

EXHIBIT - SUBSTANCE MISUSE POLICY

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1.0 Purpose

The Policy is intended to ensure that any use or misuse of prohibited or prescribed substances by ConocoPhillips employees and all other personnel involved in ConocoPhillips operations does not jeopardise the safety and performance of the company. ConocoPhillips regards substance misuse as a significant risk to health and safety and this policy is intended to minimise the problems arising as a result of such misuse.

There is zero tolerance towards employees or third parties who do not comply fully with this policy.

The purpose of this document is also to increase employees' awareness of the potential detrimental effects of substance use and misuse. The Company recognizes substance misuse and dependency are preventable conditions, and that employees who have such problems can be helped. The Company's Integrated Occupational Health Service (IOHS) will give advice and assist in the rehabilitation of employees who volunteer a substance misuse problem before there has been a violation of policy. Employees who have or develop a substance misuse or dependency problem are required to contact their country medical staff at the earliest opportunity. Failure to declare such a condition may lead to serious disciplinary action, including dismissal.

The Policy is an integrated part of the company's health, environment & safety work (HES) and adheres to the Company's Global Substance Misuse Principles and Business Ethics Guidelines.

1.1. Policy Principles

1. The company prohibits use, possession, transfer and sale of all illegal substances at the workplace or when conducting company business.
2. Personnel are required to report to work free from all illegal substances and the effects of legal substances and remain free of those illegal substances and legal substance effects while at work (for alcohol, the legal country limits for driving are applicable).
3. Many prescription medications and over-the-counter pharmacy medications have side effects that may alter one's ability to do his or her job safely and effectively. Employees or third parties involved in ConocoPhillips business and operations are responsible for obtaining the information necessary to determine whether the use of any such medication may negatively affect their productivity or the ability to perform safely in their jobs. Accordingly, all personnel to whom this policy applies should discuss their job responsibilities with their pharmacist or doctor to determine whether the use of any prescription and/or over-the-counter medication could adversely affect their ability to perform their jobs safely. To avoid potential violations of this policy, personnel should contact IOHS to have their medications reviewed with regard to possible adverse impact on safe job performance.
4. The company reserves the right to carry out appropriate searches for illegal substances and associated drug/substance paraphernalia. This includes searches on freight and mail. Searches may include personal property – should this be the case, the individual will be allowed to have an independent witness available during the search.

1.2. Scope

The Policy applies to ConocoPhillips employees and all personnel or third parties involved in ConocoPhillips operations, offshore and onshore:

1. *During working hours or whilst engaged in company business/company sponsored events:*
In addition to the ordinary work situation, any situations where the employee represents the company and thus is performing company work or representing company interests (courses, meetings, associated events etc).

Note: The Company recognises that alcohol may be served at various company sponsored events or when the individual is representing the company at associated events. See guidance under Alcohol section.

2. *While off duty*: If an employee, during his/her leisure time, causes damage to company property or property/objects at the company's disposal (houses, apartments, cars, premises, cabins, boats etc) while under the influence of substances, the company will apply the appropriate disciplinary sanctions available. The use, sale or transfer of illegal drugs is a violation of the policy and will result in disciplinary action.

Violation of this Policy by third parties will result in the violator being referred to their own employer where the offence will be dealt with under their employer's own terms, conditions and procedures.

1.3. Violation of Policy

1. Violation of the Policy by employees will be considered a disciplinary offence and therefore subject to punitive action which may include dismissal and, if appropriate, notification of legal authorities.

Violation of the Policy by third parties involved in ConocoPhillips operations will result in the violator immediately being removed from ConocoPhillips premises and referred to their own employer

1.4. Definitions

1.4.1. Substance:

The term "Substance" includes alcohol, controlled substances, illegal drugs, prescribed and over-the-counter medication and any other substances that may be inhaled, injected, ingested or otherwise introduced into the body that may alter an individual's mood, perception, coordination, response, performance or judgment.

1.4.2. Illegal or Prohibited Substances:

For NSBU UK, an illegal or prohibited substance refers to controlled drugs as defined in the UK Misuse of Drugs Act 1971 (which includes, but is not limited to, opiates, cannabis, amphetamines and barbiturates) or any substance not legally provided by appropriate authorities. For NSBU Norway, illegal or prohibited substances means substances not legally provided by appropriate authorities. Prescription medicines purchased illegally or not covered by a registered physician's direction are also covered in this category throughout the NSBU.

