



Code of Conduct and Integrity

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HIGH MANAGEMENT LETTER

Ethics and integrity are relevant and non-negotiable assets in Our Company

We do not believe integrity is not only a word on the title of a document. It defines the legal personality of QUALITECH. It is not something we pursue, by an essential and unique value which our internal and external relationships are based on.

The Code of Conduct and Integrity is based on our culture, ethical principles, and the relationship between QUALITECH and its various target public. This relationship sets expectations for our performance, quality, and diversity. It also encompasses our personal and professional commitment to always act with honesty, integrity, responsibility, and respect. This is your role. As part of our staff, you have the responsibility to ensure the values and principles of the Company

All questioning you may have been welcome and important for the practices to be improved over time.

We need to work as a team and look after QUALITECH by respecting all the values stated in this code as it guides the universal conduct expected for all of us to behave ourselves in favor of the good of all.

This is the only way for us to become a global reference in solutions for Inspection, Repair and Maintenance, where our activities are performed with excellence, in and integrated and sustainable way, where the company's recognition in a continuous process of acquiring the trust to enable us to reach the success of our mission.

2 - WHAT IS THE CODE OF CONDUCT?

Introduction

This Code of Conduct and Integrity aims to help all of us to follow the principles we believe to be essential, both inside and outside the Company. This Code applies to all employees and service providers and it is provided with the values and commitments to be shared by all stakeholders throughout our value chain, including partners and suppliers. Everyone has its own pattern of values. Therefore, it is essential that each employee reflects, in order to match their individual values with the cultural values of QUALITECH.

Mission

Act as a strategic partner with efficient and quality solutions to guarantee the safety and continuity of oil, gas and energy operations.

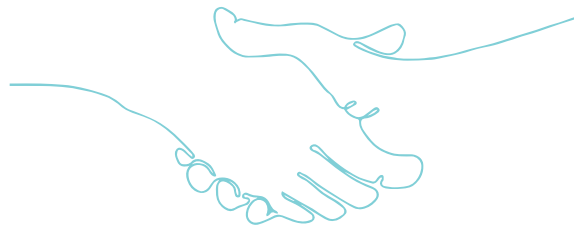


Ethic conduct

Based on the knowledge of our profile and risks, we have agreed on the Values and Code of Conduct in compliance with the applicable laws and regulations pertaining to the countries where we operate and it is a fundamental principle of QUALITECH. The Company's decisions must include fairness, legality and good corporate and accounting governance practices.

Qualitech values

Our beliefs and attitudes are based on our five values, which define our DNA and our work with customers, partners and society.



The ethics and conduct patterns represent the behavior expected from all QUALITECH Employees, to be gathered in the Values and Code of Conduct below:



Who applies to

QUALITECH is a multinational company which gives priority to work with integrity, ethics, quality, safety and social and environmental responsibility.

This Code of Conduct applies to everyone who is part of QUALITECH team and it guides its relationship with its employees, customers, suppliers, community and others.

QUALITECH actions towards its employees, customers, suppliers, community and other stakeholders shall be founded on: RESPECT, LIABILITY, SUITABILITY, LOYALTY, EQUITY and TRANSPARENCY.

THE PRACTICES BELOW ARE UNACCEPTABLE FOR QUALITECH: Any type of discrimination, harassment, child labor, slave labor, unhealthy labor, predatory environmental behavior, passive or active corruption of any degrees or natures, offensive competition, breach of industrial secrecy, use or trafficking of weapons, drugs and/or alcoholic beverages.

QUALITECH adopts good MANAGEMENT practices and guides its decisions by using the RESPONSIBILITY, complying with the legislation and honoring the contracts, so it is always a safe option for its Clients.

QUALITECH constantly seeks INNOVATION, by developing activities permeated by the precepts of SUSTAINABLE DEVELOPMENT, so that the use of natural resources meets current needs without compromising the capacity of future generations.

