

Code of Ethics and Conduct

ouronova 

We are all responsible for the trust and respect placed in our brand.

Familiarize yourself and be aligned with all policies, laws and regulations that apply to your work.

Perform your tasks and carry out your activities within the highest ethical and legal parameters.

If you know or suspect a violation of this code of conduct report it immediately.

In case of doubt seek guidance from a manager or the Ethics Council.

Respect and integrity: our greatest asset

ouronova was created by people who believe that a company, in addition to being an economic and social organization made up of human, technical and material capital, is also a legal citizen with a role to fulfill in the society in which it operates.

Thus, its business and social conduct must be based on integrity, ethics and transparency.

These are the pillars of a company's sustainable growth, whose longterm survival will be determined by its ability to act and react in a responsible fashion, especially in situations that may present ethical and legal dilemmas.

It is due to our belief that this task is the responsibility of all those who are part of **ouronova**, and not only of its partners and managers, that we drew up this Code of Conduct, which materializes our commitment as a company and citizen and whose principles should, therefore, also be incorporated by our employees.

We are all responsible for the trust and respect placed in our brand. Thus, it is of the utmost importance that all employees read, understand and comply with these guidelines, which should guide activities and behavior inside and outside **ouronova**.

As integrity is our greatest asset, the duty of all members of the company to disseminate the principles of this code of conduct to managers and professionals of contracted companies and project partners, so that they can conduct their activities in accordance with these guidelines.



Eduardo Costa

1. GOVERNANCE

ouronova COMMITS ITSELF TO:

Carry out its business with transparency and integrity and respect and value its human capital.

Encourage its employees to disseminate the ethical principles and commitments expressed in this Code.

Fulfill and foster the implementation of this Code through the adoption of management and monitoring arrangements and by divulging it permanently, in addition to showing a willingness to clarify doubts and openness to suggestions, as well as periodically reviewing its precepts and practices.

MISSION

Provide technological solutions for the markets in which we operate, generating value through reliable and innovative products and services.

VISION

To be a Global benchmark in innovation and technology.

VALUES

We are committed to the excellence of our products and services.

We are entrepreneurs and seek challenges.

We are committed to economic results.

We respect, value and develop people.

2. PEOPLE

People are **ouronova**'s driving force. We value each of our employees and expect our partners and clients to follow suit.

Respect should guide behavior inside and outside. We forbid all forms of discrimination regarding gender, age, origin, religion, sexual orientation, physical appearance, health, disabilities, trade union membership or political choice.

We do not tolerate conducts that may violate the dignity of our employees. No employee can suffer any kind of harassment or retaliation.

ouronova seeks to build a work environment that assures the quality of life and well-being of its employees and clients.

■ WE ARE ALL RESPONSIBLE

Comply with local legislation and norms, especially those related to the defense of human and labor rights.

Keep an open mind and avoid any kind of prejudice regarding your colleagues' opinions, appearance or attitudes.

Encourage talents and professional growth, incentivize and motivate employees, recognizing that individual performances are essential for ensuring **ouronova**'s sustainable growth.

Foster equality of opportunity in terms of recruitment, access to training, promotion, well-being and career development.

Contribute to a healthy work environment in which all can develop.

Respect the choice of organization and association in trade unions and professional associations.

3. ENVIRONMENT AND SOCIAL RESPONSIBILITY

ouronova COMMITS ITSELF TO:

Contribute to the technological development of the oil and gas industry.

Encourage the development of social awareness and the exercise of citizenship on the part of its entire team of directors and professionals, contracted companies and project partners.

Support the deployment of social responsibility and environmental sustainability projects.

Comply with all HSE laws and regulations (Health, Safety and the Environment).

Operate in accordance with the highest international standards and practices of excellence.

Report any HSE-related incident immediately.

Cooperate with incident investigation efforts.

Conserve resources such as water and energy.

Reduce wastages and pollutant gas emissions.

Reduce solid waste and effluent emissions.

WE ARE ALL RESPONSIBLE

At work and at home disseminate the 5Rs policy, which consists of the acts of Rethinking, Reducing, Refusing, Reusing and Recycling.

Rethink your consumption and discarding habits.

Reduce consumption, opting for greater durability products.

Refuse products that harm health and the environment.

Reuse, extending a product's useful life and reducing the extraction of virgin materials.

Recycling products contributes to the reduction of water, energy and raw material consumption, in addition to generating work for thousands of people.

Foster and encourage volunteer work: use part of your free time to do volunteer work, inviting your work colleagues to take part in this collective effort to create a better and more just world.

4. CONFIDENTIALITY

ouronova is concerned with the security of all its employees', partners' and clients' confidential information.

It is the duty of all **ouronova** employees to protect sensitive and confidential information that is in any way related to the company and its clients. This is why a formal confidentiality agreement is entered into with each employee.

Any information that is not in the public domain (such as financial results, acquisitions, loss or signing of contracts and ongoing litigation) is protected, independently of the existence of contracts or formal confidentiality obligations.

■ WE ARE ALL RESPONSIBLE

Do not reveal confidential information to third parties inside or outside **ouronova**.

In case of doubt always consult the Ethics Council to obtain guidance regarding the need to formalize a confidentiality agreement.

Report any situation indicating that the protection or secrecy of sensitive information may be at risk to your manager or the Ethics Council.

