

TOTALTEC ANTI-BRIBERY AND CORRUPTION POLICY



INTRODUCTION

TOTALTEC Oilfield Services UK Ltd. and its subsidiaries/affiliations ("TOTALTEC") recognizes that bribery and corruption has a detrimental effect on communities wherever they occur. Bribery is a criminal offence in most countries in which TOTALTEC operates, and corrupt acts expose TOTALTEC and its employees to the risk of prosecution, fines and imprisonment, as well as endangering TOTALTEC's reputation. It is TOTALTEC's policy to comply with all anti-bribery and corruption laws of the countries in which we do business.

With the introduction of the UK Bribery Act 2010, TOTALTEC has taken steps to introduce "adequate procedures" which are rigorously applied and reviewed to ensure that we are fully compliant with the provisions of that Act.

It is TOTALTEC's policy to maintain the highest level of ethical standards in the conduct of its business affairs and TOTALTEC has a zero tolerance of bribery and corruption. This policy has been adopted by the TOTALTEC's Board of Directors and is to be communicated to everyone involved in our business to ensure their commitment to it.

SCOPE

TOTALTEC's zero tolerance of bribery and corruption applies to all officers, directors and employees as well as any agents, contractors, representatives or other parties acting on behalf of TOTALTEC or any subsidiary, of which TOTALTEC has effective control, in any country that we operate.

TOTALTEC expects our business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

THE STATEMENT

TOTALTEC prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from

any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

any individual employee, agent or other person or body acting on TOTALTEC's behalf

in order to

gain any commercial, contractual or regulatory advantage for TOTALTEC in a way which is unethical

or in order to

gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of TOTALTEC or of the person or body employing them or whom they represent.

EXPECTATIONS OF TOTALTEC AND STAFF

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout TOTALTEC. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained.

The Chairman has lead responsibility for policy implementation within TOTALTEC and this policy is signed by him to demonstrate the Board of Director's commitment.



Lars Mangal

Chairman

4th Oct 2016