

Compliance Department Policy

Code of Business Conduct

Contributors

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Message from the CEO

Dear Colleagues,

You are requested to thoroughly read the entire policy once a year, understand it and acknowledge it by signing it digitally on the ERP system, on or before Jan 31st. at the latest.

Conduct is the sum of our actions as individuals. These actions define our behaviour and influence how we are perceived. This is also the case for business organisations.

As a leading service provider to the energy sector, TGT is proud of its reputation as a world-class organisation with global reach and a dedicated professional workforce. Our continued success rests on the conduct of individuals. This covers interactions with customers, employees, suppliers and competitors. This means running our business in a transparent manner, maintaining impeccable ethical standards, and complying in full with local laws and regulations.

Responsibility for organisational conduct and compliance, rests with every TGT employee, whatever their role or work location. Every member of the TGT family must understand, acknowledge, and adhere to the TGT Code of Business Conduct. This defines the rules and guidelines that will help ensure our behaviour consistently reflects the highest standards of ethics.

No single document can address every situation that might arise during business activities; however, the Code sets out key principles and core values that will help individuals to resolve any ethical or legal issues that occur in the pursuit of business goals.

Employees are encouraged to raise concerns and ask questions as appropriate to any situation. Individuals who believe that there has been a violation of the TGT Code of Business Conduct are empowered and expected to raise this as an issue with a supervisor or the Chief Compliance Officer. TGT will protect employees who raise valid concerns in good faith. Any suspected violation will be investigated swiftly and in detail. Confirmed breaches may lead to disciplinary action, including termination of employment.

I thank you in advance for your commitment and adherence to the TGT Business Code of Business Conduct.



Sincerely,
Saad Bargach
Chief Executive Officer
TGT Diagnostics

Purpose

TGT is committed to earning and maintaining the trust of our clients, shareholders, employees, governments and the general public. Each contract awarded to TGT is a demonstration of faith in our commitment to conduct business in an ethical manner, with integrity and in compliance with all applicable legislation and regulations.

Reporting Violations

Any TGT employee who becomes aware of any issue or practice that actually or potentially violates the law or this Code of Business Conduct is encouraged to report it to a person of trust (e.g. supervisors or line managers). Employees reporting any such incidents should not fear any negative repercussions and will be under the protection of the TGT management team. Please refer to the Whistleblowing Policy for further details.

Seeking Advice & Reporting Issues

1. *Speak to your regional Compliance Manager or direct manager; or*
2. *Contact the Chief Compliance Officer on **+971 4 431 4904***
3. *Contact the Ethics Helpline at **compliance_communication@tgtdiagnostics.com***

Putting our Code of Business Conduct to Work

1. Responsibilities

This Code of Business Conduct applies to every director, officer, and staff member of our organisation. Every employee is personally obligated to adhere strictly to the rules and principles set out in this Code of Business Conduct. In case of doubt, employees should exercise good judgment in line with the spirit of this guide.

All TGT employees and Business Partners are responsible for ensuring they conduct all business activities in accordance with this Code of Business Conduct.

2. Our Business Partners

TGT works only with agents, representatives, suppliers, and other business partners that share our business philosophy and conduct their business in keeping with the principles expressed in this Code of Business Conduct. Please refer to the Third-Party Representatives Policy for further details.

Prior written approval is required to enter into any third-party business partnership, be it in the form of a joint venture, agency, business representation or consultancy.

3. Responses to Investigations and Questions

The Chief Compliance Officer is primarily responsible for both internal and external investigations involving possible violations of this Code or laws or regulations affecting TGT. TGT employees are expected to provide accurate information and to fully cooperate with any investigations. No TGT employee should interfere with or obstruct an investigation by providing false information, concealing, or destroying information, or disclosing information about an investigation. If a TGT employee is asked or required to be involved in any internal or external investigations, he/she should notify the Chief Compliance Officer without delay. Please refer to the Internal Investigations Policy for further details.

If any from outside the Group asks questions, requests information or wants to discuss any matter involving regulatory or legal issues, you should immediately look to refer any such questions to your functional / direct or regional manager, or the Chief Compliance Officer so that they can provide them with the relevant information.

4. Consequences of Non-Compliance

Failure on the part of any TGT Employee to meet any of the standards embodied in this Code of Business Conduct may result in disciplinary action, including dismissal, even for a first offence. In some cases, civil or criminal sanctions may apply.

TGT reserves the right and, if appropriate, will seek restitution of any bonus, commission, or other compensation received by any TGT Employee as a result of his / her intentional or knowing fraudulent or illegal conduct.

