CODE OF CONDUCT











TLBS Corporation
...We are your company

www.tlbscorporation.com


TLBS
Corporation
...We are your company

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CEO MESSAGE 01

At TLBS Corporation we inspire our staff to have an impeccable behavior inside and outside the organization; ensuring more stable, integrated and reliable relationships with the environment.

For us the How? doing things is equal to doing the RIGHT! Our Code of Conduct is based on spreading ethical values for respect: to life, to people, to the environment, to customers, to competition, to the corporation and to ourselves; we work to build a better society. However, the way we act individually and as a group represents who we are. Therefore, the continuation of our success depends on our actions, which must be not only legally legitimate, but also ethical and professional.

To maintain the standard in the behavior of our collaborators, facing the different scenarios guarantees the synergy and cohesion of the corporation. This manual has been designed by a team of experts to implement regulations, laws and policy.



Compliance will be established through this Code of Conduct, so that it serves as a tool to provide guidance on the legal and ethical responsibilities we share in the workplace. The information presented here provides us with the data and resources we need to make a sound and responsible decision-making process in our work.

Javier Agostini

The name TLBS Corporation stands for integrity and reliability. Our BRAND is a very important strategic asset. It is up to all of us to protect and improve it.

When you think you cannot choose the way OTHERS act; remember that you can choose how to REACT to them, the behavior in the present will make the difference.

"If you fail to plan, you are planning to fail "

Benjamin Franklin



INTRODUCTION 02

Our Code of Conduct contains the foundations on which the corporation is based and contains the highest standards of behavior and respect for the rights of our workers, customers, suppliers, contractors, representatives, agents and the planet.

It is expected that all workers and levels of the corporation, adopt the code as an important part of their being, in order to promote corporate identity, sense of belonging, transparent and transcendental relationships; for the benefit of all parties involved.

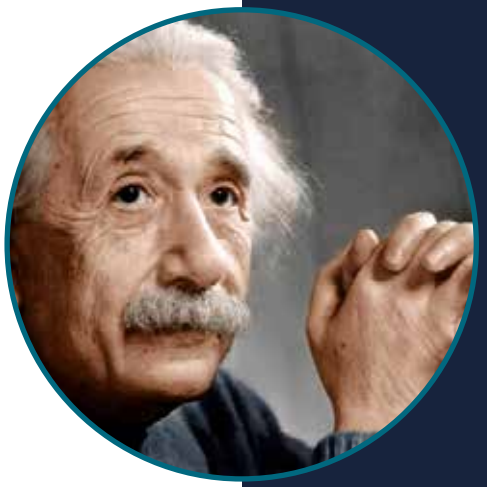
Within the purpose of our code is the overriding desire to provide guidelines, policies and standards to standardize the processes of decision-making, negotiation, our work behavior, that of our clients, suppliers, contractors, representatives, agents and that of the company. In an act of enriching correlation; based on our Win-Win culture.

This document was designed to:

- Establish the TLBS Corporation Model of Conduct efficiently and effectively, and promote best practices to facilitate its understanding and assimilation; ensuring its dissemination, implementation, and promotion through a comprehensive and sustainable integrity program.
- Promote the Model so that its implementation serves as an example to other members of the team, multiplying good practices.
- Promote the creation of a reliable and safe environment for the approach and solution of the ethical concerns expressed.
- Establish strategies for continuous improvement of the conduct model, to adapt to the realities and requirements of the Corporation; in line with current standards, norms and policies.
- This Code of Conduct describes and explains the rules and objectives that reflect our commitment to act responsibly, ethically and legally.

We always expect more from you...


TLBS
Corporation
...We are your company



"If you want to understand a person, do not listen to his words; observe your behavior"

Albert Einstein


TLBS
corporation

03 ABOUT US

We were born in 2016 in the United States of America to meet the demand of markets, and support our customers in their needs. We assist complex operational problems by applying our complementary technologies to contribute with automation and digitization in the process of maintenance of facilities and assets.

