

CODE OF CONDUCT

ATLANTIC METHANOL COMPANY



INTRODUCTION

CODE OF CONDUCT

Dear Colleagues,

The Atlantic Methanol Companies have a physical footprint on three continents and conduct business around the world. Our business depends on healthy and transparent relationships with all of our stakeholders – our customers, our owners, the communities where we operate, and one another. We enjoy these relationships due to our commitment to conduct business in an ethical and socially responsible way. This Code of Conduct is our guide to protect and build on that commitment.



Read this Code of Conduct carefully and in its entirety, because it is only through our own individual and collective commitments to these values that AMPCO will continue to be successful. Those values start with a proper respect for safety and the environment. They also require a respect for the laws that apply to us: we do not bribe and we always compete aggressively, but ethically. These laws provide the minimum for our ethical obligations, however, more is required of us to be successful. Because that success depends on all of us, we must work together in a loyal, respectful, and open manner. That means maintaining an inclusive workplace where we look for and give credit to one another's ideas and contributions.

Beyond this Code of Conduct, AMPCO has made available to you safety and legal compliance training to provide specific information about how the values in this Code impact our every-day work. We all know that not everything works according to plan, we are often faced with difficult situations we didn't expect, aren't sure of our actions, or even see a mistake. When any of these circumstances come up, it is not always easy to raise questions. Every single one of us is empowered – and expected – to speak up and ask for advice when faced with any of these challenges. If it is too difficult to speak up, use our third-party reporting system to raise questions about conduct that may threaten or be inconsistent with our values. These resources are to help each and every one of us do the right thing.

Thank you for taking the time to read our Code of Conduct and for using the information found here to help make the Atlantic Methanol Companies even better and stronger. Your dedication to living our values is vital to our continued success.

Our Vision:

Our vision is to be the most successful methanol company in the industry.

Our Mission:

Our mission is to maximize value for our customers and shareholders with a commitment to safe, clean, responsible business practices and the integration of Equatoguineans throughout the Company. It is through the quality and spirit of our people and partners that we will assure success.

Sincerely, Jim

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INTRODUCTION¹

This Code of Conduct (Code) states the values that govern behavior across all Atlantic Methanol Companies wherever they do business. It is a statement of AMPCO's commitments to all of its stakeholders – its employees, owners, customers, and communities where it operates – about how it will pursue its vision and mission.

AMPCO can deliver on its commitments in this Code only with the adoption and follow through of its employees. As a result, this Code states not just what employees should expect from the Company, but also what employees should expect from one another.

Those expectations include:

- **Safety:** The first requirement for performance excellence. No job is worth doing in an unsafe and unplanned manner. Safety hazards should be reported immediately.
- **Observance of the Laws:** Abiding by the letter and the spirit of the laws that apply to our business.
- **Honesty:** We are honest with ourselves and others.
- **Diversity & Inclusion:** We value, learn from, and respect the diversity of our workforce and the cultures where we operate.
- **Learning & Continuous Improvement:** As the foundation for success and our competitive position will erode over time without improvement.
- **Overachieve:** We continuously strive to exceed our stakeholders' expectations.



¹ This Code does not constitute an offer or guarantee of employment or any terms of employment. Further, AMPCO reserves the right to make unilateral changes to this Code at any time. Employees will be advised of any updates or changes.



RESPONSIBILITY FOR THE CODE OF CONDUCT

Each of us has a role in putting the Company Code into action:

All Employees are the front line for upholding and promoting the Code. We are all responsible for reading, understanding, and following the Code. We are also responsible to hold one another accountable by expecting that each of us perform our job responsibilities safely, ethically, inclusively, and with integrity. This means being aware of situations that could lead to illegal or unethical actions, and avoiding, preventing, and reporting such behavior.

Senior Management is responsible for setting the tone for upholding and promoting the values stated in this Code. This means setting an example through a commitment to all of the values stated in this Code. It also means promoting an open and transparent culture that encourages reporting potential violations and ensuring accountability for confirmed violations.

Supervisors/Managers are responsible for setting an example of safe and ethical behavior on a day-to-day basis. It means maintaining a work environment that promotes open communication regarding legal and ethical problems and concerns. They are also responsible to create and maintain a work environment where employees, consultants, and contractors know that ethical and legal behavior is required of them. They are expected to know what resources are available to assist in the resolution of ethical questions.

