



CODE OF ETHICS AND BUSINESS CONDUCT

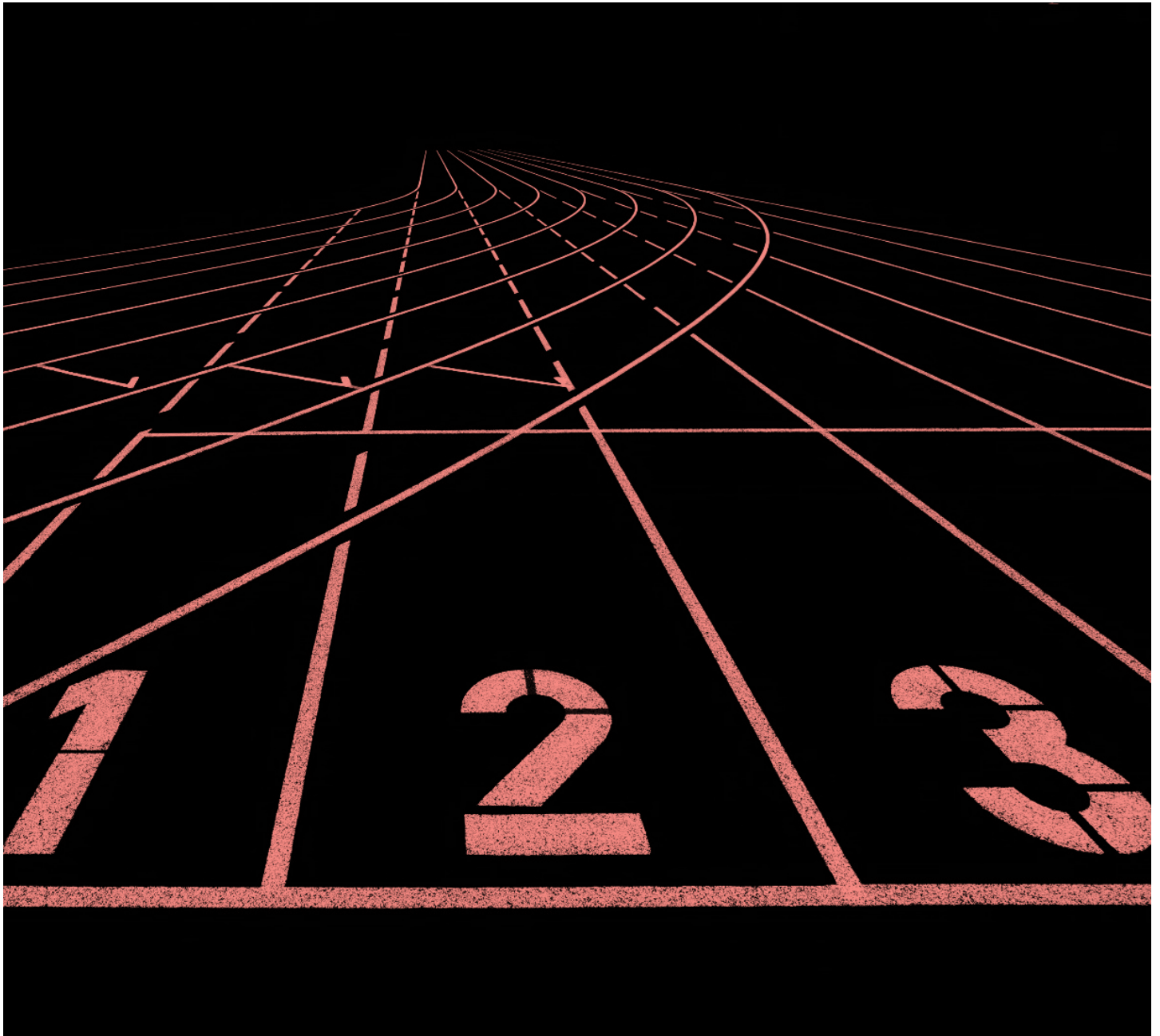
2025

EQUIPPROTEK ENERGY, LDA

EquipProtek

OIL, GAS & ENERGY SERVICES

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CODE OF ETHICS

EquipProtek Energy, Lda is committed to conducting its business honestly and ethically in every location worldwide.

This Code of Ethics outlines our core principles and serves as a guide for ethical decision-making.

We believe in creating a workplace culture rooted in respect, integrity, and responsibility.

