

A large, light gray, stylized 'T' watermark is centered on the page, serving as a background for the title.

CODE OF CONDUCT AND BUSINESS ETHICS

GES
Last Review: 04/04/2025

TABLE OF CONTENTS

I. INTRODUCTION.....	3
A. USE OF OUR CODE	4
B. DUTY TO REPORT - ADVISORY AND REPORTING CHANNELS	5
II. COMMUNITIES AND OUR PEOPLE	7
C. FOR THE DEVELOPMENT OF OUR COMMUNITIES	7
D. FOR THE WELLBEING OF OUR EMPLOYEES.....	8
1. Commitment to uphold the Human Rights of our employees.....	8
2. Respectful, fair and equitable treatment, free of discrimination or workplace harassment.	8
3. Political activities.....	11
4. Health, safety and environment.....	11
III. PROTECTING OUR ASSETS	12
A. MAINTAINING THE INTEGRITY OF OUR FINANCIAL INFORMATION.....	12
1. Accurate financial record information.....	12
2. Appropriate record management.....	13
B. COMMUNICATIONS	14
1. Corporate communications.....	14
C. use of technology.....	15
IV. RESPONSIBLE USE OF ASSETS.....	16
A. Asset protection.....	17
1. Physical asset protection.....	17
2. Protection of confidential information and intellectual property.....	17
3. Data protection.....	18
B. CONFLICT OF INTERESTS	20
V. APPROPRIATE MANAGEMENT OF OUR BUSINESS	23
A. FREE COMPETITION.....	23
B. PRIVILEGED INFORMATION.....	25
C. CORRUPTION AND BRIBERY	26
D. MONEY LAUNDERING, TERRORIST FINANCING FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.....	29
E. IMPORT AND EXPORT CONTROL.....	30
F. FORM FOR RECEPTION OF AND COMPLIANCE WITH THE CCEE.....	31

I. INTRODUCTION

This Code of Conduct and Business Ethics is applicable to all Board members, employees, suppliers, advisors, contractors and joint venturers ("Business Associates") of TUSCANY OILFIELD HOLDINGS LTD., its affiliates and subsidiaries (hereinafter TUSCANY, or the Company). All our Business Associates are an essential part of Tuscany. As part of our corporate program guidelines, we are committed to achieving the highest working standards and the best corporate practices, based on ethical principles of integrity, responsibility, transparency, honesty, learning, performance and teamwork.

The Code of Business Conduct and Ethics (CCEE for its acronym in Spanish) is a set of guidelines that all our shareholders, Board members, employees, suppliers, contractors, joint ventures and advisors must observe, regardless of the area where Tuscany operates, to achieve the highest working- standards and the best corporate practices, which are the basis of our success.

Failure to comply with these standards of conduct may give rise to disciplinary and legal penalties, depending on the infringement committed. Therefore, we must read, understand, seek advice and report any situation that may jeopardize or breach the Code of Business Conduct and Ethics (CCEE), whether on account of our own acts or omissions, or the acts or omissions of any other Business Associate - regardless of the position held -.

The CCEE sets out a framework of values, principles, guidelines and responsibilities that set the grounds for our work and relations with other persons and entities in the public and private sectors. This guide will allow us to identify situations that go against our corporate rights, values and principles so that we act correctly and avoid any type of liability in respect of the company and/or administrative or judicial authorities due to the failure to comply with the CCEE and/or laws that apply to us.

There may also be situations not foreseen in this Code, which may go against our corporate values, principles and guidelines and, therefore, we must refer to the indicated reporting or advisory procedures.

The publication of the CCEE, together with the training program, will provide the tools to act in accordance with Tuscany's corporate policies, seek advice or guidance, or report risks or CCEE violations.

Each year, all employees, advisors, suppliers, contractors and other Business Associates shall declare in writing that they have read, fully understood, and that they undertake to comply with this Code of Business Conduct and Ethics.

A. USE OF OUR CODE

The CCEE conveys our corporate policy and aims to raise awareness as to the fact that every act on our part will have consequences. Hence, our actions must adhere to the principles of integrity, responsibility, transparency, honesty, learning, performance and teamwork which are in turn the grounds for our corporate commitment.

Our corporate policies reflect TUSCANY's commitment to achieving the highest employment standards, best business practices and optimum levels of quality, through the protection of people's rights, the environment, and compliance with the laws and regulations applicable to us. Hence, our activities must be aligned with the following principles:

PRINCIPLES

Integrity: Our behavior must be impeccable so that we are able to generate a high degree of reliability in our people. We must, therefore, act righteously, with respect, abiding by principles of responsibility, transparency, honesty, learning, performance and teamwork.

Responsibility: We must be aware of and act in accordance with the law and the functions, commitments, and obligations acquired.. We must bear in mind and visualize that every act implies consequences that must be assumed.

Transparency: All actions and decisions must be supported by clear, thorough, technical and professional analyses. There must be an open, permanent attitude with respect to the Supervisors and the control dependencies of Tuscany.

Honesty: All conducts and decisions made must be straight and adhere to the commitments acquired. The truth should always be said, and actions must be sincere.

Learning: The purpose, perseverance and discipline in expanding knowledge through theory and practice increases each person's potential and improves the provision of our services in terms of high quality and innovation.

Performance: We must improve day by day the level of development of our functions and obligations, both individually and collective, to thus make a difference vis-à-vis our competitors in terms of outcomes and to maximize the value offered to our clients.

Teamwork: We achieve successful outcome by integrating the best qualities of our employees through continuous improvement and operational reliability. The union of our individual expertise and skills leads us to reach the highest standards of work life, business best practices, and optimal quality level.

The CCEE is structured as follows:

The first part includes a section that explains the duty to report, as well as the existing channels for reporting or seeking advice.

Then, the CCEE is broken down into the following sections, which in turn include sub-sections that cover certain situations and how we should act when faced with them.

