



# CODE OF CONDUCT

Version 1 - November 2023

I am pleased to introduce the EZ Ops Group Code of Conduct, a guiding compass that reflects our shared values, ethical standards, and unwavering commitment to excellence. As we continue to evolve in the dynamic landscape of the oil and gas software industry, upholding the highest level of integrity, responsibility, and respect remains paramount to our success.

At EZ Ops, we recognize that our achievements go beyond mere financial gains; they are a reflection of our character and the positive impact we make on our industry, clients, partners, and communities. Our Code of Conduct serves as a tangible embodiment of these values, offering a clear roadmap for each of us to navigate our roles with purpose and integrity.

As you delve into the contents of this document, you will discover guidelines that govern our interactions, decisions, and behaviors. From our commitments to ethical business practices and environmental responsibility to our dedication to data security and collaborative partnerships, these principles underscore our collective mission to drive positive change in the oil and gas software sector.

I encourage each of you to not only familiarize yourself with this Code but to internalize its teachings as an integral part of how we operate on a daily basis. Our Code of Conduct is not just a document; it is a reflection of who we are and how we aim to be perceived by the world. By embracing its principles, we strengthen our reputation, build trust, and create a work environment that fosters innovation and mutual respect.

Thank you for your dedication to our shared values and for contributing to our continued growth and success. Let us uphold the principles outlined in our Code of Conduct as we navigate the exciting journey ahead, shaping a future that is both prosperous and ethically sound.

Best regards,

Brandon Ambrose  
CEO  
EZ Ops Group

# Introduction

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## Who is this Code of Conduct for?

The Code of Conduct at EZ Ops is designed to provide a clear and comprehensive set of guidelines for all individuals associated with our organization. This includes employees at all levels, from executives to front-line staff, as well as contractors, consultants, and partners who collaborate with our companies. The principles outlined in the Code of Conduct apply universally, regardless of one's role or responsibilities, as a reflection of our collective commitment to ethical behavior, responsible practices, and the highest standards of professionalism. By embracing this Code, each member of our diverse community contributes to the cultivation of an environment that upholds integrity, fosters collaboration, and reflects the values that define EZ Ops.

## How can the Code of Conduct help you?

The Code of Conduct serves as a valuable resource that offers guidance, support, and a clear framework for decision-making to various individuals connected to our organization:

### 1. Employees at All Levels:

- **Clarity in Decision-making:** The Code provides a reference point when faced with ethical dilemmas, helping employees make informed choices aligned with our values.
- **Professional Development:** It assists in shaping a professional identity by promoting responsible behavior and adherence to industry best practices.
- **Collaboration:** The shared understanding of ethical conduct fosters a harmonious workplace culture, promoting teamwork and trust.

### 2. Executives and Managers:

- **Setting the Tone:** Leaders set an example by following the Code, reinforcing its importance across the organization.
- **Mitigating Risks:** The Code assists in identifying and managing potential legal, reputational, or operational risks associated with unethical behavior.
- **Cultivating a Values-Driven Culture:** By upholding the Code, leaders contribute to creating an organizational culture that attracts talent and retains stakeholders.

### 3. Contractors and Partners:

- **Alignment of Values:** The Code ensures that external collaborators understand and adhere to our ethical standards, promoting consistency in our business relationships.
- **Mutual Respect:** Contractors and partners who embrace the Code contribute to a respectful and harmonious working relationship with our company.
- **Long-Term Collaboration:** Shared adherence to ethical principles fosters strong and enduring partnerships that yield mutual success.

### 4. Regulatory Compliance:

- **Guidance for Compliance:** The Code outlines legal and regulatory expectations, reducing the risk of unintentional violations.
- **Building Trust with Regulators:** By adhering to the Code, we demonstrate our commitment to responsible conduct, strengthening relationships with regulatory bodies.

### 5. Clients and Customers:

- **Transparency and Trust:** Adhering to the Code assures clients and customers that we operate with integrity, which builds trust in our products and services.
- **Responsible Solutions:** The Code reflects our commitment to delivering solutions that align with ethical and sustainable practices, addressing clients' concerns.