A TGT Employee dismissed for violating this Code of Business Conduct is not eligible for re-employment or service as a consultant, contractor or temporary worker with any company or other entity within the Group. In the event such a former TGT Employee is re-hired or becomes a TGT Employee again by virtue of a future merger or acquisition, TGT reserves the right to dismiss the individual. TGT also reserves the right to advise any of its contractors that it does not wish such former TGT employee to perform work on TGT's behalf.

Our Business Principles

1. Improper Payments

All employees are strictly prohibited from either offering, paying, giving, or otherwise transferring any funds or assets, directly or indirectly to someone in a public office or a person having a political influence, to someone applying for a public office, to a political party or any other third party, for the purpose of obtaining or retaining an improper advantage or otherwise securing or retaining business (improper payment).

An improper payment to gain advantage in any situation is never acceptable and exposes employees and our company to possible criminal prosecution. We expressly prohibit all sorts of improper payments, whether to public officials or to private persons, active or passive.

Not all improper payments take the form of cash payments. They can take the form of gifts, travel, hospitality, or any other undue benefit. The prohibition further applies to any improper payments made through consultants, suppliers or other third parties on our behalf. Third parties engaged by TGT must be carefully supervised. We never turn a blind eye on our suppliers.

Employees must familiarize themselves with all applicable anti-corruption and anti-bribery laws and conduct our business in strict compliance with these laws. Extreme caution must be taken when choosing partners, representatives, consultants, and agents. Any transaction that could appear to be illegal or otherwise unethical must be rejected. Please refer to the Anti-Bribery & Corruption Policy for further details.

2. Facilitating Payments

Facilitation payments are small payments made to lower-level government employees to secure the performance of a routine government action. TGT prohibits facilitation payments. However, if employees believe that their own or the lives or health of others may be in danger, making such a payment is not a violation of this prohibition. Such payments must always be correctly recorded in TGT accounts and immediately reported to a superior. Please refer to the Anti-Bribery & Corruption Policy for further details.

TGT strictly prohibits bribing anyone—or receiving a bribe—for any reason whatsoever—irrespective of whether a government official is involved.

3. International Trade Laws

The movement of people, knowledge and assets is at the very core of the oilfield service industry's activities, which coincides with trade restrictions imposed by various national and international bodies. Even if inadvertent, violations of international trade restrictions can have dire consequences not only for TGT, but also the clients whom we service. As a global organisation providing products and services in numerous countries around the world, we are bound by the laws of each of the countries in which we operate, each of which maintains unique and in particular customs and trade-related laws and regulations that govern the exportation, importation, or re-exportation of TGT products, services or technology. TGT is committed to strictly complying with all international trade laws, including those of the United States and the European Union. This is an especially complex area of the law, and all employees are encouraged to actively engage the Chief Compliance Officer for support to ensure compliance with international trade laws. Please refer to the Trade Compliancy Policy for further details.

You are not expected to know every law, rule or regulation which applies to the Group's operations, but you are expected to be familiar with those laws which apply to your areas of responsibility and have an inquisitive mind.

If you have questions you should ask them, if you have concerns you should raise them.

Maintaining Our Integrity

1. Political & Charitable Contributions

We recognize our employees' right to participate as individuals in the political process and play an active role in society, including activities in political parties. However, TGT does not make any political contributions, whether in monetary payments or other donations in kind to any political party or their institutions, agencies, or representatives, anywhere in the world. Please refer to the Anti-Bribery & Corruption Policy for further details.

2. Conflicts of Interest

A conflict of interest exists when a position within TGT is used for personal gain aside from the normal compensatory rewards of employment. A conflict of interest also exists when business connections are made with competitors, clients, or suppliers outside the regular working mandate. The rules prohibiting conflicts of interest can also apply when a family member or friend of an employee has an interest in an outside entity, affiliated with TGT. As a basic rule, situations where personal interest could conflict with TGT interests must be avoided. Whenever a relationship could create such a conflict of interest, a superior must immediately be informed. Please refer to the Conflict of Interest Policy for further details.

3. Gifts, Travel & Hospitality

We endeavor to win new business with the quality of our services. TGT prohibits the soliciting or offering of any gift, personal benefit, or unjustified advantage to third parties connected with business dealings in monetary form or otherwise. Gifts to clients or other business partners and their staff members must be selected so as to avoid any appearance of impropriety in the mind of the recipient. Gifts, travel and hospitality are often a common and socially acceptable form of business custom. However, in some cases they could be suspected or misinterpreted as being offered for an illicit purpose.