1.4.3. Prescription drugs/Over the counter medicines:

Prescriptions drugs or over the counter medications refer to all substances prescribed by a registered physician for bona-fide health reasons or those substances that can be legally purchased over the counter.

1.4.4. Alcohol:

'Alcohol' means any alcohol-based product with the potential to produce intoxication.

1.4.5. Substance misuse:

Intoxication/use of substances, including the deliberate misuse of over the counter or prescribed medication in an improper way, while on duty or while off duty to such an extent that it leads to absenteeism or work related performance problems.

1.4.6. Positive Test Results:

Means a test result indicating the presence of alcohol or prohibited Substances at or above the country specific levels, once the test result has been reviewed and confirmed as positive by the Medical Review Officer/Company Doctor. The Company reserves the right to alter these levels at any time at its discretion following appropriate professional advice or legislative changes.

1.4.7. "For cause" testing:

Testing occurs in situations in which a particular incident, behaviour or performance creates reasonable concern that substance misuse may be a contributory factor.

1.4.8. "Random" Testing:

Unannounced substance misuse testing of a random sample of workers from a pre-defined group.

1.5. Responsibility under the Policy

1. The Regional President Europe & West Africa will have the overall responsibility for the implementation of the Policy and will delegate this responsibility to appropriate business unit managers.

2. The Human Resources Manager Europe & West Africa is designated as coordinator of the Policy.

3. Managers and Supervisors are responsible for:

a) Awareness of and alertness to behaviour, actions or performance that might indicate that an employee or third party individual has a substance misuse problem. In conjunction with IOHS and Human Resources, refer the employee for assessment/testing or inform the third party's employer.

b) Notifying IOHS that 'for cause' testing is required.

c) Applying the relevant disciplinary procedures where appropriate (in consultation with the Human Resources department).

d) Encouraging employees who have identified a personal substance misuse issue to contact IOHS and participate in the treatment and rehabilitation program. Note that entering into a treatment & rehabilitation program does not ultimately prevent ConocoPhillips from taking action against that employee for misconduct or other breach of contract that relates to or is caused by substance misuse.

e) Ensuring all employees and contractors in their business area are aware of this policy and the procedures required by it.

1.6. Non-conformance/Deviations from policy

An application to deviate from this Policy must be approved by the Manager Human Resources, Europe & West Africa.

2.0. Alcohol

The Company recognises that alcohol may be served at various company sponsored events or when the individual is representing the company at associated events. All employees and third parties involved in COP operations are required to behave responsibly and ensure that any alcohol consumption has no detrimental effect on safety (including driving), work performance or work attendance. Individuals consuming alcohol at such events should not return to the office or work location that day.

2.1. Responsibilities of Supervisory Personnel

When a supervisor notices that an employee/third party on his/her staff is acting in such a way as to suggest possible substance misuse or suspicion is raised via the concern of others, the following options should be considered and a course of action pursued:

1. Suspicion of substance misuse – This describes the preferred course of action where an individual's behaviour alters over time, patterns of absence/sickness develop, concerns are raised by others etc. If a supervisor suspects (or hears via a third party) that an employee or contractor is misusing substances s/he will speak with that individual and advise them that they are being referred to IOHS

for counselling/assessment. Individuals will be reminded that it is in their best interests to self-disclose any substance issues. Supervisors have the right to refer any individual to IOHS at any time.

2. For-cause testing – This applies typically where an individual appears to be visibly exhibiting signs of substance misuse or the supervisor has reasonable cause to be concerned about the immediate safety of the individual (and others by association), then they should contact IOHS and HR to arrange 'for cause' testing for substances. The supervisor shall in all cases document in writing the reasons for requesting such testing. A copy of the document will be kept in the employee's personnel file.

3. Non-conformance – it should be noted that individuals who refuse to undergo a substance test or later refuse for the test result to be made available to ConocoPhillips, will be subject to disciplinary action, which could lead to dismissal.

If the supervisor fails to take the above-mentioned steps, the company will regard this as neglect of duty.

3.0. Procedures For Testing & Screening

The company will conduct substance misuse screening according to country specific laws and company agreements (e.g. AKAN agreement in Norway), however pre-employment and for cause testing apply to the whole North Sea Business Unit.

Consent to test will be requested and recorded prior to the test taking place. Data relating to the test, including any laboratory reports, will be stored securely and confidentially by the testing Laboratory and the Medical Review Officer.

A positive test or screen – defined above - will be cause for disciplinary action, which may include termination with or without notice.

3.1. Medication check at the heliport

When going offshore, an individual's private medication (usually that prescribed by a registered physician) must be handled in accordance with "The procedures for bringing medication offshore".

