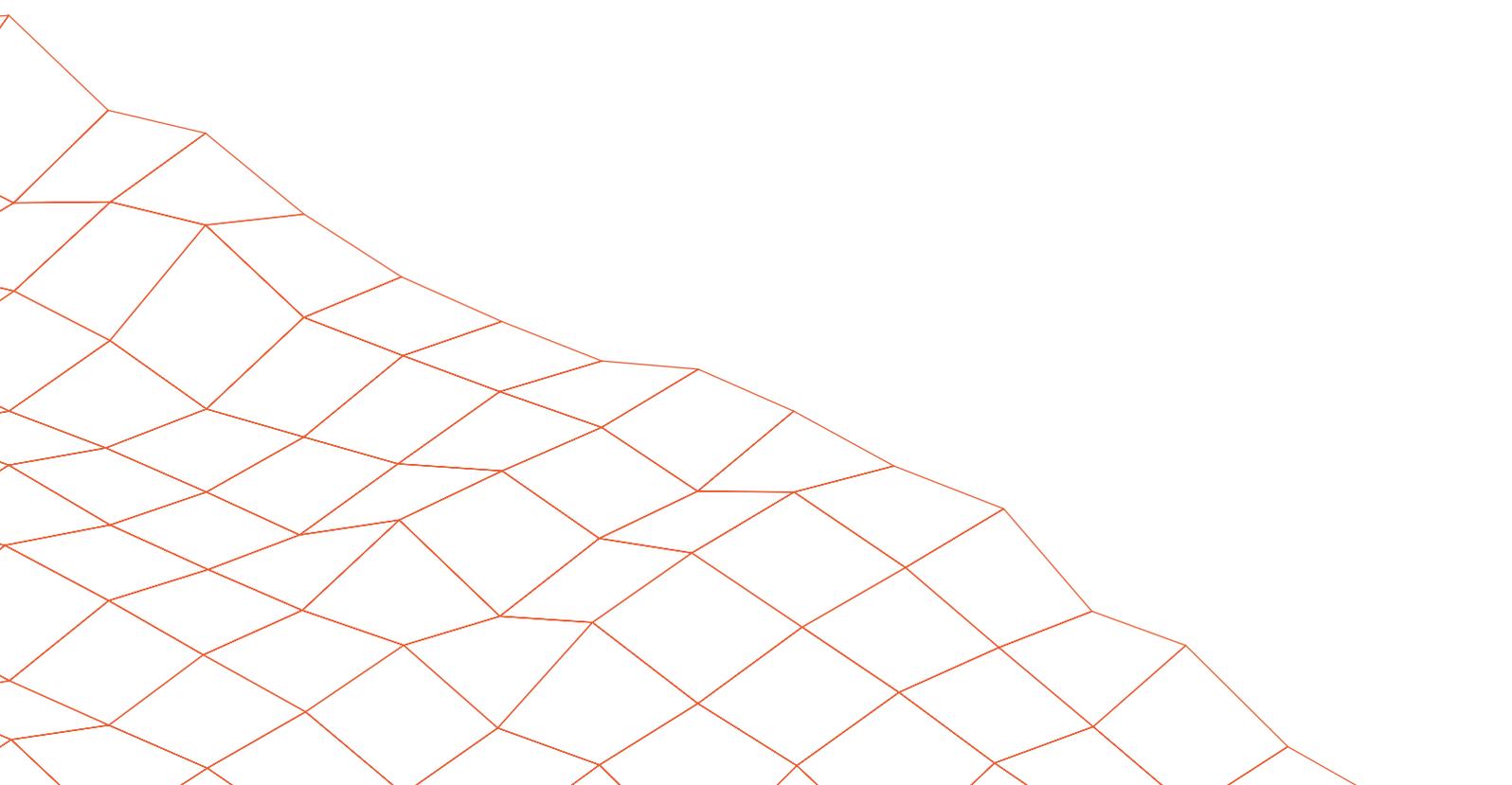


CORPORATE RESPONSIBILITY

at Lundin Petroleum



Abridged Version of Lundin Petroleum's Corporate Responsibility Staff Handbook

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Message from the CEO

Some believe there is a trade-off between ethical and commercial considerations. We do not. We believe that doing things the right way is the best way of ensuring our success over time.

A handwritten signature in black ink, appearing to read 'Alex Schneiter', with a long, sweeping horizontal stroke at the end.

Alex Schneiter,
President and Chief Executive Officer

Foreword

Dear Colleagues of Lundin Petroleum and affiliated companies,

This handbook contains the key Corporate Responsibility documents which govern the way Lundin Petroleum carries out its activities.

Since Lundin Petroleum was created, we have been committed to responsible business conduct as defined in our Code of Conduct. Over the years we have strengthened our Corporate Responsibility commitment through the adoption of policies, guidelines and management systems, to ensure full integration of responsible practice in all aspects of our work.

