

Acknowledgment of Aramco Services Company’s Supplier Code of Conduct

(Applicable to Vendors, Manufacturers, Contractors and Sub-Contractors)

Aramco Services Company (ASC) is committed to the highest ethical and legal standards in the conduct of its business. ASC requires all registered vendors, manufacturers, contractors and sub-contractors with which ASC conducts business to acknowledge and agree to abide by the policies and principles set forth in the ASC Supplier Code of Conduct.

Every two years, ASC will request all registered suppliers to acknowledge and re-confirm the policies and principles outlined in the ASC Supplier Code of Conduct. All registered vendors, manufacturers, contractors and sub-contractors are required to have an acknowledged ASC Supplier Code of Conduct on file with ASC prior to issuance of any Purchase Order or Contract.

Potential or actual violations of this Supplier Code of Conduct and other ethical irregularities are to be reported directly to the ASC Audit Manager by email, fax or telephone as detailed on page 5 of this form.

ACKNOWLEDGMENT

I, an authorized representative of
[the name of the vendor/manufacturer/contractor/sub-contractor]

(including its subsidiaries, parent corporation (s), affiliates and related entities) and hereby acknowledge and

agree to abide by the policies and principles of ASC’s Supplier Code of Conduct and ensure that the employees, officers, directors, agents, representatives of

..... are aware of and abide by such policies and
[the name of the vendor/manufacturer/contractor/sub-contractor]

principles in the process of preparing and submitting bids and proposals for ASC work, for provision of goods and services to ASC, and during the performance of all agreements entered into with ASC for such purposes.

Authorized Signatory Name (printed): _____

Signature: _____

Title: _____

ASC Vendor ID: _____ Date: _____

ASC SUPPLIER CODE OF CONDUCT

I. SCOPE

This Policy establishes a Code of Conduct for current and potential ASC Suppliers. ASC Suppliers include vendors, manufacturers, contractors and sub-contractors registered with ASC and seeking to provide goods, services or personnel (including consultants) to ASC or all other parties with whom ASC Suppliers may contract on ASC's behalf. The term ASC herein includes ASC, its subsidiaries, and affiliated companies, such as but not limited to, the Saudi Arabian Oil Company ("Saudi Aramco").

II. INTENT

ASC is committed to conducting its business in an ethical, legal, safe, environmentally and socially responsible manner. ASC requires its Suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct. ASC requires its Suppliers to consistently meet the following requirements in order to do or continue to do business with ASC.

III. SUPPLIER CODE OF CONDUCT

Compliance with Laws, Codes and Regulations

ASC Suppliers must comply with all applicable laws, codes and regulations as set forth in applicable procurement documents and agreements (including, but not limited to, proposals, invitations to bid, solicitations and resulting contractual and purchasing agreements).

Environmental, Health and Safety Practices

It is the responsibility of the Supplier to ensure that its facilities are designed and safely operated in compliance with applicable law and that they do not present unnecessary risks to the environment or to the public. ASC Suppliers shall maintain safe, sanitary and healthy environments for all their employees at all job sites.

Such compliance shall include, among other things:

- Obtaining and maintaining environmental permits.
- Proper handling and disposition of hazardous materials.
- Monitoring, controlling, and responsibly treating discharges generated from operations.
- Conducting appropriate employee safety training and providing adequate safety equipment.
- Maintaining records of safety training and monitoring safety performance.
- Ensuring Suppliers' employees comply with applicable health and safety rules and regulations and perform their duties and work in a manner which will not endanger themselves or others.

Ethical Business Practices

ASC and its Suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior. Suppliers are expected to conform to these requirements in each of the following areas:

- Fair Trade Practices

Suppliers shall not engage in collusive bidding, price discrimination anti-competitive or other unfair trade practices.

- Ethical Sourcing

Suppliers shall source goods or services from others that meet, as a minimum, country or origin standards for health and safety, working hours, pay, employment conditions and environmental protection.

- Relationships and Communications

ASC Business Ethics Policy is that all transactions are to be conducted fairly, honestly and with integrity, according to the highest ethical standards. Abuse or violation of this ethics policy is considered dishonesty.

Suppliers and their personnel shall avoid even the appearance of unethical or compromising practices in relationships, actions or communications with regard to existing or proposed business relationships with ASC.

