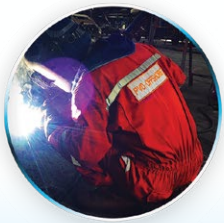
PETROVIETNAM
PV Drilling



PV DRILLING'S CODE OF CONDUCT

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LETTER FROM OUR PRESIDENT & CEO

Dear Fellow Employees,

Every day, we are proud of the commitment of "providing premium drilling and drilling-related services in the regional market and create value added for clients by delivering services with high quality at competitive prices" as our Mission Statement dictates. Our performance and safety records have been acknowledged by various customers and Organizations worldwide. Such acknowledgements have resulted in the trust that our customers have had for us thus far.

As a drilling company, we have relentlessly developed our people, management system and progressively engineered solutions that deliver the best quality of services and products to our customers while standing with our communities and stakeholders to ensure that we respect the rights and safety of our people, our environments as well as applicable laws and regulations. That is why our Code of Conduct are in place.

At PV Drilling, we live by our Core Values: People, Integrity and Professionalism. We recognize that we must be responsible for our customers, our employees and communities wherever we are located and make an impact. Our Core Values are, therefore, the compass based on which our Code of Conduct is formed. Our Code of Conduct ensures we hold ourselves as well as our conduct of business to a high standard. Our Code has so far set the foundation for our corporate culture framework and company policies and procedures all of which, in turn, provide guidance on expected behaviors.

We are expected to do what is right regardless of what our jobs are and where we are working. We act with highest integrity. We keep in mind that every of our action, word and behavior does matter. As we live our Core Values and observe our Code of Conduct, we are showing our care and respect towards our people, our communities, environment and laws and regulations.

I would like to encourage each employee to familiarize yourself with PV Drilling's Code of Conduct and use it, together with the PV Drilling Culture Handbook, as a guide to your daily business conduct. As the world gets more complex, volatile, uncertain and ambiguous, we must all remain vigilant and ensure that our actions and right behaviors are aligned.

Thank you very much for continuously living our Core Values and observing PV Drilling's Code of Conduct.

Sincerely,

NGUYEN XUAN CUONG
President and CEO

A.

GENERAL

PV Drilling's Code of Conduct ("Code") was built based on our core values and current Law and regulations. This Code is the guidelines for our behaviors and day-today conducts of business in order to pursue our vision of becoming **"an internationally reputable and reliable drilling contractor and drillingrelated services provider."**

1. SCOPE OF APPLICATION

All employees (hereinafter referred to as "We") who work at PV Drilling including the head office, representative offices, branches, subsidiaries, joint-stock, joint-venture and associated subsidiaries over those PV Drilling has control (hereinafter referred to as "PV Drilling"), are required to comply with the Code.

We communicate our Code to our customers, suppliers, partners, and we expect that they respect and appropriately comply with it.

2. OUR RESPONSIBILITIES

Our Responsibilities

We are all expected to read, understand, comply with our Code in everything that we do, every decision that we make, and in every place where we conduct our business.

It is our duty to raise our voice towards behaviors that do not comply with our Code or to report suspected violations constructively and honestly or to assist our direct supervisor or our compliance officer with their investigation when the safety of PV Drilling employees, reputation, assets, and interests are at risk.

It is our responsibility to communicate our Code to customers, suppliers, partners and explain the related laws and regulations for them to understand, respect and behave in accordance with our Code.

When we are in doubt of our action, just ask ourselves:

1. Do we have the right to do it?

2. Is our action consistent with our COC, PV Drilling's policy, and current Law?

3. Is our action aligned with PV Drilling's core values?

4. Does my action strengthen my reputation or PV Drilling's reputation if it is reported on public media?

If the answer to any of the questions above is "No", we should stop the action or seek for guidance from our immediate manager or from the compliance officer.

Responsibilities of managers

Managers must understand our COC thoroughly and promote the compliance of the COC in the workplace by acting as the role models. At the same time, we have to:

- Ensure that our subordinates understand their responsibilities and comply with our Code, PV Drilling's policy and the current Law;

- Take appropriate preventive actions to prevent misconducts; investigate and resolve reported misconducts which happen within our function;

- Maintain an environment in which everyone feels comfortable to report suspected violations of our Code by listening, explaining and assisting employees in making appropriate decisions or by reporting to higher management or the compliance officer ethical issues which have not been resolved and by keeping the identity of any individual who reports a misconduct confidential;

- Protect employees from any act of retaliation or any threats when they constructively and objectively report a COC related concern or when they participate in an investigation.