A major area of focus for us is Health, Safety and Environment (HSE) because it is the most material issue for an oil and gas exploration and production company and it is there to prevent the occurrence of accidents, particularly those involving people, whether our staff, contractors or third parties, or the environment.

In addition to the well-being of our staff we are also committed to that of host communities. Wherever we operate we seek to have a positive impact, whether through local hires, community development projects or sustainable investments. Since 2013, we have a partnership with the Lundin Foundation through which we support innovative solutions to key economic, social and environmental challenges relevant to the energy sector or our areas of operations.



We have adhered to the UN Global Compact, a United Nations initiative to encourage business to align itself with 10 Principles on Human Rights, Labour, Environment and Anti-Corruption.

We endorse the UN Guiding Principles on Business and Human Rights and have internal processes in place to ensure respect for human rights.

We support the Carbon Disclosure Project (CDP), recognising that climate change is a global concern, and report on our strategy towards energy efficiency and reduction of greenhouse gas emissions on a yearly basis.

We promote the Extractive Industries Transparency Initiative (EITI), uphold transparency in the sector to fight corruption and engage with its secretariat.

Lundin Petroleum’s Corporate Responsibility commitment has been spearheaded by the Board of Directors and management, yet everyone should ensure it is translated into responsible day to day activities.

I hereby invite you to read our latest Sustainability Report, which outlines how the policies and guidelines in this handbook are applied in practice throughout the Group and how we as a company integrate responsible business practices in all aspects of our business.

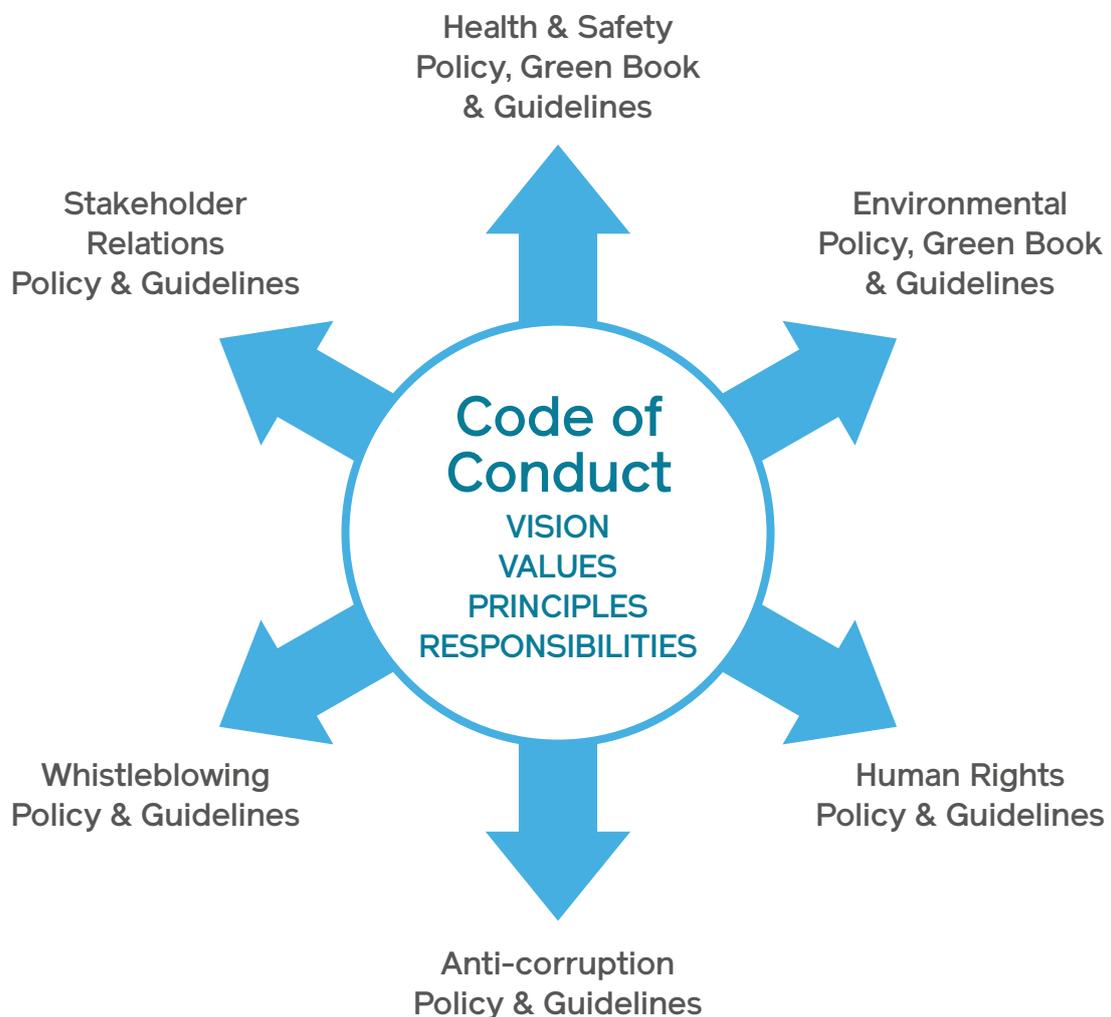


Christine Batruch,
Vice President Corporate Responsibility



Lundin Petroleum's Corporate Responsibility Framework

Lundin Petroleum's Corporate Responsibility Framework establishes policies and processes to fulfill its commitment to responsible corporate governance.



