



# CODE OF BUSINESS CONDUCT AND ETHICS

HESS CORPORATION



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# CEO MESSAGE

“

**Rooted in our Values, the Code provides clear guidance for what is expected of everyone who works at our company.”**

— John B. Hess

## **DEAR COLLEAGUES,**

Our Code of Business Conduct and Ethics sets the standard for how we operate. Rooted in our Values, the Code provides clear guidance for what is expected of everyone who works at our company. It is a critical part of our commitment to become the most trusted energy partner in the world.

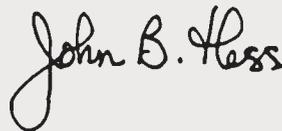
Everywhere we operate – and at every level of our company – we demand from everyone the same high level of integrity, honesty, ethical conduct and compliance with the law. Our Code serves as a constant reminder of this commitment and provides practical guidance and support for employees when questions and concerns arise.

We have a responsibility to one another and to our company to speak up about any situation that we know or suspect violates the Code and threatens our hard-earned trust. In the section entitled “Speaking Up,” we outline the process and resources for reporting these concerns. This includes a confidential Hotline that protects anonymity where local law allows.

We have a proud history and a bright future ahead in helping meet the world’s growing need for energy in a manner that respects our relationships with our many stakeholders, including employees, customers, suppliers, business partners, shareholders, communities and governments.

I thank everyone at Hess for your commitment to following the Code in all business activities. Working together – with high standards for our conduct – we will sustain long-term, profitable growth and make a positive impact on the communities where we do business for years to come.

Thank you,



**John B. Hess**

*Chief Executive Officer*

# OUR VALUES





## Our Code of Business Conduct and Ethics is built on a strong set of Values.

These Values reinforce and encourage the qualities that help us become a great company. They are the basic building blocks of our culture and represent our company’s collective conscience. While our strategy may change over time, our Values are enduring. We are all expected to live by these Values and abide by our Code.

### **INTEGRITY:**

#### Always Do the Right Thing

We are guided by the highest standards of ethical business conduct and by this simple principle: Do the right thing. Our business is built on long-lasting relationships, founded on trust. Our handshake is our bond and we stand behind our promises. We treat our employees, customers and partners with fairness, honesty and respect, just as we would want them to treat us. At Hess, our goal is to build long-term relationships and trusted partnerships.

### **PEOPLE:**

#### We Grow, Develop and Reward People

We value each member of our workforce by investing in personal development, rewarding accomplishments and “growing our own” future leaders. We appreciate diversity and treat each other with respect. This is the Hess Way.

### **PERFORMANCE:**

#### Carefully Measure our Efforts

We are an agile team with a can-do spirit. We cooperate within and across businesses to achieve shared goals. We encourage innovation, accountability and collaboration and we hold each other accountable for our performance.

### **VALUE CREATION:**

#### Building a Sustainable Enterprise

We are committed to creating shareholder value based on sustained financial performance and long-term profitable growth. That means managing risk and carefully considering each strategic, tactical and investment decision.

### **SOCIAL RESPONSIBILITY:**

#### Being a Trusted Partner

We are committed to meeting the highest standards of corporate citizenship by protecting the health and safety of our employees, safeguarding the environment and making a positive impact on the communities where we do business.

### **INDEPENDENT SPIRIT:**

#### Have A ‘Can Do’ Attitude

We are committed to preserving the special qualities and unique personality that have made us a successful independent enterprise.

# OUR STANDARDS





Guyana Planning Room, Houston, Texas

## GETTING TO KNOW OUR CODE

Our Code of Business Conduct and Ethics is an integral part of being a Hess employee. It defines our standards of business conduct and establishes the behaviors expected of us in our daily activities. Although it may not address every issue that could arise, it provides answers to frequently asked questions and directs us to resources that provide additional guidance. It tells us how to ask questions, get advice or report concerns. By following our Code, we uphold the Hess Values and maintain our reputation as a company that people can trust.

We must abide by both the letter and the spirit of our Code. It applies to all of us — employees and contracted staff — worldwide, and to all officers and members of the Board of Directors. In addition, we expect our suppliers, contractors, agents and other business partners to follow similar principles when working on our behalf.

Failure to comply with the Code and related policies, or applicable laws, may result in an investigation and disciplinary action, including termination of employment or services. If criminal activity is identified, we may also contact and assist relevant authorities.

 [Read more in our Discipline Policy](#)

If you find that local laws or regulations conflict with the Code or any related policies, procedures or standards, consult with the Legal Department.

No person has the authority to waive any provision of our Code without prior approval from the Legal Department or Global Compliance.

## UNDERSTANDING YOUR RESPONSIBILITIES

We share the privilege and responsibility of complying with our Code. This means we are all expected to:

- **Know the Code:** We must read and understand our Code and all related company policies, procedures and standards that apply to our daily work.
- **Know the Law:** We must follow the laws and regulations that apply to us, regardless of where we are located. Violations of these laws can result in severe civil and criminal penalties for our company as well as the individuals involved. Investigations into potential violations are costly and disruptive to our business and damaging to our reputation.
- **Ask Questions:** We must ask questions and seek advice if we are unsure about how to handle a situation or need guidance on where to find information.
- **Raise Concerns:** We are encouraged to raise concerns, even if they are difficult, and to ensure that our direct reports are comfortable raising issues.
- **Never Retaliate:** We are strictly prohibited from retaliating against anyone who seeks advice, raises a concern or reports misconduct.

## SPEAKING UP

We all have an obligation to speak up about potential, suspected or actual violations of company policies or applicable laws. By doing so, we uphold our Values and our commitment to integrity, honesty and ethical business practices. In addition, it allows us to address problems and concerns before they become serious issues for our company.

► *If you wish to ask a question or raise a concern, you may reach out to anyone with whom you feel comfortable, including:*

- Any manager or supervisor
- Global Compliance
- Legal Department
- Human Resources
- Hess Hotline

### Open Door

We encourage a culture of open and honest communication. All managers are responsible for maintaining an “open door” for their direct reports and others who may reach out to them. While you are encouraged to first reach out to your manager with concerns, there may be instances where you wish to ask questions or raise concerns to any of the resources listed in this section.

 [Read more in our Open Door Policy](#)

### Confidentiality

Confidentiality is a priority, and we will make every effort to protect the confidentiality of reports of concerns and the identities of those who make reports or participate in an investigation. However, there may be instances when, due to the nature of an investigation or certain legal requirements, it is necessary to disclose someone’s identity. In those instances, we will work closely with the reporting individual to address any questions or concerns.



