

CHEVRON LUBRICANTS LANKA PLC
(the “Company”)

POLICY ON INTERNAL CODE OF BUSINESS CONDUCT AND ETHICS

1. OVERVIEW

The Board of Directors of the Company has adopted the Policy on Internal Code of Business Conduct and Ethics (the “Policy”) to set forth broadly the standards of conduct and principles to be adhered to by the directors of the Company (each, a “Director”) and the employees of the Company (each, an “Employee”) in carrying out their respective duties and responsibilities including with regard to trading in the Company’s listed securities. This document sets forth a summary of the Policy.

Any capitalized term not specifically defined in this Summary will have the meaning therefor set forth in the Policy.

2. ROLE AND RESPONSIBILITY OF DIRECTORS

Directors are responsible for devising proper internal controls to ensure that the proper books of accounts are maintained, the integrity of financial statements, assets are safeguarded, transactions are executed by those who have appropriate authority and there is proper segregation of duties.

3. BUSINESS CONDUCT AND ETHICS CODE

The principles and values that govern the conduct of business of the Company are set forth in the Business Conduct and Ethics Code (the “Code”) that constitutes the policy. Such principles and values are broadly the following:

1. Employees - It is the Company’s policy to provide equal employment opportunities to Employees without discrimination and illegal bias. The Company adopts a “pay-for-performance” philosophy. The Policy sets out the Company’s position with regard to controlled substances, drugs and alcohol as well as with regard to workplace violence and harassment.
2. Human Rights - The Company recognizes its responsibility to respect human rights and the positive role it can play in the communities where it operates.
3. Company records and internal controls - Company books and records must be prepared accurately and honestly and all books and records must be supported by documentation that provide a complete, accurate, valid and auditable record of

each transaction. The Company is committed to the value of Integrity. Any scheme with the intent of defrauding any person is prohibited.

4. Conflict of interest - All business decisions should be made free from any conflict of interest based on sound business reasoning. All Directors and Employees should avoid all conflict of interest situations including competing against the Company or providing or accepting gifts or entertainment of more than nominal value or cash in any amount to or from people or companies doing or seeking to do business with the Company.
5. Insider trading - All Directors and Employees must adhere to the provisions of the Securities and Exchange Commission of Sri Lanka Act when trading in the Company's listed securities and Directors and Employees possessing non-public, price-sensitive information about the Company must not trade its securities, directly or indirectly.
6. Bribery and Corruption - All Directors and Employees should adhere to the Company's Policy on Anti-bribery and Corruption in their business dealings on behalf of the Company.
7. Government Affairs and Political involvement - No Employee can engage in lobbying activities, provide gifts to public officials, make political contributions and engage in political activities except with guidance and/or approval in the manner set out in the Code.
8. Operational excellence – The Company's policy is to protect the safety and health of people, its assets and the quality of the environment and to conduct its operations reliably and efficiently.
9. Compliance with the legal framework - It is necessary for Directors and Employees to ensure that the Company complies with all laws and regulations as applicable to the business of the Company including international trade laws, anti-boycott laws, anti-trust and competition laws.
10. Data privacy and protection of information and intellectual property – Personal data will be handled and processed in accordance with the applicable law including the Personal Data Protection Act. Information relevant to the business of the Company and intellectual property of the Company will be used, managed, handled and dealt with as per the guidelines set forth in the Code and other internal processes of the Company.

4. REPORTING OF ACTIVITY OR BEHAVIOUR IN CONTRAVENTION OF THE POLICY

Any activity or behaviour that contravenes the Policy must be reported in accordance with the Company's Whistleblowing Policy.