QUALITECH assumes the HUMAN CAPITAL as its greatest asset and it considers the teamwork a crucial tool to ensure the business continuity.

The important thing is that such clearly defined patterns of behavior are followed by everyone, and that they are also widely accessible to the external public, especially business partners and customers.

3 - Our employees

Relationship with colleagues, regardless of hierarchy, position or function

Some values are expected within relationships among the employees, such as the cordiality, trust, respect and dignified and honest conduct, regardless of any hierarchical position or function, were the individual differences are always respected.

We must not hinder the colleagues' reputation through prejudiced judgments, perjuries, unsubstantiated information, or any other subterfuges.

We shall not seek to obtain exchange of favors that may appear or give rise to any kind of commitments or personal obligations.

Relationship with customers, partners, suppliers and competitors

We must treat our customers, partners, suppliers and competitors in a respectful and cordial manner, always acting in accordance with applicable legislation, being attentive to the preservation of the corporate image and confidential information.

QUALITECH is committed to fairly acting in the world market, aligned with the constitutional principles of free competition, free initiative and equal opportunities for all, for the benefit of maintaining the economic order.

Participatory Management

QUALITECH provides a favorable environment, focusing on dialog, and it encourages employee's participation so that they can effectively contribute to QUALITECH management.

Work Environment

QUALITECH provides its employees with an adequate working environment, aiming at safety, hygiene, health and well-being. Individual rights are legitimate and shall be respected.

When exercising their activities, employees shall preserve the company's assets, such as its real estate, equipment, materials, technological and strategic information, as well as its operational shore bases, among other QUALITECH assets.



Equality And Diversity

QUALITECH does not tolerate any practices of discrimination by its employees, suppliers, business partners or service providers whether ethnic-racial, physical, linguistic, religious, political, socioeconomic, generational, gender, etc., since we believe that the appreciation of diversity contributes to different world views and enriches our work.

We demand respect to others and among themselves in order to have a peaceful and healthy work atmosphere. Respecting others is everyone's duty.

Harassment And Intimidation

QUALITECH believes that maintaining an environment free of violence or threats is essential for the development of a healthy work atmosphere. It means that words, gestures or attitudes that may disqualify the employee's self-esteem, safety or image due to his/her hierarchical or sexual bond, will not be tolerated and the harasser shall be disclosed. Any negative conducts that destabilizes the relationship between employees in the work environment shall be disclosed and they will be thoroughly investigated and punished accordingly.

Alcohol And Drugs

The objective of Alcohol and Drug Policy for QUALITECH is to prevent the illegal and abusive use of alcohol and drugs, when not prescribed, we understand that the use of such substances interferes with the people's attention and ability and may also change their behavior leading to unsafe acts and risk to life.

The use of illicit drugs and the ingestion of alcoholic drinks are prohibited by any employees or service providers within the facilities of QUALITECH, Customers and other Stakeholders'.

The violation of the principles and criteria of the Alcohol and Drug Policy may result in disciplinary action and/or termination of the employee or service provider, with its immediate removal from QUALITECH facilities. In addition to that, the suspicion of any criminal activities is subject to be informed to Competent Authorities. The noncompliance of these standards will be treated in accordance with the regulations in force.

The guidelines and orientations on this topic can be found in QUALITECH Alcohol and Drug Policy.

Prevention And Safety

Our prevention and safety activities are consolidated by our Integrated Management System which follows strict criteria recognized internationally and it is guided by a policy that includes topics such as instruction, qualification, training and commitment of the workforce.

We are committed to providing a safe and secure environment for our staff in our facilities or workplaces. In this context, prevention and safety mean the prevention of all and any types of accidents and incidents related to people, environments and assets. We continually work on improving and upgrading our prevention and safety initiatives.