### DID YOU KNOW?

**CALLS TO THE HESS HOTLINE WILL NOT BE TRACED OR RECORDED, AND CALLERS CAN CHOOSE TO REMAIN ANONYMOUS IF THEY WISH.**

### Anti-Retaliation

We do not tolerate any form of retaliation against anyone who, in good faith, raises a concern, reports misconduct or helps with an investigation. Reporting in good faith means providing all of the information you have with the belief that such information is true, regardless of whether it later turns out to be mistaken.

Examples of retaliation include:

- Denial of benefits
- Discipline
- Suspension, demotion or termination
- Threats, harassment, mistreatment, or discrimination

 [Read more in our Anti-Retaliation Policy](#)

### Hess Hotline

► *The Hess Hotline provides a way to ask questions, report concerns or get information anonymously. The Hess Hotline is available 24 hours a day, 7 days a week, 365 days a year and in multiple languages. Local privacy laws may affect availability and terms of use. The Hess Hotline can be reached:*

- By phone at 1-800-353-2790 (Toll-Free USA) or 1-503-597-4377 (International Collect Call)
- Online at HessHotline.ethicspoint.com
- By local toll-free phone numbers that can be found on the Hess Hotline website

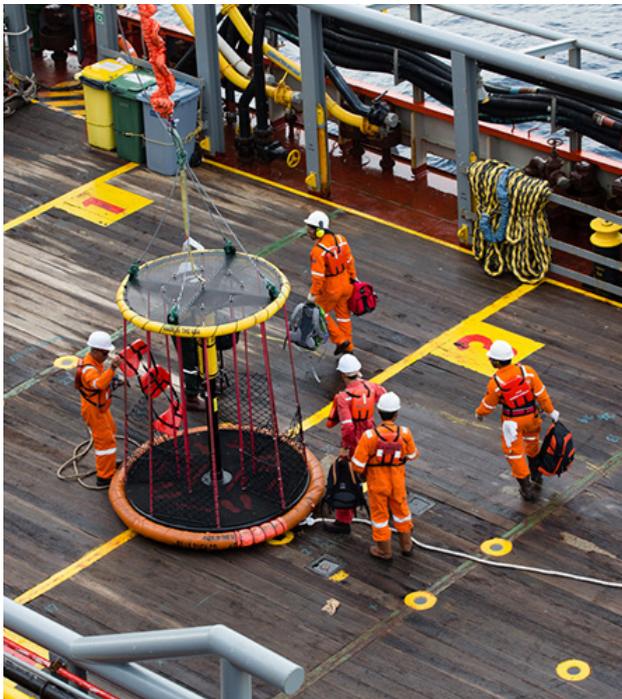
## HANDLING REPORTS AND INVESTIGATIONS

### Global Compliance

The Global Compliance Group oversees our worldwide compliance program. Our program reinforces our commitment to ethical business conduct and provides you with the tools necessary to take ownership of compliance and perform your everyday duties with integrity. Global Compliance raises compliance awareness through communication and education; monitors and audits compliance with company policies and procedures; and investigates and responds to suspected violations. Global Compliance is your central resource for compliance information and guidance.

► *Global Compliance can be reached at any time to answer questions, listen to concerns or provide advice.*

- By phone at 1-877-296-1343 (Toll-Free USA)
- By secure fax at 1-877-876-4254 (Toll-Free USA)
- By email at Integrity@Hess.com
- By mail at 1185 Avenue of the Americas, New York, NY 10036, USA



Offshore Operations, Gulf of Thailand

## Q&A

**Q: I AM CONCERNED THAT MY MANAGER IS MAKING UNETHICAL DECISIONS BUT I AM AFRAID I WILL GET IN TROUBLE IF I DISCUSS THESE CONCERNS WITH MY MANAGER DIRECTLY. WHAT SHOULD I DO?**

**A:** Retaliation against anyone who reports a concern in good faith is strictly prohibited at Hess. You may discuss your concerns with your manager directly without fear of retaliation. However, if you are uncomfortable speaking with your manager, you may report concerns through any other reporting channel, including Human Resources, the Legal Department, Global Compliance or the Hess Hotline.

### Referable Compliance Matters

Global Compliance is also responsible for investigating Referable Compliance Matters — significant potential, suspected or actual violations of applicable law or company policy. We have a duty to immediately report such violations to any of the resources available to us and to cooperate with any investigation. It is not permissible to begin an inquiry or investigation on your own.

Examples of Referable Compliance Matters include:

- Improper payments or benefits to third parties
- Inaccurate reporting in the company's books and records
- Matters involving one or more senior manager
- Significant or systemic environmental, health and/or safety issues
- Allegations relating to a pending government investigation
- Issues that may result in significant media attention

🖥️ [Read more in our Referable Compliance Matter Policy](#)

# OUR COLLEAGUES



*Production Operations, North Dakota*



Offshore Operations, Gulf of Mexico

## ENSURING A HEALTHY AND SAFE WORKPLACE

Promoting health and safety throughout our organization is a critical responsibility — one that we must never ignore, minimize or compromise. We all have a responsibility to ourselves, our colleagues and the public to make time for safety, speak up about safety and support the continuous development of our safety culture. We must be aware of and follow health and safety laws, regulations and policies related to our work activities.

 [Read more in our Environment, Health and Safety Policy](#)



If you become aware of, or suspect, unsafe working conditions or significant safety issues, report the situation immediately to any resource listed in the section on Speaking Up.

### Substance Abuse

We must be free from the influence of alcohol or any other substance that could prevent us from performing our jobs safely and effectively. This is true whether we are on or off company premises. Alcohol at business dinners or at certain company events is permissible if used safely and only if you have arranged alternate transportation home or to your next destination.

 [Read more in our Drug and Alcohol Policy](#)

### Workplace Violence

We do not tolerate violence. This includes acts or threats of violence in the workplace or in other settings in which we may find ourselves in connection with our work activities. Weapons are not permitted on company premises or while conducting business on the company's behalf.

 [Read more in our Violence Free Workplace Policy](#)



If you experience, witness or are otherwise aware of a violent or potentially violent situation, report it immediately to any resource listed in the section on Speaking Up. If you or someone else is in immediate danger, contact local authorities.

## Q&A

**Q:** *I THINK A SMALL PART ON THE RIG WHERE I WORK MIGHT BE DAMAGED, BUT I AM NOT SURE. I HAVE EXAMINED THE PART AND THE DAMAGE DOESN'T SEEM SERIOUS. IN ADDITION, I DON'T WANT HESS TO LOSE THE TIME AND MONEY IT WOULD TAKE TO FIX THE PART. WHAT SHOULD I DO?*

**A:** We all have a responsibility at Hess to report safety concerns immediately. By not reporting a possible issue, you are creating an unsafe working environment. Safety issues such as faulty parts or equipment could result in serious problems for our company.

