address discriminatory practices against minorities or groups deprived of certain advantages for various reasons. (It's important to note that determining and illustrating instances of positive action is within the purview of organizational management and the human resources department; such judgments are not within the scope of other levels.)

The «Anti-Discrimination Policy in the Workplace» explicitly defines Dana Energy's stance on this matter.

Question and Answer:

Q: I applied for a position in another department, but despite my qualifications, the team manager, who is hiring, selected a male candidate. I feel discriminated against since everyone on the team is male. What can I do?

A: If you are certain that discrimination has occurred, discuss the matter with your direct manager, EVP, or a representative from the human resources department. You can also reach out to the Dana Energy Hotline for assistance.

Workplace Harassment

We have a zero-tolerance approach toward any form of physical, verbal, or non-verbal abuse or harassment. Harassment can manifest through words or actions that lead to misunderstanding, warnings, abuse, humiliation, threats, or physical harm to another person. It can also foster an intimidating, hostile, or offensive environment. Harassment generally encompasses a series of incidents.

Disagreements related to work performance or other work-related matters typically do not fall under the category of harassment and are addressed within the context of performance management. Workplace violence is also regarded as a form of harassment and can affect individuals of any gender. This can include stalking, verbal abuse, use of property, involving family members or pets to threaten or intimidate, physical, mental, and psychological harm, and preventing a party from accessing the workplace.

The «Anti-harassment» policy comprehensively addresses this issue.



Safety and Health

Safety stands as a foundational value within Dana Energy. The absence of safety often stems from a lack of awareness. For us, safety always takes precedence and embodies a precious culture that safeguards us from harm. Furthermore, safety is integral to sustainability, holding a paramount place in our core values. We wholeheartedly prioritize the health and safety of every individual at Dana Energy. By offering training and raising awareness among all employees, we not only protect the lives of our colleagues but also ensure environmental preservation. At Dana Energy, safety encompasses «psychological well-being and mental health, physical health, a commitment to sustainability, and environmental protection.»

Maintenance of Assets and Property

The utilization of tangible and intangible assets, intellectual property rights, facilities, financial resources, and indeed time – one of the organization's most precious assets – during working hours is only permissible if directly aligned with Dana Energy's business objectives. Engaging with any of these assets requires proper authorization and coordination with the relevant representative and official associated with said asset. This provision also applies to instances involving the borrowing of any property or similar asset belonging to Dana Energy. Employees of Dana Energy bear the responsibility of safeguarding the organization's assets and properties against misuse, damage, and destruction. Failure to fulfill this duty will result in the application of relevant legal measures.

Drugs, Psychedelics, and Alcoholic Beverages

Dana Energy maintains an environment entirely free from drugs, psychotropic substances, and alcoholic beverages. In this context, being under the influence of narcotics, psychoactive drugs, or alcoholic beverages within Dana Energy's workspaces is strictly prohibited. Encouraging or endorsing the use of alcoholic beverages, narcotics, and psychotropic substances in any capacity is unacceptable and will be addressed with utmost seriousness in accordance with regulations. To mitigate the risks stemming from colleagues' impairment due to addiction, the organization may conduct unannounced diagnostic tests at operational and production sites.

A Guide to Appropriate Organizational Appearance

Dana Energy Company operates actively in the oil and gas sector, serving primarily government organizations and institutions that adhere to stringent governmental regulations and standards. Therefore, every oil company operating in Iran must exercise caution in ensuring its employees dress appropriately, especially when engaging with external parties, particularly customers and clients.

Employees of the organization, especially when interacting externally, should be mindful of maintaining an appearance that doesn't give rise to public relations challenges for the organization or compromise the organizational brand.

We kindly request all our colleagues to don official attire in accordance with the country's laws when receiving external guests, participating in off-site meetings, or attending events and gatherings overseas. For official meetings, colleagues are urged to select their attire thoughtfully, taking into account the culture and customs of both the organization and the guests. Wearing tight or revealing clothing, which society deems unsuitable for professional settings and the organization, is not acceptable within Dana Energy.

As a general guideline, appropriate organizational clothing should strike a balance between elegance and comfort while minimizing potential complications or issues for both employees and the organization. It's important to avoid attire that draws undue attention from colleagues or is generally overly informal.

