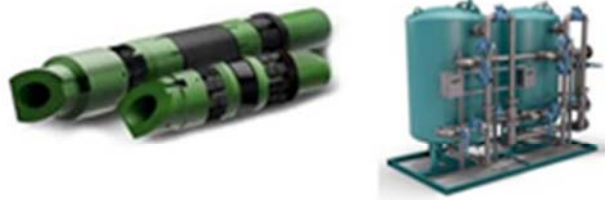


JeFrayn Energy Services Code of Conduct



1. OUR VALUES
2. OPERATION ETHICS
3. BUSINESS ETHICS
4. TEAM ETHICS

JUNE 19

JeFrayn Energy Services Ltd
Authored by: Francis Yappi

Document Control & Compliance

DOCUMENT CONTROL

- Directors, officers, Employees shall ensure they are using the most updated version of our Code of Conduct posted on Company Website.
- This document is the original version of JeFrayne Energy Services Ltd Code of Conduct and was approved by JeFrayne Energy Services Managing Director, Francis Yappi
- This code of Conduct is effective 1st of June, 2019.

DOCUMENT SCOPE, COMPLIANCE AND ACCOUNTABILITY

- Observance of this code is expected in letter and spirit and applicable to Directors, Officers and Employees.
- **Any intentional or unintentional violation of any of the policies of this code could be subject to disciplinary action up to and including termination. The individual could also face personal financial and criminal liability if applicable laws are violated.**
- Any waiver, deviation or exception to the Code of Conduct must be approved according to JeFrayne Energy Services Ltd requirements. In case of doubt or if where is no designated approver, the company Legal must approve the waiver, deviation or exception.
- **The Board of Directors must approve any waiver, deviation or exception of this Code of Conduct for Directors and Officers.**
- Any suspected or evidenced non-compliance with this Code of Conduct must be reported. Reporting may be conducted to management and also through the legal or finance groups. If confidentiality is any concern, reporting can be made online at ethics@jefraynes.com.
- **Not reporting a suspected or evidenced non-compliance with this Code of Conduct could also result in disciplinary action.**
- There will be no retaliation for good faith reporting of suspected or evidenced noncompliance or deviation from our Code of Conduct. Disciplinary action may be taken for any intentional reporting of false information or fact related to compliance with the Code.
- Compliance with this Code of Conduct will be enforced by regular management communication sessions, online and in person training.

Content

- Managing Director Statement
- Our Values
- Our Policies
 - Operation Ethics
 - Policy 1: HSE Policy
 - Policy 2: Driving
 - Policy 3: Service Quality
 - Policy 4: Personnel and Assets Security
 - Policy 5: Information Security
 - Business Ethics
 - Policy 6: Anti-Corruption
 - Policy 7: Conflict of interest and Donations
 - Policy 8: Ethics and Business integrity
 - Policy 9: Data Integrity
 - Policy 10: Confidentiality
 - Policy 11: Trade Control Compliance
 - Team Ethics
 - Policy 12: Workplace Harassment
 - Policy 13: Substance Abuse
 - Policy 14: Financial Transactions and Reporting
 - Policy 15: Gifts and Entertainment
 - Policy 16: Non-compete and intellectual property
 - Policy 17: Non-discrimination Policy
 - Policy 18: Crisis management

Managing Director Statement

JeFraysn Energy Services Business Fundamentals

I would like to share with you the below business principles that will guide our business principles on all our actions.

- **Customer Focus:** Our customers are our main priority and we understand that bringing added-value to their solutions must remain our ultimate goal. This is the inspiration of JeFraysn Energy Services Ltd. We are a customer-focused organization that brings fit-for-purpose ideas, technologies and solutions to our clients. We take pride in providing quality services to our customers and will deliver products and services that exceed industry standards. We want to be recognized as the best service company when it comes to service delivery.

- **Safety and Social Focus:** We act and operate in Canada with a world wide expansion aim and have a clear role to play in the community in where we are established. We will employ the best talent, strive to increase our safety footprint, abide with local regulations and policies to serve local operations. We will deliver our services in the most ethical way and be in full compliance with international and national policies/laws and regulations. Accountability, Ethics, Efficiency and Integrity are the cornerstones to JeFraysn Energy Services Ltd, and will maintain our outstanding reputation by doing the right thing, the first time, all the time. You can view our full Code of Conduct here.