It is the duty and responsibility of all employees to follow QUALITECH QHSE Policy



Offering hospitality, souvenirs and gifts

Giving and receiving gifts, souvenirs and hospitality is considered a practice of common courtesy in business, it symbolizes an attitude of kindness and appreciation, provided that this practice occurs in an appropriate, ethical and legal manner where our limits are strict from when we allow the offer or acceptance of gifts and hospitalities.

In some situations, the offer or receipt of gifts and hospitality may generate expectations or claims of favoritism, perceptions that bribery has occurred or an inappropriate advantage and may characterize a conflict of interest situation.

In such situations when there is the intention or expectation of obtaining undue advantage or improperly influencing the action of a public authority or private company, the employee shall refuse to receive or give any gifts, regardless of their nature or value.

QUALITECH always honors its own costs related to trips, fairs, accommodations and other related expenses.

In the event of doubts about practical situations involving hospitality, souvenirs and gifts, the employees shall consult their direct supervisor.

Relationship with the public and private sectors

QUALITECH prohibits any types of bribe to public or private agents for joining bids and administrative contracts, as well as the exemption from payment of taxes, privileges in obtaining licenses, authorizations and permits and situations of supervision or regulation, the hiring of current and former public or private agents, among others.

When exercising the position or function, the Employees and Third parties shall not perform, require or accept improper, dubious or illegal payments, with a view to favoring and granting benefits, privileges or advantages that are in disagreement with the legislation and with respect to QUALITECH internal policies and procedures

Our Business Relationships shall be based on trust and transparency complying with applicable laws, respecting internationally recognized human rights and following the ethical and cultural standards established by QUALITECH.

Sponsorships and Donations

QUALITECH understands by sponsorship and donations the financial support granted to projects of third-party initiatives focused on cultural, social and socio-environmental causes, aiming at contributing to a better world and with the objective of strengthening its image and its relationship with stakeholders, adding value to the brand, generating recognition and strengthening itself with its service market.

Only projects that meet one or more of the above objectives will be selected, they shall comply with the rules of this Code and comply with the purposes of the laws applicable to different sort of tax incentive.

We are committed to the Code of Conduct and Integrity in business and attentive to the history of those who will receive our funding, sponsorships or donations, to avoid possible associations of our image with fraud or corruption.

Conflict of Interest

The Conflict of Interest occurs when an employee is able to influence a decision of the Company or of other employees or managers, which may result in some, direct or indirect, personal gain, for him/herself, members of his family or friends.

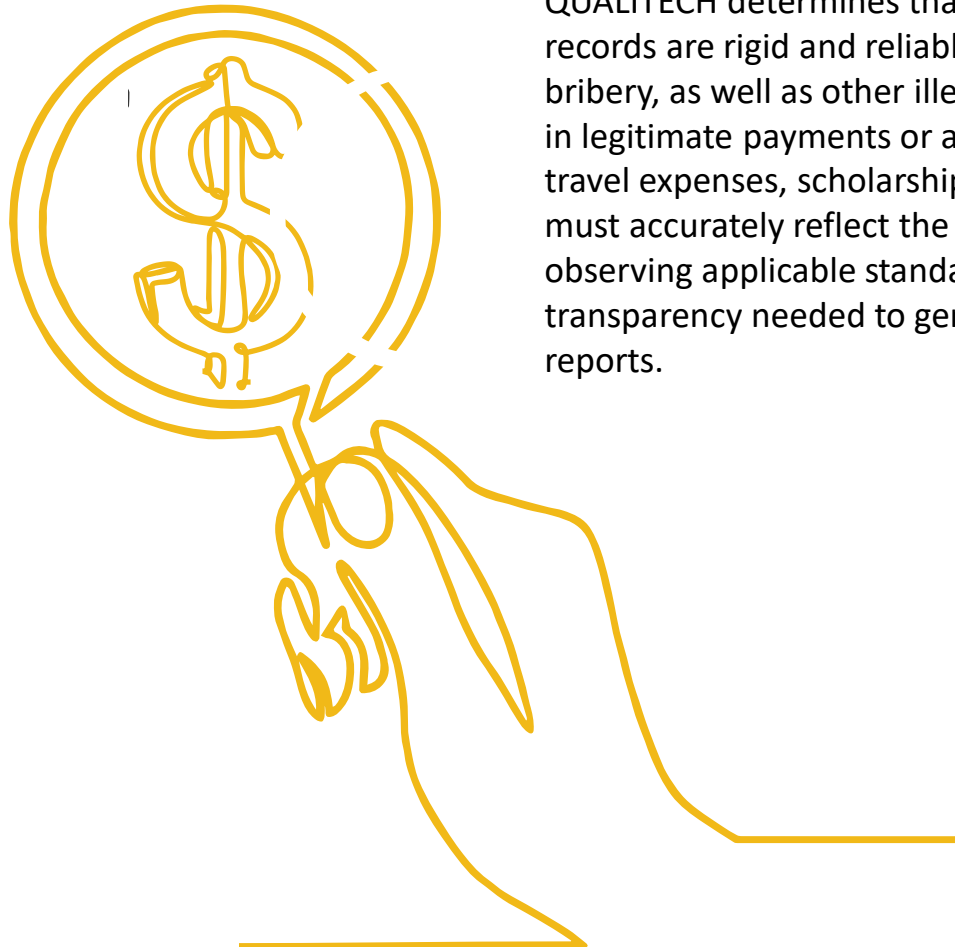
QUALITECH employees shall ensure that their actions do not conflict with the Company's interests or damage its image and reputation. Personal relationships should not extend over the employee's professional conduct.