## PREVENTING DISCRIMINATION AND HARASSMENT

We are committed to providing a workplace free from discrimination and harassment, where everyone is treated with respect.

### Equal Employment Opportunity

We strictly prohibit discrimination of any type and are committed to equal employment opportunity for all employees and applicants. No one should receive less favorable treatment before or during employment on the grounds of race, color, religion, gender, national origin, age, sexual orientation, disability status, protected veteran status or any other basis that is protected under federal, state or local laws. This also applies to how we treat our contractors, partners, customers and suppliers.

 [Read more in our Equal Employment Opportunity Policy](#)

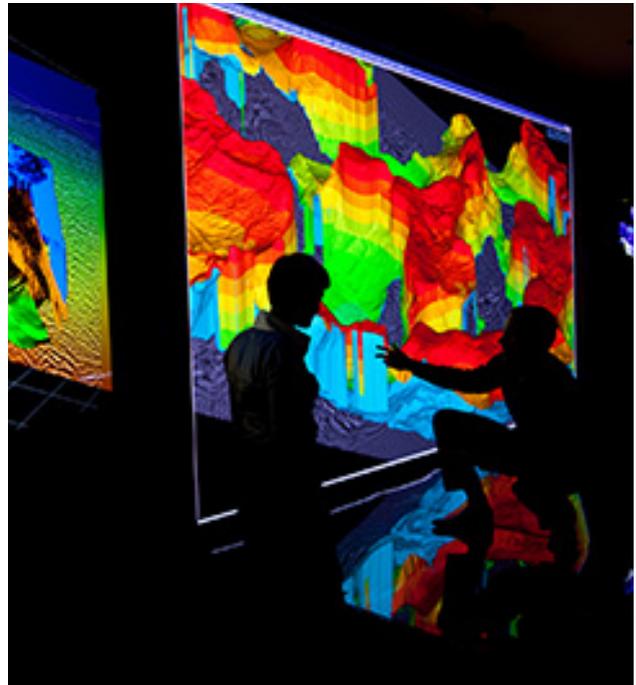
### Harassment

We prohibit any form of harassment, including sexual harassment and workplace bullying of any employee on the basis of any status protected by law. Harassment can be physical, verbal or visual, and generally includes any conduct toward a person that is unwelcomed by that person and has the purpose or effect of creating an intimidating, hostile or offensive work environment. This includes the conduct of anyone in the workplace—managers, colleagues and non-employees. Harassment is prohibited regardless of whether it occurs in the location where we work or in other settings in connection with our work activities.

 [Read more in our Harassment-Free Workplace Policy](#)



If you know or suspect that discrimination or harassment has occurred, report the situation to any resource listed in the section on Speaking Up.



Visualization Room, Houston, Texas

## PROMOTING INCLUSION AND DIVERSITY

We are a global company and much of our success stems from the value we place on diversity. Our diverse workforce promotes an open, multicultural and inclusive working environment, and it helps us deliver exceptional service to our customers and develop trusted relationships with our partners and in the communities where we do business.

As a company, we are committed to the proper management and use of personal information. We may only collect, access, use or disclose it for legitimate business purposes, and must not share it with anyone, inside or outside of the company, who does not have a legitimate business need to know it.

### PROTECTING EMPLOYEE INFORMATION

In the course of our employment, we entrust certain aspects of our personal information to the company. Personal information includes any information that identifies a living person, such as government-issued identification numbers, email addresses, home addresses and telephone numbers, as well as personal financial and medical information. As a company, we are committed to the proper management and use of personal information. We may only collect, access, use or disclose it for legitimate business purposes, and must not share it with anyone, inside or outside of the company, who does not have a legitimate business need to know it. Certain sensitive personal information, such as medical information, must not be disclosed to anyone without the consent of the relevant individual. We have a duty to inform individuals about the personal information we collect about them and how we will use it. We must store, process and dispose of such information securely. If you have access to the personal information of others as part of your role at Hess, you must ensure that you process it lawfully and securely.

Many countries have their own legal requirements governing the use of personal information. We must understand and comply with the specific requirements that apply in the locations where we work.

 [Read more in the Global Data Privacy Policy](#)

### Q&A

**Q:** *I RECENTLY OVERHEARD MY MANAGER TALKING ABOUT ME WITH ANOTHER EMPLOYEE. MY MANAGER SAID THAT EVEN THOUGH I AM THE BEST EMPLOYEE ON THE TEAM, I WOULD NEVER BE CONSIDERED FOR PROMOTION BECAUSE OF MY GENDER. I DO NOT FEEL COMFORTABLE CONFRONTING MY MANAGER ABOUT WHAT I OVERHEARD. WHAT SHOULD I DO?*

**A:** Discrimination is strictly prohibited at Hess. We will not tolerate employment-related actions or decisions made on the basis of gender or any other legally protected characteristics. A decision not to promote you based on your gender is a violation of company policy on discrimination. You should report the issue immediately to any manager, Human Resources, the Legal Department, Global Compliance or the Hess Hotline.



If you become aware of actual or potential loss, theft or other breach of security involving personal information, contact Information Technology.

# OUR COMPANY



*Operational Headquarters, Houston, Texas*



*Drilling Operations, North Dakota*

## MAINTAINING ACCURATE BOOKS AND RECORDS

We are required to maintain accurate books and records in accordance with the securities and accounting laws of the United States and the countries in which we operate. These documents form the basis of our earnings statements, financial reports and other public disclosures, and they guide our business actions and decisions. Each of us is responsible for keeping accurate records of transactions, time reports, expense accounts and other financial records. In addition, we must comply with our company's system of internal controls over financial reporting.

We may never make a false representation in our books or otherwise mischaracterize information. This means we cannot:

- Intentionally distort or disguise the true nature of any transaction
- Make a representation, written or verbal, that is not fully accurate
- Establish any undisclosed or unrecorded funds or assets for any purpose

We have a responsibility to cooperate with internal and external auditors reviewing our business activities. This responsibility also applies to government investigators. We must never interfere with or seek to improperly influence any audits or examinations of our company.



If you have concerns regarding accounting, internal controls or auditing, report them to any resource listed in the section on Speaking Up. If you become aware of any actual or threatened litigation, investigation or proceeding, contact the Legal Department or Global Compliance.