- **People Focus:** At JeFraysn Energy Services Ltd. our goals are ambitious and growth our ultimate focus. We will be pin pointed to our team development and motivation. Our management team along with our employees will strive to excel and deliver the best quality services. We are committed to building a strong corporate culture through integrity, engagement opportunities for our employees.

There is nothing more important than safety and we will empower our employees to align with safety leadership across all levels of the organization. As such, every JeFraysn Energy Services employee is fully empowered to stop any activity if the operating risk cannot be brought below acceptable and manageable levels.

As we are moving forward, we will capitalize on the strengths of our organization. We see an increasing number of opportunities in the Alberta region amid an industry that is showing signs of recovery. This is a perfect time for our start up JeFraysn Energy Services Ltd. As such, we are counting on all JeFraysn Energy Services employees for their commitment and support in driving each of these business principles to make JeFraysn Energy Services Ltd. a leader in the oil and gas service industry.

We look forward to building a strong and bright future together.

Our Values

Our Values

- **Customer Focus:** Our customers are our main priority and we understand that bringing added-value to their solutions must remain our ultimate goal.
- **Safety and Social Focus:** Our Commitment to develop local talent, economy, promoting local community interest, protecting environment and following local regulation and policies at a highest standards of Ethics and Integrity.
- **People Focus:** We are committed to building a strong corporate culture through integrity, engagement opportunities for our employees.

Our Policies

OPERATION ETHICS

JeFrayn Energy Services Ltd recognizes that an essential factor in its business success is the emphasis it places on Health, Safety, and Environment (HSE). HSE is a fundamental element of all of our business activities. This commitment is an integral part of the service delivery workflows encompassing the organization from the lowest levels to the highest, including all contractors. The leadership teams have full responsibility, and accountability to drive this culture by ensuring effective implementation of our standards. In addition, we must comply to legal, international, national and customer's standards and requirements whichever are more stringent. Our ultimate aim is for JeFrayn Energy Services Ltd to be recognized in the region as the leader in HSE.

Health Safety and Environment Policy

We will demonstrate our commitment by:

- **Setting measurable HSE objectives** as part of our business performance and monitoring them for continuous improvement.
- **Driving HSE behaviors** with a no defect mind set and rewarding outstanding HSE performance and initiatives.
- **Eliminating undesirable HSE events and accidents** with a strong reporting culture and effective investigation of near misses.
- **Training our workforce and contractors** on our HSE standards to prevent losses.
- **Effectively communicating** our HSE policies, standards, programs and performance.
- **Protecting the health, safety and security of our people and contractors at all times.**
- **Meeting legal, international, national and customer standards and requirements.**
- **Protecting the environment** through spill prevention, reduction of natural resource consumption and emissions, and the reduction and recycling of waste.
- **Ensuring HSE is considered while designing,** engineering and deploying our services and products.
- **Maintaining an updated response plan** to minimize the effect of any business disruption or crisis.

Every JeFrayn Energy Services Ltd employee and contractor are accountable to ensure compliance with this policy. We will update this policy regularly to ensure that it still reflects our strong commitment and focus on HSE.

OPERATION ETHICS

The prime objective of JeFraysn Energy Services Ltd Management is safe and efficient operations. Driving represents the highest risk to this above all other activities.

Accordingly, the company has adopted a set of principles as a policy to minimize the risks and protect its employees, their families, customers, contractors, third parties, and the communities affected by its operations.

This policy is applicable to all JeFraysn Energy Services affiliated bases, field operational sites, head offices, contractors operations and third parties providing transportation services as part of product and service delivery.

Furthermore, JeFraysn Energy Services Ltd strongly encourages all of its employees to follow these principles, as applicable, while driving their personal vehicles in order to extend this safety initiative to their families.