Code of Conduct

Vision

As an international oil & gas exploration and production company operating globally, we aim to explore for and produce oil & gas in an economically, socially and environmentally responsible way, for the benefit of all our stakeholders, including shareholders, employees, business partners, host and home governments and local communities.

We apply the same standards to our activities worldwide to satisfy both our commercial and ethical requirements. We strive to continuously improve our performance and to act in accordance with good oilfield practice and high standards of corporate citizenship.

Values

We are committed:

- » To act in a fair, honest and equitable way
- » To observe local laws and regulations
- » To respect local customs and traditions
- » To observe applicable international laws and standards
- » To uphold the ten principles of the United Nations Global Compact on human rights, labour standards, environment and anti-corruption

Responsibilities

We are responsible:

- » Towards our shareholders, to realise and sustain a good return on investment and a continuing growth of the assets
- » Towards our employees, to provide a safe and rewarding working environment
- » Towards host countries, owners of the resources, to find and produce oil & gas professionally, efficiently and responsibly
- » Towards local communities, to contribute to local development and higher living standards
- » Towards society, to contribute to wealth generation while limiting possible adverse impacts on the environment

Principles

We are guided by:

Attitude Towards Business

We seek to achieve high standards of performance, while being attentive and sensitive to the way our business is conducted. We are committed to:

- » Continuously seek growth opportunities
- » Promote innovation throughout our operations
- » Be flexible and take measured risks
- » Practice free and fair competition
- » Uphold internationally proclaimed human rights
- » Maintain transparency in the way we conduct operations
- » Honor our commitments
- » Use appropriate and adequate means to protect our staff and operations
- » Refrain from accepting / offering improper payments, gifts or engaging in bribery or any form of corrupt business practices
- » Seek similar standards from our partners and contractors

Attitude towards Employees

Our performance as a corporate entity is dependent upon the performance of our employees as individuals. We therefore aim to achieve maximum employee satisfaction and ultimate standards of performance. To that end we are committed to:

- » Respect and promote employees' rights, including freedom of association and the right to collective bargaining
- » Offer rewarding working conditions
- » Provide a safe and healthy working environment
- » Realise each employee's individual potential through training and job promotion
- » Respect the cultural diversity of our employees
- » Ensure equal opportunity without discrimination on the basis of age, culture, disability, gender, race, religion, etc.
- » Avoid the direct or indirect use of child or forced labor

Code of Conduct

Attitude towards Host Countries

We seek to respect and gain the respect of the countries in which we operate. Good relations with host countries are prerequisites to our business. Wherever we operate we are committed to:

- » Observe local laws and rules
- » Respect the sovereignty of the state
- » Observe and, through our example, promote the rule of law

Attitude towards Local Communities

Local communities may be affected by our operations. To ensure that communities benefit from our presence, we are committed to:

- » Encourage local employment
- » Where appropriate, engage in capacity building, through the transfer of skills and technologies
- » Where appropriate, work with local communities to improve their health, education and welfare
- » Respect local people and their traditions
- » Minimise disturbances that may be caused by our operations
- » Assess the potential impact of our security arrangements
- » Refrain from any implications in tribal, internal or other armed conflicts or acts of violence

Attitude towards the Environment

We strive to limit adverse impacts on the environment, thereby contributing to sustainable development, and are committed to:

- » Comply with applicable environmental laws and regulations, and international standards
- » Adhere to our environmental policy and sound management practices
- » Use appropriate products, equipment and processes
- » Cooperate with industry, government and the public on programs to protect the environment
- » Minimise and mitigate the effects of pollution within the scope of our operations
- » Assess and monitor our environmental performance, including in relation to climate change

Compliance

This Code constitutes the commitment of the Company and its employees to aspire to the highest standards of conduct. It is an integral part of employment contracts.

Any violation of this Code by anyone within our company will be the subject of an inquiry and appropriate remedial measures.

We will promote compliance under this Code throughout our operations, by way of training, reporting or other appropriate actions.