## PROTECTING OUR ASSETS

We are expected to treat company property — both tangible and information assets — with the same care and respect that we do our own.

### Physical Property

We must protect our physical property from theft, damage, loss or misuse. This includes facilities, vehicles, computers, mobile devices, other business equipment and supplies. Occasional personal use of certain company property is sometimes appropriate, as long as such use is authorized and does not interfere with our ability to do our work.



If you suspect any form of misuse or theft of physical company property, report the situation to any resource listed in the section on Speaking Up.



Offshore Operations, Gulf of Thailand

### Confidential and Proprietary Information

We are entrusted with our company's confidential and proprietary information, and expected to protect this information at all times. This includes non-public information that may be of use to competitors or harmful to our company if made available to the public, including technical, financial, marketing and other business information. Access to the company's confidential and proprietary information may only be granted to fellow employees and authorized third parties who have a legitimate business need to know it. We must never disclose such information to an outside party without first obtaining proper internal approval and executing an appropriate nondisclosure agreement with the outside party. Our obligation to protect the company's confidential and proprietary information continues even after our employment at Hess has ended.

We must secure our passwords and other login information and take care not to lose, misplace or leave unattended confidential and proprietary information, or to discuss such information in open areas or public places.

 [Read more in the IT Security Program Policy and Password Standard](#)



If you become aware of a situation that could compromise information security, including lost or stolen passwords, contact Information Technology.

### Intellectual Property

Intellectual property is one of our most valuable assets, and provides us with a competitive advantage in the marketplace. Intellectual property includes anything we create on company time, at the company's expense or within the scope of our work activities, including, for example, trade secrets, copyright material, patented or patentable equipment and processes, trademarks and logos. Such property belongs to the company, regardless of whether it can be patented or protected by copyright or is a trade secret or trademark, and we must protect it.

### Q&A

**Q: I TRAVEL FREQUENTLY ON HESS BUSINESS AND ALWAYS BRING MY COMPANY-ISSUED LAPTOP. THE LAPTOP CONTAINS QUITE A BIT OF CONFIDENTIAL AND PROPRIETARY HESS INFORMATION. WHILE ON TRAVEL, I HAVE TO ATTEND A BUSINESS DINNER. I DON'T WANT TO BRING THE LAPTOP TO DINNER AND WILL ONLY BE GONE FOR A SHORT TIME, SO I AM CONSIDERING STOWING IT UNDER THE FRONT SEAT OF MY RENTAL CAR. WHAT SHOULD I DO?**

**A:** We have a responsibility to secure the company's confidential and proprietary information, including technologies containing such information, at all times. While locking the car and storing the computer out of sight are good precautions, you should either bring the laptop to dinner or, if available, store it in the safe of a locked hotel room.

While Hess values the use of social media to strengthen its connection with stakeholders, such use presents certain risks and carries certain responsibilities.

### Communications

Our reputation for integrity is an intangible asset that must be protected. Therefore, our communications should give an accurate and consistent view of our business and comply with relevant laws, regulations and standards in the countries where we operate. We must carefully manage our brand and properly handle outside inquiries by referring such inquiries to the appropriate individuals. Any use of the Hess logo must conform to company brand guidelines.

 [Read more in the Communications Policy](#)

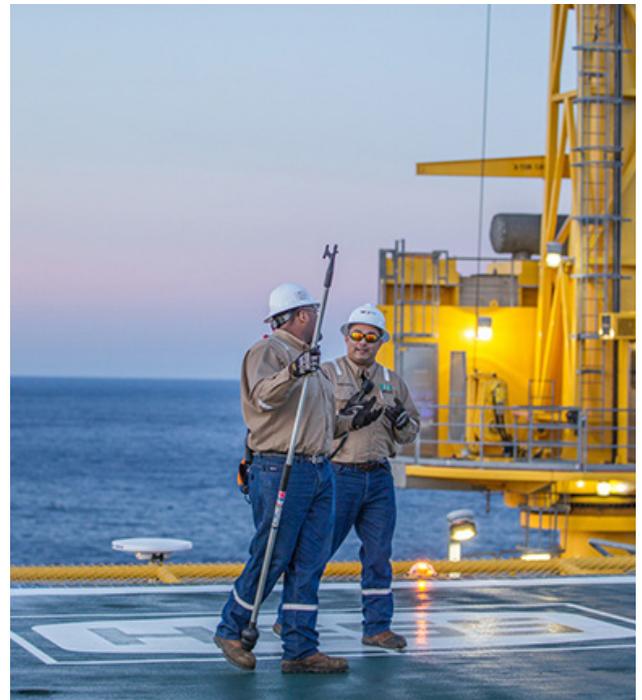


Requests for information from investors or securities analysts must be forwarded to Investor Relations. Inquiries from the media must be directed to Communications.

### Social Media and Networking

Social media has changed the way we share information. These platforms include social networking sites, such as Facebook, Twitter and LinkedIn; blogs; photo and video sharing sites; forums; and chat rooms. While Hess values the use of social media to strengthen its connection with stakeholders, such use presents certain risks and carries certain responsibilities. We must comply with company policies on the use of social media during or away from work, especially where any communication involves Hess, its operations, people, competitors and/or other business-related matters.

 [Read more in the Social Media Policy](#)



*Offshore Operations, Gulf of Mexico*

## MANAGING OUR RECORDS

We have a responsibility to know and follow applicable statutory, regulatory and contractual requirements governing how long we should retain company records and how and when to destroy them. This includes records that document the completion of an action, transaction, decision or other significant company activity, program or project. They can be in any format and may be stored in any location, including on the internet, intranet or in the cloud. Company records can include all forms of electronic messaging and records in company databases, electronic systems and our shared networks. We must know and follow the guidelines set forth in our records management policies regarding the creation, receipt, retention, preservation and destruction of company records. In addition, the Records Retention Schedule establishes official retention requirements for all records across the company.



*Production Operations, North Dakota*

## Q&A

**Q: I WAS INFORMED THAT A GOVERNMENT INVESTIGATOR WILL BE INSPECTING MY DEPARTMENT AND COLLECTING SPECIFIC RECORDS FROM MY OFFICE. SOME OF THESE RECORDS REFLECT POOR RESULTS IN MY DEPARTMENT. SINCE DISCLOSURE OF THESE DOCUMENTS COULD HARM OUR REPUTATION, I FEEL THAT SHREDDING THEM IS MY ONLY OPTION. WHAT SHOULD I DO?**

**A:** Documents that may be required in connection with a government investigation must be preserved and may not be destroyed or altered in any way. You must cooperate with the investigation and provide any and all documents relevant to the investigation.