In essence, the Code of Conduct serves as a guide that empowers individuals by providing a clear roadmap for ethical decision-making, fostering a positive work environment, mitigating risks, building trust with stakeholders, and contributing to a more responsible and sustainable industry. By aligning our actions with the Code, we collectively work towards a prosperous and ethical future for everyone involved.

# Core Values and Business Principles

Our Code of Conduct is intricately linked to our Core Values and the EZ Ops Business Principles, acting as a tangible embodiment of the values and commitments that define our organization.

Each principle outlined in our Code resonates with the broader themes of integrity, collaboration, innovation, sustainability, and ethical responsibility that form the foundation of our business. As we navigate the complexities of the oil and gas software industry, our Code serves as a practical guide, translating these principles into actionable guidelines that shape our behavior, decisions, and interactions.

By upholding the Code, we reinforce our dedication to not only delivering exceptional solutions but also doing so in a manner that reflects the highest ethical standards, strengthens our industry relationships, and ensures a positive impact on our clients, partners, employees, and communities. Through this interconnected approach, our Code of Conduct serves as a bridge, uniting our aspirations with our actions and guiding us toward a future of sustainable growth, mutual respect, and enduring success.

**Here is a reminder of our core values:**

## Our Core Values

### Relentless- (Hungry)

Disciplined, Care, Out of Box, Passionate, Focused, Driven, Creative, Never satisfied, Dream big, Over deliver, Solving Big Problems, Want to have an impact on the world (Hungry)

**ANTI-VALUE:** Giving up, not thinking they can do it, Thinking too small/ Restricting your thought, Don't Care.

### Selfless team player - (Humble)

Accountable, balls in their court, trustworthy, genuine, straightforward, Vulnerable and Seeking to Learn from Others (Humble)

**ANTI-VALUE:** Thinking about ourselves first, not thinking about the team we are playing on, Egotistic

### Joy to be around (Smart-Emotional Intelligence)

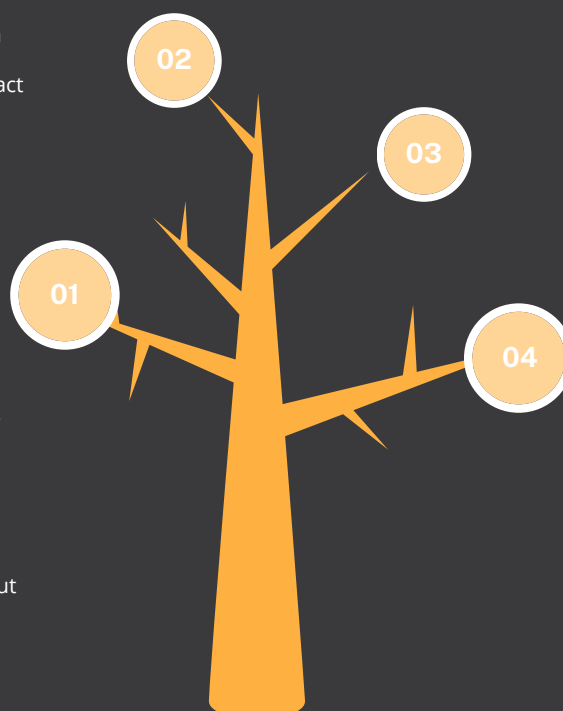
Empathetic, Joy, Chipper, Energy, Energetic, enthusiastic (Smart) - Emotionally intelligent

**ANTI-VALUE:** Grumpy, taking internal frustrations out on others. Would prefer to not be around this person, rude

### User Value Obsessed

Provide value to people who are overlooked, Equip people to be their optimal selves.

**ANTI-VALUE:** Not being caring or empathetic to users, not listening to users



# YOUR RESPONSIBILITIES

## CHOOSE THE RIGHT PATH

The Code of Conduct is here to guide you. It establishes the clear boundaries within which all members of the EZ OPS team are expected to operate consistently, day in and day out.