Responsibilities of the Compliance Team

- Organize and communicate our Code to all employees and ensure that the Code is easily accessible to every employee;

- Create and maintain communication channels related to the compliance of our Code;

- Attend to reports, offer guidance, investigate and take appropriate disciplinary actions against violations of the Code;

- Collect and analyze input and respectively update the Code periodically or when required;

- Keep all reported information confidential;

- Take appropriate measures to protect employees from any act of retaliation when they make a constructive and objective report or participate in an investigation.

3. REPORTING CONCERNS OR SEEKING GUIDANCE

When you need guidance or need to report a suspected violation of our Code, please approach the following contacts:

- Your immediate supervisor (manager): it is recommended that you look for the guidance and report your concerns to your immediate manager because your manager is either familiar with your work or is possibly responsible for dealing with your concern.

- The compliance officer: you can communicate directly or email to the following contacts:
  Telephone: + 84 91 1215355
  Email address: coc@pvdrilling.com.vn

PV Drilling encourages everyone's participation in raising all COC concerns for our knowledge and actions in a timely manner. However, it should be noted that false reporting is a violation of the COC.

The COC Compliance Hotline

The compliance officer ensures that the hotline is active at all times and is attended in both Vietnamese and English languages. We can discuss any concern by calling the hotline at

84 911 21 53 55
coc@pvdrilling.com.vn

When calling the COC hotline, your identity will be kept confidential and will only be shared to the persons responsible for the investigation.

4. ZERO TOLERANCE FOR RETALIATION

The Management of PV Drilling will not tolerate any act of retaliation to ensure that every employee feels comfortable to raise questions and concerns to protect our core values.

An individual is considered as complying with our Code when he/she makes, in good faith, a constructive report on what they reasonably believe or suspect as non-compliance with the Code, PV Drilling's policy and current Law or looks for guidance on a specific course of action or participates in a related investigation. Therefore, any act of retaliation against such individual is a serious COC violation which, if sufficiently proved, shall lead to appropriate disciplinary actions.

Retaliation can take on various forms, either directly or indirectly, ranging from unfair treatment, coercion to any forms of reprisals against the individual who makes a report or assisting in an investigation. When an individual has the knowledge of actual or potential retaliation, he or she shall report it to the immediate supervisor or PV Drilling compliance officer.

5. VIOLATIONS AND DISCIPLINARY ACTIONS

Violations are any behaviors or actions that do not comply with our Code, PV Drilling's policy, the current Law or that encourage others not to comply for whatever reason. A violation is considered serious when it is an act of retaliation.

We need to report to our immediate manager or the compliance officer when we reasonably believe or have the basis for suspicion that an action is a violation, especially an act of retaliation. PV Drilling will always tolerate individuals who proactively report themselves of misconducts because it will help us to address the problem before it gets more serious.

PV Drilling will take appropriate disciplinary action, including dismissal or taking a lawsuit against violations. Besides, violations of our Code can also be violations of the current Law and may lead to sanctions and other forms of punishments by the Law.

B.

OUR CORPORATION

PV Drilling has been recognized as a pioneer of Vietnam drillers when it became the first Vietnamese company to own, operate and provide drilling rigs and drilling-related services. We have built trust and confidence with our customers in the drilling market through our mission of providing drilling and drilling-related services in Vietnam as well as in the international markets by constantly applying advanced drilling technologies, cutting-edge drilling equipment and tools, and successfully developing drilling-related services.