In each section we find:

- i) the description of certain situations that illustrate our rights, which TUSCANY seeks to protect;
- ii) obligations that we must fulfill in order to guarantee our own rights and those of others, in accordance with the corporate commitment made, and which would generate liability for us if we were to act against them;
- iii) some sections describe warning signs for situations that involve a risk of breaching the Code of Business Conduct and Ethics (CCEE), the corporate policies and the domestic and international legislation applicable;
- iv) some sections define specific concepts;
- v) finally, each section includes questions to be asked to consciously act pursuant to the values, principles and procedures established in the Code of Business Conduct and Ethics and other corporate documents.

B. DUTY TO REPORT - ADVISORY AND REPORTING CHANNELS

In order to achieve the highest working- standards and the best corporate practices, we must report every breach or situation that jeopardizes or fails to comply with the ethical and transparency commitments of TUSCANY due to actions or omissions committed by us or by others, even contractor or supplier personnel and other project managers. We must also report situations of intimidation, threats, or those that generate fear on the part of co-workers, direct manager, hierarchical superiors, or third parties so that, from my position and competence, I perform actions that are contrary to the CCEE and/or entail economic and reputational detriment to the company. We must bear in mind that refusing to speak when faced with situations that breach or jeopardize compliance with the Code of Business Conduct and Ethics (CCEE in Spanish) increases the risk of causing damage to my colleagues, the community, the company, competitors, clients, consumers and the domestic and international economy. Therefore, we must not cause, accept or support breaches, as this may bring disciplinary or

criminal consequences, depending on the conduct committed or omitted.

Similarly, since this is a company that strives to provide opportunities for our employees, suppliers and contractors, Tuscany acknowledges the importance of the participation of the persons who report and/or take part in the process of investigating behaviors that jeopardize or breach our CCEE and our policies; therefore, we have a reporting procedure that ensures:

- Appropriate handling of the information received, confidentiality, and anonymity.
- Analysis of the information received and the effective and impartial processing of complaints regarding the situations reported.
- No reprisals against any report made in good faith and the rejection of any type of action against the person who reports a situation. If this does occur, the company will deem these actions gross misconduct that will have disciplinary consequences for the employees engaged in these behaviors.

These reporting and investigation procedures are considered part of this CCEE and shall be followed to ensure the right to the correct process.

We have the following reporting channels, where it is possible to file claims, be it anonymously or in your own name:

1. Emails to cumplimiento@tuscanydrilling.com
2. Direct report to the Compliance Officer (provided that they are not involved in the event you wish to report).
3. Online report through the link provided in the TUSCANY website, <https://www.tuscanydrilling.com/contactanos/lineaetica>

The reporting channels are managed by the Compliance Officer for Colombia and by Internal Audit for other jurisdictions, independent areas, which will impartially manage the claims filed, guaranteeing anonymity, confidentiality, and proper handling of the information reported.

All reporting channels allow for anonymous reporting. However, it should be noted that any report that does not provide clear information or sufficient support to initiate investigations will be dismissed.

Moreover, it is also possible to contact the Area Head, Superior, Compliance Officer, or Internal Audit in cases where:

- We believe that we require guidance and advice because we do not know how to act in a given situation that involves the rules established in the CCEE.
- If we have doubts about reporting something because we are not sure if the conduct

breaches the CCEE or gives rise to an ethical issue.

It is also good to ask ourselves the following questions to clarify our concerns, to help guide us in our actions:

- Is the conduct contrary to the principles of integrity, transparency, honesty, responsibility?
- Does it match any situation described in the code of business conduct?
- Is the person breaching the duties and/or functions pertaining to his/her position?
- Is this conduct legal? Does a penalty apply?
- What would management and other employees think if they found out that someone had engaged in such behavior?
- What would my accountability be for failing to report behavior that contravenes the CCEE?

II. COMMUNITIES AND OUR PEOPLE

At Tuscany, we seek to contribute to the economic and social development of the communities who live in the areas where we operate. Similarly, it is our aim to ensure that people work in an environment that provides decent and safe conditions.

C. FOR THE DEVELOPMENT OF OUR COMMUNITIES

As a company that is committed to the internal sustainability policies and social-economic development of each country where we operate, TUSCANY ensures regional participation from communities in processes relating to hiring and the procurement of goods and services.

What are my responsibilities?

- To respect cultural diversity and share our knowledge with the members of the communities where we operate.
- To ensure in personnel hiring processes the priority of hiring local personnel, in accordance with experience, ability and skills, pursuant to the profile required.
- To report any situation that jeopardizes the fair access for people from the community, the safety of underage individuals as a result of their being hired, or any situation that endangers the safety and rights of community members, due to any activity to be carried out, or being carried out by the company or its contractors.
- To prevent damage being caused to communities during the course of our activities.

D. FOR THE WELLBEING OF OUR EMPLOYEES

In order to ensure the wellbeing of our employees, Tuscany undertakes to protect our Human Rights, to ensure we are treated with respect, fairness and equality, without any discrimination or workplace harassment. Similarly, there must be suitable health, safety and environment standards in place.

How to be part of our team?

Tuscany performs its human talent selection and hiring management securing the hiring of competent personnel who meet the required profiles. This is a transparent, fair, and impartial process.

1. Commitment to uphold the Human Rights of our employees

The protection and respect of our people's human rights is a basic principle in the way TUSCANY conducts its business. We aim to carry out our business purpose, based on behaviors that adhere to the Universal Declaration of Human Rights, the principles and recommendations of the United Nations Human Rights Committee, the Inter-American Court of Human Rights, international guidelines such as Article One of the UN Global Compact, which set standards for companies to contribute to the protection of human rights, laws against workplace harassment and other regulations in force in the countries where we operate.

The respect and protection of human rights depends on everyone's commitment to respecting each other, and the responsible fulfillment of our duties, without negatively impacting the dignity, goodwill, health and other rights of our colleagues (including my subordinates), supplier workers or contractors.

Tuscany does not allow, nor does it tolerate human trafficking, slavery, torture, inhuman or degrading cruel treatment or underage labor.