5. ouronova'S IMAGE

A **ouronova** attaches great importance to the protection of its image and reputation, including employees' professional or private use of social media.

This applies to all social media websites (eg: Facebook, LinkedIn, Twitter), blogs, photo and video-sharing websites (eg: YouTube, Flickr, Blogs, Instagram), in addition to wikis and discussion forums.

Only duly designated employees are authorized to speak publicly about **ouronova** or on its behalf.

The use of social media by any employee, including privately, can potentially be attributed to **ouronova** and impact the company itself negatively, as well as its reputation. Thus, any employee who uses social media should do so in a responsible way.

■ WE ARE ALL RESPONSIBLE

Never speak on **ouronova**'s behalf unless you are expressly authorized to do so.

Be careful with your choice of words when using social media and avoid offenses or comments of a political, religious, sexual or racial nature.

6. FINANCIAL AND ACCOUNTING INTEGRITY

ouronova adopts strict accounting principles and norms.

It is our obligation to keep accounting ledgers and records in order to understand, with a sufficient level of detail, the transactions that correspond to each expenditure or deployment of assets.

USE OF ouronova ASSETS

ouronova employees should not use **ouronova** resources, intellectual property, time and facilities, including office equipment and e-mails, for personal ends or other purposes that are not related to their obligations at work.

All should ensure that company assets are used adequately, preventing wastage and poor conservation.

WE ARE ALL RESPONSIBLE

Keep complete, accurate and easy-to-analyze records of all expenditures and revenues, independently of their size or purpose.

Under no circumstances alter or conceal accounting data, provide or record false or erroneous information in the ledgers.

Undertake expenditures only with prior authorization or within previously agreed limits, providing adequate proof, reports and precise controls.

Protect and keep all documents for the period of time specified by law.

Refuse and do not provide false or incomplete documents.

Do not transfer or cede company assets to third parties without prior authorization.

7. CONFLICT OF INTEREST

All **ouronova** employees should avoid situations in which they feel divided between their commitment to ethics and good conduct and other personal interests, whether professional, family-related or financial.

Avoid creating or putting yourself in situations that may influence your ability to make objective, unbiased and impartial decisions. When in doubt you should contact the Ethics Council.

EXAMPLES OF CONFLICT OF INTEREST:

Business ownership or other for-profit activities that are linked to the employee's functions or are in conflict with his or her work schedule.

Participation in the hiring of family members or people who are close.

Using a printer or copier for private purposes.

Participation in external activities that have a negative impact on **ouronova's** reputation.

Offering or acceptance of an undue advantage.

Personal investment or gains in opportunities developed by the company.

8. HIRING OF SUPPLIERS AND SERVICE PROVIDERS

In relations with partners, suppliers and service providers, **ouronova** commits itself to:

Provide employees of service providers, when working in its facilities, with the same work safety and health conditions as its own employees, reserving the right to require compliance with hygiene and safety and information secrecy and security norms.

Require service providers to instruct their employees to observe the ethical principles and conduct commitments stipulated in this Code, especially regarding zero tolerance of corruption, for the duration of their contracts.

Select and hire suppliers and service providers based on strictly legal and technical quality, cost and punctuality criteria, in addition to demanding an ethical profile in their management and social and environmental responsibility practices, rejecting unfair competition, child labor, forced or compulsory labor practices, or other practices contrary to this Code's principles.

NEGOCIATION WITH THIRD PARTIES

All employees should require their suppliers, service providers and partners to provide them with information about the reputation, qualifications and experience of any contractors before hiring them, in addition to providing them beforehand with the applicable policies and procedures.

9. COMBATING CORRUPTION

ouronova adopts a zero tolerance policy towards corruption in all its forms. Employees are expressly forbidden to receive or offer any kind of undue advantage. It is also forbidden to request, authorize or allow third parties to perform any of these acts on behalf, or in favor of, **ouronova**.

ouronova will not tolerate any act of corruption, whether by our personnel or third parties acting on our behalf.

■ WE ARE ALL RESPONSIBLE

Comply with anticorruption laws.

Demand the same from those we do business or hire.

When negotiating with third parties, be on the lookout for any signs that they may be involved with corruption. Perform a careful analysis of their reputation, contract clarity, commission payment conditions and reasonableness of the amounts involved.

10. OPEN CHANNEL

ouronova is committed to maintaining, without exception, an environment of open and honest communication, where all feel comfortable to talk about situations in which they feel that the this Code of Conduct may have been violated, or to dispel doubts.

All situations or complaints can be reported anonymously using the [Ethics and Conduct Channel](#) form and they will be treated confidentially. **ouronova** guarantees that retaliation will not occur, nor will it be tolerated, against anyone who, in good faith, makes any report or raises suspicions of violations. You can also send questions or suggestions to:

etica@ouronova.com

11. DECLARATION OF ADHERENCE TO THE *ouronova* CODE OF ETHICS AND CONDUCT

I hereby declare, for all due purposes, to have received, read and understood the **ouronova** Code of Conduct, which I commit to comply with in the course of my work.

I commit myself to observe it and act with integrity, giving an example and immediately communicating any conduct that may come to my knowledge which deviates from what is established in this Code.

Name: _____

CPF: _____

Company: _____

Area: _____

Date: _____

Signature: _____

The violation of the norms established in this Code will entail the application of disciplinary measures, which may include dismissal.