Driving Policies

- **Driver Training:** JeFraysn Energy Services Ltd requires that all drivers maintain a valid license according to local regulations. All JeFraysn Energy Services Ltd drivers, established contractors, and third-party transportation rental vehicle drivers must attend Driving training and a practical evaluation prior to driving for any business purpose.
- **Journey Management:** Each JeFraysn Energy Services Ltd Business unit must have a Journey Management Plan to manage the driving risk and obtain management approval. The Plan should include specifics on Fatigue Management, Night Driving, Speed Limits, Traffic Laws, Customers procedures. **Personal Vehicles:** The use of personal vehicles for any JeFraysn Energy Services Ltd operational field trips is not allowed.
- **Pre-trip Vehicle Inspection and Load Securement:** All drivers are responsible for their pre-trip vehicle inspections and obligated to secure their load in a safe and lawful manner.
- **Seat Belts:** All occupants, including the driver of any vehicle must wear a seat belt at all times while driving.
- **Mobile Phones:** The use of mobile phones and hands-free devices is not allowed while the vehicle is in motion for any JeFraysn Energy Services Ltd related business purpose.
- **Substance Abuse and Smoking:** Drivers must not drive under the influence of alcohol or drugs, or any other prescribed medications that could impair their performance. Smoking is not allowed in any JeFraysn Energy Services Ltd vehicles.
- **Driver Performance Monitoring:** Each JeFraysn Energy Services Ltd vehicle, and established contractor or long-term rental vehicle shall have a monitoring system installed in the vehicle. This information will be used to proactively manage and improve driving performance. JeFraysn Energy Services Ltd equally expects all passengers of vehicles assigned to company operations as part of their duty to ensure that respective drivers abide by these principles. Any violation or unsafe behavior is sufficient cause to stop the trip and report to management.

OPERATION ETHICS

One of the JeFraysn Energy Services Ltd Business fundamentals is to deliver products and services meet or exceed our customers expectations and requirements and objectives. At JeFraysn Energy Services Ltd, every employee should be motivated by a constant quest for excellence in order to provide best-in class Service Quality at all times.

SERVICE QUALITY

Our commitment to Service Quality relies on the following:

- **Competent Resources:** Providing certified and fully operational assets as well as motivated, trained, competent and experienced personnel to our customers.
- **Operating Standards and Processes:** Developing and implementing work flows to cover all aspects of our operations cycle and ensuring procedural adherence of the same.
- **Operational Excellence:** Executing flawlessly to always meet and exceed customer's objectives; ensuring operational risks are properly managed with actions to reduce residual risks to negligible levels; and recognizing outstanding performance.
- **Auditing and Continuous Improvement:** Regularly assessing our performance; the effectiveness of our quality processes and our compliance levels, and taking appropriate actions to continuously improve our solutions, products and services.

All JeFraysn Energy Services Ltd employees and contractors are accountable to ensure compliance with this policy. We will review this policy regularly to ensure that it still reflects our strong commitment and focus on Service Quality

OPERATION ETHICS

One of the main responsibilities of JeFraysn Energy services Ltd Management and leadership teams is to protect JeFraysn Energy Services' personnel and assets wherever we operate.

This policy is applicable to all bases, field operational sites, head offices, contractors operations and third parties providing Products and Services for JeFraysn Energy Services Ltd.

Personnel and Asset Security Policy

We will protect our Personnel and Assets by addressing the following:

- **Security Risk Assessment:** It is mandatory to understand and manage security risks before engaging in any operation in a given country. This shall be done as part of due diligence for new operations and regular reviews for on-going operations. Under no circumstance including business reasons, shall personnel and assets be exposed to unmanageable security risks.

- **Security Procedures:** Each JeFraysn Energy Services Ltd office and operational base shall have a security procedure tailored to the specific country and location risk profile. This procedure shall be updated regularly and effectively communicated by security training, briefings and inductions.

- **Emergency Response Plans:** It is essential for every JeFraysn Energy Services Ltd office and operational base to have an Emergency Response Plan updated and drilled regularly, according to the country and location risk profile.

All JeFraysn Energy Services Ltd employees must comply with this policy and ensure that deviations are reported to upper management.