We are a “General Contractor” company for Engineering, consulting and project development, specialized in the areas of Oil and Gas, Reliability, Maintenance and Engineering Services for all types of assets and facilities. We use Artificial Intelligence and the Internet of Things through intelligent systems; we manage powerful technological tools to deliver comprehensive solutions from “ERP” Enterprise Resource Planning to “EAM” Enterprise Asset Management. We propose to reduce costs without decreasing the quality of our services and products, we help our customers to control budgets as a wholesale supplier of parts, spare parts, consumables, materials, equipment and commercial and industrial machinery.

Our culture is based on Win - Win; we move our specialties under the principle: Know - Do, we provide high-performance practical solutions being an agile, flexible agent that perceives your environment carrying out actions to maximize the chances of success, We help to meet the objectives of our clients as a supplier of goods and services for the sectors: Residential, Commercial and Industrial.

To meet the needs of our customers we have three lines of services:
SOFT - HARD - FLEET.

MISION

Provide products, services and technology for projects, reliability, maintenance and engineering and the best asset and facility management for our customers in residential, commercial and industrial areas.

Spread ethical values for respect for life and for people to build a better global society.

We are your company …

VISION

We will be the most focused service company in the management of business assets for all types of facilities and offer integrated engineering, technology and product solutions. Our biggest challenge is to accompany our customers in their needs and contingencies for production processes, operations, logistics, supplies, maintenance and special projects.

We are TLBS Corporation
Always with you.


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VALUES 04

Respect

We show respect to our workers, customers, suppliers, competitors and environment; we treat them as we expect to be treated.

Associated work

We encourage teamwork and partnership to achieve our goals and exceed our clients' expectations. Allowing that under this environment our staff can develop their work with equity and cooperation. We consider everyone equally important.

Ethics

We believe that staff work best when building trust. We respect and treat our colleagues, customers and suppliers so that they always feel appreciated and welcome at TLBS Corporation.

Transparency

We work under the principles of honesty, impartiality and transparency; seeking the benefit of the collective interest. Our technological tools, after the human resource, represent the most valuable tools for the successful control of all management, from the cloud and in real time.

Integrity

We demonstrate honesty, integrity and active participation in every action and decision we make. This helps us to uphold the values and principles of cooperation.

Staff

We are highly convinced that our people are the most valuable asset for our company, focused on diversity and inclusion in our work areas.

Responsibility

We are committed to social development, we believe that by cooperating and providing collective solutions for the benefit of communities we can contribute to the development of our country and a better balance of the societies of the world.

Art and social culture

For us to serve means to help spontaneously and to adopt an attitude of diversity, integrity and performance with a sense of collaboration towards others, at TLBS Corporation we transfer our high quality products and services to people in all areas of life: business, work, family, among others; making life lighter and more comforting in the search for the highest satisfaction of our customers and people.



05 TLBS CONDUCT



ISSA 2019



Power - gen 2019

Our image as a corporation depends on how our workers act in the work and social environment. The integrity of the staff cannot be called into question under any circumstances. Ethical conduct and ethical decision-making go beyond mere compliance with the law and therefore require employees to apply their judgement and accept their personal responsibility.

Among the aspects considered as primary within the code of conduct, the Zero Tolerance Policy is noteworthy in cases of racial discrimination, gender discrimination, harassment at work and risky and irresponsible behaviour.

TLBS Corporation truly values employees who report any concerns. If you think there is a problem and you are not sure what to do, we encourage you to seek advice, or if you see something that in your opinion is not right, always defend the right thing and communicate it. The company allows you secure media to report your concerns anonymously through various communication channels, such as email, phone or online channel. All bona fide reports and employee concerns are managed by an independent third party with the support of the Department of Human Resources.

Each employee must model an attitude and behavior according to the full compliance with the company's and the state's rules, laws and procedures.


QUALITY CONTROL
TLBS
Warranty
QUALITY CONTROL

ATTENTION TO ETHICAL CONFLICTS

06

¿Did you know?

Faced with an ethical conflict you must contact to the Resource Management Humans through hr@tlbscorporatión.com

In the presence of a particular situation where you are facing an ethical dilemma or difficult decision, we recommend that you ask the following questions:

- Is my action or decision legal?
- Does my action or decision comply with the corporation's policies and values?
- Does my action or decision comply with the ethical principles of this Code of Conduct?
- Is my action or decision free from any personal conflict or interest?
- If the news were to be published in the press, would what I intend to do be considered positive?
- Could my action or decision support a review of regulatory bodies?
- Can my action or decision serve as a model for other team members?
- Have I asked for advice from others who are aware of the matter, so that I can make an informed decision?
- Does my action or decision protect the interests of TLBS Corporation?
- Do I feel comfortable with the action or decision taken?

