



TARANAKI THRU TUBING TOOLS CODE OF BUSINESS CONDUCT AND ETHICS

It is the policy of Taranaki Thru Tubing Tools to apply high standards of courtesy, professionalism, and honesty in its interactions with customers, shareholders, suppliers, co-workers and the community. This Code governs the business-related conduct of all Taranaki Thru Tubing Tools Representatives, including, but not limited to, the Directors, Managers, Employees and Consultants of the company. The purpose of this Code is:

- To encourage among Taranaki Thru Tubing Tools Representatives a culture of honesty, accountability and mutual respect
- To provide guidance to help Taranaki Thru Tubing Tools Representatives recognize ethical issues; and to provide mechanisms to support the resolution of ethical issues.

Taranaki Thru Tubing Tools will take such disciplinary or preventive action as it deems appropriate to address any existing or potential violation of this Code brought to its attention. Any Taranaki Thru Tubing Tools Representative in a situation that he or she believes may violate or lead to a violation of this Code shall follow the reporting of violations process.

Our Policy

COMPLIANCE WITH LAWS

A variety of laws apply to the Company and its operations. It is the Company's policy to comply with all applicable laws, including employment, discrimination, health, safety, competition, and environmental laws. No Taranaki Thru Tubing Tools Representative has authority to violate any law or to direct another Taranaki Thru Tubing Tools Representative or other person to violate any law on behalf of the Company. Each Taranaki Thru Tubing Tools Representative is expected to comply with all such laws, as well as rules and regulations adopted under such laws. Violations of laws may subject a Taranaki Thru Tubing Tools Representative to individual criminal or civil liability, as well as to discipline by the Company. Such individual violations may also subject the Company to civil or criminal liability or the loss of reputation or business.

HUMAN RIGHTS AND THE LAW

Taranaki Thru Tubing Tools complies with employment laws in every country in which it operates and supports fundamental human rights for all people. We believe that business can only flourish in societies where human rights are protected and respected. We recognise that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. Taranaki Thru Tubing Tools Human Rights Policy Statement contains over-arching principles which we embed into our policies and systems.

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CONFLICTS OF INTEREST

Taranaki Thru Tubing Tools Representatives are expected to make or participate in business decisions and actions in the course of their relationship with the Company based on the best interests of the Company and not based on personal relationships or benefits. A conflict of interest, which can occur or appear to occur in a wide variety of situations, may compromise a Taranaki Thru Tubing Tools Representative's ability to act ethically.

We avoid any personal activity or relationship that has the potential for – or even the appearance of – interfering with our objective decision-making as a Taranaki Thru Tubing Representative.

All Taranaki Thru Tubing Tools Representatives are required to disclose any conflict, a suspected conflict, or the appearance of a conflict, immediately and fully.

BRIBERY AND OTHER IMPROPER PAYMENTS

No Taranaki Thru Tubing Tools Representative may, directly or indirectly, give, offer, demand, solicit or accept a bribe to or from anyone in the course of conducting business on behalf of the Company, including for the purpose of obtaining or retaining business, or for any other advantage. No Taranaki Thru Tubing Tools Representative may, directly or indirectly, give, offer, demand, solicit or accept any improper payment to or from anyone in the course of conducting business on behalf of the Company, including for the purpose of obtaining or retaining business, or for any other advantage. Improper payments include, without limitation, any gift, gratuity, reward, advantage or benefit of any kind (monetary or non-monetary). For greater certainty, a third party intermediary, such as an agent or family member, cannot be used to further any bribe or improper payment or otherwise violate the spirit of this Code.

PUBLIC DISCLOSURES

Taranaki Thru Tubing Tools has an obligation in compliance with applicable laws to make full, fair, accurate, timely and understandable disclosure in its financial records and statements, in reports and documents that it files with or submits to regulatory authorities and in its other public communications. In furtherance of this obligation, each Taranaki Thru Tubing Tools Representative, in performing his or her duties, shall act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated, in order to ensure that to the best of his or her knowledge the Companies books, records, accounts and financial statements are maintained accurately and in reasonable detail, appropriately reflect the Companies transactions, are honestly and accurately reflected in its publicly available reports and communications and conform to applicable legal requirements and Taranaki Thru Tubing Tools system of internal controls.

HANDLING OF CONFIDENTIAL INFORMATION

Taranaki Thru Tubing Tools Representatives should observe the confidentiality of information that they acquire by virtue of their relationship with the Company, including information concerning the Company and its customers, suppliers and competitors and other Taranaki Thru Tubing Tools Representatives, except where disclosure is approved by an executive officer of the Company or otherwise legally mandated.

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In addition, Taranaki Thru Tubing Tools Representatives must safeguard proprietary information, which includes information that is not generally known to the public and has commercial value in Taranaki Thru Tubing Tools business. Proprietary information includes, among other things, operational results, business methods, analytical tools, software programs, trade secrets, ideas, techniques, inventions (whether patentable or not). It also includes information relating to marketing, pricing, clients, and terms of compensation for Taranaki Thru Tubing Tools Representatives. The obligation to preserve proprietary information continues even after employment ends. In addition to violating this Code and policy of the Company, unauthorized use or distribution of proprietary information could also be illegal and result in civil or even criminal penalties.

Taranaki Thru Tubing Tools considers its proprietary information an important asset and may bring suit against employees or former employees to defend its rights vigorously.

