
Code of Business Conduct



**Kinetics Controls
& Innovation Ltd**

RIGLESS WELL INTEGRITY & INTERVENTION ISOLATIONS

Building Strong Working Relationships

With our Customers, Employees, Suppliers, Contractors & Agents

The Need

In this code KCI lays out the behaviours we expect of our employees, suppliers, contractors, agents & partners.

KCI are committed to following all applicable legal requirements & in working to the highest ethical standards.

This code is not produced as an alternative to individuals being unwilling to accept responsibilities for their own actions. We must all use good judgement & common sense in our business relationships.

KCI expects those who manage or supervise others to lead by example & to provide support at all times to those who need it.

KCI consider failure to follow this code as gross misconduct, which may lead to the relevant actions being taken.

KCI aim to become the world's leading provider of Fully Engineered Rigless Leak Sealing Solutions for Wellheads, Valves, Production Pipelines, & Annulus Anomalies to the global Oil & Gas industry by building strong & sustainable working relationships with our Customers, Employees, Suppliers, Contractors, and Agents & Partners.

KCI believe that this code gives everyone that we work with, including employees, the opportunity to understand the behaviours expected of them when doing business with the company. If you believe that any aspect of this code is being breached you should speak to your line manager who will treat your observations in complete confidence.

KCI establish this code in conjunction with the companies HR & HSE policies & copies of these policies are available on request.

Alcohol & Drugs

Alcohol & drugs impair performance & compromise health & safety. You must not be under the influence of drugs or alcohol when you report for work or during the working day. Employees may be required to undergo testing for alcohol or illegal drugs in certain circumstances. If you are taking medication that may affect your work performance or the safety of yourself or others you must inform the company as soon as possible. If you have a substance dependency you should inform the company & ask for medical assistance before it affects your performance at work.

Anti-Bribery & Corruption

KCI aim to conduct all of its business in an honest & ethical manner. KCI will not tolerate any acts of bribery or corruption & is committed to acting professionally & ethically in all our business dealings & relationships. If you believe or suspect that an act of bribery or corruption has occurred you should inform your line manager at the earliest possible opportunity.

Business Gifts

KCI believe that the acceptance of business gifts & offers of hospitality can give rise to suspicion of inappropriate conduct. Offers of hospitality must be reported, recorded & authorised appropriately. Gifts should not be accepted unless the value is negligible or is presented as a seasonal gift. Do not make, accept or offer any improper business gifts or payments in connection with KCI business activities.

Equal Opportunities & Diversity

KCI recognises the benefits of a diverse workforce & are committed to providing a working environment that is free from discrimination. KCI will seek to promote the principles of equality & diversity in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies & the public. All employees & those who act on the company's behalf are required to adhere to this when undertaking their duties or when representing the company in any other guise.

Harassment & Bullying

KCI is fully committed to promoting a fair & harmonious working environment in which everyone is treated with respect & dignity & in which no individual feels bullied, threatened or intimidated. The aim of this is to prevent harassment & bullying in the workplace which includes harassment & bullying by other workers or by third parties. Harassment or bullying at work in any form is unacceptable behaviour & will not be permitted or condoned.

Public Interest Disclosure ("Whistleblowing")

KCI constantly strives to safeguard & act in the interest of the public & its employees. It is important to KCI that any fraud, misconduct or wrongdoing, by employees or other agents, is reported & properly addressed. This applies to all employees & all other agents of the company, who are encouraged to raise concerns in a responsible manner. KCI prefers that a concern is raised & dealt with properly, rather than be kept quiet.

Compliance with Laws, Rules & Regulations

KCI believe that each & every individual is responsible for knowing & following the laws that apply to the place or country in which they are working. KCI require all employees or other agents to apply the highest standard of behaviour to their business activities at all times. KCI require accurate & complete records to be kept & maintained at all times & that these documents be made available to relevant regulatory authorities as & when requested.

Anti-Competitive Behaviour

KCI require all employees & other agents to never talk to or exchange information with competitors to fix prices, fix terms relating to pricing formulas or credit terms, divide up markets, customers or territories, limit production or rig a competitive tendering process. KCI believe that it is always wrong to gather competitor information by way of theft, illegal entry, bribery, misrepresentation or electronic interception.

Conflicts of Interest

KCI discourage any activities that may result in a conflict of interest between personal & business interests. KCI encourage the reporting of any potential conflicts to management at the earliest opportunity. KCI believe that the following activities are potential conflicts of interest; accepting commissions or gifts of more than a nominal value, excessive hospitality, loans or other favourable treatment from any supplier, customer, or competitor of the business, seeking to benefit personally from a business opportunity, benefiting directly from the sale, loan or gift of any company property & working in any capacity whatsoever for a competitor.

Health & Safety

KCI are fully committed to achieving our target of zero accidents and to the open & transparent reporting of the company's health & safety record. KCI encourage all employees or other agents to assist the company in achieving this target & following this principle.



Further Information

If you require any further information please do not hesitate to contact KCI General Manager Kevin Watt on the following:

kevin.watt@kcilttd.co.uk

+44 (0) 1224 255480

KCI Code of Business Conduct Approval

	
Kevin Watt, General Manager	Roy Mackenzie, Managing Director
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