

ANNEX 4 – Sample Code of Conduct

(Available in public domain on IFC website:

[http://www.ifc.org/ifcext/spiwebsite1.nsf/0/98C159A5B919D2CA8525738A007B8EBF/\\$File/Quarry%20ESIA%20Vol1%20I%20%20EIA%20GNL-2.pdf](http://www.ifc.org/ifcext/spiwebsite1.nsf/0/98C159A5B919D2CA8525738A007B8EBF/$File/Quarry%20ESIA%20Vol1%20I%20%20EIA%20GNL-2.pdf))

11.15 WORKER CODE OF CONDUCT PROPOSAL

Introduction

Peru LNG S.R.L (“PERU PLNG”) is responsible for the construction and operation of the Liquefied Natural Gas Plant and required marine installations (collectively known as the "Liquefied Natural Gas Exportation Project"), as well as any other associated commercial activities (the "Project”).

The Project also includes activities that are carried out to extract rock from the quarry GNL-2, located inside the Peru LNG S.R.L. concession. The mining property involved makes up a total surface of 500 hectares. The point of access is located at Km 168 on the South Pan American Highway, in the Department of Lima.

The areas to be used in the quarry extraction activities include:

- Access roads: to the quarry, to the dump pits, to the magazine,
- Accumulation and selection area (6 Ha),
- Area for damp pit (17 Ha),
- Temporary facilities for mining contractor (4 Ha).

PLNG has identified, with the help of authorities and the local population, a series of topics related to the Worker's behavior. They must be considered, in order to avoid or minimize any adverse effects, either social or environmental regarding any aspect of the project.

The term "Workers" refers to all people directly hired by PLNG and all permanent or temporary personnel hired by any contractor or subcontractor that provides services to PLNG.

The terms "Project Vehicles", "Project Transport Units", or "Project Vessels" mean vehicles, transport units or vessels provided or operated by PLNG or any of its contractors or subcontractors.

The term "Project Area" means the Plant, any connected quarry, any office and any other PLNG owned or operated facilities that work on the Project itself, excluding PLNG operations and offices in the city of Lima.

OBJECTIVE

The objective of this Code is to avoid or minimize, as much as possible, any negative impact that could be produced as a consequence of interrelations between the Workers inside the local areas of influence and the outskirts of the Project Area.

ASSENT

- Each of the Workers will receive a written copy of this Code as a part of the induction process. Additionally, a copy of this Code will be available in a visible place in each Area of the Project.
- As a requirement to be hired, all Workers must sign a copy of this Code, where they acknowledge it and certify they have read it and accepted its terms, promising to comply with its terms thoroughly and at all times.
- Any question related to this Code or any regulation within it must be addressed by a representative designated by Peru LNG Community Relations Manager (CRM).
- The Workers are obliged to comply with the rules and procedures indicated in this Code, so as to maintain good relations with the local communities in the direct area of influence of the Project.
- Any worker may be subject to disciplinary actions and/or may be fired if their behavior while he was employed by PLNG went against the rules stated in this Code.
- This Code can be modified at any moment by PLNG, in which case PLNG will immediately deliver a written copy of said change to each Worker, in accordance with the assent procedure explained before.

Rules regarding the local population

- The local population is defined as all people that live within the direct area of influence of the Project, or in the areas used for the transportation of equipment and materials required for the construction or operation stages of the Project.
- All workers are expected to behave adequately at all times and must avoid improper relations with the local population.
- Any public release about the Project must be approved by the PLNG General Manager or the person he appoints.
- The PERU PLNG Community Relations team has been authorized to interact with the local population and request and receive their comments, suggestions and complaints, according to corresponding procedures created specifically for that purpose. Therefore, the Workers will not interrelate with the local population without the express consent of the PLNG Community Relations team.
- All Workers shall avoid any discriminatory conduct based on gender, age, disability, race, language, culture, political affiliations, philosophy, religion, or any other illegal basis.
- All Workers must comply with, at all times, all applicable environmental rules and regulations, including complying with the social and environmental responsibilities PERU PLNG has implemented based on the applicable Environmental Impact Assessment.
- Should the Worker fail to comply with the present Code, or behave in such a way that he/she creates a problem with the local population, the corresponding action must be communicated to the Community Relations manager, detailing what happened, so that the PLNG Community Relations office can carry out an investigation.