USE OF ASSETS OF THE COMPANY

Assets of the Company, including facilities, funds, materials, supplies, time, information, intellectual property, software, corporate opportunities and other assets owned or leased by the Company, or that are otherwise in the Companies possession, may be used only for legitimate business purposes of the Company. Assets of the Company are not to be misappropriated, loaned to others, donated, sold or used for personal use, except for any activities that have been approved in writing by an Executive Officer of the Company in advance, or for personal usage that is minor in amount and reasonable. Taranaki Thru Tubing Tools Representatives are to report any theft or suspected theft to an Executive Officer or Director of the Company. No Taranaki Thru Tubing Tools Representative should knowingly invoke an action that could result in damage to the Companies assets.

FAIR DEALING

Each Taranaki Thru Tubing Tools Representative should deal fairly and in good faith with other Taranaki Thru Tubing Tools Representatives, customers, suppliers, regulators, business partners and competitors. No Taranaki Thru Tubing Tools Representative may take unfair advantage of anyone through manipulation, concealment, misrepresentation, inappropriate threats, fraud, abuse of confidential information or any other intentional unfair-dealing practice.

DELEGATION OF AUTHORITY

Each Taranaki Thru Tubing Tools Representative, and particularly Executive Officers and Directors must exercise reasonable care to ensure that any permitted delegation of authority is reasonable and appropriate in scope and includes appropriate and continuous monitoring.

HEALTH AND SAFETY

The Company strives to provide each Taranaki Thru Tubing Tools Representative with a safe and healthy work environment. Each Taranaki Thru Tubing Tools Representative has responsibility for maintaining a safe and healthy workplace for all Taranaki Thru Tubing Tools Representatives by following safety and health rules and practices, and promptly reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behaviour will not be tolerated by the Company.

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Taranaki Thru Tubing Tools Representatives should report to work in proper condition to perform their duties, free from the influence of illegal drugs or excessive alcohol. The use of illegal drugs or excessive alcohol in the workplace will not be tolerated by the Company.

DISCRIMINATION AND HARASSMENT

Taranaki Thru Tubing Tools is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples of conduct that will not be tolerated include derogatory comments based on racial, ethnic or religious characteristics, age, ancestry, colour, race, citizenship, ethnic origin, creed, disability, family status, marital status, gender, sex, sexual orientation, unwelcome sexual advances or comments and any other ground of discrimination prohibited by law.

E-MAIL, THE INTERNET, TELEPHONES AND OTHER FORMS OF COMMUNICATION

The Company provides employees with access to e-mail, the Internet, telephones and other forms of communication for business purposes, and while we understand the need for limited and occasional use of these tools for personal purposes, this use should not be excessive or be detrimental to the Company. The Companies e-mail system, including e-mail accounts and addresses, are the property of the Company. The Company has the right to access, monitor and review communications conducted using the Companies resources and employees should have no expectation of privacy when using these resources. Internet use must be conducted in a reasonable professional manner and must not impede on employee's ability to perform his or her duties. For example, accessing Internet sites containing obscene or offensive material, or sending e mails that are derogatory or harassing to another person or group of people or chain emails, is prohibited. Employees must be also vigilant to ensure that the network security is maintained.

Taranaki Thru Tubing Tools policies against workplace discrimination and harassment apply fully to employee use of e-mail, the Internet, telephone and other forms of communication. Taranaki Thru Tubing Tools Representatives should refer to the Companies Social Media Policy for more information on how Taranaki Thru Tubing Representatives should conduct themselves online.

REPORTING OF VIOLATIONS PROCEDURE

Taranaki Thru Tubing Tools Representatives who observe, learn of, or, in good faith, suspect a violation of this Code must immediately report the violation and follow the reporting of violations process. The Company does not tolerate acts of retaliation, including demotion, discharge, discipline, discrimination, harassment, suspension or threats, against any Taranaki Thru Tubing Tools Representative who makes a good faith report of known or suspected acts of misconduct or other violations of this Code.

COMPLIANCE

All Taranaki Thru Tubing Tools Representatives have a responsibility to understand and follow this Code. In addition, all Taranaki Thru Tubing Tools Representatives are expected to perform their work with honesty and integrity in all areas not specifically addressed in this Policy. The Company will discipline any Taranaki Thru Tubing Tools Representative who violates this Code or related practices.

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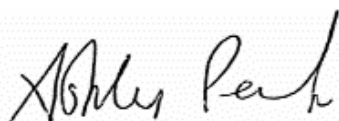


SUPPLEMENTARY POLICIES

This policy is further supplemented by;

- 4TL-HSEQ-POL-QA-01 - Quality Assurance Policy
- 4TL-HSEQ-POL-ENV-02 – Environmental Policy
- 4TL-HSEQ-POL-HS-03 – Health & Safety Policy
- 4TL-HSEQ-POL-DAA-04 – Drug and Alcohol Policy
- 4TL-HSEQ-POL-MV-05 – Motor Vehicle Policy
- 4TL-HSEQ-POL-SM-06 – Social Media Policy
- 4TL-HSEQ-POL-IT-07 – Information Technology Policy
- 4TL-HSEQ-POL-DP-08 – Data Protection Policy
- 4TL-HSEQ-POL-HUR-09 – Human Rights Policy

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Ashley Peat
General Manager

12/01/2022

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