OPERATION ETHICS

Dealing with sensitive and confidential information is part of JeFraysn Energy Services Ltd activities. Employees who have access to, or work with company proprietary information as well personal information of others employees must take all necessary measures to protect these data.

Information Security Policy

We will protect our Information by:

- **Information Technology Systems Security:** We will ensure our IT systems are protected by latest security systems and software, and backups and business continuity workflows shall be in place to avoid any business disruption due to loss of data.

- **Mobile Devices and Offices Access Control:** In every JeFraysn Energy Services Ltd location and office, all measures shall be in place to ensure that company mobile devices (laptops, phones) are secured at all times, Including while travelling.

- **Employee Training and Accountability:** JeFraysn Energy Services Ltd Employees shall be trained on how to handle, manage, store and dispose Customer and company proprietary and sensitive information.

All JeFraysn Energy Services Ltd employees must comply with this policy and ensure that deviations are reported to upper management.

BUSINESS ETHICS

It is JeFrayn Energy Services Ltd policy to conduct its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in our dealings wherever we operate. We are committed to implementing and enforcing effective programs to counter improprieties and ensure anyone doing business on behalf of JeFrayn Energy Services Ltd has sufficient awareness to conduct themselves accordingly.

Anti-Corruption Policy

We will demonstrate our Commitment by:

- No providing or promising to provide any payment of money, gifts or hospitality with the purpose of inducing or influencing behavior to a public official in the performance of his duties to assist in retaining business or securing any improper business advantage for or with the Company.
- No making nor accepting facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favor or advantage. All employees must avoid any activity that might lead to or suggest that a facilitation payment or kick back will be made or accepted by us.
- Not making contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

This policy does not prohibit giving and receiving promotional gifts of nominal value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to or be construed as bribery. All employees must comply strictly with JeFrayn Energy Services Ltd ethics policy in respect of gifts and hospitality and the associated the financial authorization procedures. If any question exists as to the appropriateness of a gift or hospitality, guidance from JeFrayn Energy Services Ltd Legal should be sought.

All JeFrayn Energy Services Ltd employees are accountable to ensure compliance with this policy.

BUSINESS ETHICS

It is the policy of JeFrayn Energy Services Ltd that directors, officers, and all employees are expected to avoid any actual or apparent conflict between their own personal interests and the interests of the Company. A conflict of interest can arise when one takes actions or has personal interests that may interfere with his or her work objectives.

Conflict of Interest and Donations Policy

- **Directors, Officers, and Employees are expected to avoid situations where an employee's own personal interest may interfere in any way the Company's interest.** All are expected to refrain from taking for themselves opportunities discovered through their use of corporate assets or through their positions.
- **Business dealings with family members or with a business where a family member plays a significant role should be avoided.** Conflicts of interest may arise when an employee or his or her family members receive improper personal benefits as a result of their dealings with the Company.
- **Investments over seven percent in an outside company** could create a conflict of interest if that company is a competitor, supplier, customer or other related party. These situations should be avoided and, in the occasion where essential, should be approved in writing by JeFrayn Energy Services Ltd Legal.
- **Other employment outside of the Company should be evaluated** as a possible conflict of interest as it could detrimentally affect performance and or responsibilities.
- **Donations, where we made them, shall be strictly controlled and approved** by upper Management and finance department. No donation of any sort should be done without approval of executive management.
- **All JeFrayn Energy Services Ltd employees shall make prompt and full disclosure to their supervisors** any situations involving a possible conflict of interest. Such situations should be reviewed with JeFrayn Energy Services Ltd Legal.

Compliance with this policy is a condition of employment at JeFrayn Energy Services Ltd

BUSINESS ETHIC

JeFraysn Energy Services' Ltd policy is to comply with all applicable governmental and customer, legal and other requirements wherever it conducts its business. The corporation prides itself on the integrity of its team. A core value since inception, JeFraysn Energy Services Ltd strives to grow strategically and deliver exceptional value to its shareholders safely, efficiently, and ethically. Its leadership teams are entrusted to conduct their business honestly and honorably in the pursuit of operational excellence.