If the answer to all questions is "Yes", the action or decision, based on the principles indicated in this document, is clearly related to the TLBS Conduct.

If, on the other hand, you answer "No" to any of these questions, a violation of what is described in our Code of Conduct or policies has occurred or may occur, and you are responsible for reporting it.

Where an employee requires assistance or guidance in the face of an ethical dilemma or difficult situation, the employee may use the following actions or means:

Talk to your immediate supervisor

In most cases, your superior is the right person to consult. If you are unsure of the most appropriate way to proceed, consult higher instances. Asking your superior for advice is the best option.

Talk to a higher level supervisor

In special cases, when he does not consider it appropriate to consult his immediate superior, he may seek advice or communicate his concerns to his immediate superior.

Contact the Human Resources team

The human resources team is at your disposal to receive, channel and resolve any concerns, dilemmas or ethical issues that concern you, in addition to any other concerns related to your employment. Contact us through hr@tlbscorporationn.com.



RESPONSE TO ETHICAL CONFLICTS

07

We attend all reports of alleged violations of our Code of Conduct in a discreet and confidential manner; therefore the information will only be known by the personnel clearly involved, with the aim of being able to give a correct and timely resolution to the situation.

Aspects to consider when responding:

- Your participation in an investigation may be requested, if necessary.
- It is hoped that you can help in an honest and frank manner.
- In some cases and in accordance with the laws, the corporation may access, review and disclose the information processed or stored in the equipment, devices and computers of TLBS Corporation.
- All reported cases will be promptly investigated and appropriate disciplinary measures will be taken.

DISCIPLINARY ACTIONS

08

Actions that can lead to a disciplinary action include:

- Transgress the code, rules or policies of the corporation.
- Ask others to violate the code, rules, or policies of the corporation.
- Report a false accusation of possible violation of our code, our rules or policies.
- Do not report a known or suspected breach of our code.
- Do not cooperate honestly and openly during an investigation.
- Retaliate against anyone who reports a possible breach of our code, our rules or policies.
- In general perform any inappropriate conduct that compromises the company and transgresses the regulations and the code of ethics.

Disciplinary sanctions include the following:

- Verbal or written attention call.
- Temporary suspension with or without pay.
- Permanent suspension with or without pay.
- Dismissal.
- Legal and judicial proceedings

PRACTICING THE TLBS CONDUCT 09

¿ Did you know ?

"TLBS has a training course of communicational synergy"

We believe that all our employees are entitled to fair, courteous and respectful treatment, wherever they are working: in office, operational or industrial facilities, customer offices, among others.

Considerations:

- Trust in the team and did not accept any mistreatment from colleagues.
- Understand that every achievement and every failure must be shared.
- Maintain a culture of trust, mutual respect and dialogue throughout the corporation.
- Listen, motivate and support others to achieve common goals, and value the contributions of others.
- Remember that TLBS Corporation does not tolerate any form of abuse or harassment and we do not tolerate any action, conduct or behavior that is humiliating, intimidating or hostile.

At all times:

- Comply with this Code of Conduct.
- Communicate effectively and respectfully.
- Maintain flexible thinking.
- Share your experiences and inspire the rest of the team.
- Create a positive work environment.
- Promote culture and corporate identity.
- Report immediately if you experience any harassment.
- Promote an objective approach based on mutual respect and recognition for the contributions of others.
- Respect the rules of conduct of the company, treating with dignity and respect all candidates for jobs, other employees, contractors, customers and all third parties with whom they maintain contact in the course of their work.

