

CODE OF CONDUCT OF NNP1PC

Code of Conduct

The Nam Ngiep 1 Power Company [the Company] is licensed under agreement with the Government of the Lao PDR to build, own and operate the Nam Ngiep 1 Hydropower Project [the Project] in the provinces of Bolikhamxay and Xaysomboun.

Nam Ngiep 1 is bound by this agreement to maintain the highest standards of ethics among its staff and among the personnel of all contractors hired under the project. All personnel working for Nam Ngiep 1 or on tasks contracted by Nam Ngiep 1 [project staff] are therefore required to sign and to respect at all times the following code of conduct. The term project staff as used herein includes all people working for Contractors, Subcontractors and Shareholders of Nam Ngiep 1 on the project site and surrounding area.

Conflicts of Interest

To maintain transparency in all decision making no staff member should be involved in awarding benefits or employment to any person with whom they have financial, family or personal interests. Project staff are forbidden from accepting, soliciting, requesting or implying expectations of payment, gifts or sexual favours in exchange for awarding benefits or employment.

Use of Drugs and Alcohol

Consumption of alcohol shall only be permitted in areas approved by Nam Ngiep 1. A list of approved areas shall be circulated to all managers and contractors. Project staff shall not drink alcohol in villages around the site unless written permission is granted by Nam Ngiep management. It is a disciplinary offence for project staff to be at work whilst under the influence of alcohol or drugs not medically prescribed. Being in possession of, or using, distributing or selling illegal substances is not permitted. The conviction of an employee on drug-related charges will result in dismissal. Staff are not permitted to drive any vehicle or operate machinery while under the influence of alcohol.

Personal Gifts

Project staff must not abuse their position for personal gain. Therefore staff shall not accept gifts, payment or sexual favours through work links. Any abuses will result in dismissal. Staff should conduct themselves at all times in a manner that avoids suspicion of such behavior.

Sexual Relationships

Sexual activity between any project staff and a person under the age of 18 is considered a criminal act and the Company will take action to report such activities to the relevant authorities. Mistaken belief in the age of a child is no defense.

All staff shall make themselves acquainted with the laws of the Lao PDR relating to sexual relationships and respect these laws. Offences against the law shall be reported by the Company to the local authorities. Project staff entering premises that are suspected of providing commercial sexual services will be subject to disciplinary action.

Trade in Wild Animals and Plants

Project staff are expressly forbidden from hunting, taking, selling or buying any plant or animal, or product from any plant or animal, protected under Lao law. Any staff found in possession of a protected animal or plant, or reported as being in possession of any part of such a plant or animal, shall be brought before the Lao authorities for investigation. Any individual proven to be trading, killing, taking or consuming such plants or animals shall be dismissed immediately.

Trade in Antiquities and Cultural Artefacts

The laws of the Lao PDR concerning antiquities, and cultural or religious artefacts (items of national

heritage) shall be observed by all project staff. Trade in such restricted items shall be reported to the authorities.

Theft

Theft of property from the Company, from co-workers, or from residents of the Project Area will not be tolerated. Proven instances of theft shall result in dismissal.

Harassment and Exploitation

All employees have the right to be treated with dignity and respect. Any proven instances of harassment, exploitation or abuse will be treated as misconduct and will result in disciplinary action.

Gambling

Gambling is illegal in the Lao PDR and project staffs are prohibited from gambling in work camps and in villages around the project area.

Enforcement

ANY BREACH OF THIS CODE OF CONDUCT WILL BE TREATED WITH DISCIPLINARY ACTION, UP TO AND INCLUDING DISMISSAL.

Depending on the severity of the offence, personnel in breach of this code may be issued with a warning, a fine and or dismissal. Staffs who reoffend after two written warnings shall be dismissed immediately.

Duty to Report

It is the duty of any project staff member who becomes aware of any breaches of this Code of Conduct to report this immediately.

Spot Checks

Nam Ngiep 1 management shall conduct random spot checks on construction camps, local villages and designated entertainment areas, to assess adherence to the code of conduct. Denial of access to camps or staff quarters or refusal to answer questions posed by Nam Ngiep staff shall be taken as an admission of guilt.