## YOUR COMMITMENTS

- Recognize the potential risks inherent to your role and understand how to effectively manage them.
- Seek guidance whenever you encounter situations that lack clarity or certainty.
- Proactively engage in and complete the ethics and compliance training provided to you in a timely manner.
- Ensure that any external contractors, agents, or consultants you collaborate with are informed about our Code and adhere to its principles.
- Raise your voice. It's your responsibility to promptly report any suspected breaches of the Code, upholding your duty to maintain its integrity.

# YOUR INTEGRITY CHECK

Our Code of Conduct doesn't encompass precise solutions for every circumstance, quandary, or choice.

To assist you and your team in navigating specific challenges aligned with our Code of Conduct, consider utilizing the Integrity Check questions. If needed, don't hesitate to seek assistance from your line manager. We are here to support you.

## WHEN IN DOUBT, ASK YOURSELF...

1. Is this action within the bounds of the law and do I have the necessary authorization?
2. Does this action align with ethical standards and am I setting a positive example?
3. Am I upholding the fundamental values of 'honesty, integrity, and respect for individuals'?
4. Is my behavior both ethical and in accordance with EZ Ops' Business Principles, our Code of Conduct, and relevant guidelines?
5. Have I fully comprehended the potential risks involved, including those that could impact EZ Ops' reputation?
6. If they became publicly known, would I still be confident in the ethical nature of my actions?

# MANAGERS RESPONSIBILITIES

Our reliance on our managers to uphold our ethical standards and serve as examples for their teams is paramount. Therefore, we anticipate managers to exhibit leadership by adhering to our Code and cultivating a culture that values ethics and compliance. This culture should make ethical choices the norm and foster an environment where voicing concerns is encouraged.

## IN YOUR CAPACITY AS A MANAGER, YOU ARE REQUIRED TO:

- Embrace a thorough understanding and adherence to the Code.
- Gain an understanding of the primary Code violation risks applicable to your business or function, along with the protocols to mitigate them.
- Ensure your team members allocate time to promptly complete their Ethics and Compliance training assignments.
- Guarantee that your team comprehends the procedures to avert Code violations, including accurately documenting gifts, hospitality, and potential conflicts of interest in the Code of Conduct Register.
- Ensure that newly onboarded team members are swiftly briefed on our Code of Conduct, the Code-related risks associated with their roles, and the avenues available for seeking advice and assistance.
- Stay vigilant for any instances of Code breaches and motivate your team to speak out if they possess knowledge of or suspicions regarding a breach.
- In the event you are informed of a potential Code violation, it is your responsibility to report it. You may refer the matter to your line manager. It is crucial to maintain confidentiality when addressing reported concerns. You should never attempt to investigate the matter independently.
- Make determinations and execute appropriate consequence management measures in response to Code violations.



# OUR BEHAVIOURS, PEOPLE AND CULTURE

Our aspiration is for EZ Ops to stand as an excellent workplace while safeguarding our standing with customers, suppliers, governments, and communities. We are committed to upholding our image as a company unwaveringly dedicated to ethical practices. Achieving this demands a collective adherence to our fundamental principles of honesty, integrity, and treating individuals with respect by everyone representing EZ Ops in business matters.

This segment within our Code of Conduct outlines the benchmarks of commendable conduct that we anticipate from you – principles that your peers are equally entitled to anticipate from you. It's important to bear in mind that should you become aware of or have suspicions about any breach of the Code, we encourage you to voice your concerns.

## Health, Safety, Security, Environment and Social Performance

Each entity under EZ Ops operational control, including companies, contractors, and consultants, is mandated to adopt a methodical approach to health, safety, security, environment, and social performance management.

This approach ensures legal compliance and encourages continuous enhancement, fostering a culture where the entire EZ Ops family, including EZ Ops staff and contractors, shares this profound commitment.

You must always comply with the law, standards and procedures and intervene in unsafe or non-compliant situations.