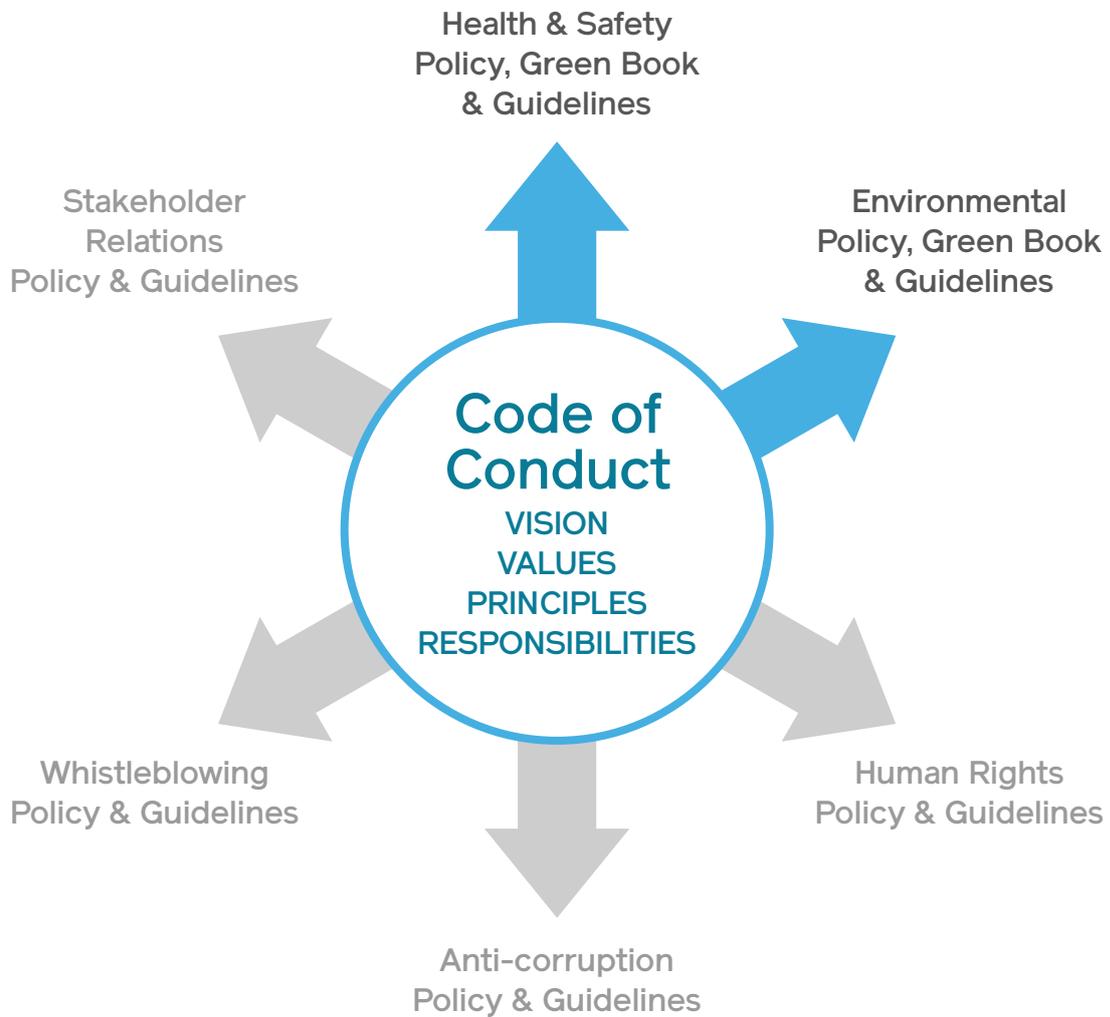
We will assess performance under this Code on a yearly basis.

The Code of Conduct was revised and approved by the Board of Directors on May 5, 2011.

HEALTH,

SAFETY

& ENVIRONMENT



Group Health and Safety Policy

A strong health and safety culture is essential to the success of Lundin Petroleum's operations.

Introduction

Lundin Petroleum recognises that prevention of accidents and ill health is essential to the efficient operation of its business. Lundin Petroleum conducts its operations in a manner which protects people and property and complies with all applicable legislation, as consistent with our Code of Conduct.

Objective

Lundin Petroleum's health and safety objective is to provide a safe working environment for employees, contract personnel and others who may be put at potential risk by the activities of the company.

The control and management of health and safety issues should be considered at all stages of operational and commercial activities.

Expectations

Accidents are preventable. To advance a strong safety culture that effectively prevents accidents, local management shall clearly define health and safety objectives and targets including:

- » Promoting a healthy work environment
- » Preventing occupational illness and hazards
- » Reducing risk to personnel
- » Reducing health and safety hazards
- » Promoting risk identification
- » Preventing loss of asset integrity

Health & safety hazards must be identified and current and potential risks must be prevented, corrected or controlled. Operating countries are expected to:

- » Ensure that proper personal protective equipment (PPE) is in place for its operations and that everyone knows how to use and maintain them.
- » Make sure that everyone understands and follows safe work procedures.
- » Ensure that hazard correction procedures are in place.
- » Maintain equipment regularly and thoroughly.