Human Resources is responsible for ensuring that new employees receive a copy of the Code, each employee acknowledges having read it, for coordinating training, and for ensuring compliance with Company policies and practices. They also provide a forum for any employee issues or reports regarding matters that cannot be resolved at the Department level. Human Resources also participates in any investigation required should an employee fail to comply with those policies and practices.

Finance & Administration is responsible for protecting Company assets and for providing information concerning financial authority levels. The Vice President of Finance & Administration is also responsible for all financial matters.



The General Counsel is responsible for answering any questions or concerns of a legal nature and assisting in any investigation of potential and alleged violations of the Code.

USING THIS CODE

The rules and principles contained in this Code are meant as a guide for our behavior as AMPCO employees. This is a quick reference to ethical business conduct. As a result, the Code does not identify all legal or ethical challenges you may face in the course of your work. We are all required to read the Code and acknowledge in writing that we have read it. We are then required to participate in annual training as a reminder of our obligations under the Code. The Company also has a number of policies and procedures that provide more detail to many of the concepts in the Code, with training on those policies and procedures.

While the Code does not address every legal or ethical challenge that may come up, it identifies the values that must guide our decisions when faced with a difficult situation. With those values in mind, ask yourself these questions before deciding to take a course of action:

- Is it legal?
- Is it consistent with our values?
- Is it good for AMPCO and its stakeholders?
- If it became public, would I be comfortable with it?

Answering “yes” to all of these questions is essential before taking action. Whenever unsure and when circumstances permit, don’t hesitate to consult a peer, supervisor, Human Resources, or the General Counsel.

SAFETY, HEALTH AND ENVIRONMENT

The safety and health of our employees, customers, and the public, as well as protection of the environment, are priorities in all AMPCO activities. Each of us must take daily responsibility for a work environment that meets the Company’s safety, health, and environmental standards. That is a commitment we make to ourselves and to one another. This commitment means complying with applicable laws, including all reporting requirements.

- **Drugs, Alcohol, Firearms and Other Prohibited Items**

Drug and alcohol abuse can seriously jeopardize safety, health, and job performance. AMPCO prohibits an employee’s unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance, or being under the influence of a prohibited substance while on Company premises or otherwise performing services for the Company without authorization from appropriate medical personnel. Any employee testing positive for prohibited substances will be disciplined, up to and including termination.



Firearms, explosives and other dangerous items and substances have been determined by management to be a threat to the Company's safety, health and environmental goals. They are strictly prohibited on AMPCO property unless specifically authorized by the Company.

- **Threatening and Violent Behavior**

AMPCO prohibits verbal or written threats of violent behavior, as well as acts of violent behavior and threatening gestures, in the workplace or the communities where we operate. Such acts and statements threaten the Company's safety, health and environmental goals and are disruptive to the workplace. These acts will not be tolerated, regardless of location, and will be subject to disciplinary action, up to and including termination.

Reporting unsafe or environmentally unsound practices or conditions is how we look out for one another and deliver on these commitments to safety. This responsibility includes immediately reporting any violations of safety policies or potential hazards. Additionally, every employee is empowered - and expected - to stop work being carried out unsafely. Failure to stop unsafe work, failure to properly report safety/environmental hazards, or asking another employee not to report safety/environmental hazards is a violation of this Code.





COMPLIANCE WITH THE LAW

Employees must generally understand and comply with all laws affecting their work. The consequences for violating any of these laws can be severe for both the Company and the individual involved, including possible civil and criminal liability.

AMPCO's operations are global in nature, so the Company is subject to a wide variety of laws across national and state borders. All of those laws can't be listed here, but the categories of laws that pose the greatest risks to the Company and its employees include the following:

- **Anti-Corruption Laws – Government Officials**

AMPCO complies with all applicable anti-corruption laws. The laws of nearly all jurisdictions where the Company operates prohibit bribery of their own public officials. Bribery of other countries' public officials is also prohibited under a number of laws applicable to the Company, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the British Bribery Act 2010 ("Bribery Act"). The FCPA, in particular, makes it a criminal offense to bribe foreign governmental or political officials to obtain or retain business (similar to the Bribery Act); and requires companies to maintain and keep records and accounts that fairly and accurately present their activities and transactions.

