HESS' ANTI-BRIBERY AND ANTI-CORRUPTION GUIDING PRINCIPLES

Hess is committed to operating with the highest level of integrity. All Hess colleagues must adhere to the following Anti-Bribery and Anti-Corruption Guiding Principles:

- Business activities must be conducted with integrity and in accordance with Hess Values.
- 2. Bribery or corruption will not be tolerated, whether in the public or private sector.
- **3.** Facilitation payments are prohibited.
- 4. Anti-corruption laws prohibit improper payments and require maintenance of accurate books and records for all transactions.
- 5. If there are any inconsistencies between Hess policies and anti-corruption laws or regulations, the more restrictive standards apply.

- 6. Hess can be held responsible for the acts of third parties associated with or acting on its behalf.
- **7.** Certain interactions with Government Officials must be pre-approved.
- 8. Compliance due diligence must be conducted on certain third parties prior to entering into engagements with them.
- 9. Anti-corruption laws provide severe criminal and civil penalties for violations committed by both companies and individual employees.
- 10. Concerns about potentially improper activity, doubts or questions must be raised to managers, the Legal Department or Global Compliance.