## Harassment

We are committed to providing a safe and respectful workplace environment for all employees, clients, partners, and stakeholders. We strictly prohibit any form of harassment, including but not limited to sexual harassment, verbal abuse, bullying, and discriminatory behavior. All instances of harassment will be treated seriously and addressed promptly.

We encourage individuals who experience or witness harassment to promptly report the incident to their supervisor, manager, Human Resources, or any designated reporting channel. We assure confidentiality and protection against retaliation for those who come forward. Upon receiving a report, we will conduct a thorough and impartial investigation. Appropriate action will be taken, ranging from education and counseling to disciplinary measures, based on the severity of the offense.

We expect our clients, partners, contractors, and suppliers to uphold the same standards of harassment prevention and response.

## Equal Opportunity

We are committed to providing equal opportunities to all employees, clients, partners, and stakeholders. We firmly believe in promoting diversity, inclusivity, and a workplace environment that values and respects the unique contributions of every individual.

We do not discriminate against any individual based on their race, color, gender, religion, age, nationality, disability, sexual orientation, or any other protected characteristic. All recruitment and hiring processes are conducted without bias or discrimination. Employment decisions are based on qualifications, skills, and experience. Employees are considered for promotion and advancement solely on the basis of their performance, qualifications, and potential.

Any individual who believes they have experienced discrimination or witnessed any unequal treatment is encouraged to report the incident through the appropriate channels. We ensure confidentiality and protection against retaliation for those who come forward.

We expect our suppliers, partners, and contractors to uphold the principles of equal opportunity and diversity in their interactions with our organization.

### Use of IT and Electronic Communications

IT and electronic communications encompass hardware, software, and all processed data. This category also covers personal IT equipment authorized by your line manager for business purposes.

This policy outlines the guidelines for the appropriate and responsible use of information technology (IT) resources and electronic communications at EZ Ops. It ensures the secure, ethical, and efficient use of these resources while maintaining the confidentiality, integrity, and reputation of the organization.

This policy applies to all employees, contractors, consultants, partners, and any individual granted access to EZ Ops' IT resources and electronic communication systems.

<p>Acceptable Use</p>	<p>IT resources and electronic communications shall be used for business purposes and activities directly related to the scope of employment. Personal use is permitted within reasonable limits, provided it does not interfere with work responsibilities, breach security, or violate any policies. Accessing, transmitting, or storing offensive, inappropriate, or illegal content is strictly prohibited.</p>
<p>Data Security and Confidentiality</p>	<p>All users are responsible for safeguarding confidential and sensitive information. Unauthorized access, disclosure, or sharing of such information is prohibited. Encryption and secure passwords must be utilized to protect sensitive data during transmission and storage.</p>
<p>Software and Applications</p>	<p>Only authorized and licensed software and applications should be installed on company devices. Downloading and installing unauthorized software or applications is prohibited due to security risks.</p>
<p>Electronic Communications</p>	<p>Professional language and conduct must be maintained in all electronic communications, including emails, instant messages, and social media platforms. Confidential company information should not be shared via non-secure or personal email accounts.</p>
<p>Security Measures</p>	<p>Anti-virus software and firewalls must be active and up-to-date on all devices accessing company networks. Users must promptly report any suspected security breaches or unauthorized access to IT personnel.</p>
<p>Monitoring and Compliance</p>	<p>EZ Ops reserves the right to monitor and access electronic communications and IT usage to ensure compliance with policies and regulations. Non-compliance with this policy may result in disciplinary action, up to and including termination.</p>

Please review our more detailed policies for further information.

# MANAGING RISK IN INFORMATION AND COMMUNICATION

We are committed to safeguarding the privacy and security of personal and sensitive information. This Data Privacy Policy outlines our practices for collecting, processing, storing, and protecting data in compliance with applicable data protection laws and regulations.

