

Acknowledgment of Aramco Asia

Supplier Code of Conduct

(Applicable to Vendors, Manufacturers, and Contractors)

Aramco Asia is committed to the highest ethical and legal standards in the conduct of its business. Aramco Asia requires all registered vendors, manufacturers, contractors and sub-contractors with which Aramco Asia conducts business to acknowledge and agree to abide by the policies and principles set forth in the Aramco Asia Supplier Code of Conduct.

This acknowledgment shall be submitted to Aramco Asia at the time of registration or, if previously and currently registered, at the time of submitting bids and proposals in response to Aramco Asia's invitations and solicitations to bid.

ACKNOWLEDGMENT

I, on behalf of _____, hereby acknowledge and
 [the name of the vendor/manufacturer/contractor/sub-contractor]

agree to abide by the policies and principles of Aramco Asia's Supplier Code of Conduct and ensure that the employees, officers, directors, agents, representatives of

_____ are aware of and abide by such policies and
 [the name of the vendor/manufacturer/contractor/sub-contractor]

principles in the process of preparing and submitting bids and proposals for Aramco Asia work, for provision of goods and services to Aramco Asia, and during the performance of all agreements entered into with Aramco Asia for such purposes.

Authorized Signatory: Name (printed) _____ Signature _____

Title _____ Date _____

Aramco Asia Vendor Number _____

ARAMCO ASIA SUPPLIER CODE OF CONDUCT

I. SCOPE

This Policy establishes a Code of Conduct for current and potential Aramco Asia Suppliers. Aramco Asia Suppliers include vendors, manufacturers, and contractors registered with Aramco Asia and seeking to provide goods, services or personnel (including consultants) to Aramco Asia or which are parties to agreements with Aramco Asia for such purposes. The term Aramco Asia herein includes Aramco Asia Japan K.K., its subsidiary, and its affiliated companies.

II. INTENT

Aramco Asia is committed to conducting its business in an ethical, legal, safe, environmentally and socially responsible manner. Aramco Asia requires its Suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct. Aramco Asia requires its Suppliers to consistently meet the following requirements in order to do or continue to do business with Aramco Asia.

III. SUPPLIER CODE OF CONDUCT

Compliance with Laws, Codes and Regulations

Aramco Asia Suppliers must comply with all applicable laws, codes and regulations as set forth in applicable procurement documents and agreements (including but not limited to proposals, invitations to bid, solicitations and resulting contractual and purchasing agreements).

Environmental, Health and Safety Practices

It is the responsibility of the Supplier to assure that its facilities are designed and safely operated in compliance with the established government and industry environmental protection policies and that they do not present unnecessary risks to the environment or public. Aramco Asia Suppliers shall maintain safe, sanitary and healthy work environments for all their employees at all job sites.

Such compliance shall include, among other things:

- Obtaining and maintaining environmental permits.
- Proper handling and disposition of hazardous materials.
- Monitoring, controlling, and responsibly treating discharges generated from operations.
- Conducting appropriate employee safety training and providing adequate safety equipment.
- Maintaining records of safety training and monitoring safety performance.
- Ensuring Suppliers' employees comply with applicable health and safety rules and regulations and perform their duties and work in a manner which will not endanger themselves or others.
- Providing training required to promote sound public health and hygienic practices.

Ethical Business Practices

Aramco Asia and its Suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior. Suppliers are expected to conform to these requirements in each of the following areas:

- Fair Trade Practices

Suppliers shall not engage in collusive bidding, price discrimination or other unfair trade practices.

- Ethical Sourcing

Suppliers shall source goods or services from others that meet, as a minimum, country or origin standards for health and safety, working hours, pay, employment conditions and environmental protection.

- Relationships and Communications

Aramco Asia Business Ethics Policy is that all transactions are to be conducted fairly, honestly and with integrity, according to the highest ethical standards. Abuse or violation of this ethics policy is considered dishonesty.

Suppliers and their personnel shall avoid even the appearance of unethical or compromising practices in relationships, actions or communications with regard to existing or proposed business relationships with Aramco Asia.