MISSION:

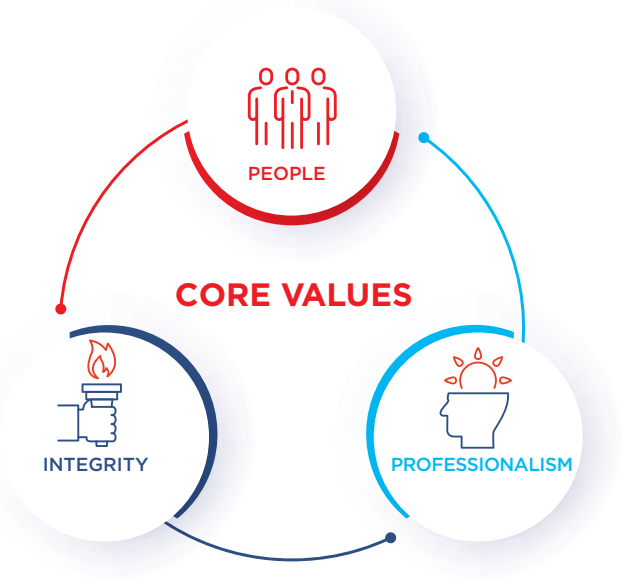
"Becoming a leading regional drilling services provider and drilling contractor, creating great value added for clients by delivering premium services at competitive prices."

VISION:

"To be an internationally reputable and reliable drilling contractor and drilling-related services provider."

PEOPLE

- Maintain positive workplace relationship with each other.
- Nurture passion by sharing knowledge, experience, ideas and information with each other.
- Create a positive workplace environment where every employee can learn, contribute, and excel in his/her field of work together with the continuous development of PV Drilling.
- Ensure the safety of our people and our workplace.



INTEGRITY

- Always behave in accordance with the Law and our Code.
- Raise questions and concerns when we notice inappropriate conducts.
- Preserve PV Drilling as well as customers' assets.
- Being accountable for our own action.

PROFESSIONALISM

- Have the required skills and capability to do our work effectively and efficiently.
- Respect all commitments we have made and strive to generate the best results by taking suitable approaches and minimize costs.
- Constantly develop and innovate to create value added services for customers.
- Make decisions based wholly on the interest of PV Drilling and the long-term interest of our customers and investors.

6. BUILDING A POSITIVE WORKPLACE RELATIONSHIP

PV Drilling's success depends on every employee's commitments and focus on the common goal. In pursuing a positive workplace relationship, we need to:

- Always fulfil our duties and being accountable for our own actions;

- Share information and assist others to do their work. No one is allowed to place the individual's interest or the interest of his/her group above that of PV Drilling.

- Actively communicate to strengthen team's bond to generate better results;

- Offer sincere and constructive comments to others;

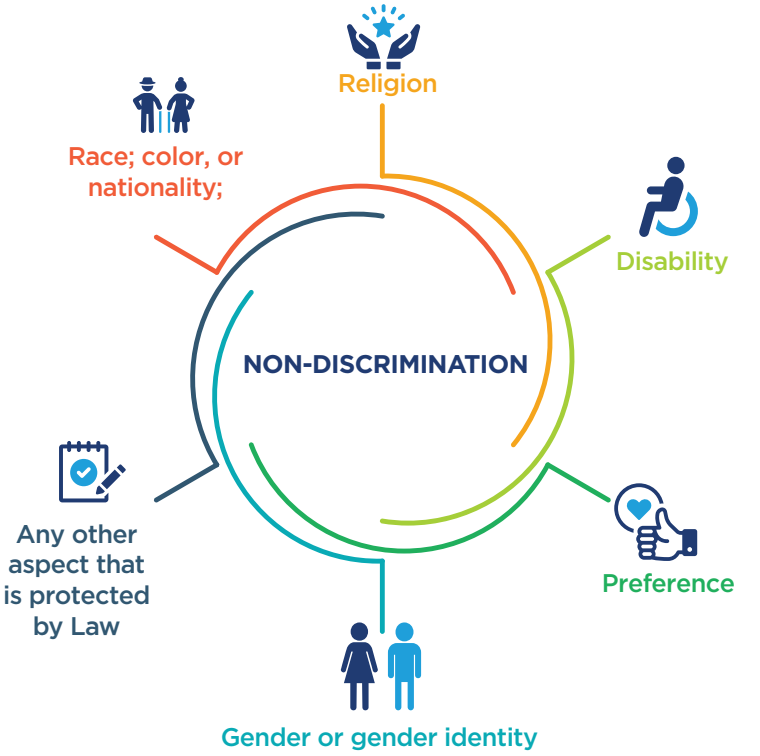
- Respect our direct supervisor and management by following their instructions and guidance;

- Promote, if being in management position, positive workplace relationships among the team members by demonstrating fairness and respect to all employees through day-to-day activities.