Suppliers shall not encourage or utilize current or former ASC employees to disclose or provide any confidential, proprietary, or other restricted business information obtained while in ASC's service to influence ASC's existing or proposed commercial transactions for the purpose of gaining a commercial advantage or to otherwise damage ASC's interests. ASC will take the necessary measures to detect any such improper business practices and will take appropriate action against current or former employees and Suppliers who violate these restrictions. Suppliers shall be expected to cooperate with ASC investigations and provide reasonable assistance as requested.

- Bribery, Kickbacks and Fraud

No funds, assets or services shall be paid, rendered, loaned or promised for payment or otherwise dispersed by Suppliers or their representatives as bribes, "kickbacks" or other payments designed to influence or compromise the conduct of ASC or its representatives.

- Gifts, Gratuities and Hospitality

Suppliers and their personnel shall not offer or provide ASC or its personnel with gifts, gratuities or hospitality unless it involves nominal value and is in line with customary business practices. Nominal gifts are described as gifts of a general nature having a low value, including such items as logo inscribed pens, caps, shirts and coffee mugs. Customary business practice in terms of hospitality would include the acceptance of reasonable business entertainment and business meals. Gifts, gratuities and hospitality offered or extended by Suppliers to ASC personnel which exceed nominal value or reasonable hospitality are reportable under internal ASC policies and regulations.

For the avoidance of any doubt, ASC pays for its employees business expenses, Suppliers are not required or requested to incur or reimburse business expenses for ASC employees.

IV. MONITORING AND COMPLIANCE

Suppliers shall conduct periodic internal reviews and inspections to ensure their compliance with this Supplier Code of Conduct and its applicable requirements. If a Supplier identifies areas of non-compliance, the Supplier is expected to notify ASC as to its plans to remedy any such non-compliance.

ASC or its designated representatives may engage in periodic monitoring activities to confirm Suppliers' compliance with this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess Supplier performance and compliance. The Supplier performance assessment will be used as a factor in the selection of bidders, or restrict Supplier access to new ASC business opportunities.

Suppliers are responsible for ensuring that the standards and requirements of this Code are communicated and understood by their personnel working on or in support of ASC projects, jobs, contracts, agreements and orders. Suppliers will be held responsible for the conduct and actions of their employees.

The implementation of this Policy is a shared responsibility between ASC and its Suppliers.

Suppliers are to promptly disclose to ASC, on a confidential basis, all current and potential incidents which give rise to the appearance of conflicts of interest and instances of illegal, unethical or fraudulent behavior by any party, including Supplier employees or ASC employees, related to any of ASC procurement and contracts business. Suppliers are to cooperate with ASC in any inquiries or investigations pertaining to past, current or potential instances of apparent unethical or fraudulent behavior or conflicts of interest related to any ASC business activity.

ASC Supplier employees that become aware of violations of this Policy are obligated to notify ASC. Supplier employees are to report violations and irregularities directly to the ASC Audit Manager by email, fax or telephone as follows:

Email: ChiefAuditorHotline@AramcoAmericas.com
Phone: 713-432-5840
Fax: 713-432-8637

Based on the assessment of information made available to ASC, ASC reserves the right (in addition to all other legal and contractual rights) to disqualify any potential Supplier or terminate any relationship with a current Supplier found to be in violation of this Supplier Code of Conduct, without liability.

V. CONFIDENTIALITY

All advertising, press releases or printed matter that reference ASC or a Supplier's relationship with ASC must be approved by the ASC Public Affairs Department prior to publication or other use.

VI. APPLICATION

This Supplier Code of Conduct is a general statement of ASC's expectations and requirements with respect to its Suppliers. This Policy should not be read in lieu of, but in addition to, any Supplier obligations set forth in a) requests for proposals, invitations to bid or other solicitation documents, or b) agreements by and between ASC and the Supplier. In the event of a conflict between this Policy and any ASC solicitation documents or applicable agreements, the terms of ASC's applicable solicitation documents or agreements shall prevail. The requirements of this policy are not subject to waiver. Neither ASC, its Suppliers nor their personnel or representatives are authorized to propose or approve conduct inconsistent with this Code of Conduct.