Human Resources (person on emergency duty) shall be notified by heliport security

- if medication outside the scope of the policy are found
- of medication that has been deliberately concealed or hidden
- if the IOHS concludes that the medication in all probability was intended for intoxication, or for reducing the withdrawal symptoms of substance misuse

This may result in disciplinary action.

It should also be noted that an individual should be in a fit condition when proceeding to check in at the heliport. They should not be under the influence of alcohol or any other substance when checking into travel to an offshore installation.

3.2 Pre-Employment Screening

In connection with external recruitment, the company will inform candidates about the requirement for substance testing in connection with the mandatory medical examination prior to employment. The job offer from the company is conditional on an approved medical examination.

3.3 "For Cause" Testing

In most cases of For Cause testing, there will be a delay between the test being carried out and the result being known. ConocoPhillips reserves the right to suspend an employee (on full pay) from duty who has been the subject of For Cause testing, where there are health and safety reasons to justify this, until the test results are known.

Behaviours that may give reasonable cause for suspicion and justify testing include:

- Reporting for work and in situations where the employee represents the company and thus is performing company work (courses, meetings, etc.), under the influence of substances
- Performing work in a negligent manner, particularly when this results in injuries or property damage
- Post-accident when there is reasonable suspicion that substance misuse is a causal factor.
- Other factors during the employee's work performance that may give cause for suspicion that the employee is under the influence of a substance.
- The detection of evidence within the workplace of drug paraphernalia.
- During rehabilitation and post-rehabilitation.

3.4 Random Testing

This Policy permits Business Units within the NSBU to have random testing programmes providing the programme complies with country-specific legislation, industry or local agreements and there has been full employee consultation. Business Units within countries that do have random testing programmes are required to have a written procedure in place that clearly describes the random selection process and testing methods used. In the UK, the Data Protection Act (Part 4 of the Information Commissioner's Employment Practices Data Protection Code) states random testing of all workers is not justified if in fact it is only workers engaged in a particular activity that pose a safety risk. Business Units with random testing programmes may therefore only randomly test workers whose activities actually have an impact on the health and safety of others, i.e. safety sensitive positions. In the NSBU, this is likely to be limited to offshore workers and onshore Plant workers.

3.5 Breath tests

If there is reasonable cause to suspect that an employee reports for work, or in other work situations (a course, meeting etc.), under the influence of alcohol, the employee will be asked to submit to a breath test.

If the reasonable cause for suspicion is confirmed by a positive breath test showing a blood-alcohol concentration of 20mg/100ml or higher in Norway or a blood alcohol concentration of 80mg/100ml or higher in the United Kingdom.

- the employee will not be permitted offshore or will be requested to leave the work place, course, meeting, etc.
- his/her supervisor and IOHS will be informed
- the supervisor and Human Resources will counsel with the employee
- IOHS may take further tests as appropriate

The Company's disciplinary procedures will be followed and disciplinary action will be taken in such cases, (for Norway reference. chapter 9, Company Working Rules; for UK reference Employee Handbook).

If an offshore employee in Norway takes a test that shows a blood-substance level of less than 20/mg/100ml, the employee may report for new departure the next day. The following tables outline the actions required depending on blood alcohol concentration.

Norway: Table 3.5.1

Blood Alcohol Concentration (BAC) mg/100ml	Action taken at Heliport	Action taken by IOHS, HR, Line mgr	Action taken for onshore personnel
< 0.2	Heliport notifies COP. Not permitted on flight	IOHS to be notified. Flight next day	On suspicion : IOHS to be notified. Result of

			blood test defines next step.
= > 0.2	Heliport notifies COP. Not permitted on flight	IOHS, HR, Line Mgr to be notified. Disciplinary action.	HR and Line Mgr to be notified. Disciplinary action.

UK: Table 3.5.2

Blood Alcohol Concentration (BAC) mg/100ml	Action taken at Heliport (offshore personnel)	Action taken for onshore personnel
< 80, normal behaviour	Heliport notifies COP Logistics. Permitted on flight at COP discretion	No action
< 80, abnormal behaviour	Heliport notifies COP/employer. Not permitted on flight.	Refer to IOHS & HR for further action.
= >80	Heliport notifies COP/employer. Not permitted on flight. Disciplinary action	Disciplinary action

3.6 Urine/Blood Tests

An employee may be asked to provide a specimen of urine for drug testing and/or breath or blood for testing for alcohol, if referred for For Cause Testing. An individual will be deemed to be in violation of this substance misuse policy if the following is detected:

Norway: blood-alcohol concentration (or equivalent urine level) of 20mg/100ml or higher.

