CODE OF ETHICS FOR CONSULTING AND ENGINEERING

Arighi Engineering Services (AES) aims to promote relationships with clients based on transparency, fairness, honesty and confidentiality.

This Code of Ethics makes explicit and formal commitments that have always characterized the Company activities, so they can be known and shared with its clients.

- 1. Purpose of AES is to produce concept engineering, FEED design, tender engineering, detail and construction design, as well as performing consulting services.
- 2. AES's potential clients are Oil Companies, Main Contractors, Engineering Companies, Construction Yards and others mainly involved in the Oil & Gas sector, both in Italy and abroad.
- 3. Our goal is to grow. AES pursues strong and loyal relationships with its clients, through close collaboration, and simultaneously AES wants to expand its clientele both in Italy and abroad.
- 4. The goal of AES is to produce every possible effort, within the limits of the received mandate, so that clients can successfully achieve their goals, whether they are commercial (acquisition of new orders) or operational (execution of orders).
- 5. AES commits to provide solid and state of the art skills, flexibility, proactive approach, prompt mobilization.
- 6. During an engineering or consulting process, AES strictly asks clients to provide only the necessary information for the completion of the agreed services.
- 7. AES ensures full confidentiality for each document and for all information received by the client, such as marketing policies, business strategies, interlocutors through which the client develops his business, Company standards, Project Execution Plans, etc.
- 8. AES can't grant the exclusivity of engineering and consulting services to any client.
- 9. In the event a Client needs that AES refrain from working with one or more competitors, this demand must be explicitly submitted. AES will analyse the request, and possible agreements may be negotiated. In any case, the commitment of abstention if agreed will refer to one specific Company, will be limited in duration and will be limited in the instance. Without agreements signed by the parties, Clients can't consider the relationship with AES as exclusive.

- 10. Supporting clients during the bid phase (tender engineering) is considered a strategic goal by AES. In fact, whenever a client of AES wins a contract, this becomes a good opportunity for further and greater collaborations.
- 11. In case a Client, during the tender for getting a contract, entrusts AES to perform consulting or engineering activities, AES feels obliged not to take assignments from other Clients engaged on the same tender.
- 12. If the winner of a tender is different from the client to which the consulting and engineering services have been performed during the tender itself, the bond of exclusivity will be considered concluded, while the obligation of confidentiality about the information acquired during the tender, will be kept.
- 13. When AES is performing consulting activities or engineering for a Client, the Client can define AES as a nominated subcontractor, if he wishes. In addition, the Client may define one or more people of AES as functionally included in his staff throughout the execution of the project. Both are possible only prior to an explicit agreement between the parties. On the contrary, the Client can't openly state or imply that a member of AES is an employee of theirs.
- 14. AES promises to not transfer to third parties the technical documentation developed during the engineering and/or the consulting process. However the skills and the experiences gathered over the years, which represent the know-hows of AES, cannot be considered properties of the clients.
- 15. General Manager and employees of AES will commit to comply with the provisions of this code of ethics, having signed it

Olgiate Comasco, 31-10-14

Marco Arighi Founder and CEO

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