2. Respectful, fair and equitable treatment, free of discrimination or workplace harassment.

Our policy seeks to provide equal opportunities, regardless of race, gender, religion, age, sex, ethnic group, nationality, sexual preference or any other reasons.

The Company promotes workforce inclusion and diversity, ensuring equitable access to working opportunities and that they are valued in the work teams seeking an environment where all employees can develop professionally without feeling that they are being discriminated.

The hiring, evaluation and promotion of our employees is solely based on the abilities,

strengths, experience and skills required for the position.

All of our employees are entitled to enjoy an appropriate, healthy and safe working environment, where they can function and fulfill their objectives, away from discrimination and workplace harassment acts. We do not tolerate any offensive, humiliating, discriminatory or workplace harassment-related conduct. Therefore, we promote respect for the dignity of human beings and provide development opportunities to thousands of people.

What is labor harassment?

Various means of aggression, ill-treatment, disparagement and offensive treatment and, in general, every outrage affecting work under proper and fair conditions, freedom, intimacy, honor, mental health of employees in a working environment.

We will not tolerate any violation of these standards, and the breach thereof will result in the enforcement of the disciplinary measures established for such cases by the company and by the laws of each country where we operate.

What are my responsibilities?

- To acknowledge that we all have the same rights, and that we must not abuse our position.
- To use respectful language, refraining from making humiliating and/or degrading comments.
- To abstain from discriminating or rejecting anyone for any reason.
- To use corporate procedures to report any breach of employees' obligations.
- To contact the Labor Coexistence Committee whenever a situation arises that jeopardizes respectful, dignified, fair and equal treatment, free of discrimination, or in case of labor harassment among employees or on the part of hierarchical superiors. The purpose of the Labor Coexistence Committee is to promote dignified, healthy working environments.
- These issues can also be escalated to the superior or the Human Talent Area.

Additional responsibilities for all management executives and persons with subordinates:

- Ensure that selection, hiring, and promotion decisions are solely based on the merit of the employees. These decisions cannot be the result of subjective preferences nor any type of interests or considerations other than merit, which imply discrimination of other participants.

- Promote individual and teamwork in an environment characterized by respect, high standards and tolerance.
- To hear and process all requests, claims and complaints from employees, in accordance with internal procedures.
- To file the reports in an objective manner; in other words, based on true information on a failure to comply with duties and results. Abstain from using degrading and inappropriate language.
- Be alert and ensure that subordinates do not discriminate or infringing upon the rights of others. Enforce the pertinent corrective measures and report to the Human Talent area, based on internal procedures.

Failing to comply with our obligations to maintain a respectful, fair and discrimination-free working environment entitles TUSCANY to undertake the pertinent investigations against those involved, and apply disciplinary measures against those responsible, which may include contract termination, provided there is a just cause. Moreover, these breaches may give rise to lawsuits being filed within the judicial system of the countries where we operate, due to the breach of current norms that demand fair treatment.

Let's keep in mind that it is our responsibility to maintain an appropriate working environment, in accordance with our functions, responsibly, without breaching the norms of ethics, and reporting every situation that we become aware of, which implies the violation of our rights, or those of our peers.

Warning signs:

- An employee is abusing his/her position and uses degrading, humiliating words to refer to another employee or to his/her work.
- A staff member treats someone differently on a repeated basis, compared to the other employees under the same conditions.

Question: Can workplace harassment be evident due to excessive work assigned?

Response: Yes. Whenever there is evidently discriminatory treatment with respect to the other employees under the same conditions, as to the excessive assignment of work on a continuous basis.

3. Political activities

TUSCANY does not participate in political activities nor does it make any contributions of political nature. As Tuscany's Business Associates, we may participate in political processes, provided that: we do so on our own name and in accordance with the provisions of the law, we carry out such activities during non-working hours, we do not use goods, resources, image, or the name of TUSCANY, and the objectivity required to carry out our duties or role is in no way affected by political opinions.

4. Health, safety and environment

Tuscany is committed to delivering the highest standards to our employees, clients, contractors, suppliers, advisors and community in general, and it is also committed to achieving safe and reliable operations and services by preventing accidents and/or occupational diseases, or negative impacts on the environment and property. To achieve this, the following guidelines and responsibilities are established:

Guidelines:

- Senior management commitment to the implementation and compliance with the Integrated Management System, as well as the allocation of human, technical and economic resources required.
- Creation of a safe working environment for the entire labor force through the adequate identification of hazards and issues, and the assessment and control of risks and impacts.
- Compliance with the entirety of the national regulations in force and international standards applicable to our processes, as well as internal corporate requirements.
- We commit to sustainability and are socially responsible in the use of resources and comprehensive and responsible interactions with our stakeholders.
- Follow-up and measurement of objectives and goals of the HSEQ Integrated Management System, promoting continuous process improvement.
- The consumption of alcohol and psychoactive substances is prohibited.

The breach of our policies and procedures may give rise to disciplinary sanctions that, depending on the conduct committed, may be considered serious fault and just cause for contract termination.

What are my responsibilities?

- To comply with the corporate HSEQ policies.

- To immediately stop any work or activity that is unsafe, or that does not comply with safety policies or procedures.
- To comply with the training and coaching scheduling sent by the company.
- To seek supervisor advice with respect to situations that may endanger one's own safety or that of others.
- To report every incident to the Line Manager or HSEQ Supervisor immediately.
- To cooperate in all investigations.
- To use resources rationally.
- To carry out duties responsibly, without affecting your own safety or that of others, and/or causing environmental impacts.
- We must never possess, distribute, consume or work under the effects of alcohol or drugs.
- To notify a supervisor if you suspect that someone is under the effect of alcohol or psychoactive substances.

III. PROTECTING OUR ASSETS

In order to protect our tangible and intangible corporate assets, and the assets of those who have placed their trust in us, we must maintain the integrity of our financial information; issue accurate communications; use our assets responsibly and act transparently, thus avoiding grounds for conflicts of interest. Therefore, we must conduct our business with transparency and honesty.

What is a Record?