- **Anti-Bribery Practices**

AMPCO does not engage in bribery. Bribery is against our commitment to honesty and the FCPA, Bribery Act, and numerous other countries' laws prohibiting the bribery of public officials. Many of these laws also make it a crime to make a "facilitation payment," a small bribe that is also prohibited under Company policy. These anti-bribery provisions prohibit anyone working on AMPCO's behalf from offering or paying any bribe, kickback, or similar unlawful payment to, or otherwise entering into a sensitive transaction with any public official, political party or official, candidate for public office, or other individual in any country, to influence an official decision or to secure any contract, concession, or other favorable treatment for the Company. These offers and payments are illegal whether made directly or indirectly to a public official.

- **Record Keeping**

AMPCO maintains and keeps records and accounts that are honest, accurate, and complete. They must fairly and accurately represent its activities and transactions. The obligation for accurate record keeping applies not just to employees in financial roles but also to every employee who creates business records. It is AMPCO's policy to present financial statements in accordance with generally accepted accounting principles.



No secret or unrecorded fund of corporate assets will be established or maintained, and no false entries will be made in the Company's books or records.

AMPCO requires annual training to notify and remind employees of these requirements. The Company also maintains a system of internal controls to ensure proper documentation and approval of all business transactions by authorized management and the accuracy and completeness of Company records.

- **Anti-Corruption Laws - Private-Sector Employees**

AMPCO does not engage in bribery of private-sector employees, also known as commercial bribery. Commercial bribery is giving to or receiving from customers or suppliers (or their representatives), any personal payments, bribes or kickbacks with the expectation or effect of obtaining more favorable business terms or opportunities than would otherwise be available. Commercial Bribery is prohibited by the laws of various jurisdictions, including the United Kingdom and many U.S. states. Further information on practices that may be considered commercial bribery can be found under "Conflicts of Interest - Gifts and Entertainment."

- **Antitrust/Competition Laws**

AMPCO succeeds based on the merits of our work and we avoid any conduct that would restrict free and open competition. The intent of the antitrust and competition laws is to strengthen and promote competition, making it illegal to come to any agreement or understanding to restrain trade. Examples of agreements or understandings to restrain trade include: fixing prices with competitors; restricting production or output; communicating about production/sales plans or forecasts; dividing markets, territories, or customers; fixing the resale prices our customers can charge; rigging work bids with competitors; and organizing or participating in the boycott of a third party.

Other conduct that should be monitored and/or prevented depending on the circumstances includes conduct within trade associations, tying arrangements, exclusive dealing, customer restrictions, refusal to deal, reciprocity, price discrimination and below-cost pricing. The Company requires those employees most likely to encounter these issues to take annual training as a reminder of these risks. Consult with the General Counsel if you have questions or concerns.

- **Insider Trading**

We may come to learn through our employment at AMPCO nonpublic "inside information." That information can be about matters such as significant contracts, major litigation, potential sales or acquisitions, or confidential mineral plans or activities. The information can be about AMPCO or its owners, suppliers, and customers. This information is to remain strictly confidential until released to the public. Such information is never to be used for personal advantage or disclosed to any other party.



As such, employees are prohibited from trading in securities when they possess material inside information relating to those securities. If an employee has non-public information relating to the Company, its owners (Chevron Corporation and Marathon Oil Corporation), or any related joint ventures, affiliates or subsidiaries, the employee, and any person having a close relationship with the employee, may not directly or indirectly buy or sell securities (including stock options) of the affected companies.

The laws described above are only a few categories that apply to AMPCO. Although the Company provides training on these legal risks, that training doesn't make you a lawyer. If you have a question about any legal issue impacting the Company, you should promptly direct it to the General Counsel.





EMPLOYMENT PRACTICES

Respect for the dignity of every individual is the foundation of AMPCO's employment practices. We recognize and value the unique contributions a diverse workforce can bring toward making AMPCO successful. AMPCO will not make any hiring, compensation, promotion, termination or other job-related decision based on race, color, sex, religion, age, physical or mental disability of otherwise qualified individuals, or any other characteristic protected by law, or participation in a protected activity as defined by law.