Suppliers shall not encourage or utilize current or former Aramco Asia employees to disclose or provide any confidential, proprietary, or other restricted business information obtained while in Aramco Asia's service to influence Aramco Asia's existing or proposed commercial transactions for the purpose of gaining a commercial advantage or to otherwise damage Aramco Asia. Aramco Asia will take the necessary measures to detect any such improper business practices and will take appropriate action against current or former employees and Suppliers who violate these restrictions.

- Bribery, Kickbacks and Fraud

No funds, assets or services shall be paid, rendered, loaned or promised for payment or otherwise dispersed by Suppliers or their representatives as bribes, "kickbacks" or other payments designed to influence or compromise the conduct of Aramco Asia or its representatives.

- Gifts, Gratuities and Hospitality

Suppliers and their personnel shall not offer or provide Aramco Asia or its personnel gifts, gratuities or hospitality unless it involves nominal value and is in line with customary business practices. Nominal gifts are described as gifts of a general nature having a low value, including such items as logo inscribed pens, caps, shirts and coffee mugs. Customary business practice in terms of hospitality would include the acceptance of reasonable business entertainment and business meals. Gifts, gratuities and hospitality offered or extended by Suppliers to Aramco Asia personnel which exceed nominal value or reasonable hospitality are reportable under internal Aramco Asia policies and regulations.

For the avoidance of any doubt, Aramco Asia pays for its employees business expenses, Suppliers are not required or requested to incur or reimburse business expenses for Aramco Asia employees.

IV. MONITORING AND COMPLIANCE

Suppliers shall conduct periodic internal reviews and inspections to ensure their compliance with this Supplier Code of Conduct and its applicable requirements. If a Supplier identifies areas of non-compliance, the Supplier is expected to notify the Aramco Asia Purchasing or Contracting Department, as applicable, as to its plans to remedy any such non-compliance.

Aramco Asia or its designated representatives may engage in periodic monitoring activities to confirm Suppliers' compliance with this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess Supplier performance. The Supplier performance assessment may be used as a factor in the selection of bidders, or restrict Supplier access to new Aramco Asia business opportunities.

Suppliers are responsible for ensuring that the standards and requirements of this Code are communicated and understood by their personnel working on or in support of Aramco Asia projects, jobs, contracts, agreements and orders. Suppliers will be held responsible for the conduct and actions of their employees.

The implementation of this Policy is a shared responsibility between Aramco Asia and its Suppliers.

Suppliers are to promptly disclose to Aramco Asia, on a confidential basis all current and potential incidents which give rise to the appearance of conflicts of interest and instances of unethical or fraudulent behavior by any party, including Supplier employees or Aramco Asia employees, related to any of Aramco Asia procurement and contracts business. Suppliers are to cooperate with Aramco Asia in any inquiries or investigations pertaining to past, current or potential instances of apparent unethical or fraudulent behavior or conflicts of interest related to any Aramco Asia business activity.

Aramco Asia Supplier employees and Aramco Asia employees that become aware of violations of this Policy are obligated to notify Aramco Asia. Supplier employees and Aramco Asia employees are to report violations and irregularities directly to Aramco Asia Internal Audit by email, as follows:

auditing@aramcoasia.com

Based on the assessment of information made available to Aramco Asia, Aramco Asia reserves the right (in addition to all other legal and contractual rights) to disqualify any potential Supplier or terminate any relationship with a current Supplier found to be in violation of this Supplier Code of Conduct, without liability.

V. APPLICATION

This Supplier Code of Conduct is a general statement of Aramco Asia's expectations and requirements with respect to its Suppliers. This Policy should not be read in lieu of, but in addition to, any Supplier obligations set forth in a) requests for proposals, invitations to bid or other solicitation documents, or b) agreements by and between Aramco Asia and the Supplier. In the event of a conflict between this Policy and any Aramco Asia solicitation documents or applicable agreements, the terms of Aramco Asia's applicable solicitation

documents or agreements shall prevail. The requirements of this policy are not subject to waiver. Neither Aramco Asia, its Suppliers nor their personnel or representatives are authorized to propose or approve conduct inconsistent with this Code of Conduct.