

ROTARY DRILLING CO. LTD. BUSINESS PARTNER CODE OF ETHICS

Dear Business Partner,

ROTARY Drilling Co. Ltd. Business Partner Code of Ethics is an abstract of ROTARY Drilling Co. Ltd. Code of Ethics and contains the norms of ethics we consider particularly important in our business relations, and we also expect our business partners to comply with these norms. Business partners include suppliers, customers and other contracted partners of ROTARY Drilling Co. Ltd.

1. **Communication** - We expect our business partners to follow the strictest code of conduct in all verbal and written communication. Business partners shall handle information related to business partners as confidential.
2. **Statements and reports** - Business partners shall never compromise the integrity of financial statements and reports.
3. **Assets** – Business partners shall assume responsibility for ensuring the integrity, adequate and economical use of ROTARY Drilling Co. Ltd. property.
4. **Intellectual products** – Business partners shall respect that valuable, confidential ideas, strategies and other types of business information created or developed at ROTARY Drilling Co. Ltd. represent company property, and in certain cases they are under the protection of intellectual property law.
5. **Insider trading** – Business partners shall not unlawfully use insider information for material gain.
6. **Human rights** – ROTARY Drilling Co. Ltd. partners shall respect their employees' freedom of religious belief and assembly, their right to rest, free time and regular paid leave, and shall commit themselves to implementing a fair policy of employment and remuneration in compliance with applicable laws.
7. **Avoidance of discrimination** – ROTARY Drilling Co. Ltd. business partners shall not discriminate against anybody on the grounds of sex, marital status, age, ethnic origin, colour, religion and political conviction, disability or sexual orientation.
8. **Harassment** – ROTARY Drilling Co. Ltd. business partners shall not engage in behaviour that could be characterised as offensive, intimidating, malicious or insulting.
9. **Forced and child labour** – ROTARY Drilling Co. Ltd. business partners shall not tolerate any form of forced, bonded and child labour.
10. **Health, safety and environmental protection (HSE)** – ROTARY Drilling Co. Ltd. business partners shall comply with the relevant health, safety and environmental protection laws and regulations.
11. **Corruption** – ROTARY Drilling Co. Ltd. business partners shall commit themselves to conducting business free of any and all forms of corruption and fraud, including the rejection of propositions or attempts made in favour or on behalf of their employees or organisations and aiming at payment of unfair amounts.
12. **Conflicts of interest** – ROTARY Drilling Co. Ltd. business partners shall not employ persons who are employees of any ROTARY Drilling Co. Ltd. company and shall not allow them to acquire property or share in their companies.

13. **Fair competition** - ROTARY Drilling Co. Ltd. business partners shall conduct their operations in accordance with the norms of fair competition, and in conformity with applicable competition laws. It does not support the unethical practice of chain debts.
14. **Products and services** - ROTARY Drilling Co. Ltd. suppliers shall provide high quality and safe products and services; supply timely, true, reliable, precise and clear information.

ROTARY Drilling Co. Ltd. business partners shall ensure that every stakeholder is informed of the above expectations and their application. Business partners shall immediately inform ROTARY Drilling Co. Ltd. on any breach of the Code of Ethics and the implementation of corrective actions.

If norms of the ROTARY Drilling Co. Ltd. Business Partners Code of Ethics are permanently and substantially breached, ROTARY Drilling Co. Ltd. will terminate its business cooperation with the business partner concerned.

In addition to ensuring compliance with the above norms, ROTARY Drilling Co. Ltd. business partners shall also strive for better understanding the entire content of the Code of Ethics and ensuring compliance with the Code, irrespective of the application of legal consequences stipulated under contracts which otherwise apply. ROTARY Drilling Co. Ltd. will encourage its business partners to apply and follow the above provisions throughout the entire chain of their own suppliers, subcontractors and business partners.

Should you have any questions or complaints concerning ethics, or wish to report any unethical conduct, please contact ROTARY Drilling Co. Ltd. Ethics Officer.

Mailing address: ROTARY Drilling Co. Ltd. Ethics Officer, H-8800 Nagykanizsa, Erzsébet tér 22.

Email: etikaibizottsag@rotarydrilling.hu

We request you to support our efforts aiming at ethical business conduct!

ROTARY Drilling Co. Ltd.