It contains information that evidences a corporate activity. Records may include auditing reports, expenditure reports, time reports, market data and contracts.

A. MAINTAINING THE INTEGRITY OF OUR FINANCIAL INFORMATION

The information contained in our records must be true, accurate, complete and understandable.

It must be adequately managed, in accordance with the parameters set out in the internal procedures and in the applicable law.

1. ***Accurate financial record information***

Our shareholders, as well as the regulatory entities, rely on the comprehensiveness, accuracy, and transparency of our accounting records.

Each one of us must ensure that the accounting record information reflects the reality of the operations and clearly and honestly reflects our financial position. This is achieved by complying with our corporate policies, as well as all applicable laws.

Maintaining books and records, disclosing financial statements, and accounting and auditing also imply **ABSTAINING** from recording non-existent expenditures, using false documents, failing to record transactions in books or their undue inclusion, deliberately destroying accounting documents prior to the term set out by the law.

2. Appropriate record management

Records are valuable corporate assets that must be adequately managed and must be discarded when they are no longer required, in accordance with the terms set out in the applicable law. The policies and procedures on document management and financial reporting provide guidance on how to report information, how long to keep it for and how to destroy it. Appropriate information management helps us prevent business risks that may entail legal or financial consequences for our company.

Identifying the type of information will make it possible for us to adequately manage records and keep documents that are relevant for lawsuits, investigations or auditing processes. Should government entity representatives, corporate auditors or management request information or documentation, we must cooperate by providing a precise and full response to the request.

What are my responsibilities?

- To understand the information that comprises a record, which must be appropriately reported, retained or destroyed.
- To adequately record all expenses, assets, liabilities, and revenues. To abstain from concealing, modifying, forging or disguising the true nature of any record or transaction.
- To ensure that all records are complete, accurate, understandable and timely.
- To follow all internal control procedures.
- To ensure that all financial transactions are authorized by the line manager.
- To fully cooperate with audits, as well as with internal or official investigations.
- To immediately report any accounting or auditing irregularities, cases of fraud or any other information that may lead to errors in our reports, as you may be considered an accessory for not reporting.

The act of concealing, modifying, forging or disguising the true nature of any record or transaction shall give rise to disciplinary penalties that may lead to contract termination and indemnification for damage caused. Furthermore, the company shall report this to the

competent authorities so that they can undertake investigations to determine the criminal liability of the perpetrators and accessories in the crimes of destroying, deleting or totally or partially concealing a document that may be used as evidence.

Warning Signs

- Deficient asset verification.
- Incorrect recording of expenses or liabilities in terms of times or quantities.
- Recording of fictitious revenue or the undue posting of revenue.
- Lack of reasonable detail on invoices.

Question: As part of the job, one of us manages the information regarding services rendered to clients, and to improve the sales figures for the month, he/she decided to change the ticket service provision dates for the first week of the month, so that they can be considered within the month that just ended. Is this acceptable?

Response: No. Recording correct and actual dates in every service document is fundamental to ensure that financial statements reflect the actual position of the company at the end of the month and the year. No false income or expense entries in the company records shall be made, even if doing so may improve our financial results.

B. COMMUNICATIONS

Written and verbal communication must be respectful and reflect the reality of our company, though this does not imply that confidential information not known to the public may be disclosed.

1. Corporate communications

Corporate information belonging to Tuscany or others who have placed their trust in us must be protected. In this regard, all pieces of written or verbal communication must be previously approved.

Corporate communications must meet the guidelines set forth in Tuscany's Corporate Identity Manual. This includes appropriate use of identity signs, institutional color palette, typography, graphic structure, and variations of the brand and advertising and/or promotional material.

In order to act in accordance with free market competition, all declarations made about our products and services must be true and accurate.

No false, pejorative or misleading declarations regarding another person or company may be made. Declarations of this type may affect a person's goodwill and the reputation of companies, which may entail criminal, civil liability, and disciplinary sanctions.

All interactions with our clients, suppliers, advisors, joint ventures and competitors must be fair, respectful, transparent and honest. If we become aware of false or misleading communications about Tuscany or our competitors, we must report this to a line manager or the Compliance Officer.

C. USE OF TECHNOLOGY

We are responsible for using technology, including social networks, in a responsible, productive, ethical manner, and for lawful purposes.

The wording of text messages, chats, e-mails and other communications issued through the use of technology must be respectful and for business purposes. The use of corporate computers, mobile phones, email accounts and technological platforms supplied by the Company for the performance of its functions may be monitored to ensure the appropriate use of resources.

The use of technologies or systems provided by the company, such as cell phones or email, implies that the information transmitted, received or stored may not be considered private. If you want to keep any type of private information, abstain from creating it or storing it in Tuscany's systems.

In furtherance of legal obligations or internal reviews, Tuscany may acquire information from any individual computer and each employee shall be responsible for the information created or stored on the equipment.

The inappropriate or illegal use of company resources may entail disciplinary or legal consequences.

What are my responsibilities?

- Written and verbal communication on corporate information must be previously authorized by my superior or the Board of Directors, depending on the content.
- Avoid making public declarations about our commercial activities, unless you are authorized to do so.
- Abstain from making misleading, exaggerated, speculative declarations, or from participating in any type of informal discussion on sensitive or confidential matters.
- Use equipment and IT network appropriately at all times.

- Remember that any communication or document created, sent or received on my corporate computer or cell phone is not considered private material.
- Seek the support of a line manager or compliance officer, if unsure about the appropriate action to follow.
- Cooperate with corporate and competent authority investigations; make the computer available for analysis or provide any information required during the review.
- Report any event related to the undue use of communications to my line or through the reporting hotline.
- Refer to our Electronic Communications Policy for further information.

Question: If an employee checks his/her personal email and resends content that may be considered offensive by his/her friends during non-business hours, would it be deemed that the content is not relevant to Tuscany, because it is made through the personal email after business hours?

Response: No. It is never acceptable to use corporate computers or network systems to see or resend inappropriate personal emails, even if done after working hours, or while alone at the office or at home. The information used on the corporate network, equipment and system may never be considered private for employees.

