

## **KMG INTERNATIONAL BUSINESS CONDUCT AND CODE OF ETHICS (abbreviated version)**

This abbreviated version of KMG International Business Conduct and Code of Ethics describes our Group's set of values, principles and ethical regulations that we observe in our day by day activities and we also expect our business partners to align with.

KMG International Business Conduct and Code of Ethics has the goal of promoting ethical values and principles, in order to increase the quality of services offered and to protect our Group's reputation. Being engaged in almost all the operations pertaining to the Oil & Gas Industry, our Group success is possible only if our business is based on a clear and long - term strategic orientation towards **INTEGRITY, HONESTY** and **RESPONSIBILITY**.

Through **RESPONSIBILITY** we understand accountability, transparency, ethical behavior, social involvement, respect of stakeholder interests, state of law, international norms of behavior and human rights. **INTEGRITY** and **HONESTY** are part of our credo and we meet the highest ethical standards in all the business dealings.

We are a dynamic leader in the regional oil field and believe that our success is possible because it stems from and is shaped by a well-defined set of values:

- Our **PEOPLE**: we place the highest priority on the needs of our employees. Our actions are always determined by their dynamism, contemporary spirit, creativity and experience.
- CARE, INTEGRITY** and **RESPONSIBILITY**: we are a trustworthy worldwide partner and a valued corporate citizen. We are honest with all our stakeholders and take responsibility for our actions.
- DETERMINATION**: the strength of our business stems from our firmness of will and our determination to succeed and deliver excellence in everything we do.
- ENVIRONMENTAL PROTECTION**: Both we and our partners adhere to all the national laws and regulations governing the environment and proper management of resources, wherever we or they operate.
- SUSTAINABILITY**: we support the principles set forth in the Universal Declaration of Human Rights and maintain the high standards of integrity. Also, through developing profitable business and active engagement with the local communities, we aim to ensure that our business practices contribute to long-term economic and social development.
- HIGH QUALITY**: we are committed to quality in everything we do and we strive to continuous improvement. We are passionate about achieving quality results which exceed expectations – our own and those of the stakeholders.
- COMMITMENT TO LEADERSHIP**: we use our experience, our technology and perseverance to offer products and services of the high standards and are committed to leadership in all our actions, which directly or indirectly impact all our stakeholders.

Starting from above mentioned, we comply with the following organizational and behavior rules in all our activities and we request to our business partners to act in the same behavior:

**We are a customer-oriented business**, we place the customer at the center of our business.

**We do business in a transparent manner** and ensure timely, reliable and relevant information disclosure. Information disclosure shall be made only by the authorized personnel and business partners are not allowed to comment on behalf of the Group on any related aspect with the mass media or other third parties.

**We are an equal opportunity employer**, committed to respect all applicable human rights, civil rights and labor laws and does not tolerate any form of abuse, harassment or discrimination in any Company workplace.

Our Group does not condone the use of forced or child labor and consequently, we expect that our business partners to contribute to the abolition of the child labor and effective elimination of the forced labor.

**We protect our resources and information**, by keeping accurate financial records, take good care of our assets, handle confidential information with care and protect the intellectual property.

Business partners shall follow our business conduct as regards financial reporting and align with the acceptable accounting principles and good practices. Business information shall be used according to the confidential agreements concluded with KMG International and/or its companies, and intellectual property (e.g. copyrights, trademarks, patents, industrial design rights, and trade secrets etc.) should be used under the provisions of intellectual property law.

**We provide excellence through our QHSE strategy**, and we are dedicated to maintain safety and health of everyone involved in our activities (employees of the Group, business partners, communities located near our work places and the public, influenced by our work environment). Our business partners should comply with all health, safety and environmental protection laws and regulations wherever they operates.

**We are law-obedient corporate citizen**, we comply with applicable regulations and legal requirements whenever we operate, pay liable taxes and use strictly legal methods in all our business.

**Bribery and corruption:** KMG International is committed to conduct business fairly, honorably, with integrity and honesty and in compliance with all applicable laws. We adopt a zero tolerance approach to bribery and corruption in all of our business dealings and relationships wherever we are operating and we are requesting the same approach from our partners.

**Competition:** We engage only in fair competition and seek no advantage that contravenes laws applicable in the country of operation.

**Insider trading:** KMG International doesn't enter illegal insider trading practices and business partners shouldn't use insider information for personal gain.

**We do not tolerate conflicts of interests** and all our activities must be undertaken for the best interest of the Group, free of any outside influence. Our employees must not engage during their employment in any contractual relationship with our business partners and competitors, if it harms the interest of the Group.

It is not allowed to provide and/or receive gifts and business courtesies with the intention of influencing, inducing or rewarding individuals or companies in order to gain any advantage through improper performance, or in explicit or implicit exchange for favors or benefits.

**We are politically-neutral** and we are not engaging in any political activities in the countries where we operate. Any political views expressed by our employees and business partners to third parties are purely personal and do not express our Group point of view.

**We are a socially responsible member of the local communities**, and fully understand that sustaining the local communities goes far beyond a job creation. Our approach to corporate social responsibility (CSR) calls for a continuous and active involvement in projects for the benefit of local communities.

KMG International Business Conduct and Code of Ethics shall be sent to each business partners during negotiation process, before entering in business relationship the potential business partner shall acknowledge the receipt and the alignment to this document. In addition, this document shall be deemed in any other necessary occasions.

It is the responsibility of the business partner to ensure that its stakeholders (employees and subcontractors) are informed about and are aligned with the provisions of KMG International Business Conduct and Code of Ethics.

Upon any breach of this document that may impact the provided products and services, or in case of any unethical conduct, the business partner shall inform KMG International by email at [compliance@rompetrol.com](mailto:compliance@rompetrol.com) or by post address: City Gate Northern Tower, Piata Presei Libere no. 3-5, 5<sup>th</sup> floor, 013702, Bucharest 1<sup>st</sup> District, ROMANIA – in attention to Compliance Department.

Thank you for your support in developing and maintaining a culture of integrity and responsibility within KMG International!

KMG International N.V.