Colleagues should refrain from wearing conspicuous accessories, symbols, or slogans on clothing, as well as from displaying visible tattoos on hands and face, sporting unconventional makeup or haircuts, and adorning themselves with decorations unsuitable for a relatively formal organization. For more detailed guidance, please consult the «Organizational Appearance Guidelines.»

Human Rights

We are steadfast in our commitment to uphold the principles outlined in the United Nations Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. We also adhere to the principles delineated in the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, and the International Finance Corporation Performance Standards.

In numerous communities where we operate, social issues are an integral and complex backdrop. As a result, our approach to managing human rights issues within our organization is comprehensive, encompassing the entirety of our endeavors rather than being confined to isolated activities. Our corporate policies, management processes, investment initiatives, and engagement in voluntary endeavors synergize to ensure effectiveness through collaborative efforts, further reinforcing our unwavering dedication to upholding human rights.



Business Partners and Organizations

Healthy Competition and Antitrust Laws

Dana Energy adheres to equitable practices and operates within the bounds of antitrust laws and the principles of healthy competition. This commitment extends to both competitors and suppliers.

Antitrust laws are designed to foster and safeguard robust competition across all sectors of the economy. Their existence is aimed at cultivating fair competition among sellers, curbing monopolies, and enriching consumer choices.

Within Dana Energy, the stance towards monopolies is notably stringent, reflecting a resolute attitude towards any form of monopoly in its business and operations.

At Dana Energy, any individual or entity—legal or natural—seeking to establish or facilitate a monopoly through any means is regarded as acting against the ethical tenets of Dana Energy's business. Appropriate actions will be taken in accordance with applicable regulations.

The accumulation of monopoly power within a specific market that hampers the entry of smaller competitors stands as a prime example of monopolistic behavior that the Dana Energy Antitrust Law vehemently opposes.

Anti-corruption

Corruption undermines lawful business operations, erodes competition, and distorts credibility. Ultimately, corruption places companies and individuals in jeopardy. Dana Energy vehemently opposes all forms of corruption and actively strives to prevent its occurrence and existence across all organizational activities.

Bribery involves providing money or valuables to someone to induce them to act in

a manner contrary to their duties, to infringe upon someone's rights, or to make an unjust decision. When an advantage or favor is extended to a third party in a way that influences business conduct, it signifies a bribery scenario.

This illicit practice can manifest in diverse forms such as monetary exchanges, valuable items, credits, non-standard discounts, travel perks, facilities, and services. It's crucial to note that even offering a bribe is enough to constitute a criminal act. The prohibition against corruption encompasses all individuals representing Dana Energy. In the event of corruption violations, penalties will span from disciplinary actions to termination.

This prohibition extends to bribery payments. If a situation arises where an individual believes that their personal, familial, social well-being, safety, or comfort is imperiled unless a bribe is paid, they may do so (only once). However, this action must be immediately reported in a fully transparent manner to a member of the Dana Energy Professional Ethics Committee, supported by detailed financial documentation.

It's possible that Dana Energy could face allegations of bribery or corruption-related actions from third parties due to profits from contracts. In response, Dana Energy has established specific criteria to mitigate risks stemming from such circumstances. These criteria are outlined in a document, and all third parties are expected to adhere to it and comply with its provisions.

Question and Answer:

Q: A port official has informed me that unless a payment is made to expedite our shipping turn, the goods will be delayed in reaching the project site. Should I comply with this request?

A: No. This payment might conflict with anti-bribery and corruption laws, as well as other applicable regulations.

Q: The employer has asked me to oversee the purchase of five laptops for the organization. Should I comply with their request?

A: It's essential to remember that all Dana Energy customers, whether internal or external, hold significance, and treating them with respect is paramount. To handle this situation, initiate a conversation with a customer-oriented and respectful approach. Politely inform them that you will discuss the matter with your senior manager and revert with an update. Following this, escalate the matter to the relevant project manager and EVP. In certain contracts, employers request items like laptops, software, training courses, etc., to expedite project progress, and these items are stipulated in the contract. If such items are detailed in previous agreements and contract clauses, pursuing their acquisition is unimpeded.