Ethics and business Practice Policy

All JeFraysn Energy Services Ltd employees must perform their jobs in compliance with all applicable laws, rules and regulations of the jurisdictions within which the Company operates. Employees should demonstrate they comply with this policy by:

- **Strictly following our policies, procedures, standards and guidelines to deal ethically** with our customers, suppliers, contractors, government agencies, and fellow employees.
- **Respecting our competitors and their offerings;** vigorously and fairly competing with them, and never colluding to gain an unfair industry advantage.
- **Assigning responsibilities based on competency** and trust, and demanding personal accountability.
- **Promoting transparency** and exercising due care in the manner in which we work and how we obtain our results.
- **Honestly and accurately reporting and tracking** all of our business activities.
- **Disclosing to executive management** any unscrupulous or material information as and when it may become available.
- **Conducting periodic internal and external audits** of all departments to verify our obligations.

Any deviation from this policy should be reported at ethics@jefraynes.com. We shall review this policy regularly to ensure it still reflects our business environment and our strong commitment for conducting business in most ethical manner.

BUSINESS ETHICS

JeFraysn Energy Services' Ltd policy is to preserve the integrity of all customer and internal data, whether received or generated for the duration of the authorized use, or as legally required.

At JeFraysn Energy Services Ltd, our customers engage and entrust us to execute a service, capture and evaluate operational data, and document the results. Often, the customer may also discreetly share data which they consider commercially sensitive. It is important therefore, to ensure that data is securely handled to preserve that confidentiality.

Data is routinely captured and recorded throughout all business processes. As process integrity and efficiency are important metrics to any organization, it is imperative that all of our employees understand their obligation and comply with the need for records to be correctly maintained.

Data Integrity Policy

We will enforce this by:

- **Putting processes** in place to manage and control customer and internal data.
 - **Creating awareness around data integrity** by training and communication campaigns.
 - **Only requesting and accessing customer data** when required and only for legitimate business purposes.
 - **Taking all reasonable measures** to protect the confidentiality of any trusted or sensitive information of our customers.
 - **Immediately notifying our customers** of any unintentional access or wrongful receipt of proprietary data.
 - **Sharing customer data internally only with those employees** whose job roles require access to such data.
 - **Diligently preparing and accurately recording** to the highest quality data and business records as required.
 - **Securely retaining and appropriately disposing of customer data** where and when required to do so.
 - **Never preparing inaccurate records, or tampering or altering data** in an attempt to conceal potential wrongdoings.
 - **Defining clear accountability lines** with regards to handling, generating, transmitting, receiving, storing and disposing customer and internal data.
- Every JeFraysn Energy Services Ltd employee and contractor is accountable to ensure compliance with this policy. We will update this policy regularly to ensure that it still reflects our strong commitment and the business conditions.

BUSINESS ETHICS

All JeFraysn Energy Services Ltd Directors, Officers and Employees shall undertake to keep secret all technical, commercial and financial information concerning the aims and activities of the Company and its affiliates, of which they gained knowledge during the course of their employment within the Company.

Confidentiality Policy

Information, written or otherwise, regarding the Company's business, including but not limited to information regarding customers, employees, costs, prices, earnings, products, operations, potential acquisitions, and other arrangements, is presumed to be confidential information. It should be considered that any non-public information shared by the Company, its suppliers or customers is confidential, whether or not it is marked.

- **Directors, Officers, and Employees shall not, without the Company's prior written consent, publish or disclose** to anyone outside of JeFraysn Energy Services Ltd or use in any other than the Company's business, any confidential information, whether during the course of their employment with the Company or thereafter.
- **Directors, Officers, and Employees as well as relatives and associates are prohibited from buying or selling Company securities by law if they possess material, non-public information (MNPI).** Transactions that may be thought to be necessary or justifiable are not an exception and good judgment exercised to avoid the appearance of sharing or taking action when in possession of MNPI.
- **Directors, Officers and Employees undertake not to reproduce copy or take excerpts from any Company document** available to him or her for any purpose other than those involving the activities of the Company. Any breach of confidentiality will be treated as misconduct and would be subject to disciplinary or legal action.

Compliance with this policy is a condition of employment and failure to observe it may result in legal difficulties up to and including criminal penalties under insider trading laws.