IV. RESPONSIBLE USE OF ASSETS

Corporate assets include rigs, programs, systems, brands, commercial names and other assets that may be subject to the protection of intellectual property rights. We must be careful at all times when using these assets and protect them from any damage, such as loss, theft, misuse or waste.

We must only use the corporate assets for legitimate commercial purposes. The use of our assets for any other activity requires written authorization by a management executive of Tuscany.

Moreover, any manager, employee or advisor who, for his/her own benefit or for the benefit of a third party, abusing the duties inherent to his/her position, misappropriates the assets of the company or acquires obligations on behalf of Tuscany and causes financial damage, is considered embezzlement and shall be reported to the competent authorities.

A. ASSET PROTECTION**1. *Physical asset protection***

Physical corporate assets include construction development, materials, equipment, and even office supplies. All these assets must be used for corporate purposes and must be protected. Each employee having access to company computers must physically protect those assets at all times. Failing to do so to an acceptable extent may lead to disciplinary action, which may include payment for damage caused.

2. *Protection of confidential information and intellectual property****Intellectual property***

Every creation produced by the human mind. This includes brands, copyrights, invention patents, utility models, software, designs, procedures.

Information and knowledge are some of the company's most valuable assets. It is our responsibility to protect the information and to protect the intellectual property belonging to Tuscany, our clients and competitors.

Confidential information.

Any commercial information that provides a business advantage above the competitor, which is not public. Includes: prices, sales, databases, marketing strategies and plans, software, process experience, clients, among others.

Confidential information can be provided to us through various means - through conversations, documents, emails or technology used in our business - and may refer to any part of our own business, or that of our clients.

We must maintain the confidentiality of the confidential information belonging to the company and to third parties that have entrusted us with such information, so as to preserve its integrity.

The disclosure of corporate confidential information is prohibited, unless this has been duly authorized by a company management executive.

The disclosure or inappropriate use of confidential information belonging to our clients is never allowed, unless this has been authorized by the client, and there is also authorization from one

of the management executives within our company. All contractual commitments related to confidential information must be honored.

The information, documentary records, programs, software, procedures, methods, etc. that are developed during the working relationship are the exclusive property of the Company.

It is the obligation of all Company employees to respect third party intellectual property, registered brands, patents, business secrets, know-how, and copyrights.

It is prohibited to use unauthorized or unlicensed software in Company equipment.

Any development or innovation created by employees during their working relationship must be reported to the Company in order to obtain adequate legal protection.

Prohibition of Plagiarism

It is absolutely prohibited to copy, replicate, reproduce, or appropriate the work, material, documents, texts, or ideas of others without proper authorization or recognition. The information must be properly cited and referenced.

Incurring the foregoing prohibition is considered a serious fault and may give rise to the commencement of a disciplinary or just cause process for the termination of the contract.

3. Data protection

At Tuscany, in accordance with data privacy laws, we protect the personal information provided by our employees, advisors, clients and other persons. We seek to respect people's fundamental right to privacy and confidentiality.

The duty to protect the information provided means that its collection, storage, use and deletion must be in accordance with the regulations that govern personal data privacy in each country where we operate. In this regard, no personal information shall be disclosed to third parties, unless there is prior, express authorization from the owner, requirement by a public or government authority in furtherance of their duties, or by court order.

According to law, this protected information refers to medical, professional and employment background data. Regarding other types of information that reveal the possible perpetration of a crime, Tuscany has the legal obligation to report this to the judicial authorities, so that the relevant investigations can be conducted.

We respect a person's right to privacy and protect this information against improper use. No one can gain access to the records pertaining to candidates looking to join Tuscany, current

employees or former employees, without due authorization. If no longer required, the information compiled will be securely deleted, destroyed or depersonalized.

We respect the physical and intangible assets of others by protecting any confidential information that may come to our knowledge through third parties, during the normal course of our operations. We protect such information and comply with contractual obligations. We do not disclose protected information to unauthorized persons.

What are my responsibilities?

- To protect the confidential information belonging to our company and that provided by others in confidence.
- To abstain from disclosing or using confidential information or intellectual property belonging to Tuscany and others, provided to us in confidence, without due authorization.
- To obtain written authorization from a supervisor to use Tuscany's assets or resources for personal use, community use or for charity activities.
- To protect physical assets and computers against loss or damage.
- To be careful when talking about company information.
- To seek advice from a Line Manager or the Legal Area if unsure whether corporate authorization is required prior to using or sharing confidential information.
- Refer to our data privacy policy to obtain further information.

Warning Signs:

- Use of company facilities for personal benefit.
- Downloading confidential and privileged information for personal use or for the benefit of a third party.
- Unauthorized copying of software programs owned by the company.
- Use of corporate credit cards for personal purchases.

Question: Two work colleagues make the most of the presence of a subject matter expert to ask his opinion on certain important topics, to finalize certain business strategies, and openly discuss corporate information, without noticing that the person they are talking to works for a competitor company. Are the employees right to do this because, in their opinion, they were trying to define business strategies?

Response: No. First of all, they were required to confirm who they were talking to. Secondly, they must bear in mind that no confidential information must be disclosed to third parties during their meeting, unless there is a confidentiality agreement signed by the parties. Therefore, it

was essential for them to verify the existence of this agreement, prior to disclosing confidential information.

B. CONFLICT OF INTERESTS

The professional decisions and activities we carry out in working with Tuscany must be loyal, impartial, transparent, honest, and must reflect the expertise that another professional of my same level would apply in my case. They should never be influenced by my personal interests or those of a third party. Tuscany has a Conflict of Interests Management Policy that is mandatory for all Tuscany employees and its Business Associates.

There are certain circumstances that may involve, in my professional role, the convergence of other interests due to: friendships, romantic or family relationships at work; business relationships with family members, friends or persons in a romantic relationship with me; participation in commercial interests or external employment; being part of a Board of Directors of another company or having been a public official and having managed private interests at Tuscany.

