



ROSETTI PIVOT LTD
RC 1216884

ANTI-CORRUPTION POLICY

Rosetti Pivot Limited's core business is Project Management, Engineering, Procurement, Construction Management of Oil & Gas Production facilities including platforms (jacket and deck), integrated modules and subsea facilities.

With a mission to continuously build a world class reputation in compliance with our core values, we operate all our business transactions with integrity, professionalism, fairness and comply with International, National and State applicable laws and regulations.

Rosetti Pivot Limited's (RPL) employees and the members of our Board of Directors are familiar with the legal and regulatory requirements applicable to our business responsibilities and fulfill our duties in accordance with these laws and regulations. And we have dealings with only companies, contractors, sub-contractors, consultants, agents, and business partners that have like anti-corruption policy.

Bribery is the offering, promising, giving, accepting, or soliciting for an advantage as an inducement for action which is illegal or a breach of trust. It is also an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage. While Corruption is the abuse of entrusted power for private economic gain. This policy will refer to both as "Corruption".

We have zero-tolerance for corruption and are committed to the highest standard of integrity in all our business dealings. We comply fully with all applicable anti-bribery and anti-corruption laws, statutes, directives and/or regulations including but not limited to the Economic and Financial Crimes Commission (Establishment) Act; Money Laundering Prohibition Act, 2004 and Corrupt Practices and Other Related Offences Act, 2004 and all other applicable anti-bribery and anti-corruption regulations and codes of practice.

Our zero-tolerance approach to corruption is communicated to all our clients, contractors, sub-contractors and business partners at the inception of our business relationship with them and as appropriate thereafter.

All our business transactions are conducted in a manner that will pass scrutiny. Our internal control systems and procedures are subject to regular audits to provide assurance that they are effective in countering corruption.

Consequently, knowing that corruption is a critical impediment to achieving our business goals, we have also taken the following practical and effective measures against it, so **we do not**:

- Give or receive bribes, kickbacks, or similar payment of any sort, to or from our clients, contractors, sub-contractors, government, public bodies, politicians and political parties or any entity acting on their behalf, doing or seeking to do business with us.
- Pay bribes to obtain or retain business.
- Bribe foreign public officials anywhere in the world.
- Accept secret commissions from contractors, sub-contractors, consultants, or external bodies.
- Accept gifts, gratification, entertainment or other items from our clients, contractors, sub-contractors or their agents, employees, or fiduciaries. No employee may accept or give gifts/hospitality which could be construed as favours to influence a decision.
- Make political contributions. Which includes contributing company funds or other assets for political purposes.
- Encourage employees to make any of such contribution or reimburse the employee for any of such contribution.
- Solicit for political contributions or engage in political activities whose purpose is to assist the company in obtaining or retaining business.
- Provide funds or property(ies) that may be used directly or indirectly to advance any political campaign, candidate, or party.
- Conceal any circumstance that may be construed as illegal or seeking special favor from RPL Supervisors/ Function Managers or other appropriate personnel.
- Use proprietary information for personal financial advantage.
- Carry out business activities that will result in conflict of interest between our private financial activities and our role in the company's business.

30th March 2022

Cosimo Pirchio
Rosetti Pivot Limited - Managing Director