

APPROVED BY:

Colmstock A.

Companyap
Manhoadul

Companyap
Manhoa

October 12, 2016

## **Business Code of Conduct**

## 1. Compliance with laws and regulations

## GENERAL PRINCIPILES

Each Employee and Representative is asked to acquire the necessary understanding of the mandatory rules that must be observed as part of his or her responsibilities and, if there is any uncertainty, to consult his or her supervisors, who will indicate the course of the action to be taken.

In addition, each Employee or Representative is required to carry out in good faith and comply with any commitment made in the course of his or her relationship with clients, suppliers or other «Reservoir Evaluation Services» LLP partners. He or she must treat these partners and suppliers fairly, based on criteria and transparency.

# RULES RELATING TO THE FIGHT AGAINST CORRUPTION

«Reservoir Evaluation Services» LLP rejects corruption in all its forms. In particular, «Reservoir Evaluation Services» LLP pledges that it will never resort to corruption "in order to obtain or retain business or other improper advantage in the conduct of international business", in accordance with the terms of the OECD convention on combating bribery of foreign public officials and related national legislation (including the Foreign Corrupt Practices Act of the USA) and Principle 10 of the UNGC.

#### COMPLIANCE WITH ANTITRUST LAWS

Most countries have laws and regulations designed to encourage fair competition and prohibit certain practices that could restrict the development of trade (such as unlawful agreements between suppliers). Employees and Representatives must know and observe these laws and regulations; failure to do so could have serious consequences for the Company as well as for the entities in question. These laws and regulations are often complex and in the event of uncertainty, Employees should obtain more information from the personnel within the Company who are knowledgeable in this area.



#### 2. Prevention of conflicts of interest

## TIES WITH A COMPETITOR, CLIENT OR SUPPLIER

A situation of conflict of interest arises when the private interests of an Employee of Representative or those of his or her friends or relatives interfere or could interfere directly or indirectly with the interests of «Reservoir Evaluation Services» LLP or a client or supplier of the «Reservoir Evaluation Services» LLP.

Consistent with these principles, constitute a situation of conflict of interest:

- The fact of conducting private transactions with clients, suppliers, partners or competitors unless they have notified and received approval from the proper personnel.
- The fact of having financial interest in or conducting private transactions with clients, suppliers, partners or competitors unless they have notified and received approval from the proper personnel.
- The fact of having relationships that yield privileged information or entail the use of influence, notably in the following cases:
  - (i) The direct or indirect holding of shares issued by a client, supplier, partner or competitor.
  - (ii) The acceptance or solicitation of loans, advances. Guarantees or other services provided by a third party outside the LLP in order to influence a decision by the LLP.
  - (iii) Work conducted for a LLP supplier, client or competitor simultaneous with working with the LLP.

#### FAIR TRADE

Employees or Representatives of «Reservoir Evaluation Services» LLP should abide by the rules of fair trade, particularly with regard to clients and suppliers, to the mutual benefit of all parties. Such a policy will ensure an atmosphere of trust that is conductive to a long-term relationship.

Our relationship with our customers and our ability to satisfy their needs are a cornerstone of our LLP culture. We are committed to providing our clients with state-of-the-art technological products and services that provide the best value in terms of price, quality, delivery time, safety and respect for the environment.

## REMUNERATION, GIFTS AND BENEFITS

No Employee or Representative may accept ox offer gifts, remuneration or other benefits to a client, supplier or competitor. Only gifts or benefits of small value not paid in cash and consistent with accepted practices and with provisions relating to the fight against corruption may be accepted or offered.

Employees or Representatives should contact their direct supervisors if there is any uncertainty.

Under no circumstances may an Employee or Representative solicit a gift or other benefit.



## **PUBLIC ACTIVITIES**

«Reservoir Evaluation Services» LLP respects the right of its employees to express themselves and voice their opinions and their right to participate in public life as citizens.

Solely in order to avoid any conflict of interest, Employees or Representatives shall refrain from involving the LLP in their public or political activities, from committing the LLP's resources in support of political candidates and from taking part in any decision by a public agency or other government body regarding the LLP.

# 3. Respect for persons and the environment

## HEALTH, SAFETY AND THE ENVIRONMENT

### Health and safety

The health and safety of Employees and Representatives is a priority for «Reservoir Evaluation Services» LLP. Each Employee and Representative has the right to work in a safe environment and under healthy working conditions as well as a responsibility to contribute to such an environment through responsible behavior. The LLP's policy in this area applies to all Employees or Representatives and subcontractors and relies on a system of health, safety and environmental management that incorporates a preventive approach to risk management. This policy must be supported without exception by every Employee and Representative through exemplary behavior and shared vigilance.