Anti-corruption

Any forms of corruption, including bribery, gratuity and influence peddling, are unacceptable by QUALITECH, whether by our employees, suppliers and service providers, or by anyone who is part of our value chain. We have ZERO tolerance for this type of behavior which is not in accordance with Corporate Culture; it does not benefit communities, but it represents a burden for the Company, ruins reputations and exposes companies and individuals t

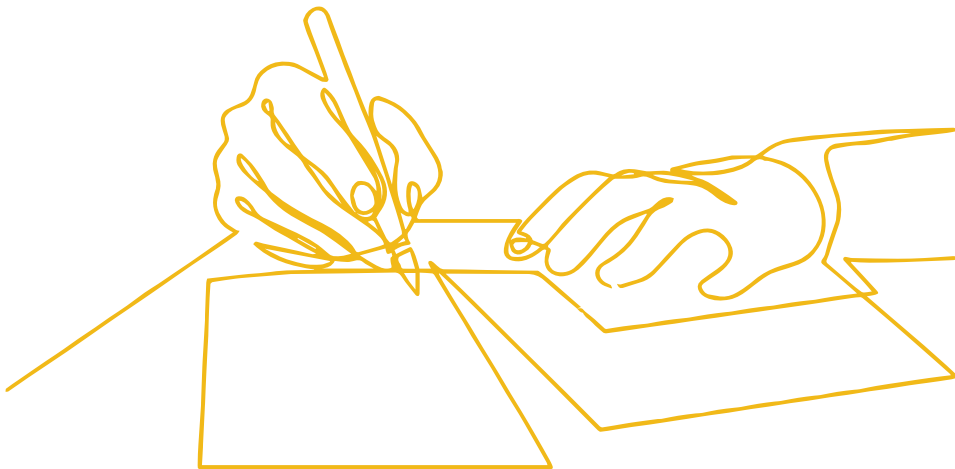
Accounting records and controls Qualitech

QUALITECH determines that accounting procedures and records are rigid and reliable, not allowing any types of bribery, as well as other illegal practices, whether disguised in legitimate payments or as commissions, consultancies, travel expenses, scholarships, entertainment, etc., they must accurately reflect the transactions made, by strictly observing applicable standards and laws, ensuring the transparency needed to generate reliable records and reports.



