

Ethic & Behavior Code






Growing with integrity

Development and improvement live in our company DNA. We are a team committed to the achievement of its goals. We do it the right way, taking care of our company and our people.

This ethics code came up through CLEAR's commitment to integrity – this way expressing our moral values and behavior rules. The code is based on an assessment of our compliance risks and a careful review in which different managerial areas of the company participated.

The code is our everyday guide. It was created to Build Trust in our team, in our environment, with our clients and the whole community.

I would like everyone to read it, discuss it, share it and apply it in all the company activities.



Juan Gonzalo Gonzalez Pedrosa
President
Clear Petroleum S.A.

Index



- Goals 5
- Scope 5
- Resolutions 5
- Corporate Values 8
- Responsibilities 10
- Development 12
 - Commitment to out enviroment 12
 - Corruption intolerance 12
 - Business Integrity 13
 - Commitment to people 13
 - Assets responsibility 14
 - Company information & impression 15
 - IT safety & use of digital resources 16
 - Clash & hospitality 17
 - Gifts & hospitality 18
 - Complaints 19
 - Sanctions 21
- Related Policy 22
- APPENDIX I 26

Goal

Through this Code, we provide ethical behavior standards which guide our members in order to take accurate decisions. Therefore, we pass on this ethical commitment to our business partners.

Scope

We apply this Code on our members and business partners. We expect that the standards are met in all the activities and decisions of our company, in every single transaction in its name.

The rules we establish on this Code are mandatory and provide a wide guide on appropriate individual or company behavior. However, the Code cannot cover eventual situations. We must apply the rules with good judgement – reflecting their principles on every action or actual decision.

Resolutions

- **Company:** When we talk about 'our company', 'the organization' or, simply, 'us', we are always referring to CLEAR PETROLEUM CORPORATION, ENDURANCE SOLUTIONS, COMPAÑIA ANDINA DE TALADROS CORPORATION.

- **Member:** every person on our team, including partners, directors, managers, own staff and recruited staff.
- **Business partner:** any other individual or legal entity related to the Company for any reason, including clients, suppliers, unions, national and local governments.
- **Morale:** set of rules that we apply on our daily lives and which guide our actions and judgement over what is moral or immoral, right or wrong, good or bad.
- **Ethics:** knowledge derived from research on human behavior while trying to explain moral rules in a rational way based on grounded scientific theory.
- **Integrity:** flawless honest behavior consistent with our principles and our actions.
- **Transparency:** spread truthful suitable information with clarity.
- **Responsibility:** behave accordingly committed to meeting established goals.
- **Security:** Ideal security and health working conditions – guaranteeing top security measures in installations and services, keeping a close eye on protecting the staff, hired staff, clients and the whole environment – setting an example for the Organization in general.
- **Gifts:** presents or benefits given as common courtesy.

- **Corruption:** receive, offer, ask for any kind of benefit or valuable to influence someone improperly – whether a civil servant or any other person.
- **Civil servant:** any person representing the National Government (including any public agency), government companies, foreign governments and overseas bodies.
- **Perks:** meals and snacks. Besides, cultural or sports events.



Corporate Assets

Our corporate assets represent our principles and the foundation of the Company's task. Every single member of the company must reflect those principles through their actions.

Commitment



We become aware on how to do our job taking into account the impact on our clients, the environment and everyone who belongs to the organization.

Trust



We do our job accurately and consistently- confirming service quality, always a step ahead of other service companies.

Responsibility



We take decisions always considering our professionalism and integrity guiding principles, optimizing our assets, taking staff into account and protecting the environment.

Excellence



We work through clear processes which provide us with a competitive advantage based on our service vocation, foreseeing improvement opportunities, always looking for a positive impact so that we get profitability and added value in the face of our clients.

Focus on the client



The way we work allows us to count on a wide range of solutions to figure out the issues presented by the industry. Thus, we can respond accurately.

Austerity



Monitoring expenses and looking for efficiency through the use of tools that boost the necessary synergy to strike a balance between the simplicity of our actions and the growth of the Company.

Passion for our job



We are chosen due to our professionalism, our knowledge and experience. We are also proud of our achievements.

Responsibilities



Directors & Managers

Meet the Code and have others meet the Code.

Promote its circulation & implementation.

Support the Official implementation of this Code.

Apply sanctions in case of unfulfillment.



Code Officer

Apply the Code.

Support training on it.

Interpret its principles and inform others about its suitable application.

Suggest possible actions to deal with a clash of interests or manage the allocation of a gift.

