

CODE OF CONDUCT FOR THIRD PARTY

1. INTRODUCTION

Purpose and Applicability

The Company's Third Party¹ Code of Conduct explains the standards of integrity and business conduct the Company expects of its Third Parties (TPs) with which it does business. It establishes clear compliance standards and ethical principles which are expected from all TPs of the Company.

2. LEGAL COMPLIANCE

General Compliance

TPs shall comply with applicable laws and regulations including international laws and Company Policies.

Labor Protection

TPs must provide their Employees with a healthy work environment and ensure that their employees are free from discrimination or harassment for any reason whatsoever, including skin color, ethnicity, age, gender, sexual orientation, religion, or political affiliation.

Environmental Compliance

TPs must conduct their operations in strict compliance with applicable environmental laws and standards.

Anti-Bribery

TPs shall not solicit, offer, make or receive any form of bribe or improper payments in order to win or retain business or influence a business decision on behalf of the Company.

Fair Competition and Trade Practices

TPs shall not engage in any unfair competition practices individually or in collusion with others.

Cyber Security

TPs shall strictly abide by all applicable laws and regulations regarding cyber security, data protection and money laundering of the countries/provinces/states in which they operate.

3. BUSINESS ETHICS

Complete and Truthful Information

TPs must ensure that the information provided by them to the Company regarding products or services is truthful, factual and legitimate. TPs must also acknowledge that all the other information they provide to the Company is truthful, accurate and complete.

¹ Definitions

Third Party/ Third Parties - Entities (including their personnel) and individuals that are contracted to work for or with the Company in any business function in any country in which the company operates.

Marketing Communication and Advertising Media

TPs shall not make false/misleading statements on performance of product or service. Without prior permission from the Company, TPs shall not disclose information regarding the Company's products or services to the media or any other party. During external business interactions, TPs shall not make any false or misleading statement to any party.

Subject to The Company Audits

TPs shall not misrepresent, disguise or otherwise attempt to cover up any information that may compromise Company's interests. TPs shall be subject to audits from the Company or TPs appointed on its behalf at reasonable business hours.

Subject to Background Verification

The Company reserves the right to conduct background checks during the course of business relationship. Depending upon the findings of background verification report, the Company reserves the right to terminate the business relationship without incurring any monetary liability. TPs shall give proper references and certified copies of Know Your Customer ("KYC") documents to the Company for conducting background verification of TPs and their organizations.

Unauthorized Commitments

TPs shall not make commitments on matters in which they have not been authorized in writing by the employee with such express authority to do so. Any loss incurred from a TPs unauthorized commitment or its failure to reject the unauthorized commitment of the Company' employees (i.e. those employees not expressly authorized to make such a commitment) shall be fully borne by the said TPs on a full indemnity basis and the Company shall not be obligated to any contractual commitment to the TPs arising from such actions.

Bribing the Company Employees

TPs are not allowed to bribe or transfer illicit benefits to any Company employee in any form whatsoever, including but not limited to cash, negotiable securities and payment vouchers, direct or indirect loans or advances, in an attempt to obtain illicit benefits or maintain cooperation with the Company. In addition, TPs are not allowed to give inappropriate gifts, loans and/or entertainment to the Company's employees that far exceed the propriety of the situation, or any other conduct that could be construed as inappropriate conduct. Whether the entertainment or gifts are appropriate business etiquette or not shall be determined by AG&P at its discretion, after taking into account various factors, considering whether those involved in the giving or receiving would be embarrassed should such events or actions be made known to the public.

This clause also applies to the family members and other close relatives of the Company employees.

Gifts and Entertainment

TPs shall not extend gifts to Employees or immediate family members of the Employees, which may influence or create the perception of influencing the decision to do business with such TPs.

Conflict-of-Interest Relationship

A conflict of interest exists where the personal interests of Employees interfere with the business interests or benefits of the Company. In the event that an Employee or his/her immediate family

member(s) works for the TPs, or acts as an Employee, Consultant, Board Member, Executive, or Shareholder of the TPs, the TPs shall report such situations to the Compliance Officer of AG&P at ethicshelpline@think-gas.com

Intellectual Property Rights and Confidential Information

TPs shall respect the Company's intellectual property rights. Without prior permission, TPs shall neither disclose any confidential information that they have access to during their dealings with the Company nor use any of its intellectual property, except in accordance with any applicable license or authority in writing granted by the Company.

4. COMPLIANCE MANAGEMENT

Establishing a Compliance System

The Company encourages all TPs to establish their own compliance management system to ensure compliance with local laws, fair competition and alignment with Policies.

Communicating the Company Principles

TPs shall make this Code of Conduct available to their respective Employees or develop an equivalent document with standards consistent with those contained in this Code of Conduct.

Consequences of any Violation of this Code of Conduct

Any violation of this Code of Conduct may result in invocation of right to audit TPs books, forfeiture of payments or the immediate termination of the business relationship with the Company. In addition, the Company reserves the right to bind the TPs to indemnify all losses caused to the Company due to their violation of this Code of Conduct.

5. VERSION UPDATE

The Company reserves the right to supplement and change this Code of Conduct at any time. TPs are expected to monitor the website regularly for changes to this Code of Conduct and can write to Compliance Officer at ethicshelpline@think-gas.com any time for updated version of Code of Conduct.

6. SUBMITTING QUESTIONS OR REPORTING VIOLATIONS

If you have any question about this Code of Conduct or become aware of any violation of this Code of Conduct that is believed in good faith to be either an actual or potential violation of this Code of Conduct, please send an email to ethicshelpline@think-gas.com. Please submit the questions or report any suspicious behavior which may constitute a violation with your real name attached.

Please note that the information that you provide to the Company must be truthful, accurate and complete to the greatest extent possible. If necessary, the Company expects you to reasonably assist in any investigation in the incident or situation that you report, including providing reasonable access to any associated documentation within TPs control. Reporting misleading or defamatory information to the Company may result in immediate termination of your business relationship with the Company.