

## ANTI-BRIBERY AND CORRUPTION POLICY

South Western Technologies and Oilfield services places a high value on ethical behavior. Corruption can threaten South Western's business by damaging our reputation and exposing the Company, and individual employees to significant fines, penalties and even jail term. As a South Western employee, you are representing our Company to the world. As such, all South Western employees should strive for the highest ethical business standards and feel proud of our Company. All South Western employees are responsible for always acting with integrity and complying with all applicable anti-corruption laws and South Western's Anti-Bribery Policy and Procedures. South Western has a zero tolerance on corruption and bribery, and any employees found in violation of anti-corruption laws, or South Western's Anti-Bribery Policy and Procedures, will be dismissed.

South Western's management is committed to sending a clear message to all employees, and all our business partners, that corruption and bribery will not be tolerated. Our Anti-Bribery Policy and Procedures extend to all South Western employees, and everyone we do business with, including agents, suppliers, distributors, consultants and any other third party acting on South Western's behalf.

South Western's Anti-Bribery Policy and Procedures outline permissible and non-permissible behavior to ensure compliance with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. South Western's Anti-Bribery Policy and Procedures prohibit all South Western officers, directors, employees, agents, or other parties we do business with, from:

Offering, promising, giving, or authorization of the giving of anything of value.

- To a Government Official or a private sector individual.
- For an improper or corrupt purpose.
- To obtain or retain business, or other improper advantage.

In addition, Company officers, directors, employees and agents, and any others acting on our behalf, or for our benefit, shall not request, agree to receive, or accept payment or any inducement to improperly perform any service, activity, or function for the Company. Violations will be subject to appropriate disciplinary action up to and including termination in addition to the legal consequences of applicable laws.

Chris Idisi

Managing Director & CEO

1<sup>st</sup> March 2021