No interests other than those that are my responsibility as a Business Associate should come together. . In line with the Conflict of Interest Policy, in the event that a circumstance arises that gives or may give rise to a conflict of interests, I must report it to the Human Talent Area, and declare myself hindered in my ability to make decisions before getting involved in the matter.

Being involved in a conflict of interests or knowing about the existence of a conflict of interests and failing to report it, may give rise to a labor or commercial contract termination; a claim may be made for damage, as applicable, and the case will be filed with the authorities so that they can undertake the pertinent criminal investigations and procedures.

It is our obligation to report conflicts of interest so that the appropriate bodies can analyze these conflicts and take measures to manage them in order to avoid improper actions and decisions that are inappropriate or motivated by interests other than the interests of the company. Even if there is any doubt as to the existence of conflicts of interest, the situation must be reported for it to be assessed by the Human Talent Area and referred to the pertinent area. .

Although it is impossible to address all situations that imply conflict of interests, the following examples describe some scenarios:

- A relationships characterized by subordination and/or direct or indirect supervision between persons who are family until the fourth level of consanguinity or affinity*, persons who have or have had a romantic relationship or a close friendship.
- Have a second job in which the employer is a direct or indirect associate or competitor of the company.
- Be an owner, have an economic interest, or have shares in companies that are associates of the company or companies that are direct competitors of Tuscany.
- Be part of the Board of Directors of one of the company's competing companies, or a company that is an associate of Tuscany.
 - Have a family relationship up to the fourth degree of consanguinity or affinity with an employee of the company or an associate.
- Have romantic or close friendships with other Tuscany employees when there is subordination between positions.
 - Encourage, receive, or give gifts such as hospitality, trips, donations, among others, especially with suppliers, clients or public officials that do not fall within the provisions of the compliance policy.
 - Any situation in which the conditions of judge and party come together. - - - Influence for one's own benefit from one's rank or position within Tuscany.
- Participate in public politics and carry out political activities within the company.

*Fourth degree of consanguinity or affinity**

Grandparents, parents, uncles, brothers, children, grandchildren, nephews and cousins.

Likewise, grandparents, parents, uncles, brothers, children, nephews, cousins of the spouse or permanent couple.

Situations that give rise to conflict of interests imply affectation of impartiality on the professional decisions to be made. Therefore, if I am involved in such a situation, I should not keep quiet about this, in the belief that my decisions will not be affected by my friendship, family or romantic relationship. Quite the contrary; I must immediately report personal relationships of this kind.

Question: If the Head of any area has a romantic relationship with someone to whom he assigns functions and is under his supervision, and fails to report this to a line manager, the Compliance Officer or the Corporate Ethics and Conduct Committee to declared themselves hindered because they believe that their decisions are not influenced by their romantic relationship, are they acting correctly?

Response: No. A conflict of interests is not based on the decision making influenced by a personal relationship; it arises merely through the existence of: a) a relationship characterized by subordination and/or supervision between the Manager and the employee and, b) the personal relationship between the two of them.

Question: If the permanent couple of the Contract Manager works in a catering company and they hire such company for one or more of the operations centers, and they justify their decision on the ground that it was the one that offered the lowest price among the three offers, did they act correctly?

Response: No, because even if the contract was awarded to the lowest priced offer, there was a relationship constituting a conflict of interests that had to be reported so that other Tuscany employees could evaluate the offers and to decide upon the best offer.

What are my responsibilities?

- To identify if I have any personal relationships (family, romantic, friendship) with anyone at Tuscany, and if there is any relationship constituting subordination and/or supervision with such person.
- To identify if I have any personal relationships (family, romantic, friendship) with anyone that has an investment, or who is a partner, director, manager, employee or advisor of a company that is currently, or is trying to become a client, competitor, supplier, contractor or subcontractor of Tuscany.
- To identify if I have an interest, am a partner or belong to the board of directors of a non-profit company or organization that currently is, or is trying to become a client, competitor, supplier, contractor or subcontractor of Tuscany.
- To report all the above situations to my supervisor, the Compliance Officer, the Corporate Conduct and Ethics Committee.
- To use the reporting channels to report situations relating to other colleagues or contractors and suppliers that may affect Tuscany's transparent business.
- To notify my supervisor when any of my family members is interested in making a commercial transaction with our company.
- To abstain from making decisions involving interests other than corporate interests.

- To act in the best interest of our company and to never allow my personal interests to interfere with my ability to make objective business decisions.
- To seek advice from my supervisor or the Compliance Officer if unsure about the action to take.

V. APPROPRIATE MANAGEMENT OF OUR BUSINESS

At TUSCANY, integrity, transparency, honesty, impartiality, responsibility, trust and respect for the cultural diversity are essential values that serve as the grounds for our commercial relations worldwide with other individuals or companies. Hence, we contribute to negotiation under fair conditions, without breaching the law or the corporate policies.

Our corporate success depends on our understanding and compliance of free competition, privileged information, corruption and asset laundering laws, among other applicable on each country we operate, in furtherance of our functions.

A. FREE COMPETITION

Tuscany seeks to participate in the market under fair and transparent conditions, without behaving in a way that limits free competition and without abusing a dominant position as forbidden by the applicable laws in the countries where we operate, especially Decision 608 of 2000 issued by the Andean Community, which we use as a reference.

Warning Signs:

In relationships with competitors, clients, suppliers, no agreements can be made to:

- Directly or indirectly set prices or other trading conditions;
- Restrict the supply and demand for goods or services;
- Divide up the goods or services market;
- Prevent or hinder the access or continued existence of current or potential competitors on the market;
- Establish, agree or coordinate postures, inaction or results regarding public tenders, bidding or auctions.

Engaging in these behaviors may give rise to disciplinary sanctions, such as contract termination and monetary fines. Furthermore, there will be criminal liability, punishable through imprisonment for cases when, in order to tamper with the contractual procedure, there is collusion with another party in the public tender, public auction, quick selection or bidding process.