Corporate Restructuring

Aiming at preventing the liability for harmful acts committed by another QUALITECH which it is involved as a result of corporate restructuring processes, measures should be taken to verify whether the other QUALITECH has been or is involved in acts harmful to the public or private administration, and whether it has vulnerabilities that pose risks to the Code of Conduct and Integrity.



Hiring third parties

The employees responsible for hiring Third Parties shall follow this Code on a day-to-day basis and carefully analyze the information obtained.

The Employee shall request the Third Party to submit all information and documents necessary for the evaluation of the contract, by observing the requirements related to the agreement. It is important that proper checks are adopted for hiring and supervising suppliers, service providers, intermediary agents and associates, among others, especially in situations of high risk to Integrity.

QUALITECH will verify the possibility of inserting in the contract clauses that require, the Commitment to the Code of Conduct and Integrity in public-private relations and QUALITECH guidelines and Policies, including the submission of their Code of Conduct and Integrity, if applicable;

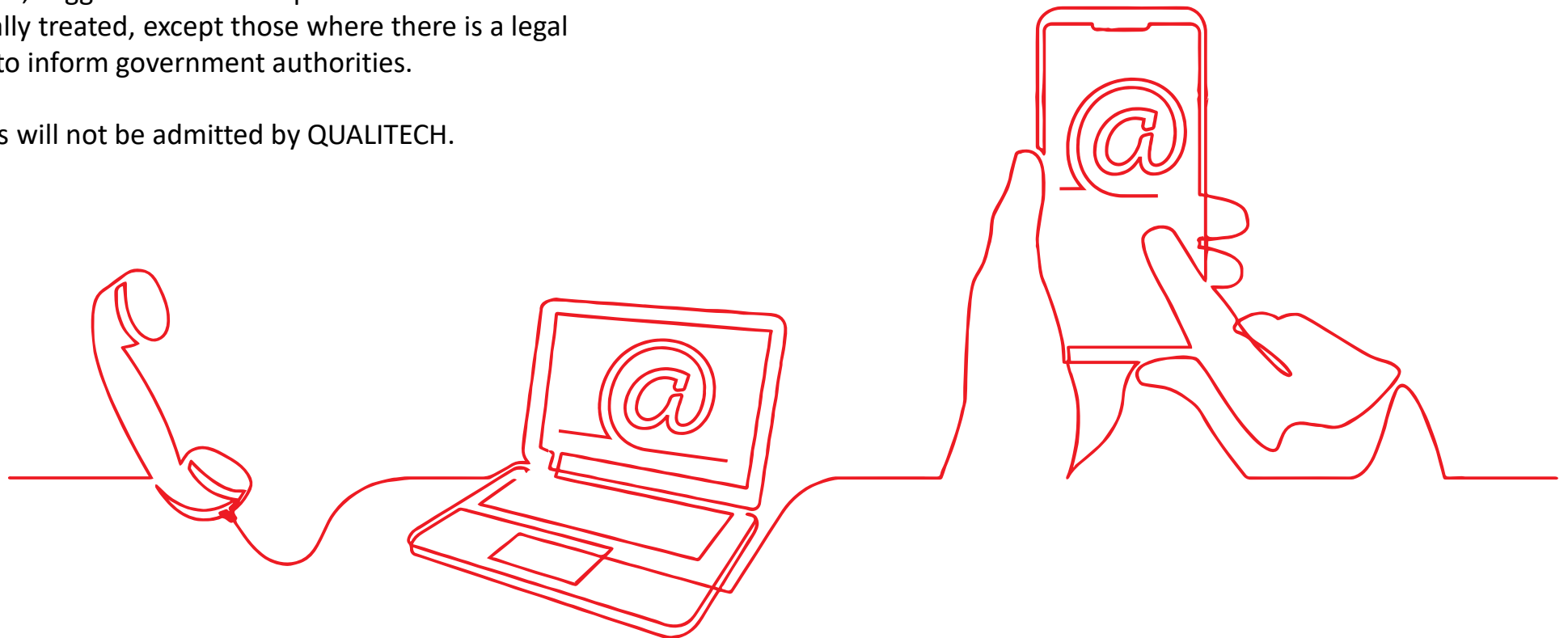
QUALITECH will adopt ways to periodically verify if their contractors are acting in agreement with the contract and it is not adopting behaviors contrary to its values or laws.