United Kingdom: blood-alcohol concentration (or equivalent urine level) of 80mg/100ml or higher

Drugs: Results will be regarded as positive if at or above a level determined by legally defensible laboratory analysis and then confirmed as positive once fully assessed by the Medical Review Officer/Medical Adviser. The company reserves the right to alter, at its discretion after receiving appropriate advice, the definition of a positive test result for any prohibited substance.

4.0. Assistance and Rehabilitation

ConocoPhillips offers assistance for employees with a substance misuse problem provided they volunteer a problem. An employee may not volunteer a problem once they have been notified that they are about to be tested for substance misuse. The assistance includes an assessment by a Medical Representative to determine the appropriate rehabilitation or treatment programme and then financial assistance with the programme.

ConocoPhillips cooperates with doctors and institutions, in the public and private sectors, with regards to substance misuse treatment.

Reimbursement of costs for private treatment may be made under certain circumstances

- the institution for treatment and rehabilitation must be approved by IOHS.
- the employee have entered into an Rehabilitation/AKAN-agreement with the Company
- abstinence for 6 months after end of treatment and rehabilitation program

Up to 50% of the costs may be reimbursed. The Company may also consider financing the full cost of treatment and deduct 50% of the costs in the employee's salary over a period of 12 months.

4.1 Rehabilitation Agreement (known as AKAN-Agreement in Norway)

If an employee volunteers a substance misuse problem as described in section 4.0, the company may order the employee to sign a rehabilitation agreement or AKAN agreement as a condition of their continued employment. The alternative to signing such an agreement may be termination of employment.

The rehabilitation agreement or AKA agreement may be established following an evaluation of the employee by the IOHS, which will make sure the agreement is implemented and monitor agreement compliance. The Company Doctor will make an evaluation concerning the employee's medical certificate for offshore work.

The agreement will contain information about substance tests to be conducted during the agreement period. The purpose of the tests is to document that the employee is complying with the rehabilitation agreement. The term of the agreement will be 2 years.

On suspicion or proof of breach of the agreement, the Company Doctor will always make an evaluation of the employee's fitness for work, including medical certification for offshore work. If such breach happens, the appropriate Human Resources representative will be contacted.

The appropriate Human Resources representative will receive a copy of the agreement if the agreement was prompted by a disciplinary situation. The Human Resources representative and the employee's supervisor will be informed if the employee violates the agreement. Violation of an agreement will result in the employee being referred back to Human Resources for assessment of disciplinary action.

5.0. Confidentiality and disclosure requirements

IOHS is required by law to observe medical confidentiality. Information of a personal nature will not be disclosed without the consent of the employee concerned. This, however, does not apply to the essential information required to prevent dangerous conditions and serious health risk. When IOHS, during its periodic physical examinations, identifies substance misuse that may lead to dangerous conditions or serious health risks, the employee's supervisor and the appropriate HR representative shall be notified. Other actions may be taken as necessary e.g. offshore certificate withdrawn, rehabilitation agreement sought.

6.0. Strategy for prevention and control of Substance problems among employees

The company has divided its substance misuse work into three strategy zones that are described below:

6.1. Main strategy - Green zone

Prevent the development of a substance problem through the company's well-defined substance misuse policy combined with effective training and information about substances and the potential detrimental effects of substance use.

Means to implement the main strategy may involve:

- courses followed up by HES & Q meetings offshore / section meetings
- onshore information directly to the employees
- information videos
- presentations by expert personnel
- awareness campaigns
- training of leaders to recognise Substance misuse problems

6.2. Secondary strategy - Yellow Zone

Assist employees who have or are developing a Substance problem.

Actions may include:

- Outlining support available if problems arise
- Information to the employee about available rehabilitation programs
- Rehabilitation programs

6.3. Tertiary strategy - Red zone

Aimed at employees who have violated the company's substance regulations and represent a threat to the work environment.

Actions linked to:

- Company Work Regulations
- Company disciplinary procedures

Employees and third parties may be refused permission to travel on company business or to a company location and may be removed from any ConocoPhillips workplace, either temporarily or permanently, at the discretion of ConocoPhillips.

7.0. Communication of the Policy

1. The Policy will be communicated to all ConocoPhillips employees and third parties involved in ConocoPhillips operations.
2. Training will be available to Managers and Supervisors to aid them in recognizing substance misuse and administering the requirements of the policy.