In the event that Tuscany has a dominant market position, such position must not be abused through behavior such as: imposing predatory prices; adoption of unfair conditions with respect to third parties offering equivalent services or operations, placing them at a competitive disadvantage; behavior that hinders or prevents access or the continued existence of current or potential competitors on the market, for reasons other than the economic efficiency.

Warning Signs:

- Events with competitors.
- Competitors, clients or supplier proposals to split the market share or to set the conditions thereof.

What are our responsibilities?

To understand the behaviors that go against free competition, in accordance with the applicable legislation.

- To abstain from setting prices; this includes no minimums or maximums, or stabilizing prices with competitors.
- To abstain from agreeing on the division of markets, consumers or territories with clients, competitors or suppliers.
- To abstain from agreeing to limit production with competitors, including agreements to reduce capacity.
- To select suppliers based on the most favorable offers for the company, based on objective criteria.
- To immediately step away from meetings where competitors are present and are attempting to reach an agreement to tamper with market conditions.
- To abstain from agreeing on behaviors with competitors, clients and suppliers to limit transparent competition.
- To reject every offer aimed at negatively impacting free competition and to notify a line manager, the Compliance Officer, the Conduct and Ethics Committee or the reporting hotline, reporting any situation that arises in connection with , any of our employees, clients, suppliers or competitors, which goes against competition and affects our business.
- Obtain market or competitor information through legitimate and appropriate channels.
- Report situations that potentially involve breach of laws on free competition.

B. PRIVILEGED INFORMATION

We may not unduly use privileged information belonging to Tuscany, our clients and suppliers, made known to us by virtue of or on account of position or duties, where such information is not of public knowledge.

Privileged information is that to which only certain people have direct access, due to their profession or trade, which due to its nature, is subject to confidentiality, as if known, it could be used to obtain profit or benefit for oneself or for a third party.

The information to be considered privileged must be sufficiently suitable for its use and, at the same time, it must relate to specific facts and refer to the corporate environment or the scope of operation of the company.

Examples: unannounced marketing plans, launching of new product, financial data, changes in profits or earnings, mergers or acquisitions, or business strategies.

Warning signs:

The following events are some that entail the undue use of privileged information:

- Providing privileged information to those not entitled to gain access to it.
- Using privileged information for personal benefit or the benefit of third parties.
- Willfully concealing privileged information to the detriment of the company or for personal benefit or to benefit third parties, which implies using it only for yourself and, through inaction, affecting the company, to enhance the benefit to yourself or the benefit to third parties.
- Similarly, the undue use of privileged information will arise when such information is not made public and there is an obligation to do so, and if it is disclosed in a closed environment or it is not disclosed at all.

This behavior shall give rise to disciplinary actions that may even lead to the contract termination, in addition to the criminal and civil liability incurred.

Furthermore, in the event that any employee, advisor, managing executive or member of the Board of Directors of Tuscany unduly uses information made known to him/her on account of his/her position or function, in order to obtain benefits for him/herself or a third party, the company shall refer the matter to judicial authorities so that they can undertake the respective investigations, as this is considered criminal conduct.

The only events where privileged information can be disclosed is when: there is express authorization from the Board of Directors that lifts the confidentiality obligation; when such information is requested by a public authority in furtherance of its duties; when it is made available to the agencies entitled to know it, such as the General Assembly, Board of Directors, statutory auditor, external advisors and associates in furtherance of their right of inspection, considering the limitations in force pursuant to the applicable laws.

What are my responsibilities?

- To maintain confidentiality and abstain from using privileged information for purposes other than those inherent to my corporate responsibility.
- To notify my line manager, the Compliance Officer or the reporting hotline of any situation I become aware of that may affect the confidentiality of privileged information, or where such information might be unduly used.

C. CORRUPTION AND BRIBERY

In promoting transparency in our businesses, Tuscany does not allow nor does it tolerate corruption crimes, both on a national or transnational level.

As a corporate commitment, we embrace compliance with laws against corruption, especially the United Nations Convention Against Corruption (UNCAC), the Interamerican Convention against Corruption from the Organization of American States (OAS), laws against corruption in the countries where we operate, the US Foreign Corrupt Practices Act (FCPA), the Canadian Corruption of Foreign Public Officials Act (CFPOA) and principle 10 of the United Nations Global Compact.

TUSCANY acknowledges the prevention, detection and response against public and private corruption as a corporate policy and commitment.

No bribery of public or private sector officials is permitted.

Gifts include invitations, trips, gift cards, profit share in a business, reduction or elimination of debts, disguised donations, personal favors, work offers for the individual or family members, or any other undue profit.

The bribery of national and foreign public officials, international organization officials and private sector individuals are behaviors prohibited by criminal law and must not be committed or

allowed by our partners, managing executives, employees, contractors, subcontractors and managing partners who have any relationship with TUSCANY.

Bribes entail criminal liability that may lead to imprisonment; disciplinary liability that gives rise to the contract termination and, finally, liability for damage caused to Tuscany.

The crime of bribery includes: Promising, offering, requesting, granting, receiving or authorizing cash, checks, presents, gifts, favors, the exchange of favors or other improper benefit, directly or indirectly to: national or foreign public officials; officials from a public international organization; managing executives, administrators, employees or advisors of entities in the private sector, including associations and foundations.

The aim of bribery is to ensure that a public servant or international public organization official acts or abstains from acting in furtherance of his/her lawful duties or, in the case of persons in the private sector, that they stop fulfilling the duty inherent to their functions (private sector employees), in order to obtain personal benefit or to benefit third parties.

Even the act of inducing the foreign public officer to use his/her position and influence acts or decisions of the foreign country or international organization is considered bribery.

Gifts and hospitality

During the course of our role in the Company, we occasionally accept or provide gifts, hospitality or invitations, though only under the following conditions:

- They are not in exchange for granting any advantage or ignoring any procedure.
- We do not do so when a decision is about to be made that is in any way related to the third party involved.
- The associated costs are reasonably consistent with similar situations.
- We accept gifts or make invitations as long as they do not compromise our objectivity in decision making or good judgment, and we never accept cash or cash equivalents.

