

What has changed in the updated Code?

The primary changes to the Code have been made to align with policy changes and developments that have been implemented or are near rollout. Below is a summary of the key changes as part of the update:

Key Additions:

- 1) Noble's Mission and Vision added have been added.
- 2) A section on Noble's commitment to Quality & Excellence has been added and also contains detail on Operations Excellence, the One Noble initiative and P2R project, and Enterprise Risk Management.

Key Updates:

- 1) Introduction section ("Living by the Code") has been updated and refined.
- 2) Noble's Values have been updated to those in place today, amending our value of *Respect*, which was an amendment to what was previously *Fair Employment*, and adding the value of *Performance*.
- 3) General Business Principles section removed with its themes incorporated throughout the Code
- 4) The Health, Safety and Environment section has been updated to reflect current initiatives also including additional information regarding our environmental commitments as supported by our value of *Environmental Stewardship*.
- 5) The Legal section regarding our commitments to anti-corruption has been updated to add the requirements relating to the U.K. Bribery Act which include the prohibition of facilitation payments.
- 6) The Assets and Information section has enhanced detail on physical security and information security both reflecting initiatives which include our efforts around cyber security.
- 7) The Financial section has been updated to incorporate requirements relating to U.K. law and accounting requirements.
- 8) The Q & As throughout the Code have been updated utilizing themes and questions from real issues and questions that have been faced by Noble employees.