Requirements

- » General Managers or Managing Directors in each country are responsible for implementing Health & Safety policies, setting objectives, and reporting results, to comply with the Group HSE Management System (the Green Book).
- » General Managers shall attribute HSE roles and responsibilities within their organisation and provide for training to ensure an adequate level of knowledge and capability.
- » Each country must have local Health and Safety managers to provide specialist advice in order to reach the Group goal of zero fatalities and zero accidents.
- » The systematic identification and management of hazards is required, with appropriate risk assessments and subsequent actions to minimise exposure.
- » Each operating country shall establish emergency and contingency plans to assist the Group with reducing the impact of operational risks. This approach also minimises threats to the business, protecting our shareholders' interests.

Lundin Petroleum recognises the value of its employees and considers their well-being to be a major factor in the success of its business.

Group Environmental Policy

Protection of the environment is an essential element of operational planning and execution.

Introduction

Lundin Petroleum conducts its activities in a manner that respects the environment, and in compliance with all applicable environmental laws and regulations, consistent with our Code of Conduct.

Objective

Lundin Petroleum's objective is to minimise the potential impact of its operations on the environment.

Environmental Expectations

To advance a strong environmental culture that effectively minimises potential impacts or risks of incidents, local management shall clearly define objectives and targets to:

- » Detect potential environmental hazards, minimise current and potential risks through prevention, correction or implementation of controls.
- » Safeguard ecosystems, species and genetic diversity
- » Promote energy efficiency
- » Reduce the carbon footprint and greenhouse gas emissions
- » Prevent unnecessary waste
- » Manage water with due consideration of the needs and requirements of other stakeholders

In our country of operations, General Managers shall:

- » Attribute roles and responsibilities within their organisation to comply with the Group HSE Management System (the Green Book).
- » Implement environmental policies, set objectives, report results and ensure that the Group's goal of zero harm to the environment is met.
- » Identify necessary training requirements for employees or contractors to have the knowledge and capability to conduct operations in a manner that is consistent with sound environmental practices.
- » Manage potential impacts on biodiversity and climate change within the scope of their operations.

For new operations or phases, the planning process will include carrying out environmental studies. The level of assessment necessary will be related to the operational phase and/or the potential for significant environmental effects to arise.

Biodiversity

The Group supports the objectives expressed in the Convention on Biological Diversity and respect for the protected areas as defined by IUCN, UNESCO and RAMSAR.

Operations are expected to integrate biodiversity in their environmental management planning and decision making processes, undertaking environmental baseline studies and impact assessments, engaging with local residents and biodiversity experts, and contributing to R&D for the conservation of biodiversity.

Climate Change

It is expected that all operations will support the Group in its commitment to explore and produce oil and gas in an environmentally responsible way. The Group adheres to the Best Available Technique (BAT) principle in order to minimise emissions.

The Group reports on a yearly basis its strategy and performance in relation to air emissions to the Carbon Disclosure Project.

Lundin Petroleum will monitor and audit all aspects of environmental compliance.

HSE Goals

Lundin Petroleum aims to foster an HSE culture throughout the Group that results in:

- » Zero fatalities
- » Zero incidents
- » Zero harm to the environment

The way to achieve these goals is to strive for continuous improvement and to:

Health

- » Promote a healthy working environment
- » Prevent occupational illnesses
- » Reduce health hazards

Safety

- » Promote risk identification
- » Prevent loss of asset integrity
- » Reduce risk to personnel

Environment

- » Promote energy efficiency
 - » Prevent unnecessary waste
 - » Reduce the carbon footprint
-

HSE Management System “The Green Book”