In order to ascertain whether someone might be seeking to bribe me through gifts or invitations, the following questions must be asked to resolve my concern.

- Who is offering me a benefit? Is there a company behind this? Is it a client? Competitor? Contractor? Supplier? Third Party? Public servant?
- When are they offering a benefit? Is it prior to a decision that I must make and which involves the interests of the person or company that is giving or offering the benefit?
- What gain or benefit does the person or company seek with the benefit they are offering me?

- Is the purpose of the benefit or gift to ensure that my decisions differ from what another professional would do in my place?
- Would receiving a gift imply an obligation to the person giving the gift?
- Will I be reproached by my line manager, peers, family, authorities and by the company if I receive any gift?
- Is giving or receiving a gift an attempt to establish a commercial relationship, a normal courtesy, or is it intended to influence the objectivity of a business?

What are my responsibilities?

- To abstain from offering, promising, giving or authorizing cash, gifts, invites, favors or presents to public officials or persons from the private sector, even with respect to companies working for Tuscany, and not even if the company were to gain from these actions.
- If we know of any situation where money, presents, gifts or any other undue benefit is offered to us, we must immediately reject such offer, report the risk to a line manager, the Compliance Officer and/or call the reporting hotline, in accordance with the internal procedure.
- Similarly, if we know of any situation relating to any company member or managing partners who are bribing others or are being bribed, this must be immediately reported, otherwise we may be considered accessories.
- We must follow the mandatory procedures, such as the obligation to report.

Question: If I need to complete a permit, license or any other process with a public entity, which takes months and I'm getting no response whatsoever, and in order to expedite the process I decide to liaise with the public official and, to such end, I offer to pay a certain amount of money, would I be acting appropriately?

Response: No. Even if expediting the outcome of the public official's decision represents an essential requisite for us to operate, Tuscany does not justify any form of bribery.

Warning Signs:

- The client, supplier, contractor or managing partner we will negotiate with has no corporate anti-corruption programs.
- The person I am negotiating with, or who is working for us has been investigated or has been legally prosecuted for crimes of corruption.
- A vendor or contractor refuses to have his/her books and accounting records reviewed.
- The value of a transaction is higher than the actual market price.
- Unjustified increase in assets.

D. MONEY LAUNDERING, TERRORIST FINANCING FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

Tuscany's commercial transactions may not be used as medium for laundering money that has been illegally obtained, nor to finance terrorism or proliferation of weapons of mass destruction.

Tuscany's policy is to comply with international standards and the domestic standards of the countries where it operates, with particular attention paid to the FATF's 40 Recommendations. Under this principle, measures are adopted to prevent, detect and report behaviors which lend themselves to money laundering, terrorist financing or or proliferation of weapons of mass destruction.

Money laundering, also known as asset laundering, is a transaction that aims to give the appearance of legality to funds or cash illegally obtained through other crimes like theft, kidnapping, extortion, bribery, illegal enrichment, among others, described and declared as such in the legislation of each country where the company operates.

On the other hand, the financing of terrorism is the process by which goods, resources or assets of illicit or licit origin are obtained that are used to carry out terrorist activities, that is, those that generate anxiety, fear or terror in the population.

Finally, the financing of the proliferation of weapons of mass destruction is any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionation, transport, transfer, storage or use of nuclear, chemical or biological weapons, their means of delivery and other related materials in contravention of national laws or international obligations. when the latter is applicable.

Our company has mandatory procedures that we must follow in order to prevent our company from being used and being involved in transactions seeking to conceal and give illegally obtained cash or funds the appearance of legality, with such funds or cash then being used to finance terrorism or proliferation of weapons of mass destruction.

Questions to be asked by those engaged in negotiations and transactions:

- Who are the company's debtors (companies or individuals)? Who are the clients?
- How are payments being made? Are payments made through means other than bank accounts?
- What are the company's expenditures? Are there any items or amounts that seem odd based on my expertise?

What are my responsibilities?

- Verify the lawful origin of the funds received by the company.
- Abstain from tampering with accounting records.
- Report any abnormal circumstances.
- Report any unusual event.
- Verify the destination of donations.

Warning signs:

- Incomplete information or evasive responses from potential new clients, suppliers, contractors, or any other company or person where there is any type of contractual relationship.
- Sanctions issued by public entities of companies with which we have contractual relations for failing to comply with the requirements in prevention, detection and response to money laundering, terrorist financing and financing of the proliferation of weapons of mass destruction
- If any person or company with which we do business appears on any list of money laundering, terrorist financing and/or financing of the proliferation of weapons of mass destruction issued by different authorities.

E. IMPORT AND EXPORT CONTROL

We are committed to compliance with the law to control the export and import of commodities, goods and services provided by Tuscany.

What are the responsibilities of the Associates involved in the import and export process?

- Identify and understand the domestic and international laws applicable to the import and export process.
- Identify the operation's goods, technology or services, legal requirements, technical norms, logistics, costs (both international and domestic).
- Obtain quotes from suppliers as needed to carry out the operation and ensure that procurement is carried out through a transparent process.
- Obtain permits prior to importing or exporting goods, technology or services.
- Maintain clear, accurate and complete information on imports and exports.
- Enforce control on the activities of suppliers when importing or exporting.
- Refer to my supervisor or to the competent authority in case of breach of such norms, or in case of suspected breach thereof. *What are the responsibilities of all Business Associates?*
- Have clarity about internal rules and procedures on import and export control.

- Contact my supervisor, or the competent authority when violations of the procedures established in Tuscany occur or a violation is suspected.

F. FORM FOR RECEPTION OF AND COMPLIANCE WITH THE CCEE

The form GCU-FO-012 The Business Associate Responsibility Statement must be signed annually by the Business Associates.

* **

This CCEE has been updated by the Human Talent Management and by the Chief Executive Officer and approved by the Board of Directors of Tuscany Oilfield Holdings Ltd on March 17, 2025.