At all times:

- Be discreet when talking or working on confidential topics.
- Follow the confidentiality rules of TLBS Corporation.
- Encourage your team to report any deviations from the rules, such as harassment, physical or social isolation, discriminatory isolation, or indecent proposals.
- Protect the property and information assets of the corporation.
- Use your tools, materials, equipment, software, technologies, vehicles, or any other assets necessary for the performance of your functions in a knowledgeable and secure manner.
- Perform your work safely, responsibly, securely, under safe working procedures the health and safety legislation in force.
- Report any unsafe conditions or behaviour that pose a health and safety risk.
- Promptly report any accidents, incidents, or near-misses.
- Maintain a safety culture at all events.
- Cooperate fully with your superiors in any matter concerning health and safety.
- Ensure that contracts and their terms are reviewed and approved at the appropriate level.
- Immediately report any fraud or other dishonest activity of which you are aware or have suspicions about it.
- Be alert to the possibility of fraud being committed by the corporation; or by internal or external staff and report it.
- Before speaking at an event or issuing any publication on behalf of TLBS Corporation, you must have an authorization.
- Expose your immediate superior if a relative or close friend works for a customer, supplier or competitor; and the possible existence of a conflict of interest. Put it in writing.
- Keep personal, political, and charitable activities separate from work activities.
- Respect the communities in which we work and be sensitive to their culture and customs.
- Do your job in a way that complies with environmental laws and minimizes any adverse effects on the environment.
- Report the matter immediately if they are aware, or suspect, of a violation of environmental laws or corporate principles.
- Understand and comply with all relevant permits, regulations, policies and guidelines if your work includes monitoring or handling regulated and/or hazardous materials.
- If you are unsure if something may constitute a bribe or illegal act, take precautions and seek advice from the Human Resources department.



UNDER NO CIRCUMSTANCES SHALL:

- Promote discrimination or harassment.
- Disclose information classified as confidential.
- Behave aggressively, disrespectfully, offensive, intimidating, malicious, or insulting.
- Make unwanted sexual suggestions or advances.
- Practice discrimination with racial, ethnic, religious, age-related, or sexual jokes or insults.
- Distribute offensive materials, including inappropriate images, jokes, or cartoons.
- Reveal personal information or spread malicious rumors.
- Manipulate reports, documents, or records in a malicious manner that may pose legal or administrative problems to the corporation.
- Improperly use the tangible and intangible assets of the corporation.
- Sell, transfer, or dispose of assets of the corporation.
- Act in a manner that violates client or corporate laws, regulations and policies".
- Let gifts or training influence decisions or make them seem like an influence on the recipient.
- Assume that a conflict does not matter because it is too small or insignificant.
- Post comments about individuals, businesses, or the Corporation informally, or for personal purposes.
- Let a conflict last a long time before taking action.
- You will be able to attend your workplace under the effects of alcohol, drugs or any other type of intoxication, which limits your abilities.
- Pass privileged information to third parties, such as family or friends.
- Or accept gifts or hospitality from government officials or representatives, or politicians or political parties, without the prior approval of your immediate superior.

TLBS Corporation

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OUR PEOPLE 10



Javier Agostini

Executive Director



Nemrod Contreras

Engineering



Nelson Sanoja

Projects



Ninett Vielma

Reservoirs



Linda Arias

Planning



Ender Mendoza

Operations for Latin America



Jhinezka Turrini

Treasury and Finance

We are highly convinced that our people are our most important and most

VALUABLE ASSET



Eilyn Velasquez

Public Relations



Andreina Carreño

HSE - QA/QC



Luidimar Cobis

Human Resources



Enderson Velasquez

Environment



Jesus Sarcos

Latin American Sales

EQUALITY

TLBS Corporation

...We are your company

¿Did you know?

All our processes
are made under the premises
of Equality and Equity

EQUALITY AND EQUITY POLICY 11

Our People and our commitment to them do not distinguish between races, nationalities or origins. We believe that with the formation of high-performance work teams accompanied by continuing education and training programs, we can create a unique work culture every day, providing diversity, inclusion and equal opportunities and conditions within the corporation.

There is no place for discrimination and harassment in TLBS Corporation.

We are an equal opportunity employer who employs qualified applicants without distinction of race, colour, religion, age, sex, sexual orientation, gender identity, national origin, disability or protected veteran status. We are committed to ensuring equal employment opportunities, including reasonable accommodation for people with disabilities.

We encourage a workplace with a pleasant organizational climate where employees are treated with dignity, justice and respect.

We offer you the opportunity to grow with us, to develop your talents and skills for your own benefit and that of your family, always expecting the best from you. Thank you for choosing Technologies Link Business and Services Corporation as an attractive option.