Rules regarding the Project Pre-construction, Construction, and Operations stages:

- All Workers are required to show at all times a transparent and honest behavior, and a high level of personal responsibility and professionalism, either in or out of the Project Area.
- All Workers shall comply with all applicable laws, rules and regulations.
- PLNG requires all Workers to take the medical exams necessary to work and enjoy good health. Workers shall immediately inform medical staff in the Project Area about any kind of sickness or symptom that may affect their ability to carry out their work-related obligations properly.
- Workers shall use adequate personal protection equipment during their activities in any Project Area or property, including Project Vehicles and Vessels.
- Workers are not allowed to smoke or make an open fire within or in the surroundings of the Project Area or near any Project Property, including Project Vehicles and Vessels.
- The medical staff in charge of the project shall authorize possession and use of drugs within the area of influence of the project.
- Workers are forbidden to possess, use or carry any kind of illegal drugs, medical paraphernalia, narcotics or alcoholic beverages within the Project Area or any Project property, including Project Vehicles and Vessels.
- Workers are not allowed to possess or carry weapons, such as firearms, explosives, ammunitions, knives, clubs, etc., within the Project Area or any Project Property, including Project Vehicles and Vessels.
- All Workers shall report any conflicts of interest in writing to their supervisor.
- Workers shall not receive or hand over money, goods or other objects of value in order to obtain benefits, receive favors or influence decisions benefiting PLNG, third parties, or themselves.
- Workers shall not use PLNG funds or equipment or other articles provided by PLNG for their personal benefit or any other unauthorized use.
- Workers shall keep all information related to the project in the strictest confidence.
- Workers shall carry an easily detectable ID card at all times whenever they are inside any Project Area. Workers shall show their ID card to go in or out of any Project Area, or to use transportation provided to the Workers. It is not necessary to carry the ID card when outside of the Project Area, unless the Worker is carrying out a business related task.
- No Worker may possess or withdraw any archaeological remain from the Project Area such as ceremonial jars, pottery, or similar objects. If a Worker were to find such a piece in any Project Area, the Worker shall immediately stop work and notify his supervisor, who in turn will report the finding to the PLNG archaeologist, so as to carry out the proper procedure.
- Pets are not allowed in any Project Area. Fishing is also forbidden.

- Any information or contract related to the work shall necessarily be provided or signed at the offices in Lima, Cañete, Chincha or others. Information on local contracts will not be placed on any entrance door in any part of the Project Area.
- For industrial security reasons, Workers may not approach entrance doors or access points to any Project Area for personal purchases.
- For industrial security reasons, Workers may not abandon any Project Area without permission. Local Workers will be transported to their residence in transport units provided by the Project. Project Transport Units may not make unauthorized stops.

Rules regarding Transportation of Cargo to PLNG Installations or connected businesses:

- Project Vehicles may not make unauthorized stops in towns or cities in any of the routes used to supply construction materials for the construction or operation of the Project or connected business. The only exception is in the case of an emergency.
- Project Vehicles must comply with the schedules and the maximum and minimum speed established by the company.
- Workers operating a Project Vehicle may not carry passengers other than PLNG Workers, unless allowed by a supervisor.
- Workers must comply with all traffic laws at all times, and according to guidelines provided by PLNG.
- Project Vehicles may not use routes other than those designated on the road permit or logistic plan, except in emergencies or when authorized by a PLNG supervisor.
- Workers operating a Project Vehicle may not transport cargo on said vehicle unless he/she has obtained permission and authorization for the transportation of said cargo.
- Workers operating a Project Vehicle must remain in permanent contact with home base and are forbidden to inappropriately use communication devices on any Project vehicle.

Some aspects and situations may have not been described in this Code. In such case, Workers are expected to behave and make decisions in such a way that they reflect the highest ethical standards.

Commitment

I have received, read and understood the Code of Conduct for Peru LNG S.R.L. workers. I agree to adhere to this Code, and I promise to comply at all times, with the rules and regulations established herein.

I am completely aware that I may receive disciplinary sanctions, and may even be fired, if my behavior, on or off the job, does not comply with the established rules.

All of this information has been provided to me during the induction process, thus I sign this agreement.

Cañete, 200_.

Worker's Personal Information

Names:

Last Name:

Place and Date of Birth:

Address:

Position:

Company you work for:

Department:

Signature:

Date:

Supervisor:

Department:

Signature:

Date: