

ExxonMobil Exploration and Production Malaysia Inc.

(Incorporated in Delaware U.S.A. with limited liability, Company No. 992953-X)
Menara ExxonMobil, Kuala Lumpur City Centre
50088 Kuala Lumpur
P.O. Box 10857, 50728 Kuala Lumpur, Malaysia
Tel. No: 03-4815 2000
Fax No: 03-2713 9173

Santosh Nadarajan

General Manager – Production Procurement



December 1, 2018

Dear Supplier,

Year-End Supplier Communication

Exxon Mobil Corporation¹ regularly undertakes a thorough review of its business practices and those of its affiliates. As part of the review process, we believe it is important to communicate to our goods and services suppliers ExxonMobil's expectations for the proper conduct of business activities with, or on behalf of, ExxonMobil. As guided by our long-standing Ethics Policy and other policies of our [Standards of Business Conduct](#), our principal aim is to ensure that we conduct our business in accordance with the very highest standards. In turn, we expect that our suppliers are committed to similar standards. ExxonMobil's standards cover safety, contract awards, personal business behavior, compliance with all applicable laws, adequate internal controls and the proper recording and reporting of all transactions.

As stated in [ExxonMobil Supplier Expectations](#), it is a fundamental expectation that ExxonMobil and its suppliers will comply with all applicable laws, and that all financial settlements, reports and invoicing will correctly reflect the business transactions between us. Specifically, we expect compliance with the anti-corruption and antitrust laws of the United States and every other country in which operations are conducted. No person in ExxonMobil is authorized to ask your organization to take any action on our behalf which is contrary to applicable law or ExxonMobil policies, including our Anti-Corruption and Antitrust Policies. No ExxonMobil employee or supplier is authorized to make an improper payment, including facilitating payments to any employee, official, agent, or instrumentality of any government, commercial entity, or individual in the conduct of ExxonMobil activity or business.

Another key standard is our policy on the giving and receiving of gifts and entertainment. Those parties conducting business with, or on behalf of, ExxonMobil are expected to exercise good judgment in each case. The provision of gifts and entertainment must not be intended to create an improper advantage. Our employees are restricted from receiving gifts or favors which exceed a nominal value or receiving any extravagant or frequent entertainment from individuals, companies or firms who do business, or seek to do business, with us. Likewise, while we do not envision that any gifts would be made to third parties, you should be equally prudent on the extremely rare

¹ Corporate Separateness Notice

Exxon Mobil Corporation has numerous affiliates, many with names that include ExxonMobil, Exxon, Esso and Mobil. For convenience and simplicity in this communication, the short term "ExxonMobil" is used in this communication to refer to groups of companies or to specific subsidiaries of Exxon Mobil Corporation. For all of these, word selection may have been based on convenience and simplicity, and may not identify reporting relationships, legal entities, or relationships among legal entities.

Nothing in this material is intended to override the corporate separateness of local entities. Working relationships discussed in this communication do not necessarily represent a reporting connection, but may reflect a functional guidance, stewardship, or service relationship.

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occasion you might provide appropriate gifts or entertainment to third parties when conducting business on behalf of ExxonMobil. If you have not already done so, please ensure that you adopt adequate safeguards, and that you have in place policies, procedures, and/or controls to ensure your activities related to commercial interactions and interactions with government officials fully comply with applicable anti-corruption laws and the expectations of ExxonMobil outlined above.

ExxonMobil is committed to a safe, healthy, and productive work environment for our employees, contractor employees and others who access ExxonMobil property, sites, and facilities. ExxonMobil's expectation is that you have and enforce an alcohol and drug program that at a minimum meets the requirements set forth in the agreement. Elements of an acceptable Contractor's program should include, but are not limited to the:

- 1) Prohibition, while on Company Premises (including off-duty time) of Contractor Personnel use, possession, sale, manufacture, distribution, concealment, or transport of any Prohibited Substance, which would include alcohol and potentially impairing medications used without a prescription or in a manner inconsistent with the prescription or directions for usage, e.g. some Prescription Drugs or over-the-counter medications or herbal medicines.
- 2) Prohibition of any (1) drug or alcohol-related paraphernalia used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body any Prohibited Substance, (2) paraphernalia or substance used or designed for use to dilute, substitute, or adulterate any alcohol or drug test specimen or to otherwise obstruct the alcohol or drug testing process.
- 3) Removal of Contractor Personnel from Company Work following non-compliance with any aspect of the Contractor program or the requirements set forth in the alcohol and drug exhibit in the agreement.
- 4) Commitment to comply with all applicable drug and alcohol related laws and regulations.