Applicants with a physical disability or mental health that require a reasonable accommodation, they can carry out their application process or contracting with the Procurement Department of Talents, receiving fair and humane treatment.

LEARNING, EXPERIENCE AND CAREER DEVELOPMENT POLICY 12

We firmly believe in the principles of Participation, the relationship between Theory and Practice, Feedback, Self-knowledge, Transfer and Results. These transversal foundations in all our processes, operational, administrative and financial, create a knowledge and technology structure that continuously improves our practices and working methods. Make - Review - Learn - Apply.

This policy makes TBLS Corporation a training and professional development center for our people based on experience and best practices. We offer you the opportunity to participate and get involved in our projects, plans and programs that will allow you to develop your technical and professional potential to deepen your cognitive skills. High quality training is essential to your success and that of the Corporation.



¿Did you know?

We promote continuing education and career development through TLBS University

GIFT AND HOSPITALITY POLICY 13



Offering or accepting reasonable gifts and hospitality can play a positive and legitimate role in building relationships with business partners. It is generally acceptable if it is reasonable under the circumstances, if it is proportionate and not lavish or extravagant. However, gifts and hospitality should not be used to gain improper advantage or in a way that may create a conflict of interest, involve a sense of obligation, or affect the judgment of the recipient. Gifts and hospitality should not influence any business decision, or cause others to perceive this influence.

Each TLBS Corporation activity must implement and maintain a gift and hospitality policy that establishes sufficient guidance and limits on the giving or accepting of all gifts and hospitality. These limits must be established to ensure that gifts and hospitality comply with local laws and practices, including anti-bribery laws. If there is any doubt about the limits, consult with the Human Resources department.



TLBS QUALITY POLICY

For us quality is written with “C” of Conduct, so it is always present in everything we do. Quality is evident from our behavior to our Products and Services lines.

We comply with the requirements of our customers and users, ensuring the correct compliance with national and international norms and standards; we constantly think about the development and innovation of new technologies, the skills of our staff, in the effective communication with our customers, suppliers and contributors, in the efficient search for solutions of simple and/or complex problems; to carry out them under high standards of quality and success; obtaining extraordinary results for the benefit of all.

> ***Quality means doing it rigth when no one is looking***
>
> ***Henry ford***

ENVIRONMENT, SAFETY AND WORK HEALTH POLICY 15

At TLBS Corporation, we take care of the environment, safety and health at work very seriously; our policy on this is known to all our employees and customers.

The Board of Directors of TLBS, in its process of continuous improvement and prevention of pollution, damage and deterioration of health, establishes a Comprehensive Management System based on ISO 9001: 2015, ISO 14001: 2015 and OHSAS 18001: 2015, among other quality standards. TLBS is committed to achieving an adequate and acceptable level of occupational safety for its workers and associates without reducing their overall health as a result of the work performed.

In addition, this policy establishes a frame of reference to ensure the establishment and review of the objectives and goals of Quality, Environmental Management and Occupational Safety and Health.



> ***If I knew that the world ends tomorrow, I, even today, plant a tree***
>
> ***Martin Luther King***

FOR THIS PURPOSE TLBS COMMITS TO:

• Provide a high quality service causing the least possible negative impact on the natural environment, on the safety and health of workers.

• Comply with environmental laws and strive to minimize adverse effects on the environment.

• Continuously improve the environmental management of the organization, as well as minimize and mitigate the potential environmental impacts that operational activities can generate.

• Identify, assess and control all health and safety risks, adopting best practices in all our work procedures.

• Develop training plans for all TLBS employees and associates to promote a culture of safe work.

• Ensure that employees have the training and tools to enable them to do their work safely and are empowered to make the right decisions about their safety and integrity throughout the working day.

• To promote continuous improvement in the aspects related to the quality of our services.

• Comply with permits, regulations, policies and guidelines during the use of regulated and/or hazardous materials.

• Comply with current legislation regarding occupational safety and health, as well as other requirements that TLBS may voluntarily subscribe with our clients.