On occasion, you may be notified that records or documents under your control or in your custody are required in connection with a legal matter, compliance matter or government investigation. If you receive this type of notice, you must preserve, and may not alter, conceal, delete or destroy these documents, whether in print or electronic form, until you are notified that these items no longer have to be preserved.

 [Read more in the Records Management Policy, the Records Retention Schedule, the Hess Unstructured Data Policy and the Data Recovery Policy](#)

 If you have questions about the management of records, including the retention and destruction of records, consult the Corporate Records Manager in the Legal Department.



**DID YOU KNOW?**

***COMPANY TECHNOLOGY INCLUDES, BUT IS NOT LIMITED TO, TELECOMMUNICATION (PHONE) SYSTEMS, EMAIL, INTERNET, PORTABLE DEVICES, STORAGE MEDIA, AND ALL COMPUTING HARDWARE AND SOFTWARE THAT SUPPORT COMPANY BUSINESS PROCESSES.***



*Offshore Operations, Gulf of Mexico*

**USING COMPANY TECHNOLOGY**

We are expected to use company technology in a professional, ethical and lawful manner. We must not use company-issued computers or systems to download, display, send or store material that is fraudulent, harassing, sexually explicit, obscene or otherwise unlawful, inappropriate or offensive. In addition, our technology resources may never be used to send unauthorized solicitations or to conduct business for another organization. We must follow security measures and internal controls for any technologies to which we have access.

Although limited personal use of company technology is permissible, such use may not interfere with your ability to do your work, and you should not have any expectation of privacy when using these resources. Company technology may be monitored and accessed as permitted by local law.

 *Read more in the IT Governance-Acceptable Use Policy, eCommunications Policy, Software Management Policy, Hess Global Mobile Device Policy (Company Owned), Hess Global Mobile Device Policy (Personally Owned) and Electronic Mail and Instant Messaging Policy*



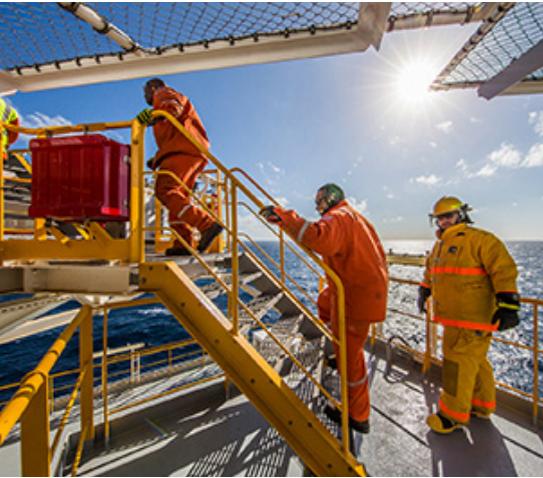
If you suspect any form of fraud, theft or misuse of company technology, report the situation immediately to any resource listed in the section on Speaking Up.

**MEETING QUALITY AND SAFETY STANDARDS**

We must adhere to quality and safety standards at all times. We must ensure that our services and products comply with quality standards that govern our work. This includes applicable laws and regulations, as well as related internal control procedures. We follow all contract specifications and endeavor to meet our customers' expectations at all times.

# OUR PARTNERS





*Offshore Operations, Gulf of Mexico*

## TREATING OUR PARTNERS FAIRLY

We value our business relationships and recognize that they are an important aspect of our success. Our business partners include customers, suppliers, vendors, joint venture partners and other third parties. All interactions with our business partners must be fair, honest and ethical.

### Promotion of Products and Services

Our sales, promotion and marketing activities must be conducted with honesty and integrity. We must be accurate and truthful when representing the quality, features and availability of our products and services, and we must never make unfair or inaccurate comparisons between our competitors' products and services and our own.

### Supplier Selection

We must treat our suppliers of goods and services equitably and engage in honest and fair supplier selection. This means we must:

- Comply with applicable company and regulatory sourcing or purchasing policies and guidelines
- Select suppliers objectively and in accordance with applicable company and regulatory bidding and supplier selection guidelines
- Communicate to our suppliers that we expect them to uphold the principles of integrity, honesty and ethical business conduct; support our commitment to safety; and behave in a manner that reflects the principles in our Code

## THIRD PARTY INFORMATION

We have a duty to protect the confidential information supplied to us by our business partners. We must follow the confidentiality provisions of any contractual agreements and laws governing our activities, and may never misappropriate or misuse confidential information provided by third parties. Our obligation to protect this information continues even after our employment at Hess has ended.

Many materials we use in our work, such as computer software, journals and other publications, are owned by third parties and protected under copyright laws or licensing agreements. We must not disclose or copy such materials or infringe on the copyrights of others.

## PREVENTING MONEY LAUNDERING

We are committed to the global fight against money laundering. Money laundering is the process by which funds generated through criminal activity, such as terrorism, drug dealing and fraud, are processed through commercial transactions in order to conceal the source of the proceeds, avoid reporting requirements or evade taxes. To help prevent money laundering, compliance due diligence must be performed prior to entering into certain engagements with business partners. We should be alert for money laundering activities by ensuring our business partners maintain a physical presence, are engaged in legitimate business and have proper compliance processes in place.

 [Read more in our Anti-Bribery and Anti-Corruption Policy and Procedure](#)

 If you have questions about how to identify potential money laundering, consult with the Legal Department or Global Compliance.

We deliver products and services to countries all over the world. It is important that we abide by all trade restrictions that apply to these activities, including all applicable import and export controls.



*Offshore Operations, Gulf of Thailand*

## COMPLYING WITH INTERNATIONAL TRADE CONTROLS

### Import and Export Laws

We deliver products and services to countries all over the world. It is important that we abide by all trade restrictions that apply to these activities, including applicable import and export controls. Many factors dictate whether products, services, technology, data or information may move across borders, including the nature of the exported item, the destination country and the end use or user. In certain instances, we must obtain licenses and government approvals to export or import an item or technology.

 If you have questions about import or export activities, consult with the Legal Department or Global Compliance.

### Boycotts and Sanctions

U.S. laws and regulations prohibit us from participating in boycotts not sanctioned by the United States. This includes boycotts of certain countries, companies or individuals. We may not engage in any agreements, provide any information or take any action that would support these non-sanctioned boycotts.

 [Read more in the Anti-Boycott Policy](#)

 Requests to participate in an illegal boycott must be immediately reported to the Legal Department or Global Compliance.