Therefore, the following rules apply with regards to the offering or acceptance of gifts:

- Employees may only accept or offer an unsolicited non-monetary gift if the following conditions are fulfilled: the gift does not go beyond common courtesy and is acceptable by local business practices; the value of the gift does not imply any obligation on the part of the recipient; the gift must bear the company logo (i.e. be part of company approved gifts, and is not of any extravagant brands. Examples of acceptable gifts: a simple writing pad, or a calendar, or business diary with company logo); and the gift is appropriate with respect to the recipient.
- An employee may accept or offer unsolicited hospitality if all the following requirements are met: the hospitality occurs infrequently and in the ordinary course of business; it involves reasonable expenditures; it takes place in settings that are reasonably appropriate and fitting with TGT employees' roles in the related business.

All employees must refrain from accepting or offering any gift or hospitality that does not meet the foregoing conditions. In cases of doubt, prior permission for the gift or hospitality must be obtained from a superior. Please refer to the Gifts, Travel & Hospitality Policy for further details.

TGT strictly prohibits offering or receiving business meals or entertainment which occur on a frequent or recurring basis, are excessive or extravagant and which may create the appearance that some favorable action or benefit is expected in return.

Company Assets, Proprietary Information, and Intellectual Property

1. Company Assets

It is the obligation of every employee to protect and safeguard TGT assets against any improper handling such as carelessness, waste, or destruction as well as against theft or other forms of unauthorized removal. The use of TGT assets is only allowed for legitimate TGT purposes. Unauthorized personal use of company assets is prohibited. The devices and equipment in any TGT office and facility are to be stored properly and used as efficiently as possible and for TGT business only. Company Assets cannot be sold or junked without prior corporate approval. Also, company assets must be stored in appropriate storage space and must be counted and reconciled against company asset register on annual basis. Any suspected case of abuse of the foregoing principles must be reported directly to a superior. Please refer to the Fixed Assets Policy for further details.

2. Retention of Company Records

We are obliged to respect the integrity of TGT recordkeeping and reporting systems at all times. TGT requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All TGT books, records, accounts, and financial statements must represent the activities they record and in a manner that reflects the nature and purpose of the activity. They must be maintained in reasonable detail and should not include any inaccurate events, exaggeration, derogatory remarks, estimations, or any other misleading information. Records and documents must be kept in compliance with applicable document retention laws. Please refer to the Employment Manual for further details.

3. Protecting Company Proprietary Information

It is compulsory to maintain the confidentiality of the proprietary information of TGT. Employees are not permitted (neither during nor after their employment) to disclose any confidential information which was received during their employment at TGT to anyone not employed by TGT. Confidential information may only be disclosed to a third party upon receipt of written authorization from the responsible manager, or if disclosure is required by law. Such confidential information includes all non-public information that might be of use to competitors or harmful to TGT, our clients or our suppliers if disclosed. Please refer to the Employment Manual for further details.

4. Data Privacy

At TGT, we also have a duty to protect employee and third-party personal data. Occasionally, our company collects sensitive personal information about our employees and third parties such as race or ethnic origin, medical information, criminal records, or trade union membership. Such information is only gathered, used, and disclosed on a business need-to-know basis or when required by law or court order. We respect an individual's right to privacy and protect this acquired information from misuse. No one may access such personal information without proper authority. TGT will take all steps necessary to provide adequate safety and privacy to all such personal data and information collected by TGT. When no longer needed, we must securely delete, or destroy any such personal data and information collected. Please refer to the Data Protection Policy for further details.

5. Respecting the Proprietary Information of Others

It is always TGT's policy to respect the proprietary information and rights of others including vendors, suppliers, customers, and competitors. Failure to respect the information of others violates this policy and could place you and TGT in significant legal and financial risk. If what appears to be the confidential information of a third party is sent to you or in some way comes into your possession, or you are aware that such confidential information has been sent or is in the possession of one or more of your colleagues, please bring the matter to the immediate attention of your functional / regional manager, or the Chief Compliance Officer.

Likewise, if you are in any doubt as to whether information you or your colleagues have received is confidential information of a third party, please raise the matter with your functional / regional manager or the Chief Compliance Officer. Please refer to the Data Protection Policy for further details.

6. Ideas and Inventions

All copyrightable materials, inventions, trademarks, service materials, promotional and marketing ideas, processes, or products related to TGT's business or any TGT employee's job, which is conceived or developed while employed by TGT is by law and policy, property of TGT unless specifically approved in writing by the CEO.