7. NON-DISCRIMINATION

Every employee at PV Drilling needs opportunities to cultivate our individual skills and competence in order to contribute to the overall success of PV Drilling. To achieve it, we must treat each other with fairness in such activities as recruitment, training, talent management, compensations and benefits, or any other human resources related activities.

All human resources management decisions must be made based solely on the individual's skills, competence and work results. Decisions must not be made based on such non-work related aspects as:



I think my supervisor might have discriminated an applicant because of his disability (which does not affect his work). My supervisor said that he will recruit someone else who is less competent. No one in my department knows this; however, if I report this, I am afraid that I will be retaliated. So, what should I do?

Your supervisor's behavior is classified as a discrimination act, and it is a violation against our Code. You should make a constructive report, in good faith, to the compliance officer, and PV Drilling will take appropriate action to protect you from any form of retaliation.

8. HARASSMENT-FREE WORKPLACE

PV Drilling wishes to create and maintain a workplace that is free from any form of harassment, offensive behavior, or disrespect. We must follow all harassment laws and regulations of Vietnam and of the countries in which PV Drilling operates business.

We need to understand that sexual harassment or any other forms of harassment are determined both by languages, gestures, behaviors of an individual and the unwelcome effects on another individual regardless of the intention of such individual. Hence, we must never use inappropriate languages, gestures, behaviors to offend others and create hostile and offensive workplace environment.

9. VIOLENCE-FREE WORKPLACE

We must never engage in any form of either spiritual or physical violence toward any employee in the workplace.

We must never engage in any act that makes others feel threatened. Violence then includes threats or acts of intimidation, threats, provocation, bullying, or similar acts.

We need to report to our immediate manager or the compliance officer when we know or have the basis for suspicion that there is actual or potential violence in the workplace.

10. COMPLIANCE WITH THE LAW

It is our duty to abide by the laws, laws and regulations of Vietnam and of the host countries. PV Drilling do not expect each employee to understand all the laws in details. However, it is important that we are aware of the laws related to our specific field of work or discuss them with your supervisor or subject matter experts.

PV Drilling's Legal Department is always available to provide information and legal advice on the Law and regulations that we need to know.

When facing a conflict between the Law and our Code, we must conform to the Law.

11. SAFETY, HEALTH, AND THE ENVIRONMENT

Our top priority is to comply with all HSEQ policies as part of our sustainable business growth.

We need to fully understand and follow the below principles in our day-to-day business activities:

- All risks and incidents that may harm our people, properties, assets, environment must be prevented and minimized.

- Always abide by the Law, other HSEQ regulations and policies.

- Enhance the customers' satisfaction by providing the safest and highest quality services via constantly improved procedures and skilled workforce.

- Ensure the safety of our people, assets, and the environment by enforcing the compliance with legal and company's HSEQ requirements.

WE MUST:

Report through either the PVD Observation or to the direct supervisor any safety concerns, unsafe behavior or conditions in the workplace.

Provide positive feedback and acknowledge safe behaviors in the workplace.

Stop any job if we believe that we either have not been trained to do it or are not capable of doing it or are not physically fit to do it safely, otherwise, it may cause harm to ourselves and our colleagues.

To ensure safety in all PV Drilling's business activities, we have the right to "Stop" any work at any of the company's premises: company's premises:

• All PV Drilling's employees, subcontractors, or visitors have the right to "Stop" any job if they think that it is either unsafe or possibly harmful to our people, environment and assets.

• The work that was "stopped" will not be permitted to resume unless all concerns and problems are identified, addressed and reasonably satisfactory to all related parties.

It is the duty of each employee to maintain and enhance safety. Each team leader, department head or head of business unit is responsible for providing explanations on the safety management issues within his/her department or unit.

?

There was a small chemical spill, approximately several litters, should I report the incident?

Yes, you should report the incident to your supervisor for him/her to investigate and prevent it from happening again in the future. It is to protect your own safety.

12. DRUG AND ALCOHOL POLICY

PV Drilling is committed to comply with all HSEQ policies to ensure both no incident and no harm to people, property and the environment. Hence, we are committed to:

- Neither consume drugs and alcohol in the workplace nor work under the influence of drugs and alcohol.

- Understand and comply with PV Drilling's drug and alcohol policy.

- Supervisors and managers, must explain, remind and guide subordinates and team members to follow the policy and be accountable to immediate superiors for violations by the team members.