Sanctions imposed by the United States, the United Nations, the European Union, other countries and other geopolitical organizations may restrict or prohibit dealings with certain countries, entities or individuals. Activities that may be restricted include transfers of assets, monetary payments, provision of services, exports of sensitive technology and travel to the affected countries. We must know and follow applicable sanctions restrictions wherever we are doing business.

 If you have questions about boycotts or sanctions, consult with the Legal Department or Global Compliance.



#### DID YOU KNOW?

**BOYCOTT REQUESTS MAY BE ORAL OR WRITTEN, AND ARE OFTEN HIDDEN IN PROPOSALS ORIGINATING FROM COUNTRIES THAT SUPPORT THE REQUESTED BOYCOTT.**

### Q&A

**Q: I AM RESPONSIBLE FOR ORDERING CERTAIN PARTS FOR A RIG MANUFACTURED BY A COMPANY IN THE UNITED STATES AND SHIPPING THEM TO A HESS SITE IN ANOTHER COUNTRY. THE PARTS MANUFACTURER TELLS ME THAT ONE OF THE PARTS IS A “CONTROLLED ITEM” AND REQUIRES A LICENSE TO EXPORT. THE PART IS CRITICAL TO THE OPERATION OF THE RIG AND I DO NOT HAVE THE TIME OR EXPERTISE TO OBTAIN A LICENSE. WHAT SHOULD I DO?**

**A:** Hess complies with all import and export control laws and regulations. Exporting an item or technology in violation of these laws can result in the loss of export privileges as well as civil and criminal penalties for our company and any individuals involved. You may not ship the part and should consult with the Legal Department or Global Compliance.



Onshore Real Time Center, Houston, Texas

## Q&A

**Q: I AM ATTENDING AN INDUSTRY CONFERENCE WITH PEERS FROM SEVERAL COMPETITORS. DURING LUNCH, SOME OF MY PEERS BEGIN TALKING ABOUT INDUSTRY PRICING STRATEGY. I KNOW THAT THESE DISCUSSIONS ARE OFF-LIMITS, BUT I AM AFRAID I WILL SEEM RUDE IF I SAY SOMETHING OR LEAVE THE TABLE. WHAT SHOULD I DO?**

**A:** We must never discuss pricing with competitors. Such discussions could violate antitrust laws and could have serious consequences for our company and the individuals involved. You should stop the conversation or remove yourself from the situation. Even if you do not contribute to the discussion, you are participating simply by being present. You should also report the conversation to the Legal Department or Global Compliance.



*Production Operations, North Dakota*

## COMPLYING WITH COMPETITION LAWS

### Antitrust Laws

As part of our culture of performance, we engage in vigorous yet fair competition, and comply with antitrust and competition laws in place wherever we do business, including U.S. antitrust and EU competition laws. These laws prohibit us from entering into formal or informal agreements with our competitors, customers, suppliers and other business partners that affect prices, terms or conditions of sale or fair competition. We must avoid the disclosure of confidential company information to competitors and exercise caution when interacting with competitors at conferences and other similar events.



If a business partner attempts to discuss topics such as pricing or competition with you, stop the conversation immediately and report the incident to the Legal Department or Global Compliance. Due to the complex nature of these laws, contact the Legal Department or Global Compliance for further guidance.

We must avoid the disclosure of confidential company information to competitors and exercise caution when interacting with competitors at conferences and other similar events.



**Competitive Information**

We may not gather information about our competitors using deception, theft, misrepresentation or other illegal or unethical means. We must be careful not to request confidential information from our vendors and business partners or from new hires about their former employers. In addition, we must not share confidential information we may have about our former employers with Hess. When leaving the company, we may not download, remove or otherwise take company information with us.

 If you have questions about competition laws, consult with the Legal Department or Global Compliance.

**DID YOU KNOW?**

*WE MAY NOT DISCUSS, OR ENTER INTO ANY FORMAL OR INFORMAL AGREEMENTS IN RELATION TO THE FOLLOWING WITH COMPETITORS, CUSTOMERS, SUPPLIERS OR OTHER BUSINESS PARTNERS:*

- *PRICING OR PRICING POLICY, COSTS, MARKETING OR STRATEGIC PLANS*
- *PROPRIETARY OR CONFIDENTIAL INFORMATION*
- *DIVIDING CUSTOMERS, MARKETS, TERRITORIES OR COUNTRIES*
- *BOYCOTTING CERTAIN CUSTOMERS, SUPPLIERS OR COMPETITORS*



Production Operations, North Dakota

# OUR MARKETPLACE





Offshore Operations, Gulf of Mexico

## ELIMINATING BRIBERY AND CORRUPTION

We strictly prohibit bribery, kickbacks, and any other improper payments, whether involving Government Officials, private sector individuals or private or state-owned companies. Bribery is never an acceptable business practice and will not be tolerated.

As a global company, we comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010 and the anti-bribery and anti-corruption laws of other countries where we do business. This means that we may never pay, or offer to pay, anything of value to any Government Official or any other person in order to obtain or retain business or to secure an improper business advantage. This prohibition includes offering, promising, authorizing or giving anything of value through a third party doing business on our behalf.

- “Government Officials” include elected or appointed officials, national or local government employees, anyone working for state or nationally owned or controlled companies (including national oil companies), political party officials or candidates for public office, employees of public international organizations or anyone else categorized as a government official under local law.
- “Anything of value” includes, but is not limited to money, gifts, meals and hospitality, entertainment, travel and accommodation expenses, per diems, employment opportunities and charitable donations.

Facilitation payments — payments to Government Officials to expedite or ensure the performance of a routine governmental action — are prohibited except in exceptional circumstances where you are threatened with violence or imminent physical harm if a payment is not made. In those limited instances, the payments must be immediately reported and accurately recorded in the company’s books and records.



If you become aware of any actual or suspected bribery, corruption or any other improper payments or behaviors, report the situation to any resource listed in the section on Speaking Up.



### DID YOU KNOW?

**A “KICKBACK” IS THE RETURN OF MONEY ALREADY PAID OR DUE TO BE PAID AS A REWARD FOR MAKING OR FOSTERING BUSINESS TRANSACTIONS.**



Onshore Operations, North Dakota

Our company could be held responsible for the acts of third parties and others acting on our behalf. To address these risks, certain third parties must be pre-approved through the company's established anti-bribery and anti-corruption approval processes and systems. You must read and understand the company's Anti-Bribery and Anti-Corruption Policy and Procedure before engaging third parties. We may never use third parties to engage in any conduct that could violate our Code or any applicable anti-corruption laws.

 [Read more in the Anti-Bribery and Anti-Corruption Policy and Procedure](#)

 If you have questions relating to bribery or corruption, including whether a payment may be considered a facilitation payment, consult with the Legal Department or Global Compliance.

