CODE OF CONDUCT

Here, you'll discover an overview of some of the legal and ethical standards we are each expected to follow every day. If you have any questions <u>contact us</u>.

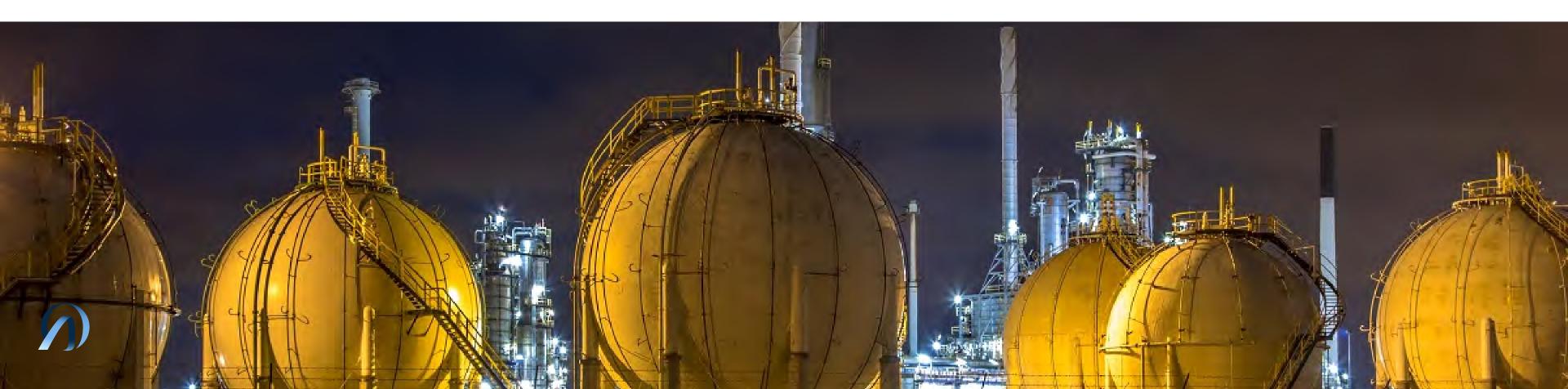




Introduction

The ARTOIL FZE Code of Conduct is based on a set of shared values and is structured around how we are expected to conduct ourselves in an ethical manner. Recognizing, internalizing, and living the Code is an essential part of who we are as ARTOIL FZE professionals and what we represent. Whether we are working with colleagues or clients, we remain diligent and mindful of our ethical accountability.

Our world is constantly changing and our Code of Conduct mirrors those changes. Through the nature of our work and the manner in which we do business as trusted professionals, we commit to ethical behavior while meeting the daily challenges of an ever-changing world.



Transparency and Confidentiality

We pride ourselves on negotiating and securing contracts legally and honourably with our clients, contractors, and other parties. We meet our contractual commitments and adhere to the agreed-upon terms and conditions.

We keep track of our time and expenses and record them accurately. Transparency is essential when it comes to divulging the basis on which we charge for our services. ARTOIL FZE practices fair competition. We do not enter into agreements with our competitors, whether formally or informally, with the intent of illegally restricting competition, fixing prices, or allocating clientele, markets, or services.

We respect our competitors' information and ensure that it remains confidential. We only collect information that is publicly available, and then only if doing so does not violate legal or contractual obligations. We gather, store, transmit and dispose of personal and confidential information in a transparent manner that inspires trust.

Access to this data is granted only if absolutely necessary. Our onus of confidentiality does not cease to apply when we leave ARTOIL FZE; we continue to acknowledge the confidentiality of information even after leaving the company.





Bribery and Corruption Prevention

ARTOIL FZE employees do not engage in corruption of any kind. This is key to building and maintaining the trust of both colleagues and clients. As such, we neither solicit nor accept any form of bribery including facilitation payments - no matter if directly or via a third party. We pride ourselves as ARTOIL FZE professionals in knowing who our clients are and exactly with whom we are doing business. We hold fast to applicable standards on antimoney laundering. If criminal activity is suspected, we take appropriate action. We do not engage in pursuits that are in breach of applicable economic sanctions or undertake services which support clients in breaching applicable sanction laws. A bribe does not always present itself in the form of payment or cash, it can be anything of value, including:

- Phony consulting fees and commissions to individuals who did not perform services
- travel
- hospitality
- entertainment

- employment opportunities
- employment opportunities outside the standard hiring process
- sponsorship/donation

Harassment and Safety

We promote collaboration across the ARTOIL FZE network. Trust is key to this collaboration as it facilitates productivity between colleaques and enhances client services. Treating each other with respect, equality and kindness builds trust. The safety of our employees is a priority for ARTOIL FZE. Therefore, we ensure a safe working environment free of aggressive, violent or disruptive conduct. We have a zero-tolerance policy for harassment, discrimination, bullying and disrespectful behaviour*. These behaviours weaken the integrity of our relationships. We encourage open dialogue that creates an environment conducive to open and honest discussion.

