

Milliardi Energo LLC is an independent oil and gas service company. It is a versatile organization, dedicated to creating and increasing shareholder value with a portfolio of quality resource personnel with excellent technical, commercial and financial skills. In all our physical operations we seek to work with partners who share our commitment to high international standards of operation. The infrastructure upon which we rely, from ships to jetties and storage, is subject to our due diligence processes. A company will not achieve sustainable business success without addressing its responsibilities to society. Conversely, a company can only pursue effective social responsibility projects if it delivers strong operational and financial results to create long-term shareholder value.

The corporate commitments policy framework sets out the essential core values which Milliardi believes will make the Company a good corporate citizen.

CORPORATE COMMITMENTS

Milliardi Energo has nine (9) corporate-level strategic imperatives covering governance, environment business and an engaged and solution-driven workforce as denoted below. These values help us earn and retain our license to operate on a daily basis and in turn, excel in business performance. Our local operations will be responsible for identifying and implementing programs to fulfill these commitments at the local level, including setting measurable goals to drive continuous improvement.

OUR APPROACH TO:

ENVIRONMENTAL AND SUSTAINABILITY MATTERS.

- **ENVIRONMENTAL STEWARDSHIP**

We aim to make a positive contribution to the protection of the environment where we operate and to minimize any adverse effects of our operations. Wherever possible, we will prevent, or otherwise minimize, mitigate and remediate, harmful effects of our operations on the environment. We will also promote, encourage and prioritize reuse and recycling methods throughout our operations and endeavour to meet the challenges presented by climate change. To say the least, we will be spearheading recycling with our advanced methods of refurbishing worn-out machinery such as drill bits. We continuously assess the impact of our operations on the environment and ensure compliance with all laws and regulations regarding the environment.

- **SUSTAINABLE BUSINESS**

We have always considered sustainable development the cornerstone of our business strategy. We aim to contribute positively to global sustainability through our operations, adoption of new technologies and the conduct of our relationships with all stakeholders. We seek to achieve sustainable and profitable growth, creating thriving eco-systems around all our businesses. Our strategy includes fostering close and continuous interaction with the people and communities around our servicing and storage divisions, bringing qualitative changes in their lives and supporting the underprivileged.

A strong environmental performance is key to maintaining our reputation and ability to generate shareholder value. In doing so we maintain a reputation of being considered as a partner of choice.

HEALTH AND SAFETY MATTERS

Health and safety is a natural priority and a core element of all of our activities. All energy companies face a wide range of health and safety matters ranging from industrial accidents to occupational illnesses. Our goal, and a key performance indicator of the Company, is zero injuries and fatalities across all areas of our operations. We aim to ensure that important factors, such as use of external contractors, are addressed in the development of our health and safety systems and procedures with a view to constructing, maintaining and developing world class safety systems across all of our operations.

- **EMPLOYEE AND OCCUPATIONAL HEALTH**

Ensuring that relationships between our employees are cohesive, safe and effective is important to our Company and we expect all our employees to be as fully committed to good corporate values and responsible behaviour at all times. Employees should be respectful in their dealings with colleagues, customers, counterparties, partners, stakeholders and peers. We aim to protect the physical health of all of our employees and contractors whilst in the workplace. In particular, we endeavour to meet any challenges presented to our employees and the wider communities in which they live and operate.

Major event can impact on our employees, contractors and local communities leading to a potential loss of reputation. We will always strive for an accident and injury free workplace, with safe and healthy work practices and conditions throughout our operations. Our ability to demonstrate a strong track record is an important factor in obtaining stakeholder approval for proposed projects. We expect all employees to be aware of the risks associated with any initiative they are involved in and mindful of their potential impact. We aim to maintain an inclusive work environment where we attract, develop and retain employees who actively contribute to growing our business. A strong health and safety record will be one of our key business drive.

BUSINESS CONDUCT MATTERS

- **POLITICAL INVOLVEMENT**

Miliardi does not, directly or indirectly, participate in party politics and the Company is not affiliated with any political party or politician. We will engage, when obligated, with the relevant government officials on matters concerning its business interest. All of our relationships with public officials will be in compliance with our anti-bribery and corruption policy.

- **BRIBERY AND CORRUPTION**

Miliardi Energo is highly opposed to bribery and corruption in whatever forms they may occur. Gifts or entertainment may only be offered to a third party if they are modest in value and cannot be interpreted as a form of influence.

It is Miliardi's policy that revenues, purchases and services from suppliers are made solely on the basis of price, quality, performance and value for benefit. Sales, purchases or award of contracts should never be made as the result of giving or receiving inducements in the form of gifts, money or entertainment from third parties or favours in any other form.

Employees should not accept gifts, money or entertainment from third party organizations or individuals, where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial

ones of low value, are not accepted. The company takes any breach of the Code very serious and will take requisite action as it deems appropriate against any employee who commits a breach of the Code. In a culture where such an action might cause offence, the gift must be declared to the Company and, if practical, donated to an appropriate charity. We are all responsible for ensuring the Code of Conduct and policies are applied throughout the organization.

Milliardi has a robust Anti-Bribery and Corruption policy. Good corporate conduct makes sound business sense which guides correct actions and enhances our reputation amongst stakeholders.

We do not tolerate bribery or corruption in our business.

- **CUSTOMER RELATIONS**

We regard mutual trust and confidence with our contractors and customers as very important. We require employees to deliver high levels of service consistently, surpassing expectations and meeting their changing requirements as well as delivering outsourced orders always within the required time-frame. We expect our employees to appreciate the importance of counterparties and customers to our business. Employees should recognize and value the benefits diversity brings and encourage a broad range of views and thinking across the company. Furthermore, we respect the confidentiality of all our commercial relationships.

- **SUPPLIER-RELATION**

We ensure that all of our suppliers are treated fairly and responsibly. We aim to pay our suppliers on time and in accordance with agreed terms of trade. We rely heavily upon the integrity and capability of our supplier base. Suppliers will conduct their activities in accordance with our own policies.

- **COMPETITION**

We, at Milliardi aim to compete vigorously with our competitors, but in a fair and responsible way, and aim to ensure that our success is built upon excellence and integrity. When in contact with our competitors, employees will be required to avoid disclosing confidential information and we will not make improper attempts to acquire competitor trade secrets or other confidential information. Employees will not undertake any arrangements or practices that may conflict with laws applicable to the conduct of our business. We recognize the risk of conflicts of interest and have policies in place to ensure employees are aware of their responsibilities.

CORPORATE GOVERNANCE MATTERS

- **COMPLIANCE WITH THE LAW AND RELEVANT REGULATIONS**

We are committed to protecting interests of our shareholders through compliance with relevant legal and regulatory environmental bodies and similarly through effective management of business risks. We comply fully with all relevant national and international laws and act in accordance with local guidelines and regulations, including those that are industry specific and govern our operations. It is the responsibility of senior personnel to ensure, by taking legal or supervisory roles where appropriate, that all other sub employees work within the required core values and ethics that represent what we stand for as a company. All business conducted on the company's behalf should be compliant with the applicable legislative and regulatory regime, including international sanctions.

Our businesses may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Our businesses will take care to ensure that such statements or

reports are correct, timely and not misleading. Conduct our business with high standards for responsible operations, business ethics and integrity, corporate governance and transparency. We always comply with applicable laws and regulations concerning disclosure of information about the company.