COMMUNITY INTERACTION POLICY 16

We are committed to supporting the communities in which we work and recognize the need to contribute to their well-being with our professional knowledge and skills. Respect and understanding for different cultures and sensitive treatment of their important aspects is key for us because it will increase respect and credibility towards the company in the international environment. We have supported and will continue to support its development from the design and implementation of innovative projects that benefit the community. We must think that we are measured by our actions outside our workplace and so we ask our employees to respect the local culture and understand the particularities of the communities where they work.



PROTECTION OF INFORMATIONASSETS POLICY 17

Our employees must maintain a responsible culture regarding the management of information assets; so under no circumstances may they disseminate classified and private company information to the general public for any personal gain or for the benefit of others other than the company. We call information assets, any verbal or written information such as technical, financial, operational, business secrets, customer information, project development, patents, copyrights, trademarks, social networks or other information concerning the company's business, operational activities or future plans.

Likewise, employees shall respect the laws and regulations of the company regarding the protection of personal data; therefore, they may not disclose confidential information of a personal nature of other employees, shareholders and customers.



For us the security of information is very important; as it allows us to preserve the confidentiality, integrity and availability of information to reduce the risk and impact of potential threats to our business and our operations.

All corporate assets, both tangible and intangible, must be used exclusively for legitimate and authorized business activities.

TLBS Corporation provides tools, products and equipment to perform the execution of each of its works, and these means should never be used for personal use or for personal benefit. The company also provides access to computer resources such as computers, laptops, mobile phones, email, Internet and Software Licenses for commercial purposes.

Failure to comply with our policies on the Protection of Property and Information Assets will result in sanctions ranging from a verbal wake-up call to the lifting of legal and judicial processes.

BRAND PROTECTION POLICY 18

Our brand is what makes us unique and special to our customers. The way we do things is the best way to show the mystique, commitment, dedication and quality of the work, not only through our visual communications, but also through our collective and individual behaviors.

We are committed to the prevention of fraud and money laundering; so we have developed from an appropriate anti fraud culture. The company has a policy of zero tolerance for fraud, which can have a serious impact on the reputation of the organization, in addition to exposing both those involved and the company to judicial and criminal proceedings. No employee should knowingly allow a company or employee to perform a fraudulent act.
We trust that the excellence of our services is the key to our success, therefore we will negotiate with our customers, suppliers and government agencies in a frank and sincere manner, and in accordance with international standards against bribes regulated in local anti-corruption and bribery laws. This includes any transaction that may appear to have been made to grant concessions or benefits.

We believe faithfully in freedom of enterprise, therefore our businesses are based solely on merit and respect for the rules of healthy competition. We hire suppliers, agents and other intermediaries based exclusively on an honest assessment of their capabilities and merits. We are morally and legally obliged to make business decisions in a way that benefits the company in the best possible way, regardless of any agreement or understanding with a competitor. As a result, the company and its employees must avoid any conduct that violates or may appear to violate antitrust laws.

We hope that in the face of conflicts of interest, managers, supervisors and employees will maintain the highest ethical standards. Therefore, any relationship with persons or companies with whom we conduct business (Business Partners) that may generate conflicts of interest should be avoided. In the event that there are employees under this situation they must make this known to their superior. Such relationships include, in particular, those with members of the same family, spouses, partners, business partners, investors or shareholders.

EXTERNAL COMMUNICATIONS AND SOCIAL NETWORK POLICY 19



We believe that the correct and timely presentation of information through our social networks, television channel and press; allows to keep our customers, suppliers and business partners informed about the novelties or projects of the corporation, and promote the recognition and positioning of our brand.

It is very important for us to protect our reputation by being consistent and accurate in our communications with the public and other stakeholders. For this reason, the company is very serious about transparency and the communication of information.

Only employees specifically authorized to do so may contact, publish or respond to queries from the media, the public or government agencies. Employees must obtain authorization before speaking at an event, granting an interview, or writing material for publication as an employee of TLBS Corporation.

The Public Relations and Marketing department must approve all information before it is published.

We recognize that the use of social networks is widespread and has significant implications for the dissemination of information. However, employees should not post comments, in any format, that are confidential, unreliable, or otherwise may harm the reputation of the Corporation.

TLBS CORPORATION

tlbs.corporation

TLBS Corporation

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“The achievements of an organization are the results of effort combined of each individual”

Vicent Lombardi




TLBS
Corporation
...We are your company