Receiving Gifts, Invitations, and Services

The utilization of privileges, facilities, consulting rights, gifts, and similar items as a quid pro quo for carrying out administrative duties and job-related responsibilities by Dana Energy employees at all levels, from natural and legal entities apart from the organization itself, constitutes a breach. Consequently, as per the law, individuals should not directly or indirectly accept gifts from external natural and legal entities, except for items of minimal value, typically presented with the company logo and intended for encouragement, commemoration, sampling, or promotion. In essence, individuals are expected to fulfill their duties impartially and independently of social matters and personal relationships. However, if not receiving a gift might lead to insult or discomfort in the work environment, the recipient can accept it and immediately hand it over to the company's vice presidents along with necessary explanations. Transparency is pivotal, and disclosing received gifts is deemed constructive.

Definition of Gift: Any non-promotional item (devoid of logos and organizational attributes) with substantial monetary value.

Definition of Service: Provision or execution of non-work-related or non-monetary actions aimed at enhancing comfort or enhancing employees' conditions within the organization.

After receiving any gift or service, all Dana Energy employees are obligated to provide comprehensive details on the «Gift and Service Self-Declaration» page. The responsibility of all Dana Energy employees is to consistently safeguard the organization against risks and prevent any form of loss, whether financial or in terms of reputation and credibility. Employees are advised to abstain from accepting gifts or services if they sense that doing so might imply they've been influenced or favored.

In instances where the gift or service is intended for the family members of organizational employees, it still necessitates registration by the employee. Regarding offered services (e.g., hotel reservations, travel expenses, dining payments), if they occur while the employee represents Dana Energy Company in an event or seminar, the employee is required to discuss the matter with their immediate manager or the organization's deputies, and registration within the system is unnecessary.



Question and Answer:

Q: A grand dinner is organized to commemorate a significant achievement in a collaborative project. Our partners include subsidiaries of the National Oil Company and several other firms. The organizer intends to present gifts to all attendees. Can I participate in this event and accept the gift, in accordance with anti-corruption laws?

A: Kindly consult the relevant EVP. The event and gifts might be subject to prior agreements within the contract. Frequently, it's customary to hold commercial events upon completion of major projects. Furthermore, non-promotional gifts need to be recorded on the self-declaration page for gifts and services, and comprehensive details must be reported to the pertinent business vice-president.

Conflict of Interest

Every member of Dana Energy has a duty to act completely impartially in dealings with companies, organizations, and individuals and not to favor any of them. Employees must not enter into relationships that are likely to create a conflict of interest between the outcome of their relationship and the interests of Dana Energy or exacerbate an existing conflict of interest, or limit, distort, or direct that employee's freedom of action, decision-making, and judgment.

None of the employees should be involved in dealings or transactions in which they, their spouses, relatives, or other people with whom they may have a close relationship are directly or indirectly benefiting financially or materially.

People should not use Dana Energy Company's assets and information in their possession for personal use or competition with the company. All individuals must promptly declare a conflict of interest if they directly observe or anticipate a conflict of interest.

Provision of Other Services

In the event that any employee of the organization is assigned a task by companies and organizations with current or potential business relations with Dana Energy, involving the provision of management, executive, consulting, or similar services, or if a proposal is made in this regard and the employee is invited to cooperate, and the action of this cooperation creates conditions of conflict of interest or exposes the organization's confidential information to the risk of disclosure, even unintentionally, the employee is not allowed to accept such an offer in any way. In case of doing so, they will be subject to disciplinary action, up to and including termination. Each of Dana Energy's employees is obliged to inform the company's vice presidents of this proposal in writing as soon as possible in such a situation and wait for a response from them.

In some circumstances where, at the company's discretion, this action can be categorized as cooperation and not only does it not lead to any conflict of interest or disruption in the performance of the responsibilities of the relevant employee, but also strengthens the relationship between the two companies and enhances the company's reputation, the license to provide these services may be granted.

Using a Lobbyist

Lobbying is a specific type of mediation aimed at influencing «policy or business decisions». Lobbying is acceptable only when the lobbyist acts on behalf of Dana Energy and with full transparency towards the group. In the case of using a lobbyist, the contact person is obliged to provide the organization with complete information about all their dealings and communications with the lobbyist and make the necessary reports.

Question and Answer:


Q: Recently, I met a representative who can help our organization obtain relevant licenses to start a business in another country, which was very difficult to obtain before. Can I cooperate with this representative on behalf of the organization?

A: Before any cooperation with this agent, be sure to consult with the vice president of the related business to ensure that the agent is reliable and their methods to advance the goals are in line with the country's laws, international laws, and ethical principles. It is also important to carefully check the representative's reputation because the organization can be held responsible for the representative's actions.