PV Drilling will take appropriate disciplinary action against violations according to PV Drilling's regulations. Serious violations can also be brought to account as per the Law.

?

There was a small chemical spill, approximately several litters, should I report the incident?

Yes, you should report the incident to your supervisor for him/her to investigate and prevent it from happening again in the future. It is to protect your own safety.

13. ANTI-BRIBERY AND ANTI-CORRUPTION

We must comply with PV Drilling's anti-bribery and anti-corruption regulations as well as those law and regulations of Vietnam, international laws and those of the host countries.

14. COMPANY ASSETS

Within the scope of this Code, the term "asset" includes both tangible and intangible assets which PV Drilling have the right to possess, use and/or dispose. It should be noted that this includes the assets of PV Drilling's clients and partners which PV Drilling is authorized to manage and use.

We must use the company's assets according to PV Drilling's policies as well as other related guidelines in order to achieve the safety and cost-effectiveness for PV Drilling.

We use the Company's assets to carry out the Company's business and we must not use them for unlawful or personal purpose. The use of Company's asset either to serve the community or at the request of local authority or for any other purposes than business purposes must be approved by the Company's authorized person.

We are entrusted with the responsibility to safeguarding the Company assets from damages, losses or abuses and to return the assets to the responsible person before leaving the Company.

PV Drilling's assets include but not limited to:

- Brand name;

- Office, plants, furniture;

- Machinery, vehicle, tools and equipment, spare parts, materials (both currently used and damaged or liquidated);

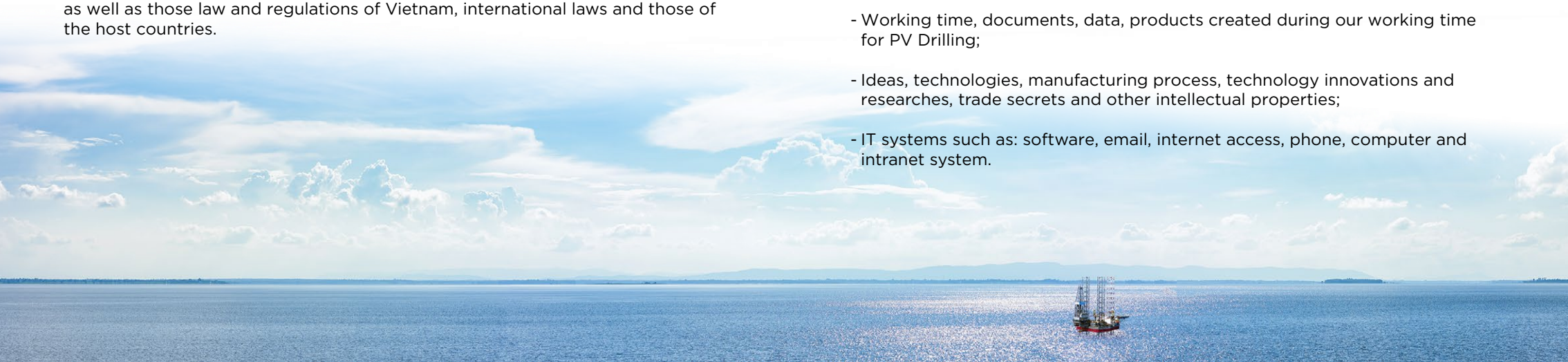
- Cash or treasury;

- Products, services;

- Working time, documents, data, products created during our working time for PV Drilling;

- Ideas, technologies, manufacturing process, technology innovations and researches, trade secrets and other intellectual properties;

- IT systems such as: software, email, internet access, phone, computer and intranet system.



15. CONFIDENTIAL INFORMATION

We all have the responsibility to keep, using reasonable measures, the non-public information to which we have access confidential because such information helps maintain PV Drilling's competitive advantage in the market. This responsibility continues beyond our employment with PV Drilling.

Never use confidential information for personal purposes. The confidential information is only shared with either the colleagues who need to know the information in order to do their jobs or when required by law or with those outside the Company upon being approved by the company's authorized person. You should also be aware that discussing confidential information at public places such as airports, restaurants, social networks and so on may put such information at risk of being disclosed.