4 – Reporting and Communication Channels

Questions, suggestions or complaints to this code for both internal and external audiences may be made by the **Ethics Channel** through the - **email helpline@qualitechirm.com**.

All questions, suggestions and complaints received will be confidentially treated, except those where there is a legal obligation to inform government authorities.

Retaliations will not be admitted by QUALITECH.



5 – Data Policy

Information Management and Confidentiality

INFORMATION MANAGEMENT AND CONFIDENTIALITY

QUALITECH does not allow employees to share documents or file storage locations with unauthorized people. QUALITECH has the intellectual license of its digital infrastructure. The improper sharing will be understood as a serious misconduct.

The information regarding QUALITECH, which is not proven to be in the public domain, is strictly prohibited from being disclosed by its Employees and Third Parties; the same is applied in relation to the information relating to its customers and suppliers.



This nondisclosure information determination and the duty to remain confidential also covers comments in public places, such as taxis, elevators, restaurants, shopping malls and with people from the social groups, family members and co-workers who do not need this information to perform their duties.

Each QUALITECH Employee is therefore the guardian of the company valuable and confidential information ("confidential information"). The confidentiality of classified and privileged information shall be maintained even at the end of the employment contract.

Privacy and Data Protection

We categorically declare our commitment to the secure of our information assets and/or information under our custody and it shall be followed and respected by all our employees. We provide internal awareness, so that the standards are followed by all its employees, ensuring the confidentiality, integrity and availability of information, not only about our customers and suppliers, but also regarding QUALITECH own employees.

QUALITECH considers information as an asset that, like any other important asset, is essential to the corporate business and therefore it needs to be properly secured.