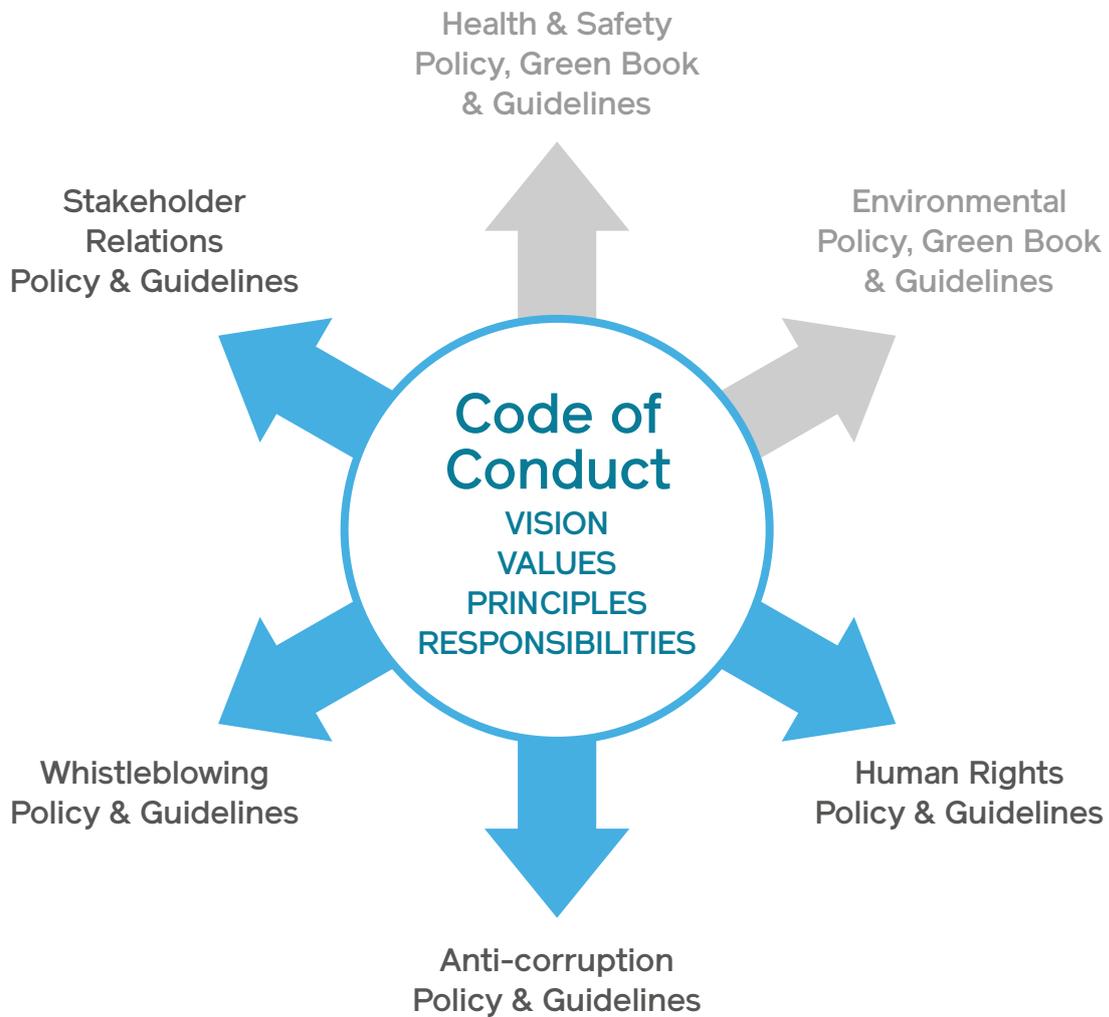
Main Elements of the Health, Safety, Security and Environmental Management System:

Element	Focus
Leadership and Commitment	The Company’s Directors recognise that HSE considerations are a key component of the Company’s business strategy. They have established the Company’s intentions and expectations in HSE Policies.
Responsibility	The CEO is ultimately responsible for ensuring that the Company acts in accordance with the HSE policies and management system.
Local Management and Implementation	General Managers, under the supervision of the COO, are responsible for implementing the Company’s HSE policies, setting objectives, reporting results and ensuring corporate goals are met.
Planning and Implementation	General Managers will establish HSE plans to achieve agreed HSE objectives, targets and reduction measures. Staff HSE responsibilities will be attributed and the necessary resources allocated.
Contractors	External contractors are expected to act in accordance with the Company’s HSE policies and demonstrate good HSE practice.
Communication and Training	The Company recognises the importance of communication and training in order for employees to be fully aware of HSE issues and competent to deal with the potential hazards and risks associated with their activities.
Risk Assessment, Emergency Response Management and Audit	Risks to personnel and assets, and impacts on the environment are to be identified, the risks – including security – assessed and appropriate control measures specified and implemented. Emergency plans for all operations, projects and facilities are to be maintained and periodically tested and updated.
Monitoring and Evaluation	The HSEMS will be subjected to periodic reviews by corporate management to ensure that it continues to be suitable and effective. If required, controls and corrective actions will be specified.

ANTI-CORRUPTION,

HUMAN RIGHTS

& STAKEHOLDERS



Group Anti-Corruption Policy

Lundin Petroleum prohibits all forms of corruption, in whatever form it may take, direct as well as indirect, active as well as passive, in all its activities.

Introduction

In furtherance of Lundin Petroleum AB's Code of Conduct commitment, the Group Anti-Money Laundering Policy and Whistleblowing Procedure and in accordance with the Swedish Code of Corporate Governance, it is our policy to conduct operations in an honest, transparent and ethical manner, observing the highest standards of professional integrity and complying with applicable international and national legislation. Lundin Petroleum supports the Extractive Industries Transparency Initiative (EITI), a voluntary initiative whereby countries decide to fully disclose revenue streams from the extractive industry.

Scope

Corruption or bribery may include, among others, improper benefits, abuse of function, breach of trust, embezzlement, extortion, facilitation payments, fraud, kickbacks, trading in influence, etc. It can be defined as providing, promising or offering ("active bribery"), as well as demanding or accepting an improper benefit ("passive bribery") which includes gifts, rewards or the like of material or immaterial value. These benefits can be obtained either directly or indirectly, through intermediaries or family members, to or from any person, including national, international and foreign public officials, political candidates, party officials, private sector employees, etc.

Corruption is illegal, can lead to criminal or corporate liability, and can severely damage the Company's reputation and standing. Lundin Petroleum prohibits corruption or bribery in all forms by its directors, officers, employees, hired contractors, consultants and others working for a Group company. No individual will be penalised for or be subject to adverse consequences for refusing to pay bribes or engaging in other forms of corruption.