## CONTRACTING WITH GOVERNMENTS

When working with government entities, we must abide by the various laws, regulations and procedures that apply to government contract work. These rules are often much stricter and more complex than those that govern our sales to commercial customers. If your work involves marketing or selling to, contracting with or working on projects for a government agency, it is your responsibility to know and follow the rules that apply to that activity.

 If you have questions about these rules, consult with the Legal Department or Global Compliance.



### DID YOU KNOW?

***UNDER CERTAIN CIRCUMSTANCES, THE EMPLOYMENT OF GOVERNMENT OFFICIALS OR THEIR FAMILY MEMBERS COULD VIOLATE ANTI-BRIBERY AND ANTI-CORRUPTION LAWS. QUESTIONS ABOUT THE EMPLOYMENT OF GOVERNMENT OFFICIALS SHOULD BE DIRECTED TO THE LEGAL DEPARTMENT OR GLOBAL COMPLIANCE.***



### DID YOU KNOW?

**GIFTS TO GOVERNMENT OFFICIALS OR THEIR FAMILY MEMBERS MAY VIOLATE ANTI-CORRUPTION LAWS IF THEY ARE PROVIDED TO INFLUENCE THE ACTIONS OR DECISIONS OF THE GOVERNMENT OFFICIALS.**

## PROVIDING GIFTS AND ENTERTAINMENT

Business gifts and entertainment can help strengthen or develop strong working relationships with our business partners and other third parties. However, we must always use good judgment and ethical decision making when offering or accepting such benefits. Business gifts and entertainment may never be intended to improperly influence the actions of the recipient.

Any gift, meal, hospitality, entertainment, or travel support must be:

- Permissible under all applicable laws
- Reasonable and appropriate under the circumstances
- Provided for a legitimate business purpose
- Properly recorded in the company's books and records

Providing business gifts and entertainment, as well as corporate social responsibility expenditures, to Government Officials or government entities presents special risks for the company. You must obtain pre-approval for certain benefits provided to governments and Government Officials through the company's established anti-bribery and anti-corruption approval processes and systems. You must read and understand the company's Anti-Bribery and Anti-Corruption Policy and Procedure before providing any of these benefits.

 [Read more in the Anti-Bribery and Anti-Corruption Policy and Procedure](#)

## Q&A

**Q: I AM RESPONSIBLE FOR REVIEWING INVOICES FROM A BUSINESS PARTNER WHICH OBTAINS GOVERNMENT PERMITS ON BEHALF OF THE COMPANY. ONE OF THESE INVOICES CONTAINS A LINE ITEM FOR A "MISCELLANEOUS FEE." I HAVE NEVER SEEN THIS FEE BEFORE AND DO NOT KNOW WHAT IT IS FOR. I ASKED THE BUSINESS PARTNER TO EXPLAIN AND WAS TOLD THAT THE FEE IS TO ENSURE HESS OBTAINS PERMITS QUICKLY. WHAT SHOULD I DO?**

**A:** Hess prohibits all forms of bribery, whether conducted directly or indirectly through a third party. Hess may be held responsible for the acts of third parties and others associated with or acting on our behalf. You should not pay the invoice and must immediately report the issue to the Legal Department or Global Compliance.



If you have questions about providing benefits to third parties, consult with the Legal Department or Global Compliance.

## AVOIDING CONFLICTS OF INTEREST

We are all responsible for avoiding situations where our personal, social, financial or political interests could be in conflict with the interests of our company, or could be perceived by others to be in conflict with such interests. We have an obligation to be transparent with the company when entering into certain personal relationships or transactions or when interacting with the company's business partners and other third parties.

Certain personal relationships or transactions, or interactions with third parties, create conflicts of interest which cannot sufficiently be mitigated or resolved. We must avoid these conflicts of interest at all times. Other relationships or transactions may be appropriate, but they must be properly disclosed, and will be reviewed, evaluated and approved on a case by case basis. All conflict of interest disclosures must be submitted by completing a Conflict of Interest Disclosure Form, available through the Global Compliance page on Hess Connect.

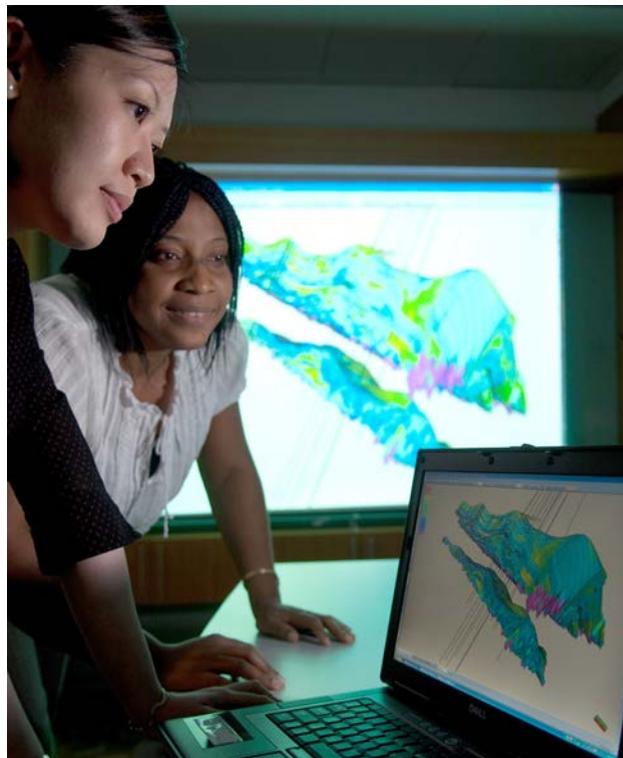
Certain personal relationships or transactions, or interactions with third parties, create conflicts of interest which cannot sufficiently be mitigated or resolved.

We must avoid these conflicts of interest at all times.



### DID YOU KNOW?

***FAILING TO DISCLOSE A POTENTIAL CONFLICT OF INTEREST VIOLATES COMPANY POLICY, EVEN IF THE CONFLICT WOULD HAVE BEEN ACCEPTABLE.***



Hess Office, Kuala Lumpur

Examples of potential conflicts of interest include:

- **Personal Investments or Transactions:** Financial interests that could interfere with the best interests of the company
- **Outside Business and Other Activities:** Interests such as a second job or board membership that could affect your objectivity, motivation, or performance at Hess
- **Personal Relationships:** Hiring, managing or otherwise establishing a business relationship with a family member, a close personal friend or someone with whom you have an intimate relationship
- **Accepting Gifts and Entertainment:** Accepting certain gifts, meals, hospitality, entertainment, travel support or other items of value from business partners and other third parties with whom Hess conducts business

 [Read more in the Anti-Bribery and Anti-Corruption Policy and Procedure](#)



If you have questions about conflicts of interest, including whether a potential conflict of interest must be disclosed, consult with the Legal Department or Global Compliance.