Concerning the alcohol and drug test panel (including screening and confirmation cutoff levels) – if any - specified by the Alcohol and Drug Exhibit of your agreement with ExxonMobil, the following must be complied with:

- A) **For agreements containing the Alcohol and Drug Exhibit requiring that alcohol and drug testing, at a minimum, be compliant with the U.S. DOT panel, you may elect to use 1) a panel that meets the U.S. DOT drug panel, 2) a panel that exceeds the U.S. DOT drug panel, or 3) the ExxonMobil drug panel, except to the extent any of these panels is preempted by local law.**
- B) **For agreements containing the Alcohol and Drug Exhibit requiring that alcohol and drug testing, at a minimum, be compliant with the ExxonMobil panel, you may elect to use 1) the ExxonMobil panel, or 2) a panel that exceeds the ExxonMobil panel (including screening and confirmation levels), except to the extent either of these panels is preempted by local law.**

This information is offered only to clarify the relevant language in your existing agreement(s) and does not create any additional contractual obligation. Capitalized terms should be understood as those terms are defined in the relevant A&D Exhibit.

While you may be organized outside of the United States, it is imperative that, in providing goods and services to ExxonMobil affiliates worldwide, you not deal with any entities, organizations, persons, or vessels with which a U.S. person could not deal and that you not provide to ExxonMobil any goods or services in which a U.S. person could not deal, for example goods manufactured or extracted in a country subject to comprehensive U.S. sanctions. The countries

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and territories currently under comprehensive U.S. sanctions are Crimea, Cuba, Iran, North Korea, and Syria. The U.S. also imposes comprehensive sanctions against persons, entities, and vessels on the U.S. Treasury Department Office of Foreign Assets Control's List of Specially Designated Nationals and Blocked Persons ("SDN"), including any entities or vessels owned directly or indirectly, individually or in the aggregate, 50% or more by one or more SDNs, and it imposes more limited sanctions against Russia and Venezuela. We fully expect you to be aware of applicable sanctions and export controls, including relevant EU or other applicable sanctions and export controls and, in providing goods or services to ExxonMobil affiliates worldwide, we expect that you not deal with any sanctioned party or provide to ExxonMobil any goods or services with which a U.S. person cannot deal. Should you have any questions about what entities, organizations, persons, or vessels are sanctioned, please consult with an attorney experienced in such matters.

ExxonMobil expends considerable resources protecting our data, including defending our computer network from the increased risk of sophisticated cyber-attacks and stewarding personal information according to regulatory requirements. This communication reinforces ExxonMobil's expectation that you take appropriate steps to protect information (electronic and hardcopy) and information systems in your control from new and evolving risks of cyber attackers. You should maintain appropriate data protection and cybersecurity measures based on professional guidance and best practices.

If there are circumstances where you suspect information related to ExxonMobil is compromised, you should promptly bring such circumstances to our attention. Please contact ExxonMobil if you have any suspicions as to whether an email purportedly from ExxonMobil is actually from our company. Also, we request that you regularly train your personnel on cybersecurity, including training to be alert to cybersecurity attacks that rely on personal inattention, such as "phishing" attacks or other suspicious emails containing attachments or links that could potentially compromise computer systems.

More and more countries around the world are adopting data protection or data privacy laws, which regulate the collection and processing of information, including personal information. These laws deal not only with how such information is collected and stored, but also the purpose(s) for which it is used. In addition, in many countries there are also particular restrictions on how personal information is transferred across national borders and to third parties.

ExxonMobil is committed to protecting the personal information of its employees, contractors, vendors, customers and other third parties with whom it deals. If you have not already done so, please ensure that you adopt adequate safeguards to keep all personal data used pursuant to your agreement with ExxonMobil secure, and that you have controls and tools in place to ensure compliance with applicable data privacy laws.

We also ask you to be alert to the potential for Illegal Information Brokering where persons approach suppliers offering confidential information that is used to obtain business through corruption of the competitive bidding process. Such practice is illegal and we ask that you report the occurrence of any such incident.

It is your responsibility to communicate the expectations of the above paragraphs to all subcontractors that work for you on ExxonMobil projects or sites.

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Finally, we expect that all financial data shall be complete and accurately recorded and all invoices to ExxonMobil accurately reflect pricing, payment terms, and other provisions as stated in your contract with us.

We are committed that contracts and other awards are made in a fair manner. We encourage you to contact us if you are aware of any practices which fail to meet these standards or if you have any concerns in this regard.

For best awareness and understanding of our business standards, we would appreciate your bringing this communication to the attention of those within your organization who have business contact with us or our affiliates. Should you at any time have any questions or concerns as to the application of these business standards, please let us know by contacting our Controls Advisor, Helen Ponniah (+60348153238), helen.c.ponniah@exxonmobil.com*

We take this opportunity to also remind you that it is a PETRONAS requirement that, in doing business or service with ExxonMobil in Malaysia, you and your sub-contractors are required to obtain and possess a valid PETRONAS license at all times.

Sincerely,



Santosh Nadarajan
General Manager
Production Procurement

* Alternatively, you may call the ExxonMobil Corporate "hot line" at either 1.800.963.9966 (inside the United States) or 001.972.444.1990 (call collect outside the United States).