You must disclose and identify to the Chief Compliance Officer any new invention, works of authorship, technology advances or unique business solutions developed or discovered during your employment period promptly and in sufficient time so that TGT may determine whether to seek legal protection for such items. Please refer to your Patent and Confidential Information Agreement for further details.

7. E-Mail and Internet Usage

For those TGT Employees and others affiliated with TGT having access to TGT's e-mail and internet systems, access and use is intended for conducting TGT business. Accessing sites and / or sending or receiving messages that are inappropriate, particularly those that are hateful or pornographic in nature, is strictly against TGT policy. This includes any material that describes or depicts sexual or sexually suggestive actions, appearances or poses, or that contains derogatory material about any racial, ethnic, or other group.

Additionally, accessing, transmitting, or displaying any form of discriminating materials is prohibited. This includes all types of materials that would be in conflict or in violation of the intent expressed in any TGT policy. Additionally, you are prohibited from identifying yourself as a TGT employee or otherwise affiliated with TGT when posting comments or downloading unapproved files onto any TGT system and you have no right of privacy with respect to TGT's e-mail and internet systems.

All messages, files, documents, and other types of information created by employees for TGT use or purpose using TGT systems are TGT property. Therefore, TGT reserves all legal rights to inspect all messages and information transmitted through, stored, or contained in TGT's systems. Please refer to the Employment Manual for further details.

The Work Environment

1. Safety

TGT is strongly committed to maintaining a safe and secure workplace to ensure the well-being of its employees, visitors, vendors and customers. To facilitate this, TGT has developed TGT-wide safety and environmental programs and policies which are available through the Human Resources Department, the intranet or local policy manuals.

Each of us is individually responsible for observing the safety, health and environmental rules and practices that apply to such TGT employee's job and position and to attend all appropriate training programs.

While TGT takes numerous steps to avoid incidents that may cause injuries, when injuries or near misses do occur, it is the policy that these events should be reported to the relevant functional / regional manager or the Chief Compliance Officer immediately.

Each individual must ensure that all statements and reports made by him or her are true statements in connection with the incident and to cooperate fully with any investigation. Please refer to the Employment and HSE Manuals for further details.

2. Protecting the Environment

TGT is committed to conducting all its business operations in a manner that promotes and maintains a clean, safe, and healthy environment. It is TGT's policy to strictly abide by all applicable environmental laws and policies regarding the environment.

If you have reason to believe that any applicable law or regulation, either foreign or domestic, is not being observed, you must immediately bring this information to the attention of your functional / regional manager, or the Chief Compliance Officer. Please refer to the Employment and HSE Manuals for further details.

3. Movement of Dangerous Goods

Hazardous and dangerous materials (dangerous goods) require special consideration and risk management, and therefore handling of such goods forms an integral part of TGT health and safety management system. To ensure safe and compliant handling of dangerous goods, we take all requisite precautions with regards to training and monitoring to ensure our employees perform their duties in accordance with all applicable legislation.

If you have reason to believe that any applicable law or regulation, either foreign or domestic, is not being observed, you must immediately bring this information to the attention of your functional / regional manager, or the Chief Compliance Officer. Please refer to the HSE Manual for further details.

4. Drugs and Alcohol

Drugs and alcohol may affect everyone's safety. Working under the influence of either substance impairs our judgment and slows our reflexes, which can have a negative effect on our job performance and can cause serious safety hazards. TGT is committed to providing a safe workplace and complying with drug and alcohol laws in the countries where we operate. We do not tolerate the possession, purchase, sale, transfer, use, or presence in an employee's system of any prohibited drugs while on company premises, working on our company's behalf, or operating company vehicles or equipment. Similarly, the possession, purchase, sale, transfer, or unauthorized use of alcohol while on TGT premises is prohibited. The use or consumption of alcohol or prohibited drugs while off the job also may result in disciplinary action if it impairs job performance or endangers the health and safety of other employees or the community. Please refer to the Employment and HSE Manuals for further details.

5. Equal Employment Opportunity / Non-Discrimination

The knowledge, experience and entrepreneurial spirit of our employees determine the success of TGT. TGT provides a working environment which creates and fosters professional development opportunities. Our employment practices, including our hiring policies and remuneration structure, aim to stimulate high performance and to consistently reward excellent results. TGT seeks to ensure a harmonious working environment.

The cornerstones of our corporate culture include respect and support for cultural diversity, open and honest team co-operation and an environment free from intimidation and harassment. TGT expects its management to act as role models in their business conduct and leadership style. Any behavior that goes against our high standard of business ethics should be identified, discussed and prevented. Please refer to the Fair Employment Policy for further details.

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Argentum Law &
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