WORK ENVIRONMENT

Everyone at AMPCO is entitled to a work environment that is fair, respectful, inclusive, merit-based, and professional. Harassment has the effect of creating an intimidating, offensive, or demeaning work environment. AMPCO will not tolerate harassment of any kind, whether it is sexual or non-sexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors and inappropriate comments about appearance. Harassment of a non-sexual nature may include offensive comments, jokes, taunting, or pictures related to race, religion, ethnicity, gender, age, or other protected class. Employees are prohibited from harassing other employees, contractors, or Company guests whether or not the incidents of harassment occur on Company premises and whether or not the incidents occur during working hours. AMPCO's anti-harassment policies extend to Company provided living accommodations and various facilities within Punta Europa.

Every employee has a role in creating and maintaining an inclusive and professional work environment by ensuring that the workplace is free of discrimination, harassment, intimidation, and coercion. We are all required to set an example of these values and hold one another to that same standard.

HUMAN RIGHTS

AMPCO's commitment to individual dignity and respect is not simply a matter of providing a professional work environment but also a matter of respecting human rights. Human rights are inherent to all human beings regardless of race, gender, ethnicity, religion or other status. Fundamentally, AMPCO's commitment to human rights means treating everyone with dignity and respect.



CONFLICTS OF INTEREST

When working for the Company, each of us has a duty to act in the Company's best interests. A conflict of interest arises anytime something you do or some relationship you have outside the workplace interferes with your duty to AMPCO. It means that no employees or their family and friends should gain personally, directly or indirectly, in a way that negatively impacts AMPCO's business, reputation, or relationships with its stakeholders. Importantly, even the appearance of a conflict of interest can create a problem by leading others to question your judgment and decisions around the conflict. As a result, we are all required to avoid every situation that creates or appears to create a conflict with the Company's best interests. Examples of some of those situations include:

- **Gifts and Entertainment**

An employee is not permitted to ask for or accept gifts, services, benefits, or unusual hospitality from customers or suppliers that might influence or appear to influence the employee's duty to the Company. Employees also are not permitted to offer or give gifts, services, benefits, or unusual hospitality to customers or suppliers that might influence or appear to influence their duties to their employers. Gifts and entertainment may be exchanged at a level that does not exceed customary courtesies extended in accordance with ethical business practices and the Company's Gifts & Entertainment Policy. Regardless of what those practices or the policy provisions dictate, if you're in the middle of negotiations or bid evaluations you should exercise extra care in giving or accepting gifts.

The following criteria should be used to evaluate gift or entertainment issues:

- Is it a violation of law, regulation, or policy of either party's employer?
- Is it consistent with accepted business practice?
- Is it reasonable in cost, amount, quantity, frequency, and form?
- Is it ethically acceptable?
- Could it appear to influence my duty to act in AMPCO's best interests?
- Would public disclosure embarrass me or AMPCO?

- **Outside Activities**

Employees are not to participate in outside business or personal activities that interfere or could potentially interfere with their duties to the Company or Company interests. This includes participation in any business activity that would compete with or benefit from a relationship with the Company. AMPCO employees are, however, encouraged to work with civic, charitable, and professional groups. Outside investments by employees (or through others) are not to include oil and gas, mineral, or other natural resource interests without a written confirmation from the Company's Senior Management that the acquisition is not contrary to Company interests. Note that such interests do not



include holdings in publicly traded companies, which are governed under the above section entitled "Insider Trading." Outside investments in public companies that do or seek to do business with or are competitors of AMPCO are permitted, providing no investment in any one such Company is significant to the employee's assets or income.

- **Reporting Relationships**

A conflict of interest can also be created by having a relationship with your direct or indirect report. Employees cannot have a direct or indirect reporting relationship to a near relative, romantic interest, or close friend without the written consent of the Human Resources Manager.

- **Use of Company Assets**

AMPCO facilities, equipment, materials, and other assets are not to be used for personal gain. This includes use of people's time paid by the Company for non-Company purposes. Use of Internet and telephone resources in Company-provided housing are subject to the terms of use provided for those resources. While occasional personal use of these company-provided resources is permitted, it should be kept to a minimum and never interfere with our work duties. In no event should Company assets be used for personal gain or in a manner contrary to Company interests. Whether or not the Company suffers any loss, it is still considered a conflict of interest.

Keep in mind the importance of avoiding an actual or apparent conflict of interest. If you suspect you may be conflicted with respect to your work duties, contact your supervisor to talk the issue through and see if any approvals or protective measures are warranted.