**Q&A**

**Q: I WORK ON A RIG IN ONE OF HESS' LOCATIONS. THE PRESIDENT OF ONE OF OUR PREVIOUS SUPPLIERS INVITED ME ON A HUNTING TRIP. THE PRESIDENT ALSO TOLD ME THAT THE SUPPLIER IS IN THE MIDDLE OF A COMPETITIVE BID FOR HESS WORK. I AM NOT RESPONSIBLE FOR CONTRACTING WITH THE SUPPLIER AND WOULD REALLY LIKE TO GO HUNTING. WHAT SHOULD I DO?**

**A:** Any benefits (including entertainment) that we accept from our business partners or other third parties must be related to a legitimate business purpose, must be reasonable under the circumstances, and may not be excessive in frequency or value. We may not accept benefits that are intended to, or could reasonably be perceived as intending to improperly influence a pending or prospective business decision. In addition, we must obtain approval prior to accepting any benefits from a third party being considered or evaluated as a provider of goods or services to Hess. Even though the hunting trip appears to be reasonable and related to legitimate business activities, it may be perceived as intending to influence the supplier selection process. You may be able to attend the hunting trip, but you must obtain approval through the conflict of interest disclosure process.

**AVOIDING INSIDER TRADING**

Through our work, we may learn material, nonpublic information (or "inside information") about our company or another company with which we do business. Information is considered material if a reasonable investor would consider it important in making a decision to trade in a company's securities. Information is considered nonpublic unless it has been provided to the public and adequate time has passed for the markets to digest the information.

It is generally illegal under U.S. insider trading laws and the laws of other countries where we do business to use inside information about a company to buy or sell the securities of that company. Communicating inside information to another person that would help them make a profit or prevent a loss may also constitute a violation of insider trading laws.



If you have questions about whether you possess inside information or whether you can trade in a company's securities, consult with the Legal Department.



Drilling Operations, Gulf of Mexico

# OUR COMMUNITIES





Energy Efficiency Program, Kuala Lumpur, Malaysia

## OPERATING AS A GOOD CORPORATE CITIZEN

Corporate Social Responsibility is central to our operations and the way we do business. It is inherent to operational excellence and is the responsibility of each of us in every aspect of our business. We strive to contribute to economic growth and sustainable environmental and social development where we operate. We partner with governments and communities to address social and environmental needs while contributing to economic growth.

We do not tolerate or permit the use of child, forced, indentured or involuntary labor in any of our operations. We promote health and safety and ensure compliance with fair wage and hour laws in all of our locations and operations. We will not knowingly conduct business — and will terminate business dealings — with any supplier or business partner who violates these standards.

## PROTECTING OUR ENVIRONMENT

We have made a firm commitment to protecting the environment in all areas of our operations. We meet, and strive to exceed, all applicable environmental laws and regulations. In addition, we have designed policies and guidelines for reducing or eliminating the environmental impact of our activities.

Our company policies and standards on environmental protection provide us guidance on matters such as:

- Spill prevention and cleanup
- Classification and disposal of hazardous materials
- Air emission and water quality requirements
- Product specifications

We must all be aware of the environmental concerns relating to our job activities and adhere to environmental compliance guidelines affecting our work.

 [Read more in the Environment, Health and Safety Policy](#)



If you become aware of a violation of our environmental policies, report the situation to any resource listed in the section on Speaking Up.

## Q&A

**Q: I NOTICED SOME COLLEAGUES AT MY WORK SITE DISCARDING HAZARDOUS MATERIALS DIRECTLY INTO THE GARBAGE. WHAT SHOULD I DO?**

**A:** Company policies prohibit the improper disposal of hazardous materials. Discarding hazardous materials directly into the garbage compromises environmental safety and protection. You should immediately report your colleagues' actions to the Environment, Health and Safety Department, or to any resource listed in the section on Speaking Up.

## RESPECTING HUMAN RIGHTS

While governments have the principal role in protecting human rights, we believe that we can and should respect and advance human rights in our sphere of influence. Our company policies reaffirm our longstanding support for universal human rights and set the standards for each of us with respect to labor practices, security, supply chain, community engagement and social development.

We support the Universal Declaration of Human Rights and are a signatory of multi-stakeholder voluntary initiatives, including the Voluntary Principles on Security and Human Rights, the Extractive Industries Transparency Initiative and the United Nations Global Compact. These initiatives promote human rights, transparency, anti-corruption and environmental stewardship. We also support the International Labour Organization's Fundamental Principles and Rights at Work.

 [Read more in the Human Rights Policy and the Security and Human Rights Policy](#)



If you become aware of any violations of human rights by a person at Hess, or by a customer, supplier, host government or other business partner, report the situation to any resource listed in the section on Speaking Up.

## INVESTING IN OUR COMMUNITY

We recognize that as a leading global energy company, we have the ability to help make a lasting improvement in the quality of life in the communities where we do business. We undertake community-based activities and programs at various stages of our projects and focus our efforts on making tangible and sustainable improvements, primarily in education and health.

Community investment programs must comply with U.S. and local laws, as well as relevant company policies.

 [Read more in the Corporate Social Responsibility Policy and the Anti-Bribery and Anti-Corruption Policy and Procedure](#)



*Hess-Sponsored School Program, Houston, Texas*

## PARTICIPATING IN POLITICAL ACTIVITIES

We are encouraged to voluntarily support our communities by participating in the political activities of our choice. However, we may only participate in such activities on our own time and at our own expense, as laws prohibit reimbursement for political contributions. We may never use company property, facilities, time or funds for political activities unless proper approval has been received from the Government and External Affairs Department.

In many of the countries where we do business, it is unlawful for a corporation to make contributions in connection with a political campaign or to make any payments to an official's election campaign where a corporation has business dealings with a government. Accordingly, any contributions must be pre-approved by the Government and External Affairs Department.

Voluntary contributions of personal funds to company political action committees are permitted. In addition, as legally permitted, Hess corporate funds, resources and facilities may be used to provide administrative support for such committees.

Because lobbying activities are highly regulated, we may not make any contact with government officials in an attempt to influence legislation, regulation, policy or other governmental actions on the company's behalf, unless proper approval has been received.



[hess.com](http://hess.com)