* This applies whether based on an individual's race, ethnicity, colour, age, gender, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, language, religion, disability, parental status, economic class/status, veteran status and/or any other inappropriate basis.





Compliance with Law

Internationally recognised labour principles include, for example, the principles of the UN Global Compact and the objectives of the International Labour Organisation. We champion and support internationally decreed human rights. We work to circumvent any involvement in human rights abuses. We ensure compliance with relevant labour and employment laws and employ internationally recognised labour ethics in our approach to business.

We eagerly engage in dialogue that helps to structure legislation and regulation in a manner that supports the public interest and our principles. We maintain the rule of law in our exchanges with regulators. We work with government authorities and agencies in a dutiful and direct manner. We respond immediately to requests for information from governmental and professional authorities, as mandated by applicable law and professional responsibilities.

Diversity

We believe that the diversity of our labour force provides us with a competitive edge that we wish to cultivate and expand. We encourage a culture that fosters creativity, professional growth and career progression, workplace flexibility and a healthy work/life balance. We invest in our people and their professional potential by supporting continuing education, and by creating opportunities to support both short-term growth and long-term career progression. Our innovation and problemsolving skills are dependant on our ability to continue learning and remain open minded. We honour the cultures of the countries in which we do business. Should we find that certain customs and traditions are at odds with this Code, we will confer internally and decide on the best way to follow the Code while keeping local culture and traditions in mind. Our objective is to gain the trust of our shareholders by exhibiting openness and honesty while continuing to focus on excellence and integrity.







Retaliation

Retaliation can come in many forms, either direct or subtle, for reporting in good faith real or suspected illicit activities. ARTOIL FZE protects against retaliation. In adherence to the ethical values of integrity and caution, fi a concern is reported, it will be investigated with confidentiality and discussed with others only as needed or advisable, as deemed appropriate under the circumstances. Determining when to speak out and via which channel, as is most appropriate to the situation and the individual, is facilitated through the use of professional scepticism and common sense and through applying the Code as well as ancillary advisory documents. Retaliation is a severe transgression that is not tolerated. Any ARTOIL FZE employee (or partner or staff member) who engages in retaliatory action will be held accountable.



Health and Safety and the Environment

The safety of ARTOIL FZE employees is our top priority. We believe that everyone has the right to a healthy and safe working environment. We are actively engaged in measures to attain our Health and Safety objectives and expect the same level of commitment from our employees.

ARTOIL FZE is striving to reduce the number of workplace incidents and occupational safety concerns on an ongoing basis through the continual improvement of our HSE policies. Occupational Health and Safety is the responsibility of all ARTOIL FZE employees. Risk identification, management and analysis cannot be left solely to those in management positions but should play an integral role in the way in which all of our employees work.

We provide training to all employees to make them aware of the HSE policies we have in place, providing them with valuable know-how should a risk situation arise. Al our HSE policies are compliant with the legal standards. All ARTOIL FZE employees are expected to follow our internal policies at all times. Where no such policy exists, employees are to use their best judgement, seek advice from their managers and act in accordance with this Code of Conduct.



Health and Safety and the Environment

Another key principle of the ARTOIL FZE work ethic is our environmental zero-harm policy. Our aim is to have only a positive influence on the environments we work in. We support the sustainability movement and ask our employees to do the same. By being aware of the environmental consequences of our actions, we can make changes to promote sustainability and protect the environment. We therefore conduct our business in a way that is consistent with this zero-harm objective.

No ARTOIL FZE employee should work in a situation which puts them, their colleagues or the environment at risk. Instead, all employees are entitled to stop work if they do not feel safe or if they consider their actions to be unnecessarily harmful to the environment. By working together in a healthy and safe environment and in conformity with this Code of Conduct, we hope to gain the confidence, trust and respect of our customers and shareholders and the communities we work in, while also valuing the well-being of our colleagues and employees.