Assess reports on unfulfillment of the Code and suggest possible sanctions to the Management.



Technical Representatives

Meet the Code and have others meet the Code.

Cooperate with the Code Officer in the application of the Code.

Clear up doubts about its interpretation and promote queries among their teams.

Inform and promote communication on possible unfulfillment of the Code.



Everyone in the Company

Understand and meet the requirements of the Code.

Clear up doubts about its application.

Report any form of unfulfillment.

Development

Commitment to our environment:

Ethics is a comprehensive aspect in our activities – what matters is not only the results but also the way we get them.

We meet the Law to the letter.

We respect basic rights in all our activities.

We respect the environment.

We only deal with counterparts that share our principles.

Zero tolerance to corruption:

We keep zero tolerance to corruption and to any form of bribe to public servants.

We keep a trustworthy relationship with the public area and we thoroughly forbid offering – directly or indirectly – any form of benefit in order to get an illegal advantage.

We are not politically biased and we also forbid political contributions in the name of the company.

We always provide the required information to regulatory agencies.

Business integrity:

We do not accept any form of corruption between private parties, either. We thoroughly forbid accepting or offering an advantage in the relationship with clients and providers.

We reject any form of laundering, hiding or distortion of the truthful ownership of assets and we forbid practices that triggers the grant of apparently legitimate goods but, possibly, of illegal origin.

We respectfully deal with our competitors and disavow any form of practice going against free competition on the market.

We thoroughly forbid helping out people or agencies connected to organized crime.

Commitment to people:

We promote respectful, equitable, fair treatment, based on the same opportunities for everyone – taking into account merit and effort.

We communicate respectfully and kindly – considering the different opinions and points of view – sorting out differences in a sociable way.

We provide a healthy safe working environment – demanding respect for our security policies at the workplace and punishing any form of behavior that puts at risk the welfare of others.

We forbid any form of discrimination due to gender, nationality, sexual orientation, religious, political or union beliefs.

We forbid humiliating forms of behavior as well as any form of sexual harassment or violence at the workplace – whether sexual, moral or any other kind.

We respect privacy and intimacy of people. We store personal data only when necessary and legally bound – always respecting the owners' consent, as well as their right to know the collected information and rectify mistakes.

Keeping our heritage

We take every decision based on professional and functional criteria – taking into account the company interests and looking for its legitimate benefit.



We take care of the company assets the same way as we would do it with our personal belongings, avoiding its deterioration or theft.

We do not resort to our position in the company in order to get a personal benefit – wrongly supporting a third person.

Every technological or intellectual development created in the work activity is the sole property of our company. However, we always recognize merit, originality and innovative capacity in our members.



Our information and image



We take care of our information as a strategic asset – avoiding its loss, deterioration or theft.



We forbid the use of restricted information for personal purposes or unauthorized ones.



We protect and keep a secret on any confidential information or one whose spreading could harm our company.



We do not disclose commercial information, technical or computer knowledge, management data, search results or similar information without prior written authorization granted by someone above us.



We forbid communications on behalf of the company without permission or the use of its name, logo, or images that could have harmful effects.

Software security and the use of digital resources

The information created and stored in our systems is Company ownership which, in turn, reserves the right to grant permit access to that data.

Should the situation arise in which the company grants additional permits, those will be backed up by IT policies.

We are all bound up with the obligation to inform to the IT department about any loss, theft or damage to equipment, as well as about any threat to our software data.

Software devices assigned as work tools belong to the company and, consequently, we are all responsible for their security.

Devices and data system are not allowed to be used personally or privately more than necessary. Anyone who uses them for private purposes, such as personal calls or transactions, should be fully aware that those calls are preventively monitored, and that information can be analyzed in internal research.

Clash of interests

We should always behave loyally to our company interests.

We should avoid any situation that could bring up a conflict between personal interests and those of the Company. We cannot represent it when our personal interest is in the way.

Those of our employees who are family-related are not allowed to be hierarchically above or below each other.

We should not give recommendations so that the company does business with another organization in which we have a personal interest.



We are not allowed to grant forbidden advantages in business to other companies or organizations, while being impartial.

We are not allowed to use assets or private information of the Company – according to our work position – for personal benefit or third parties or to compete with the company itself.

The moment we start working for the Company we have to fill out APPENDIX 1 of the present document which, later, will be filed in the personal record. We also have to update this record annually.

In the attachment we have to inform of direct or indirect participation in clients, competitors.

Gifts & hospitality

We forbid offering or accepting any form of gift within the framework of the company activities – except for courtesy presents or protocol ones of inexpensive costs.