Requirements

- » Maintain the Company's high level of integrity and ethics.
- » Resist any demands for illegitimate payments unless your physical integrity is at risk. Record any and all payments requested or made.
- » Report immediately suspected or actual cases of bribery to the line manager or senior corporate management.
- » Refrain from any kind of gifts or related expenses to governmental officials and other third parties during an official tender or competitive bidding process.
- » Include anti-corruption principles in contractual clauses and ensure contractors' compliance with Lundin Petroleum's Contractor Declaration.
- » Exercise care with gifts and hospitality; in particular as some companies and countries have very strict limitations on the value and nature of gifts accepted.
- » Consider the value and nature of the benefit you intend to offer, as well as the position of the recipient, and that of any benefit offered to you. In case of doubt, consult with the line manager.
- » Conduct adequate due diligence reviews of representatives, agents, contractors or joint venture partners and raise immediately concerns about suspected or encountered corruption or bribery.

Responsibilities

Country General Manager is responsible for ensuring:

- » Knowledge and training is provided throughout operations.
- » Alleged and confirmed cases of corruption are investigated, and appropriate actions taken.
- » Anti-Corruption Register containing the details of suspicious payments is maintained.
- » Corruption risk is assessed on a yearly basis.

Actual breaches shall be reported to the VP Corporate Responsibility and the CFO.

Whistleblowing Statement

Lundin Petroleum AB is committed to the highest standards of transparency, integrity and accountability, as expressed in its Code of Conduct.

In line with that commitment it has adopted a Whistleblowing Policy and Procedure to encourage employees, former employees or contractors of the Company or any of its affiliates who have serious concerns about any aspect of the business to raise them and to disclose any information which relates to improper, unethical or illegal conduct in the workplace.

Lundin Petroleum shall give due consideration to all cases of alleged wrongdoing brought to its attention through the Whistleblowing Procedure.

Group Human Rights Policy

Lundin Petroleum is committed to respect human rights wherever it operates.

Objective

In furtherance of Lundin Petroleum AB's commitments under its Code of Conduct and the United Nations Global Compact, as well as its endorsement of the United Nations Guiding Principles on Business and Human Rights, the Company reiterates through this Policy its commitment to respect human rights wherever it operates.

Lundin Petroleum is committed to respect internationally recognised human rights and not to infringe on individuals' human rights, be complicit or contribute directly or indirectly to human rights abuses.

Definitions

Human rights are to be understood as those referred to in the:

- » Universal Declaration of Human Rights
- » International Covenant on Civil and Political Rights
- » International Covenant on Economic, Social and Cultural Rights
- » International Labour Organization's (ILO) Conventions

and those referred to in relation to business activities of the:

- » Global Compact
- » OECD Guidelines for Multinational Enterprises
- » UN Guiding Principles on Business and Human Rights

Human rights due diligence is a process by which the Company identifies human rights risks it may face, assesses how human rights risks can change over time, and determines measures to put in place to prevent or mitigate human rights risks.

Requirements

- » In day to day activities Lundin Petroleum focuses on those human rights that potentially could be impacted, directly or indirectly, by its activities such as its staff and local communities. Local management shall establish objectives to comply with this commitment.
- » As per its Code of Conduct, respecting the human rights of its employees means providing a safe and sound working environment. Lundin Petroleum also recognises the importance of respecting the rights of local communities, and thus prior to any new investment, it analyses potential impacts of its planned activities.
- » It expects its employees, business partners, contractors and suppliers, to respect human rights and to observe the highest standards of professional integrity.
- » Lundin Petroleum is also committed to promote human rights in its sphere of influence.

Responsibilities

- » The responsibility to ensure respect for human rights at Group level lies with the Chief Executive Officer (CEO), with functional responsibility devolved to the VP Corporate Responsibility.
- » At the country level the responsibility to ensure respect for human rights lies with the General Manager. The General Manager shall ensure that due diligence is followed and that appropriate steps are taken.

Group Stakeholder Relations Policy

Lundin Petroleum is committed to act responsibly and to engage in an open dialogue with its stakeholders.

Objective

In furtherance of its Code of Conduct, Lundin Petroleum AB (“Lundin Petroleum”, the “Group” or “the Company”), reaffirms through this Stakeholder Relations Policy its commitment to act responsibly and to engage in an open and constructive dialogue with its stakeholders.

Stakeholders

Stakeholders are people or organisations which may be affected by or influence Lundin Petroleum’s activities, such as shareholders, employees, governments and local communities, charitable organisations, as well as business partners, contractors, industry groups, nongovernmental organisations (NGOs), international organisations, academics and media.

Stakeholder Engagement

Stakeholder engagement is the process by which the Company and its stakeholders exchange information and viewpoints in relation to the Company’s activities. It involves the Company sharing its operational plans, and stakeholders bringing their perspectives or concerns to the Company. This process enables the Company to be aware of and as a result manage stakeholder issues, risks and opportunities.