COMPANY PROPERTY

Each employee has a responsibility to protect AMPCO assets against theft, damage, loss, and misuse. Company assets include cash, land, buildings, equipment and inventory as well as business plans, inventions, electronic data, Company records and other Company information.

ELECTRONIC INFORMATION AND IMAGES

In the course of employment with the Company, employees may have access to the Company's telephone and electronic mail/messaging systems, computer network, internet connections, hardware, software, and stored information. These are all Company resources and may be used only in connection with Company-related business and in a manner (1) consistent with Company-established guidelines, (2) that protects the Company's intellectual property rights, and (3) that respects third-party intellectual property rights.

These resources are not to be used for inappropriate purposes or in a manner that would interfere with others' use. Inappropriate and prohibited uses include copyright infringement, posting or viewing obscene material, fraud, slander or defamation, intimidation, impersonation, and computer tampering.

All AMPCO assets, including personal computers and electronic information, are intended for business use and remain Company property. While occasional personal use of these resources is expected, employees are not permitted to use them for non-business purposes that may present a conflict of interest. Employees should not expect privacy in their use of these Company resources. The Company may monitor an employee's use of these resources at any time to ensure that such usage serves a business purpose, or access any information stored on Company hardware or servers at any time and for any purpose.

REPORTING & RECORDKEEPING

AMPCO's commitment to integrity requires honest, complete, and timely business reporting. Business reporting includes, but is not limited to, financial information, business plans, regulatory, production, and attendance reporting. All business reports are required to be created following internal processes and controls. They can in no way misrepresent financial results or any performance metrics.

These same reporting and recordkeeping requirements apply to business expenses. AMPCO pays for reasonable and necessary travel and other expenses incurred in the conduct of Company business in accordance with Company policies and procedures. All expense reports should be prepared properly and accurately and submitted monthly. Supervisors are responsible for careful review of expense reports submitted for their approval.



CONFIDENTIALITY

Each employee has an obligation to protect confidential information learned through the course of his or her employment. The rule is simple: keep confidential information confidential. This applies to any private information regarding Company activities and employees.

The Company's confidential or sensitive information includes anything regarding the Company or its operations not known to the public. Examples of Company confidential or sensitive information include a planned or unplanned outage, production forecasts, financial performance, technical information, contracts with third parties, and legal disputes. Unauthorized release of confidential information can, at a minimum, damage AMPCO's reputation with its customers, owners, and other stakeholders. The release of this information can also constitute a breach of our contractual commitments to third parties or even a crime.

The Company also comes into the possession of confidential employee information, or protected personal data, that must be protected. Protected personal data includes any information that can directly or indirectly identify an individual such as name, home address, salary, age, health and benefit information, and national identification number. Access to this information is strictly limited and those employees who have access to it are not permitted to disclose it. Only authorized Human Resources and Administration Department representatives can release employee information, including references, outside the Company, but only with the affected employee's prior written consent.

POLITICAL CONTRIBUTIONS

AMPCO does not make contributions to political parties, committees, elected officials or candidates for office in any federal, state, local or foreign election, except where permitted by applicable law and with prior approval of the president. Employees are encouraged to participate actively in the political process on their own time and at their own expense.

POLITICAL ACTIVITY

AMPCO believes that participation in any project is based on its potential, business economics, and technical expertise, not political motivation. As such, employees should generally maintain a stance of neutrality in the internal political affairs of a host country. Participation in the internal political affairs of a country for a business purpose is permitted only with prior written approval of the president or his designee.

AMPCO is committed to meeting the highest ethical standards in all operations, at home and abroad. This includes treating everyone fairly and with respect, maintaining a safe and healthful workplace, and improving the quality of life wherever AMPCO does business. It also means conducting business in a way that generates pride in AMPCO employees and respect from the world community.



CODE OF CONDUCT VIOLATIONS

As noted above, the Code commits the Company and each employee to certain behaviors for the benefit of one another, the Company's owners, customers, and other stakeholders. As a result, any violation of the Code is treated seriously as it threatens the Company's credibility with its stakeholders and may also result in fines, penalties, or other legal action. An employee's violation of the Code or related policies and procedures can lead to disciplinary action up to and including termination.