PV Drilling's confidential information includes but not limited to:

- Important internal information and business strategies which have neither been officially released nor by authorized representatives nor by other means of media;

- M&A projects which are not subject to disclosure under the laws;

- Lists of suppliers, business partners and trade secrets between PV Drilling and clients or third parties;

- Technology related documentations and records, manufacturing process, current R&D programs, intellectual properties;

- Information of product and service price, financial data such as operational cost, revenue, profit prior to PV Drilling's official release;

- Salary, income or personal information of employees;

- Database, information collected, purchased or transferred to PV Drilling under forms of confidential agreement from its service providers, business partners, Petrovietnam.

We must be aware that such above-mentioned information may not always be labeled as "confidential" but still needs to be kept confidential. It may also have had part of it already released to the public but the rest still needs to be treated as confidential. Therefore, we should seek guidance from our manager or Compliance officer when we are not sure whether an information can be shared or not.

Any unauthorized disclosure of confidential information, either intentionally or unintentionally, must be immediately reported to the Compliance officer so that PV Drilling shall have appropriate measures to address associated potential risks.

We suggest that you refer to the Confidentiality Policy and PV Drilling's Records and Archives Regulation for further information and guidelines.

?

A former employee asked me to provide the bidding documentation of a supplier that he used to handle during his employment at PV Drilling, what should I do?

This information is considered "confidential" at PV Drilling, so you are not allowed to provide him. What you need to do is report to your manager or the Compliance officer.

c.

OUR CLIENTS AND BUSINESS PARTNERS

PV Drilling's relationships with its clients, business partners, service providers are among the key factors in realizing our vision of becoming an internationally reputable and reliable drilling contractor and drilling-related service provider.

The relationships are based on the interests and appropriate requirements of our clients. This is the guiding principle for us to pursue sustainable growth and ensure the best quality of our services. Specifically, this principle shall affect our code of conduct; the way we do our business, protect the environment, health and safety of our people and regulate the relationship with our business partners in order to increase PV Drilling's capability in responding to customer's needs.

PV Drilling is always responsible for the quality of our products and services delivered to clients both directly and through the third parties.

We make sure that we always comply with norms and standards of PV Drilling and of our clients and at the same time respecting those of our business partners.

16. COMPETITION AND FAIR DEALING

We must ensure that we fully comply with the Laws on Fair dealing of Vietnam and those of the host countries as we believe that fair dealing and fair competition shall ensure that we always deliver the services to our clients at the most competitive price. This is truly PV Drilling's mission.

We should comply with the following basic principles to ensure fair dealing. However, they do not cover all potential situations that we may encounter:

Compete fairly on the basis of price, product and service quality and we must provide our customers with accurate information on the quality and features of our products and services that PV Drilling can offer;

Do not misrepresent material facts about competitors' products and services. Alternatively, what we should focus on is the competitive advantage of our products and services which can better meet customer's expectation;

Do not engage in discussions, agreements with competitors on the below issues: product and service price, bidding arrangements, allocation of market and equipment supplies, restriction of supply of products and services or any other forms of agreements or practices that may restrict fair competition. In case we are attending a meeting, discussion or trade conference with the participation of competitors when discussions on the above topics occur, we should speak out strongly that such discussion is inappropriate. We shall immediately withdraw from the discussion and report to the Compliance officer.

Do not either collect trade secrets by illegal and unethical means from legitimate owners or from organizations that manage such information or use such trade secrets without the owner's approval or violate confidentiality agreement that we entered or illegally disclose the trade secrets of other legitimate owners;

The Competition laws are often complex and vary among different countries. Besides, the violation of such laws shall lead to PV Drilling and related parties facing serious consequences. Therefore, based on the scope of work that we are authorized to do, we have the responsibility to read and understand the competition laws and regulations for compliance. When in doubt, please contact the immediate manager or the Compliance officer for instruction and advice.

?

In a recent meeting with a customer, he said that he would send me the quotation from our competitor in order to ask for a discount because he thought that our price was tremendously high, should I get it?

You should ask the customer whether his company signed the confidentiality agreement with that competitor or not. If the answer is "No", you can use it but need to write down his name, date of receipt on the quotation to prove it is from legitimate source. However, in case this quotation is stamped or labeled as "confidential", then you should consult the Compliance officer before using it.