Stakeholder engagement may take place at a local, national or international level; it may cover commercial, environmental, financial, governance, human rights, operational, social and other relevant issues; it may vary in form and timing according to the type of issues involved.

Community Relations

Lundin Petroleum seeks to contribute to enhancing the living standards and wellbeing of local stakeholders, namely the people in the areas it operates, by hiring local staff and participating in local projects when applicable.

Depending on the needs and circumstances prevailing in the area, Lundin Petroleum aims to contribute to projects to improve the level of health, education, welfare services as well as enterprises seeking to solve social and or environmental issues. These activities are carried out in consultation with representatives of the local community and other stakeholders.

Sustainable Investments

Lundin Petroleum's main sustainable investments take place in the form of projects managed by the Lundin Foundation. These projects aim to contribute to innovative solutions to social and environmental challenges in countries of operations. Lundin Petroleum's sustainable investments may also take the form of community development projects or corporate donations.

Responsibilities

- » At corporate level, the CEO has the ultimate responsibility for stakeholder relations. Depending on the topic and relevance, stakeholder engagement can be delegated to the COO, CFO, VP Corporate Responsibility, VP Investor Relations, Head of Communications, or others in charge of relations with banks and insurance companies.
- » At country level, General Managers have the ultimate responsibility for identifying and engaging with relevant stakeholders. They communicate internal and external stakeholder concerns and submit for approval sustainable investment proposals to the VP Corporate Responsibility.

The effectiveness of the Company's relations with its stakeholders is measured by the mutual benefit obtained through engaging in constructive actions and dialogues with individuals, communities, and institutions as well as the projects resulting therefrom.

LUNDIN

FOUNDATION



LUNDIN FOUNDATION



Lundin Petroleum's Partnership with the Lundin Foundation

Lundin Petroleum intends to pursue sustainable investments and community development projects associated to its operations. However, as the Company's operations grow, so does the need to engage in larger scale and more sustainable projects whose impact can be measured over time. This will better fulfil the commitment the Company made under the UN Global Compact to further the Sustainable Development Goals. Lundin Petroleum has therefore decided to seek the support of an organisation with a strong track record in philanthropy and social investments.

In 2013 Lundin Petroleum entered into a partnership agreement with the Lundin Foundation in order to increase the scale and impact of the Company's sustainable investment projects and benefit from the Lundin Foundation's expertise and network of implementing organisations. Lundin Petroleum has committed to annually contribute 0.1 percent of its previous year's operating income to the Lundin Foundation.

The Lundin Foundation is a philanthropic organisation founded by the Lundin family. The Lundin Foundation is currently supported by a number of publicly traded natural resource companies committed to the highest standards of corporate social responsibility. The Lundin Foundation provides early stage capital, technical assistance, and strategic grants to outstanding social enterprises and organisations across the globe, with a view to contributing to sustained improvements in social and economic development.

The projects carried out by the Lundin Foundation for Lundin Petroleum are focused on Lundin Petroleum's areas of operations and address relevant industry or societal themes. In the first years of the partnership the projects covered access to energy, biodiversity conservation and sustainable fisheries in Indonesia and Malaysia, where the Company had an active exploration programme at the time. As the Company's activities evolve over time, so does the geographical focus of future projects. Projects for 2016 and beyond support business incubators for young entrepreneurs in Norway and accelerator programmes for integration of refugees and migrants in Sweden.

LUNDIN FOUNDATION STRATEGIC AREAS



RESOURCE
GOVERNANCE



EDUCATION AND
SKILLS TRAINING



LOCAL
PROCUREMENT



ECONOMIC
DIVERSIFICATION

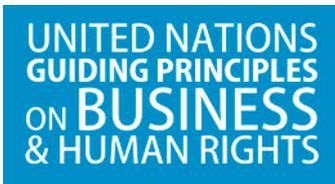


SOCIAL AND
ENVIRONMENTAL
INNOVATION

International Initiatives Endorsed by Lundin Petroleum

United Nations Global Compact

10 Principles on Human Rights, Labour Standards,
Environment & Anti-Corruption



United Nations Guiding Principles on Business & Human Rights

Clarifies state's duty to protect & company's
responsibility to respect human rights

Extractive Industries Transparency Initiative (EITI)

Promotion of anti-corruption and transparency
through disclosure of payments (company) &
revenues (government)



United Nations Global Compact's Call to Action on Anti-Corruption

Appeal by companies to governments urging them
to enhance anti-corruption measures

Carbon Disclosure Project (CDP)

Voluntary initiative to disclose climate change
strategy and greenhouse gas emissions



Global Reporting Initiative

International sustainability reporting standard

Concluding Remarks

We hope that this Handbook will be of use to you and welcome your feedback.

Please send your feedback and/or questions to:
Christine Batruch (christine.batruch@lundin.ch)