We forbid offering any form of gift to a public servant – regardless of the cost of the gift.

We forbid – regardless of its cost – any form of gift given to influence incorrectly its addressee.

We particularly forbid offering or accepting any object or service that is worth over \$70 (official market value.)

We allow offering or accepting reasonable perks, such as, transportation, meals, accommodation within the business framework, so long as these benefits are not luxurious ones or their main goal was a personal interest or idleness.

Invitations for business participation, conferences, technical courses must be authorized by a superior authority and the ethics committee.

Having received any form of forbidden gift, the person has to inform their superior immediately above them, who, in turn, will be responsible for taking care of the granted gifts. Also, the person should consult the compliance officer about the next steps to be followed.

Allowed presents should not be given or accepted in the form of money.

We must not ask for gifts – even in those cases in which it is allowed to do so.

Reports

We have to inform of any breach of Code – or any other form of behavior that can be connected to crime or jeopardize the company.

Everyone has the right to report this form of misbehavior in a safe and confidential way – knowing there will be no actions taken in reprisal due to the refusal to participate in any wrongdoing, its report or cooperation in the investigation. Our company will back up those people who suffer from reprisals.



People you can report to:

Your boss.

People & Culture manager.

The CEO, vice-president or any other authority in the company.

Ethics Line

Additionally, we count on an Ethics Line – confidential medium- managed by an independent third party in order to inform of those forms of misconduct.

The Ethics Line is available to every member of the company and it is supervised by the Ethics Committee – made up of the people in the following positions: Vice-president, Finance Administration Director, People & Culture Director, Legal & Work Issues Director.

Ethics Line can be accessed through different channels:

- **Webpage:** www.bdolineaetica.com/ClearPetroleum
- **Email Address:** ClearPetroleum@bdolineaetica.com
- **Phone Number:** 0800 - 3454 - 632
- **WhatsApp:** +54 9 11 3913 6172
- **Personal interviews :** to be scheduled by mail at eticayconducta@clear.com.ar



The company promotes the use of the Ethics Line and it will not accept any form of reprisal to be applied to a code-abiding person.



Sanctions

Non-compliance to the Code will result in the application of disciplinary measures –proportionally applied to the severity of the offense, which may result in the termination of the work relationship.

Sanctions will be applied – depending on the wrongdoer’s position in the company – by the corresponding management area or the governing body (with prior intervention of the Compliance Officer.)

Noncompliance by a business partner can result in the application of sanctions specified in the corresponding contract, the termination of business relationships and even the step to legal actions via commercial/civil/legal means.

Other forms of action can be taken, such as remedial ones or an answer to noncompliance.

Related policies

- PL-01 QUALITY, SECURITY, HEALTH & ENVIRONMENT POLICIES
- PL-02 ALCOHOL & DRUG POLICY
- PL-03 TRANSPORTATION POLICY
- PL-04 VISION, MISSION & VALUES
- PL-05 AUTHORITY OVER TASK STOPPING
- PO-21 SGI INDUCTION MANUAL









APPENDIX I

CLASH OF INTERESTS

I, _____, file _____,
complying with what is stated in **PG-12 ETHICS & BEHAVIOR CODE**, I am writing
you with the purpose of:

Verify if the present situation reflects a possible clash between my personal interests and those of CLEAR PETROLEUM LTD. and, should that be the case, receive your grant.

I am a member of an organization or I am related to people or organizations linked to CLEAR PETROLEUM LTD.

I am a partner/member/ someone related to a client/supplier linked to CLEAR PETROLEUM LTD.

I have received a benefit/gift from a third party related to CLEAR PETROLEUM LTD. At that moment that third person was i) about to sign a contract with the company ii) in the awarding process of a document iii) about to 'win or lose' a business contract or receive a perk as a result of a CLEAR PETROLEUM LTD decision or action.

I can get a personal benefit or a personal loss (or through a family member or partner), as a result of my active participation in the decision process related to hiring, payment, certification of hired staff of CLEAR PETROLEUM LTD.



I have a family/emotional/close relationship with some member from CLEAR PETROLEUM LTD or I am hierarchically related to them.

Others.

Next, I explain the details of the situation mentioned above:

To inform that I am NOT in a clash of interests with CLEAR PETROLEUM LTD.

To conclude, I commit myself to notifying immediately of any possible change of the conditions mentioned before.

Signature _____

Name _____

ID number _____

Date & Place _____



Contact us!

www.clear.com.ar



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