The Code sets the standards for all employees, management, affiliates, and partners.

POLICY BRIEF & PURPOSE

Purpose

The Code of Ethics and Business Conduct serves as a foundational framework for responsible behavior and decision-making. It defines what is considered professional and ethical conduct within EquipProtek Energy and provides clarity on our values, expectations, and commitments.

Scope

This Code applies to all employees, management, affiliates, and business partners, guiding their actions in compliance with company policies, laws, and ethical standards. Any failure to adhere to these principles may result in disciplinary action or contract termination.

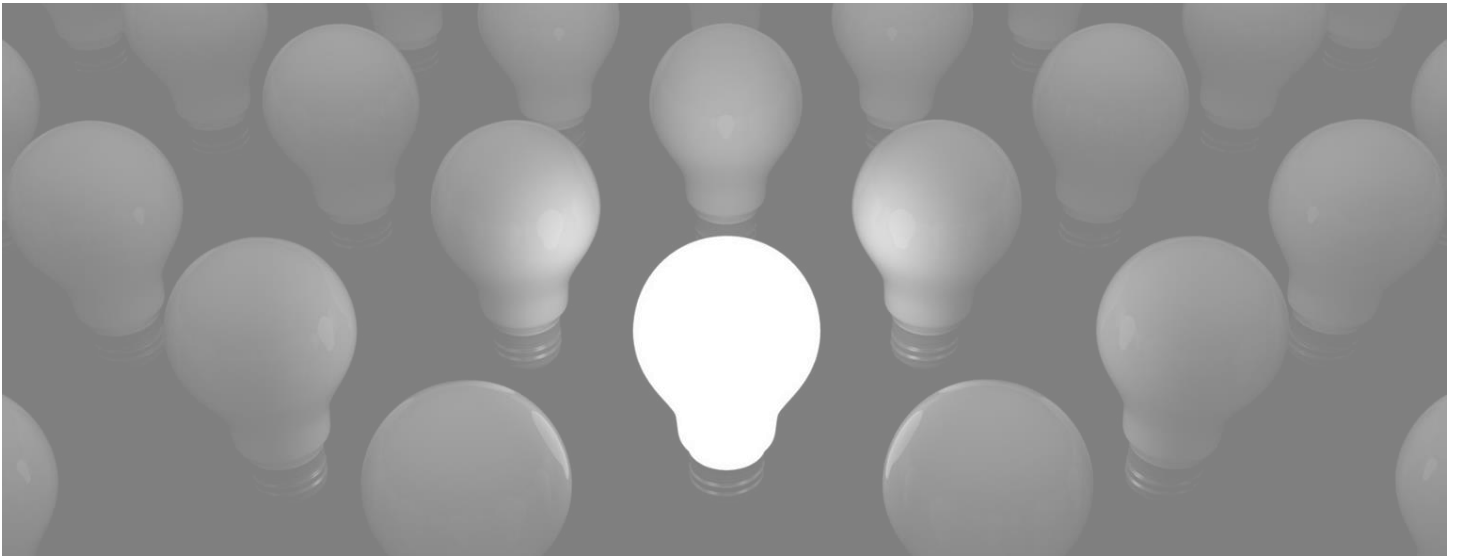


Figure 1

Policy Elements

EquipProtek Energy's ethical policies cover the following principles:

- a) **Respect for Others** We treat all individuals with respect, dignity, and fairness, fostering an inclusive work environment that values diversity and protects against discrimination, harassment, and bullying.
- b) **Integrity and Honesty**, we uphold transparency and honesty in all dealings, ensuring our actions are aligned with the company's values and commitments to stakeholders.
- c) **Conflict of Interest** Employees must avoid situations where personal interests could conflict with their responsibilities to EquipProtek Energy. All conflicts should be disclosed and managed appropriately.
- d) **Justice** We are committed to fairness in all business dealings, including recruitment, promotions, and workplace decisions.
- e) **Lawfulness** Compliance with laws, regulations, and internal policies is paramount. We act in accordance with all applicable legal requirements and ensure our operations uphold ethical standards.
- f) **Competence and Accountability** All employees are expected to perform their duties responsibly and professionally. Accountability is key to maintaining trust and upholding standards.

- g) **Teamwork** We encourage collaboration and support each other to achieve common goals, promoting open communication and shared responsibility.
- h) **Safety, Health, and Environment (SHE)** Safety and environmental sustainability are integral to our operations. We are committed to minimizing risks, preventing accidents, and protecting the environment.