BUSINESS ETHICS

JeFraysn Energy Services' Ltd policy is to comply with all applicable import and export trade controls in all countries that it operates.

As an international upstream oilfield services company our operations span the globe. With ambitious expansion objectives we routinely transfer material further afield, often across many borders so it is imperative that we follow strict guidelines when we are getting the job done.

Trade Control Compliance Policy

All JeFraysn Energy Services Ltd employees shall demonstrate their commitment by:

- **Complying with all applicable import and export laws, rules, regulations and licenses** controlling the shipment or movement of any products or services wherever we do business.
- **Complying with all applicable laws and regulations** related to the transmission of technical data or software products wherever we do business.
- **Complying with all applicable economic and trade sanctions or restrictions.**
- **Conducting all of our business ethically** and within the framework of all applicable antitrust and competition laws.
- **Refraining from knowingly** circumventing any laws, rules, regulations and licenses whilst pursuing any company business activity.
- **Remaining up to date with all laws,** rules, regulations and licenses related to trade and movement of goods as may be required.

All JeFraysn Energy Services Ltd employees and contractors are accountable to ensure compliance with this policy. We shall review this policy regularly to ensure that it still remains current with our expectations and obligations.

TEAM ETHICS

JeFraysn Energy Services Ltd is committed to promote and ensure a working environment where employees are treated with respect and dignity enabling them to achieve their full potential.

Harassment detracts from a productive working environment and can affect the, morale, confidence and performance of employees.

For the purpose of this policy, harassment is defined as any unwelcome comments (written or spoken), acts or conducts that violate an individual's dignity, and/or creates an intimidating, hostile, degrading, humiliating or offensive environment according to that individual.

Workplace Harassment Policy

JeFraysn Energy Services' Ltd policy on harassment is affirmed to provide an environment where it is clear that harassment is unacceptable and is viewed as a gross misconduct. This acts to reduce the chance that harassment will occur in the first instance, and provide a mechanism to resolve complaints where proven that harassment has occurred.

Harassment can occur on the grounds of race, religion, sex, age, disability, bullying, etc. and it can be in any form including verbal, physical, online or others.

Harassment may not necessarily be confined to the behavior of senior staff towards more junior staff, and can take place between colleagues at the same level, or involve staff behaving in appropriately towards more senior staff.

This policy applies to all JeFraysn Energy Services Ltd Employees and contractors, and relates to any harassment committed by and between employees and/or contractors. All employees are accountable to ensure compliance with this policy and to report any non-compliance at ethics@jeFraysnes.com.

TEAM ETHICS

JeFraysn Energy Services Ltd is committed to a safe, healthy, productive, and a substance abuse free workplace for all employees.

Substance Abuse Policy

The Company recognizes that:

- Alcohol, drug, inhalants or any other form of substance abuse by employees that will or have a potential to impair their ability to perform properly is strictly prohibited as it will have serious adverse effects on the safety, efficiency and productivity of other employees and the Company as a whole.
- The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or un-prescribed controlled drugs on company business or premises, is strictly prohibited and is grounds for termination of employment. Possession, use, distribution, or sale of alcoholic beverages on company premises is not allowed.
- Being unfit for work because of use of drugs or alcohol is strictly prohibited and is grounds for termination of employment.

All JeFraysn Energy Services Ltd employees are accountable to ensure compliance with this policy.

TEAM ETHICS

At JeFraysn Energy Services Ltd all transactions shall be recorded in conformity with Canadian Generally Accepted Accounting Principles (GAAP) and shall be described accurately in the books of account or in supporting documents.

Financial Transactions & Reporting Policy

All company assets and liabilities must form part of the books of account included in the company's financial statements, and we shall ensure that all books of account and supporting documents are fully available for audit by internal auditors and/or independent external auditors.

The Company must ensure that any reporting or disclosure of financial information, whether inside the company or to the public, is made by an authorized personnel as well as its, full, fair, accurate, timely, understandable and approved by the appropriate authority of the company and that this reporting or disclosure complies with all applicable laws, regulations and JeFraysn Energy Services Ltd Financial Procedures.

The Company board of Directors shall review this policy regularly to ensure that it still remains current with our expectations and obligations.