#### Security

«Reservoir Evaluation Services» LLP is committed to providing a secure working environment by mobilizing resources and implementing procedures designed to protect its Employees and Representatives, its assets and its operations from the risk of accidents, loss or damage resulting from criminal, hostile or malevolent activity. Each employee or affiliate is responsible for ensuring that security-related risks in his or her environment are properly identified.

#### Environment

As part of our commitment to sustain development, «Reservoir Evaluation Services» LLP has implemented an environmental policy and management processes for conducting its activities.

Respect for environmental laws, regulations and norms, minimizing impact of «Reservoir Evaluation Services» LLP's activities on the environment and effective waste management must be taken into account in the decisions and actions of each Employee and Representative and must be integrated from conception in the management of our projects.

«Reservoir Evaluation Services» LLP encourages its suppliers and subcontractors to manage environmental matters in the same way, with liability and accountability. Moreover, «Reservoir Evaluation Services» LLP expects its suppliers and subcontractors to make efforts to reduce their consumption of water, energy and natural resources.



# PROMOTION AND IMPLEMENTATION OF THE FUNDAMENTAL PRINCIPILES AND RIGHTS AT WORK

«Reservoir Evaluation Services» LLP recognizes the benefits of working in a positive environment. «Reservoir Evaluation Services» LLP therefore adheres to the principles of the International Labor Organization and expects its subcontractors and suppliers to respect the same principles.

#### 4. Protection of LLP assets

#### TRUTHFULNESS AND PROTECTION OF INFRMATION

In order to ensure protection of the LLP's assets, Employees and Representatives must, within the scope of their responsibilities, assure the accuracy and reliability of information they transmit to authorized recipients. Moreover, they must take the necessary steps to protect the confidentiality of information to which they have access as part of their professional duties and responsibilities. Employees and Representatives must comply with the obligation to refrain from disclosing confidential information either orally, in writing or by electronic means without the express authorization of their supervisors. This obligation remains in force even after the Employee or Representative's departure from the LLP.

The obligation of confidentiality applies both to information that «Reservoir Evaluation Services» LLP receives fron its clients and to information that belongs to «Reservoir Evaluation Services» LLP itself. As a general rule, «Reservoir Evaluation Services» LLP must maintain the confidentiality of any information that it receives from its clients and any information of which it is apprised as a result of its relationship with its clients.

Confidential «Reservoir Evaluation Services» LLP information such as:

- (i) Proposal or projects regarding new products;
- (ii) Unpublished or trademarked information regarding product design and performance, research, development, manufacture, distribution, marketing and sales;
- (iii) Information provided to clients, sales, purchase orders and sales terms and conditions;
- (iv) Principal contracts;
- (v) Proposed acquisitions or joint ventures;
- (vi) The contents of files pertaining to legal actions and in particular legal actions relating to intellectual property

Constitutes an essential advantage that must be preserved and protected by all Employees and Representatives within the LLP. This information is the property of «Reservoir Evaluation Services» LLP and may be used only with appropriate authorization in the performance of the employee's or affiliate's duties and responsibilities.

Similarly, LLP Employees and Representatives must refrain from disclosing any confidential information belonging to a former employer.



# PROTECTION OF THE LLP'S PROPERTY AND RESOURCES

As part of their duties, «Reservoir Evaluation Services» LLP Employees and Representatives have access to the use of assets belonging to the LLP. These assets must be managed for the sole benefit of the LLP. In addition, «Reservoir Evaluation Services» LLP Employees and Representatives must protect these assets deterioration, loss or destruction.

Specifically, these goods and resources include intellectual property rights such as trade secrets, patents and trademarks as well as the LLP's installations, facilities, equipment and financial resources.

#### **USE OF INFORMATION TECHNOLOGY**

Unlicensed software may not be used on the LLP's computers. Employees and Representatives are prohibited from downloading information from the Internet that has no bearing on their professional activity.

## 5. Financial security and transparency

Employee or Representative involved in the recording of accounting transactions must assure that these transactions are honestly reported in the accounts of LLP entities in accordance with current accounting principles and procedures. In addition, financial information transmitted for the purposes of financial reporting must offer a basis for making a precise and pertinent assessment of the financial situation of the relevant entity.

Accounting and financial rules and procedures applicable in the LLP must be implemented in strict accordance with the legislation of the Republic of Kazakhstan, and in the required cases - with international legislation.