AMPCO can't address any violation of the Code if it goes unreported. For that reason, employees are encouraged to report actual or reasonably suspected violations of the Code or Company policy as early as they become aware of it. Delay in raising any concerns increases the chances of the violation becoming more serious or being repeated. An employee can report a potential violation or concern directly to his or her supervisor or Human Resources. The Company commits to handle each report discreetly and to make every effort to maintain the reporting employee's confidentiality or anonymity. Reporting a violation or concern isn't always easy, so AMPCO has a hotline in place where a potential violation can be reported anonymously:

Telephone:

In Equatorial Guinea: +240-00-086-1240

In the United States: +1-800-292-4918

Online: <https://app.mycompliance.com/report?cid=AMPC>

All reports will be investigated. If appropriate, corrective and disciplinary action will be taken.

NO RETALIATION

The Company does not tolerate retaliation for any actions taken consistent with this Code. No employee will experience any adverse work treatment for:

- reporting a violation;
- stopping work being carried out in an unsafe manner;
- refusing to do something contrary to this Code, Company policies, or applicable law;
- reporting a concern or violation in good faith; or
- cooperating in an investigation.



Examples of retaliation or adverse work treatment can include: job termination; transfer; demotion, verbal abuse, and exclusion. Anyone who commits an act of retaliation will be subject to disciplinary action.

DOS & DON'TS

- ***What we should do:***

- Treat others the way we'd like to be treated ourselves – with dignity and respect.
- Follow established safety procedures to protect one another, our contractors, our customers, and our communities.
- Safeguard our environment by following appropriate procedures and fixing any problems immediately.
- Serve our customers with friendly, helpful, honest service – the way we'd like to be served as customers.
- Take responsibility for our actions.
- Tell the truth and report problems.
- Follow the law.

- ***What we should NOT do:***

- Discriminate.
- Harass.
- Steal or give away AMPCO assets.
- Disclose confidential information to outside parties.
- Cover up mistakes or problems.
- Lie to supervisors or on reports.
- Break the law.

FREQUENTLY ASKED QUESTIONS

- ***How are my obligations to meet financial or business goals and my obligations to the Code viewed by the Company?***

The two are completely compatible...and in fact directly connected. Doing the right things for the right reasons is always good business. The Company's interests are never served by unlawful or unethical business practices.

- ***Sometimes I feel like my supervisor is making fun of me and it makes me feel very uncomfortable. What should I do?***

Our values and treatment of employees go beyond legal issues and are based on respect and dignity for every employee. Discuss the matter with your supervisor or, if you feel uncomfortable doing so, raise the matter with Human Resources.



- ***We had a small spill recently that we took care of quickly...but I'm pretty sure nobody notified management. No one wants the paperwork or the aggravation. What's our stance on this?***

We will obey the law. We are responsible for being good environmental citizens – and this means not only prompt, effective clean-up but also accurate and honest reporting of any problems. Any event that threatens the environment or our reputation must be reported to management.

- ***Does this Code apply to conduct and behavior that takes place after hours on Company premises, in Company-provided housing, or off-site work-related events?***

Yes, nearly all of the provisions of this Code, especially including the Company's commitment to a safe, respectful, and inclusive work environment, apply to conduct that may take place outside the office and/or after hours. While the Company respects the privacy of those living in Company-provided housing, conduct that is inconsistent with this Code may still be subject to disciplinary action even though it takes place after hours or outside the office.

- ***Suppose I am offered a gift that I feel I should not take, but it would be embarrassing to refuse...what should I do?***

This is why the gift guidelines call for good judgment and disclosure. You should always feel free to decline a gift. However, if you receive a gift you feel is inappropriate you should advise your supervisor to insure it is not of inappropriate value. If it is determined to be an inappropriate gift, it can be returned with a thank you note.

- ***Sometimes it seems to me that safety takes a back seat to productivity. What should I do?***

We are committed to putting safety and health first. Discuss your perceptions with your supervisor. We all share the responsibility for safety and the responsibility to speak up without any fear of retaliation even when it's not popular.



ACKNOWLEDGMENT

This is to acknowledge receipt of the AMPCO Code of Conduct. I understand that violations of the Code may result in possible financial penalties as well as disciplinary actions, up to and including termination.

Name (please print): _____

Signature: _____

Date: _____

AMPCO Hotline

In Equatorial Guinea: +240-00-086-1240

In the United States: +1-800-292-4918

Online: <https://app.mycompliancereport.com/report?cid=AMPC>

Code of Business Conduct

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