External Relations, Integrity, and Ethical Conduct

EquipProtek Energy's external interactions reflect our commitment to ethical practices and combating corruption.

We conduct all business with integrity, transparency, and respect, ensuring that our partners and affiliates align with these standards.

- a) **Confidentiality, Security of Information, and Communication Resources** We protect sensitive information and secure all communication resources. Information should only be disclosed when necessary and authorized.
- b) **Conflicts of Interest** Employees must disclose any situation where personal interests may interfere with the company's best interests.
- c) **Corporate Assets** Employees are expected to use company resources responsibly and avoid any misuse or abuse of assets.
- d) **Dual Employment** All secondary employment activities must be disclosed and must not conflict with the responsibilities or integrity of the employee's role at EquipProtek Energy.
- e) **Hospitality, Entertainment, and Receiving/Giving Gifts** All forms of hospitality and gifts must align with EquipProtek Energy's ethical standards and should not influence or appear to influence business decisions. Gifts should not be more than \$50 USD or equivalent. Employees should consider discussing his or her supervisor before accepting it.
- f) **Facilitation Payments** We strictly prohibit facilitation payments or bribes to secure or expedite services. Our operations are transparent and comply with anti-bribery laws.
- g) **Political Activities and Contributions** Employees may participate in political activities privately but must not imply the company's support. Corporate resources must not be used for political contributions.
- h) **Sponsorship and Charitable Donations** We support responsible sponsorship and charitable contributions aligned with our values and social responsibility goals.

WORKPLACE STANDARDS

Working Conditions, Equal Treatment, and Opportunities

We are committed to safe, equitable working conditions, promoting equal opportunities for all employees and addressing discrimination.

EquipProtek Energy is committed to fostering a supportive, respectful, and equitable workplace where all employees have access to safe working conditions, fair treatment, and equal opportunities.

Our policies on working conditions, equal treatment, and opportunities are designed to create a positive work environment that upholds the rights and dignity of every team member, enabling them to thrive and achieve their full potential.

Working Conditions

EquipProtek Energy ensures that all employees work in safe, well-maintained environments that comply with industry standards and health and safety regulations.

We are dedicated to protecting the physical and mental well-being of our workforce by implementing rigorous safety practices, providing necessary equipment and training, and regularly assessing our facilities to prevent hazards. In addition, we prioritize work-life balance through reasonable work hours, support for time off, and resources for mental health and wellness.

Equal Treatment

We believe in treating all employees with respect, regardless of race, gender, age, nationality, religion, disability, sexual orientation, or any other characteristic.

EquipProtek Energy's commitment to equal treatment means ensuring that everyone is given fair consideration in hiring, job assignments, evaluations, promotions, and compensation.

Discrimination or harassment of any kind is not tolerated, and we have clear policies and procedures in place to address and prevent such issues.

Equal Opportunities

EquipProtek Energy actively promotes equal opportunities for all employees and candidates. Our hiring, training, and promotion processes are designed to be inclusive, recognizing the skills, experiences, and aspirations of individuals from diverse backgrounds.

We believe that a diverse workforce strengthens our company by bringing varied perspectives and ideas, which are essential for innovation and growth.

We are committed to career development for all employees, offering ongoing training, mentorship, and resources to help them succeed and advance within the company.

Our dedication to providing excellent working conditions, equal treatment, and equal opportunities reflects EquipProtek Energy's values and commitment to building a strong, cohesive, and high-performing team. By ensuring fair treatment and fostering an inclusive work environment, we create a culture where employees feel valued and empowered to make a meaningful impact.

Training and Skills Development

We invest in employee training and development, providing opportunities for professional growth and skill enhancement.

Cybersecurity

We maintain robust cybersecurity practices to protect company data and personal information from unauthorized access.

EquipProtek Energy prioritizes cybersecurity to protect the confidentiality, integrity, and availability of our digital assets and ensure a secure operating environment for all employees, clients, and partners. As cyber threats evolve, our policy establishes clear guidelines for identifying, preventing, and managing risks related to unauthorized access, data breaches, and other cybersecurity incidents. Employees, management, and IT specialists all play a role in maintaining cybersecurity:

- **Employees:** Must comply with security protocols, report suspicious activities, and follow best practices for password management and data handling.
- **IT Security Team:** Monitors system security, responds to incidents, manages updates, and ensures compliance with policy.
- **Management:** Provides resources, support, and oversight to ensure effective implementation of cybersecurity measures.

