

Code of Business Ethics (Human Rights)

The code applies to all employees of the Company. Compliance with the Code helps to sustain and enhance the good reputation of the Company and contributes to long term value creation for clientele. We believe that every employee plays their part in building and strengthening the Group as a whole. We operate a non-retaliation policy: any employee who in good faith reports any act of apparent misconduct or unethical behavior will not be victimized or treated adversely.

Company, its employees and agents, are required, as a minimum standard, to comply with all the International regulations and flag administrative requirements.

a. Code of Conduct

It is the Company's Policy to ensure that all shore based and riding squad personnel carry out their duties in an ethical and honest manner ensuring that they exhibit the highest standards of integrity and righteousness at all times. The Company is committed to:

- Ensure that no any employee participates in any incentive or bonus programs based on minimizing operational costs associated with the operation, maintenance, and repair of machinery space systems, equipment, and components without ensuring that efficiency and performance are maintained. The intent of this is to ensure that staff do not avoid such costs and thereby sacrifice required level of compliance.*
- Take appropriate action, up to and including dismissal, against any employee who obstruct, hinder or present false information, or make false statements during any inspection; monitoring or audit carried out by any authority whatsoever.*
- Ensure that NO any employee is punished, discriminated against or otherwise suffers negative consequences for reporting violations of QHSE laws, regulations, or policies.*
- Take disciplinary action up to and including dismissal against any employee who derail from specified operating policies and procedures.*

b. Dealing with Principals, Agents, Suppliers and Customers

Company provides its customers with services, which meet or exceed their requirements, through the application of company management system (QEMS) and continuous improvement programs. These are designed to develop and apply innovative ideas, to respond quickly to changing customer demands and to improve continuously service quality and value.

Employees must respect and treat in accordance with agreed terms the technology, intellectual property, confidential information and any other assets or data received from customers and others.

Company expects agents and others working on its behalf to act lawfully and ethically, and in accordance with the values and standards set out in this Code.

c. Human Rights

Company upholds all internationally recognized human rights wherever its operations are located and adheres to all relevant international guidelines regarding the human rights respect. In addition, company has "zero tolerance" for any case of human rights' violation.

Strong systems of internal control, are essential aspects of company's structure and serve to ensure that it is managed effectively and that reported results are accurate.