Scope	This policy applies to all employees, contractors, partners, and any other individuals who access, process, or manage personal and sensitive data on behalf of EZ Ops.
Data Collection and Usage	Personal data will be collected only for specific, legitimate purposes that are transparent to the data subjects. Data collected will be relevant, accurate, and limited to what is necessary for the intended purpose.
Consent	Data subjects' consent will be obtained prior to collecting and processing their personal data, unless lawful grounds for processing exist. Consent will be informed, specific, and freely given. Data subjects can withdraw their consent at any time.
Data Security	Appropriate technical and organizational measures will be implemented to protect personal and sensitive data from unauthorized access, loss, alteration, or disclosure. Data breaches will be promptly assessed and reported to relevant authorities and affected individuals in accordance with legal requirements.
Data Retention	Personal data will be retained only for as long as necessary to fulfil the purpose for which it was collected, or as required by applicable laws. Data no longer required will be securely deleted or anonymized.
Data Subject Rights	Data subjects have the right to access, rectify, erase, or restrict the processing of their personal data. Requests to exercise these rights will be promptly addressed in accordance with legal requirements.
Third-Party Processors	Third-party processors who handle personal data on our behalf will be selected based on their ability to meet our data privacy and security standards. Agreements with third-party processors will include clear terms to ensure data protection compliance.

# INTELLECTUAL PROPERTY

At EZ Ops, we recognize the value of intellectual property as a key driver of innovation and competitiveness. This Intellectual Property (IP) Policy outlines our principles and guidelines for the protection, management, and utilization of intellectual property assets generated within the scope of our operations.

Scope	This policy applies to all employees, contractors, partners, and individuals engaged in activities on behalf of EZ Ops that involve the creation, development, or use of intellectual property.
Ownership of Intellectual Property	Intellectual property created by employees within the scope of their employment or using company resources is the property of EZ Ops. Intellectual property created outside the scope of employment, using personal resources, remains the property of the creator.
Confidentiality and Non-Disclosure	Employees and individuals privy to proprietary information shall maintain confidentiality and not disclose any sensitive information to unauthorized parties, both during and after their association with EZ Ops.
IP Management and Protection	All employees involved in IP creation or development must promptly inform the relevant department or IP management team. EZ Ops will take appropriate steps to protect, register, and enforce IP rights, including patents, copyrights, trademarks, and trade secrets.
Licensing and Commercialization	EZ Ops may choose to license, sell, or commercialize its intellectual property assets for mutual benefit. Any such arrangements shall be in alignment with the company's strategic goals and industry best practices.
Third-Party IP	Employees are expected to respect third-party intellectual property rights. The use of third-party IP should be done only with proper authorization and compliance with applicable laws and agreements.
Collaborative Projects	When working on collaborative projects involving multiple parties, IP ownership, usage rights, and responsibilities shall be defined in advance through clear agreements to prevent disputes.
IP Disputes and Violations	Any disputes or potential violations of intellectual property rights should be reported to the legal team for resolution.

# INFORMATION AND RECORDS MANAGEMENT

We rely on the exchange and utilization of information for our daily activities and crucial business decisions. It is imperative that we create, utilize, and safeguard this information with utmost responsibility, especially when handling data such as personal information, sensitive commercial data, and intellectual property - both ours and that of others. Our diligence in protecting confidential information extends even when we are outside the EZ Ops environment. Furthermore, we bear the responsibility of maintaining accurate records of our business operations to preserve our institutional memory and fulfil our obligations under legal and regulatory frameworks.

As an individual at EZ Ops, you have a key role in mitigating the risks associated with the information you handle. Properly assessing these risks enables you to implement adequate safeguards for the protection of the information. When creating or receiving information, it is crucial to assign it the appropriate confidentiality classification, declare it as a record when necessary, store it in an approved repository within the organization, and only share it with those who possess the requisite entitlement and authorization. It's important to adhere to the comprehensive Information Management requirements and follow the provided guidance materials for detailed instructions.

In cases where you collaborate with third parties, it is your responsibility to ensure that you have the necessary authorization before sharing any information. If you receive directives from EZ Ops legal team to retain specific information, you must meticulously adhere to those instructions and ensure the information is maintained as directed. By fulfilling these responsibilities, you contribute to the secure and responsible management of information at EZ Ops.