17. SERVICE AND PRODUCT QUALITY

PV Drilling's prestige is built on the quality of the products and services that meet customer's needs. To safeguard the customer's trust and PV Drilling's reputation, we need to make commitment to the quality of our products and services, specifically:

- Provide quality products and services as per the Quality Management System of PV Drilling;

- Think creatively in everything we do so that PV Drilling is always in leading position in terms of product and service quality. Continuously renovate the Quality Management System in order to create added value to our clients;

- Honor all PV Drilling's commitments on product and service quality;

- Immediately report quality issues to the immediate manager or to the person in charge of quality control at PV Drilling;

- Report all complaints, from any sources, about the quality of our product or service to the immediate manager and the HSEQ division within one working day after receiving the information;

- Fully understand and comply with the procedures and standards related to your work. You should consult your immediate manager in case you are not sure about how to comply with such procedures and standards.

18. SUPPLIER RELATIONS

We trust our network of suppliers selected with an aim to enhance PV Drilling's capability in meeting customer's needs through the provision of quality products and services at competitive price. It is important that all of our suppliers honor the commitments under this Code through their ethical business conducts. This is the key condition for becoming a PV Drilling's supplier.

Strategic or regular suppliers of products and services have to be evaluated and selected in accordance with PV Drilling's criteria. They are also required to be aware of, understand and comply with this Code.

19. CONFLICTS OF INTEREST AND ACT IN THE BEST INTEREST OF PV DRILLING

We are all responsible for acting in the best interest of PV Drilling and avoiding situations that may lead to conflicts of interest with PV Drilling.

Conflicts of interest happen when our personal interests or the interests of stakeholders with whom we have relationships with prevent us from acting in the best interest of PV Drilling or interfere with the interests of PV Drilling.

In reality, conflicts of interest may happen in various situations which may not be fully listed here. Below are some common situations where potential conflicts of interest may arise:

- Use PV Drilling's assets, information, working time, resources, business opportunities for personal benefit or benefits of friends and relatives or for outside jobs;

- Have interest or financial gain from PV Drilling's supplier; or being a third party supplier of PV Drilling's suppliers, clients, competitors or a company which is seeking for business opportunities with PV Drilling;

- Have ownership interest in a company that is either a supplier or customer or competitor of PV Drilling.

- Let your business decision be influenced or appear to be influenced by personal interest, friends, relatives or outside investment;

- Directly recruit and manage a team member who is your relative;

PV Drilling tries the best to build a professional working environment through issuing and applying specific policies, regulations and procedures. However, they may not cover all situations that lead to conflicts of interest that we may have to face in reality. In such situations, we are responsible for making the decisions in the best interest of PV Drilling. When in doubt, we should consult our immediate manager or the Compliance officer.

?

My younger brother's company is submitting the bid to be PV Drilling's supplier. I think it may benefit PV Drilling and wonder whether there is conflict of interest here?

If you are among those who can select or influence the selection of the supplier, then it will create a conflict or appears to be a conflict of interest. In such situation, you had better report to your immediate manager and withdraw from the selection process.

20. GIFTS AND ENTERTAINMENT

In current business environment, giving gifts on special occasions or inviting for meals or entertainments are normal customs widely accepted over the world. However, the act of giving or accepting inappropriate gifts or entertainments can either make us neglect to act in the best interest of PV Drilling or cause damages to the Company's reputation or be regarded as illegal.

The act of gift giving, accepting or entertaining should be in accordance with PV Drilling's Regulations on Cost Management, Corruption and Bribery Policy, Vietnam laws, international laws and laws of the host countries/territories. When doing business with clients or business partners, we should seek to understand and adhere to their Code of conduct and policy on this subject matter.

D.
SHAREHOLDERS

We carefully consider each and every investment decision with integrity and professionalism while doing our business order to ensure that our shareholders, who have entrusted us with financial resources, can get the greatest and long – lasting benefits.

21. ACCURATE RECORDS

Corporate governance requires PV Drilling to maintain and manage business records related to finance, trade, human resources, HSEQ and so on. The transparency and integrity of those documents is trusted by our shareholders and investors. Inaccurate documents can threaten company competitive advantage or lead to serious legal risks.

We have to make sure that all information must be recorded fully, properly and accurately in accordance with current laws and company regulations. The original data must be recorded accurately without any forms of assumption, manipulation or distortion.