Political Activities

Dana Energy does not support any political group or party. Dana Energy may participate in public debates and discussions only if this is in line with the interests of the organization. As long as these activities have no connection with Dana Energy, individuals are free to participate in political activities.

Data and Information



Data and Information Confidentiality

The principle of confidentiality prevents unauthorized access to information that, if shared, could potentially harm the business or the reputation of the Dana Energy brand. This principle also safeguards individuals' privacy. Due to the highly sensitive nature of certain information related to Dana Energy, encompassing security, personal, commercial, technical, contractual, and other categories, it is imperative, as per this paragraph, to exercise special caution when sharing such information. Under no circumstances should this information be provided to unauthorized individuals.

Information Technology Systems

All employees are authorized to use information systems, data, and the Internet solely for the organization's business requirements. Information produced and recorded in Dana Energy databases are the property of the company, and all associated material and intellectual rights are reserved for the company.

Personnel within the organization are obligated to maintain all information, electronic files, and archives in an organized and categorized manner. At Dana Energy, information that may be deemed illegal, immoral, or offensive in any way should neither be received, stored, nor disseminated.

All employees must adhere to information classification rules based on confidentiality. It should be noted that information can be disclosed without concern or sensitivity only when the organization receives a legal request from official authorities to share or reveal such information.

Furthermore, the responsibility for maintaining confidential information persists even after the conclusion of the employee's contract.



Informing and Reporting Correctly

Non-confidential information and reports of Dana Energy Company are communicated fully and accurately both internally and externally when necessary and at the company's discretion. All information related to financial calculations must be accurate, properly documented, and in accordance with laws and regulations, including accounting standards. If, for any reason, legal authorities require the sharing of the organization's financial and accounting information, Dana Energy is prepared to transparently provide this information. All employees, especially senior managers and financial managers, are expected to commit themselves to preparing these documents at all stages of work and to the highest standard.

Record Keeping

Dana Energy always upholds its commitment to transparency and accuracy in all communications while adhering to confidentiality laws and regulations. Every employee is required to maintain necessary documents and records related to Dana Energy and its operations. Inserting any incorrect, misleading, or manipulated data in Dana Energy documents is prohibited and will be treated seriously if discovered. It is essential to accurately and comprehensively record all financial transactions in the accounting documents.

Other Notable Points

Individual Responsibilities

Each employee must ensure they are fully acquainted with their responsibilities and adhere to the established limits, rules, and processes of Dana Energy as outlined in this document. Should any questions arise or any points in this document remain unclear, employees are encouraged to contact the relevant manager or deputy for clarification.

Management Responsibilities

Managers at Dana Energy are obligated to ensure that all responsibilities assigned to employees within their units are carried out in accordance with the limits defined in this document. It is their responsibility to facilitate effective communication, provide accurate and timely solutions, offer advice in alignment with this document, and provide its correct interpretation when required.

Reporting Ambiguous Cases and Legal Gaps

In the event of any confusion regarding the interpretation of this document or if a legal gap is identified, individuals should promptly report the matter. Employees of Dana Energy can communicate such issues to their direct managers or deputy directors of the company through the established communication channels within the organization.

Furthermore, all colleagues within the organization are expected to adhere to the established code of conduct when engaged in international business trips.

Professional Ethics Committee

The «Professional Ethics Committee» of the organization holds the responsibility of establishing a shared understanding between managers and all employees within the organization. Its focus lies in ensuring that these principles are observed throughout all stages of work, aligning all activities of Dana Energy with the «Code of Conduct» document.

This committee serves as the ultimate authority for addressing received reports and violations, making decisions in such cases. The committee consists of the Vice President of Human Resources, the Risk and Audit Manager, the Human Resources Manager, and the Head of Employee Experience.

References

For more comprehensive information and an enhanced understanding of the organization's behavioral principles and foundations, please consult the following references:

- Company's Business Rules Bylaws (pertaining to free trade and anti-monopoly laws)
- Talent Recruitment Bylaws (pertaining to equality and diversity)
- Violation Reporting Regulations (pertaining to ambiguities or violations of fundamentals)
- Workplace Harassment Protection Guidelines (pertaining to workplace harassment)
- United Nations Anti-Corruption Pact
- International Labor Organization Convention
- United Nations Global Treaty
- International Financial Reporting Standards
- United Nations Declaration of Human Rights