EquipProtek Energy is committed to continuous improvement of its cybersecurity measures to keep pace with evolving threats. Through regular assessments, audits, and technology updates, we strengthen our defenses to protect valuable information and uphold trust with our stakeholders.

Our proactive approach to cybersecurity not only safeguards our organization but also reinforces our commitment to reliability, security, and resilience in all areas of operation.

Drug and Alcohol Policy

EquipProtek Energy enforces a strict drug and alcohol policy to maintain a safe and productive work environment.

We are committed to creating a safe, healthy, and productive workplace, which includes maintaining a drug- and alcohol-free environment.

Our Drug and Alcohol Policy is designed to protect our employees, contractors, clients, and the public by minimizing risks associated with substance use and promoting a culture of safety and accountability.

The misuse of drugs and alcohol can impair judgment, reaction times, and overall performance, creating significant safety hazards, particularly in high-risk environments like those within the oil and gas industry. This policy is intended to:

- Prevent the use, sale, possession, or influence of illegal drugs and controlled substances (without a valid prescription) on company premises and during work hours.
- Restrict alcohol consumption during work hours or at company premises to ensure clear decision-making and maintain a professional environment.
- Ensure that employees and contractors are always fit for duty, both physically and mentally, reducing the likelihood of accidents and injuries.

Application of the Policy

This policy applies to all employees, contractors, and vendors across all locations where EquipProtek Energy operates, including both onshore and offshore sites. It encompasses guidelines for pre-employment screening, reasonable suspicion, post-incident testing, and, where necessary, random testing, particularly for safety-sensitive roles.

Responsibilities and Compliance

All employees are responsible for adhering to this policy. Managers and supervisors are trained to identify signs of impairment and are responsible for enforcing the policy. They are also empowered to take immediate action if an employee is found violating this policy, which could include removal from duty, testing, and disciplinary actions.

Assistance and Confidentiality

EquipProtek Energy recognizes that drug and alcohol dependency is a health issue. We encourage employees to seek help through available resources, including Employee Assistance Programs (EAPs), counselling services, and rehabilitation support. Employees seeking assistance for substance dependency will be treated with confidentiality and respect, and their decision to seek help will not impact their job security when requested proactively.

Testing and Consequences of Violations

Testing may be conducted under specific conditions, including reasonable suspicion, post-incident analysis, or as part of routine procedures for safety-critical positions. Violations of this policy, such as being under the influence of drugs or alcohol while on duty, are taken seriously and may lead to disciplinary actions, including suspension, mandatory rehabilitation, or termination of employment.

Commitment to a Safe Workplace

EquipProtek Energy's Drug and Alcohol Policy is integral to our commitment to a safe and productive workplace. By fostering awareness, providing resources, and enforcing clear guidelines, we aim to protect our team and create an environment where all individuals can perform their roles effectively and responsibly.

Sick Leave

We provide appropriate sick leave to support the well-being and recovery of our employees, ensuring health remains a priority.

Our Sick Leave Policy is designed to provide support for employees during times of illness or injury, ensuring they can rest, recover, and return to work fully fit.

This policy outlines the guidelines for taking sick leave, including eligibility, procedures, and any necessary documentation.

Sick leave allows employees to take paid time off if they are unable to work due to illness, injury, or a medical condition.

This policy applies to all employees, regardless of role or location, and aligns with relevant labor laws to ensure fair and consistent treatment. Eligibility and Accrual Employees are eligible for sick leave from the start of their employment.

Sick leave accrual varies based on employment type and tenure, and specific details are provided to each employee as part of their employment agreement. Full-time employees typically accrue sick leave monthly, while part-time and temporary staff may have different accrual terms based on local regulations.

Notification and Documentation

If an employee is unable to work due to illness or injury, they are required to notify their supervisor or HR department as soon as possible, ideally before the start of their shift. Employees who are absent for more than three consecutive days may be required to provide a medical certificate or doctor's note as proof of illness. In certain cases, where extended sick leave is required, employees may be asked to provide additional documentation to help EquipProtek Energy coordinate any necessary adjustments to workload or staffing. Confidentiality and Return to Work EquipProtek Energy respects the confidentiality of employees' medical information. Any documentation or information related to an

employee's illness is kept confidential and shared only with those responsible for managing the leave.