We should refer to PV Drilling's regulations on Records and Archives for further guidelines.

?

I suspect that my colleague had put falsified data into the quality control document but I had no evidence, what should I do?

You should report your concerns to the immediate manager as a documentation with accurate and full information is crucially important, and the inaccurate one can jeopardize PV Drilling's service quality and result in undesired consequences.

22. INSIDE INFORMATION AND SECURITIES TRADE

PV Drilling is responsible to publicize sufficient, objective and accurate information related to our business activities on time through the proper media in accordance with the current laws and regulations. Until such information as mentioned above is disclosed or the related events take place, we must keep them confidential and not use such information for any personal purposes.

During our course of employment at PV Drilling, we may also be shared or exposed to the non-public inside information of other companies. In such a situation, we should keep the information confidential too and are not allowed to trade stocks or securities based on such information.

The followings are the typical examples of inside information which, being regarded as important, includes, but not limit to:

- Plan, decision to buy or sell treasury shares; to issue convertible bond and preferred stocks;
- Plan, decision on changes in dividend policy; decision on stock splitting and stock merging;
- Plan, decision on restructuring PV Drilling (splitting, acquisitions, mergers);
- Plan, decision on capital contribution, capital increase and capital divestments;
- Plan, business strategy of PV Drilling;
- Information on changing, appointing, re-appointing, dismissing key positions at PV Drilling;
- Litigation or litigation related matters.

When you are not sure if the information is non-public inside information or need assistance, please contact the immediate manager or Compliance officer.

23. MEDIA AND INVESTORS

Only PV Drilling's designated persons are allowed to provide PV Drilling's information to the media and financial communities. This is to ensure that the information released to the public is timely, accurate and consistent.

Unless you are the PV Drilling's authorized person, you should transfer all requests from the media agencies to the Public Relations and from financial communities to the Investor Relations.

E.

OUR COMMUNITY

We are part of the communities in which we are doing business.

We conduct our business in a responsible and ethical manner. This is done through our continuous assessment of long-term social, economic and environmental impact of our business activities, our products and services.

In order to maintain PV Drilling's credibility as a reliable partner in the communities in which we work, we should build positive relationships with various organizations such as governmental agencies, social organizations, mass media agencies etc., and comply with legal requirements as well as respecting traditional customs of such communities.

24. CORPORATE SOCIAL RESPONSIBILITY (CSR) ACTIVITIES

PV Drilling is committed to causing no harm to the communities in which we work.

PV Drilling always cares and lives up to the responsibility for the community and society through the CSR activities. We are therefore encouraged to participate in CSR and charity activities. However, we need to make sure our participation does not cause interruption to our work or to that of our colleagues by getting prior approval from the immediate manager.

We are proud of working for PV Drilling and one of the manifestations of this pride is the name PV Drilling itself or the PV Drilling logo on the uniforms and clothes that we wear. Therefore, we should, at all times, be aware of behaving properly. We can choose not to wear such clothes out of working time if we are not sure we can behave in a proper manner.

When taking part in social activities, we also play the role as a brand ambassador of PV Drilling; hence, we need make sure our behaviors and language are appropriate and professional.

25. SOCIAL MEDIA

Along with internet development, such social networking sites as Facebook, Twitter, Linked-In, photo/video sharing pages etc. have brought us more space and opportunities to communicate and share information. However, we should be sensitive to the fact that the information shared on social media or on the internet can be quickly widespread and may lead to undesired consequences. Therefore, to avoid such negative impact when sharing information in social media, we:

Should not discuss or communicate work related contents in social media unless you are allowed to;

Should not upload the photos of clients, partners or PV Drilling's business activities related to our clients / partners to the media or social networking sites;

If you see something in social media that appears to be unofficial information about PV Drilling or being contacted for information by media agencies, you should inform your manager immediately for appropriate guidelines and actions.

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It is such a great excitement when I have successfully negotiated a big contract that I decided to share it on Facebook together with the client's information. Right after that, I removed the post when realizing that I was clearly identified as PV Drilling's employee on the page, do I need to report this issue?

The answer is "Yes". This information is considered "confidential". Therefore, information disclosure may be harmful to PV Drilling as well as to the relationships with its partners even when it was quickly removed. You should report to your manager or Compliance Officer for appropriate action.

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