Information Technology - IT

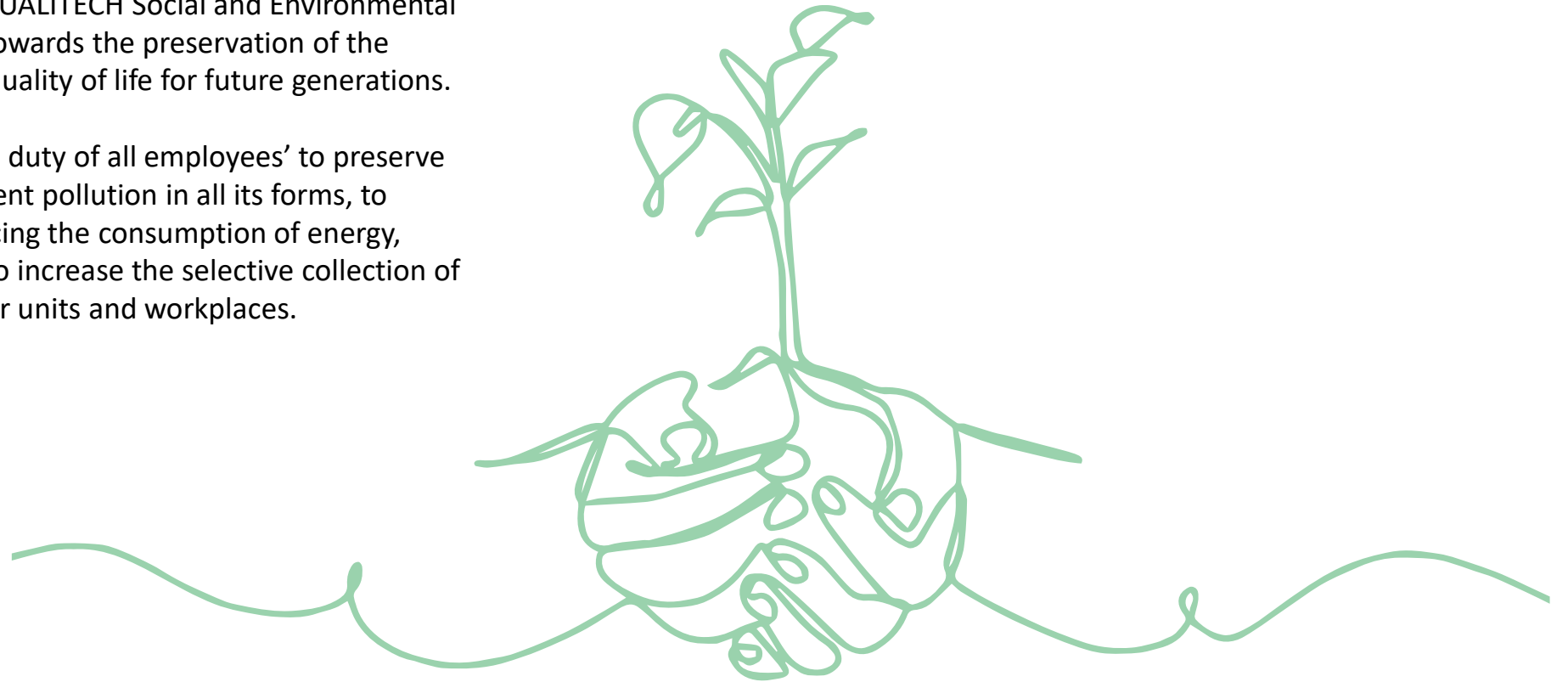
QUALITECH employees and service providers, regardless of their link, function or hierarchical level, are responsible for protecting the technological assets and information they use, within both, physical and digital, environments they have access to, by respecting policies and mechanisms of control and protection to employees, it shall ensure that all non-public information is kept in absolute confidentiality and our IT systems shall be based solely on commercial needs.

Cyber-attacks and malicious activities are a constant threat to the company, and the use of our IT solutions and equipment must be monitored to detect such risks. This includes blocking access to inappropriate websites and intercepting any information transmitted by or stored on our IT systems.

6 – Socio-environmental Responsibility

The promotion of sustainable development in a proactive way is the main objective of QUALITECH Social and Environmental Responsibility; we work towards the preservation of the environment and better quality of life for future generations.

It is the responsibility and duty of all employees' to preserve the environment, to prevent pollution in all its forms, to adopt initiatives for reducing the consumption of energy, water and supplies, and to increase the selective collection of waste generated by all our units and workplaces.



7 – General Information

Investigations and Sanctions

All reported events of suspected violations of this Code will be investigated immediately and appropriately. If, after the investigation, a conduct has occurred that has violated the rules of this Code, immediate and exemplary corrective measures shall be taken, always in accordance with the circumstances, the severity and the applicable law.

Any employees, third parties or partners who violate any provisions of this code will be subject to disciplinary sanctions under the QUALITECH Code of Conduct, listed below:

- Written warning or suspension.
- Termination without or due to Just Cause.
- Exclusion of QUALITECH supplier, partner or intermediary agent.
- Legal action.

Termination agreements may be negotiated if there is an interest on both parties in discontinuing the contract. The company does not negotiate with employees due to a unilateral will, no matter what the reason why. .

Our Responsibility

We have consolidated high ethical standards for all who work on behalf of QUALITECH. It is your duty and responsibility to act in accordance with this Code of Conduct and Integrity, both in literal and spirit terms. You are also responsible for complying with other governance documents and applicable laws that are relevant to your work.

Accession

It is required for all members to sign the Term of Commitment and Adherence to this Code.

Validity

This Code will be revised every year, being updated whenever there are changes in legislation or when the Company judges necessary to maintain its proper functioning and credibility.