Upon returning to work, employees may meet with their supervisor or HR to discuss their well-being and ensure that they are fit for duty. If temporary adjustments or accommodation are needed, EquipProtek Energy is committed to working with employees to create a smooth and supportive transition.

Extended Sick Leave and

Support In cases where a prolonged illness or medical condition requires extended time off, EquipProtek Energy may provide additional support or resources, including options for long-term leave if necessary and in compliance with local employment laws.

Employees are encouraged to reach out to HR to discuss any special requirements or concerns related to their health and return to work.

Commitment to Health and Recovery

EquipProtek Energy's Sick Leave Policy reflects our commitment to supporting employees' health and well-being. We understand that time off for recovery is essential, and by providing this support, we aim to foster a safe, healthy, and productive workplace for all. F

Anti-Harassment and Anti-Bullying

We do not tolerate harassment or bullying in any form, promoting a respectful and inclusive workplace culture. Our Anti-Harassment and Anti-Bullying Policy outlines EquipProtek Energy's zero-tolerance approach toward any form of harassment or bullying, including physical, verbal, emotional, and psychological misconduct. This policy applies to all employees, contractors, vendors, and partners, both on and off company premises, including during work-related events. Harassment includes unwanted behavior that is offensive, intimidating, or discriminatory, including actions based on race, gender, religion, sexual orientation, disability, or any other protected characteristic. Bullying refers to repeated, inappropriate behavior intended to demean, belittle, or isolate an individual, either personally or professionally.

Examples of Harassment and Bullying

Harassment and bullying can take many forms, including:

- Verbal Abuse: Insults, offensive jokes, derogatory remarks, or threats
- Non-Verbal Abuse: Hostile gestures, mocking, or social exclusion
- Physical Abuse: Unwanted physical contact, such as pushing, shoving, or aggression
- Cyber Harassment: Offensive or bullying behavior through electronic communication or social media
- Sexual Harassment: Unwanted advances, inappropriate comments, or gestures.

Responsibilities and Reporting

All employees are responsible for upholding this policy by treating colleagues with respect, reporting incidents, and supporting an inclusive workplace. Managers and supervisors are expected to model appropriate behavior, promptly address concerns, and report incidents.

Employees who believe they are experiencing harassment, or bullying should report incidents to their supervisor, HR representative, or any trusted leader within EquipProtek Energy. Reports will be taken seriously and addressed through fair and confidential procedures. Retaliation against individuals who report harassment or bullying will not be tolerated.

Investigation and Consequences

EquipProtek Energy investigates all reported incidents with impartiality and confidentiality. If a report is substantiated, the company will take appropriate action, which may include counselling, training, disciplinary measures, or termination of employment. We aim to resolve conflicts through constructive and restorative processes while maintaining a respectful and supportive work environment.

Commitment to a Positive Workplace Culture

EquipProtek Energy is dedicated to building a positive workplace culture where everyone feels safe, respected, and valued. Through clear guidelines, employee training, and proactive communication, we foster an environment that supports professionalism, empathy, and mutual respect. Our commitment to an anti-harassment and anti-bullying policy helps ensure that EquipProtek Energy remains a welcoming place for all.

Company Vehicle

All employees operating company vehicles must adhere to safety regulations, maintain proper records, and act responsibly. Employees must comply with the Company Vehicle Policy.

Environmental

We are committed to sustainable practices that minimize environmental impact and support ecological preservation.

Anti-Discrimination and Equal Opportunity

EquipProtek Energy champions diversity and equality. We prohibit discrimination based on race, gender, age, religion, or any other protected characteristic.

Data Protection

We are dedicated to protecting employee and client data, complying with all privacy laws and implementing measures to prevent unauthorized disclosure.

Anti-Bribery, Anti-Fraud, and Anti-Corruption

EquipProtek Energy has zero tolerance for bribery, fraud, and corruption. Our anti-corruption policy aligns with international standards and mandates full compliance from employees and affiliates.



Target

Administration, Employees, Contractors and Suppliers.



Report

Everyone is encouraged to report any violation to Management or Whistleblower



Improvement

Continuous revision, monitoring reporting and improvement.

EquipProtek Energy's Code of Ethics and Business Conduct is central to our identity and operations. Through this Code, we commit to maintaining high ethical standards, upholding respect, fairness, and accountability in every aspect of our business. All employees, partners, and affiliates are expected to understand, follow, and embody these principles, helping us build a sustainable and ethically responsible organization.