TEAM ETHICS

It is the policy of JeFraysn Energy Services Ltd to base commercial decisions on commercial criteria only and remain immune to favor. This policy serves to fosters constructive and fair relationships with organizations and individuals doing business, or seeking to do business, with JeFraysn Energy Services Ltd.

Gifts and Entertainment Policy

In many cultures, those constructive business relationships may include the exchange of incidental gifts and entertainment.

Directors, officers, and employees under their corporate capacities shall not accept any gifts that are more than a nominal value (Nominal value are those of less than US\$250) no more than once a year.

Should such gifts be inadvertently received, they need to be returned, with a note of thanks addressed to the vendor with a polite reminder of company policy.

Similarly, gifts shall not be given beyond the nominal value and not more than once a year.

TEAM ETHICS

JeFraysn Energy Services' Ltd policy is to ensure our employees do not compete against us and comply with intellectual property rights of all parties.

At JeFraysn Energy Services Ltd, we understand that continued access to well-trained people, and the research and development of products, techniques, and equipment are the competitive corner stones of our success in the industry. Often we are either trained, or entrusted with access to such intellectual property so it becomes imperative that we ensure that the company continues to respect the ownership, and both competitive and confidentiality rights to our collective advantage.

Non-Compete & Intellectual Property Policy

All JeFraysn Energy Services Ltd Should respect this policy by:

- **Not using any using any of company data to compete against the company** in any manner whatsoever
- **Not disclosing any company confidential or sensitive information** to any external source without relevant and documented management approval.
- **Understanding and agreeing that all intellectual property** such as inventions, innovations, discoveries, improvements, or ideas conceived or developed as an employee of the company shall be considered the company's sole property.
- **Firmly protecting the company's** rights to its intellectual property.
- **Prohibiting the disclosure or misuse of the company's intellectual property.**
- **Requesting any applicable authorization prior** to using the intellectual property of others.
- **Ensuring that the company does not knowingly infringe** or disregard confidential obligations on any valid intellectual property rights of others.

All JeFraysn Energy Services Ltd employees and contractors are accountable to ensure compliance with this policy. We shall review this policy regularly to ensure that it continues to reflect our strong commitment and the business conditions.

TEAM ETHICS

It is the policy of JeFrayn Energy Services Corporation to provide equal employment opportunities in conformance with all applicable laws and regulations to all individuals who are qualified to perform the job requirements.

Non-Discrimination Policy

The Corporation administers its personnel policies, programs, and practices in a nondiscriminatory manner in all aspects of the employment relationship, including recruitment, hiring, work assignment, promotion, transfer, termination, wage and salary administration, and selection for training.

Managers and supervisors are responsible for implementing and administering this policy. For maintaining a work environment free from unlawful discrimination, and for promptly identifying and resolving any problem area regarding equal employment opportunity.

Individuals who believe they have observed or been subjected to prohibited discrimination should immediately report the incident to their supervisors, higher management, their designated Human Resources Department contacts or at Ethics@jeFraynes.com.

Individuals shall not be subjected to harassment, intimidation, discrimination, or retaliation for exercising any of the rights protected by this policy.

All JeFrayn Energy Services Ltd employees are accountable to ensure compliance with this policy.

TEAM ETHICS

JeFraysn Energy Services' Ltd Crisis Management policy is designed to effectively coordinate the use of resources to protect life and assets during and immediately following a major crisis or disturbance affecting our operations that cannot be controlled through routine, daily and normal channels, Operating Standards and procedures.

Crisis Management Policy

Our response to Crisis is built on the following:

Crisis Management Committee:

Every business unit must have a defined Crisis Management Committee. Composed of members of upper management, the committee provides general oversight for the entire planning process and meets regularly to address emergency preparedness, response and recovery issues.

Crisis Management Response Plans:

Our structured crisis management response plans outline steps on how to handle a crisis to protect JeFraysn Energy Services Ltd employees and assets as well as to mitigate the impact on our business. These plans include communication protocols, evacuation procedures, drills, resources planning.

All Business unit managers are responsible and accountable to ensure compliance with this policy.