

POLICY

on Corruption and Abuse Prevention

in Force at the EXALO DRILLING Group

As a credible economic entity and business partner acting responsibly and transparently, gaining competitive advantage solely through the quality, price, and innovative nature of its products and services, ORLEN S.A. declares and expects a zero-tolerance approach towards any symptoms or cases of corruption and abuse, promoting actions based on ethical values and compliance with legal regulations and market standards governing anti-corruption and abuse prevention, in all markets of activity of the ORLEN Group companies, their branches, and representations, including Exalo Drilling S.A.

This 'Policy on Corruption and Abuse Prevention in Force at the Exalo Drilling Group' (hereinafter referred to as the 'Policy') has been established to ensure a fair and transparent business model for the Exalo Drilling Group, guaranteeing trust, economic transaction security, free competition, and value for all stakeholders of the Exalo Drilling Group.

The Policy complements the provisions of the Code of Ethics of the ORLEN Group, particularly in the context of building awareness and defining rules of conduct to mitigate the risk of corruption and abuse.

Subject to the requirements of local legal regulations regarding corruption and abuse prevention, the requirements of this Policy apply to all employees of Exalo Drilling Group companies, regardless of the form of cooperation or the type of position held, as well as to other stakeholders of Exalo Drilling Group companies, in particular entities acting on behalf of Exalo Drilling Group companies.

Non-compliance with the Policy may lead to reputational damage to the Exalo Drilling Group company, as well as legal or financial liability for employees, companies, or other stakeholders of Exalo Drilling Group companies and may result in the termination of cooperation and the pursuit of claims for damages.

1. Policy Objectives

The objective of the Policy is in particular:

- 1.1. To establish uniform and consistent rules of conduct for Exalo Drilling Group companies to mitigate the risk of corruption and abuse during their business activities, especially in relations with public administration representatives and counterparties.
- 1.2. To define actions and responsibilities within Exalo Drilling Group companies, the implementation of which leads to reducing the risk of corruption and abuse.
- 1.3. To strengthen the awareness of employees, external representatives, and stakeholders of Exalo Drilling Group companies regarding adopted ethical standards.

2. Definitions and Terminology

2.1. The terms used in the Policy mean:

public official	means a natural person holding a public function as defined in the legal system of the country where the Exalo Drilling Group company operates;
Exalo Drilling Group	means Exalo Drilling S.A. and commercial companies that are its subsidiaries as defined by International Financial Reporting Standard 10 – Consolidated Financial Statements or another standard replacing it, including their branches and representative offices;
conflict of interest	<ol style="list-style-type: none">1) occurs when a person holding a position subject to conflict of interest assessment within an Exalo Drilling Group company, as per the Conflict of Interest Management Policy at the Exalo Drilling Group, or an external representative of an Exalo Drilling Group company makes decisions or knowingly takes actions on behalf of the Exalo Drilling Group company in a manner that brings or may bring benefit (financial or personal) to themselves or related entities,2) occurs when the interests of a person holding a position subject to conflict of interest assessment within an Exalo Drilling Group company, as per the Conflict of Interest Management Policy at Exalo Drilling Group, or an external representative of an Exalo Drilling Group company – due to legal or factual connections with another natural person or legal entity – influence or may influence the assessment of a situation, decisions made, or tasks performed, and the nature of the legal or factual relationship raises justified doubts about the impartiality of this person or external representative;

counterparty	<p>means a natural person, legal entity, or organisational unit without legal personality:</p> <ol style="list-style-type: none"> 1) that is a party to an agreement concluded by an Exalo Drilling Group company or providing services for an Exalo Drilling Group company based on an order/commission, 2) with whom an Exalo Drilling Group company is negotiating to conclude an agreement or place an order/commission;
corruption	<p>means promising, offering, giving, accepting, or inducing the acceptance of an undue financial or personal benefit, regardless of its value, in violation of applicable law, as an incentive or reward for a person acting or refraining from acting in connection with the performance of official or professional duties; corruption is considered a form of abuse;</p>
financial benefit	<p>means any good or service whose value can be expressed in monetary terms. A financial benefit is an advantage both for oneself and for a third party and may involve increasing assets (e.g., a loan on preferential terms, a donation, winning a tender) or reducing liabilities (e.g., avoiding asset losses, debt forgiveness), which in each case primarily satisfies a material need;</p>
personal benefit	<p>means a non-material benefit that improves the situation of the person receiving it or satisfies their needs. A personal benefit is an advantage both for oneself and for a third party and may involve, e.g., promising to offer/receive a job proposal or offering a higher position in the current workplace;</p>
control mechanisms	<p>mean actions that influence the likelihood of materialisation of abuse risk and the scale of its impact on the activities of Exalo Drilling Group companies. Control mechanisms are also formal, organisational, or operational solutions aimed at preventing and detecting cases and symptoms of corruption and abuse;</p>

abuse	means an act or omission that constitutes a violation of the law, internal regulations, or rules applicable in Exalo Drilling Group companies, as a result of which the person committing it or entities associated with them gain undue benefits, or which result in unjustified losses incurred by Exalo Drilling Group companies. Benefits or losses may be financial, material, or non-material in nature – this also includes personal benefits and reputational losses. Any form of corruption, in particular, is considered abuse;
person holding a public function	means, in particular, a public official and other persons specified in the regulations of the country where Exalo Drilling Group companies operate, including members of local government bodies or employees of organisational units managing public funds;
employee	means a person employed in Exalo Drilling Group companies under an employment contract, regardless of the working hours specified in the employment contract. For the purposes of this Policy, an employee also includes a person providing services to Exalo Drilling Group companies under a civil law contract or holding a position on the management board or supervisory board of Exalo Drilling Group companies based on a resolution of appointment or a shareholder's declaration;
external representative of the Exalo Drilling Group	means any external entity representing Exalo Drilling Group companies in dealings with counterparties, suppliers, customers, or state or local government institutions, as well as any external entity supporting Exalo Drilling Group companies in acquiring clients or selling goods, products, or services on behalf of Exalo Drilling Group companies; external representatives are individuals acting on behalf of or in the interest of Exalo Drilling Group companies based on a legal action.

2.2. Whenever the Policy refers to rules on:

- 2.2.1. accepting and giving gifts, it means the rules specified in the *Policy on Receiving and Giving Gifts in Force at the Exalo Drilling Group* (hereinafter referred to as the 'Gift Policy'),
- 2.2.2. managing conflicts of interest, it means the rules specified in the *Policy on Managing Conflicts of Interest in Force at the ORLEN Group* (hereinafter referred to as the 'Conflict of Interest Management Policy'),

– which have been introduced in Exalo Drilling Group companies through separate internal organisational acts.

- 2.3. In Exalo Drilling Group companies, based on separate internal organisational acts, processes are carried out for verifying counterparties and receiving and clarifying reports of law violations.

3. Prohibited Behaviours

- 3.1. Exalo Drilling S.A. declares and expects zero tolerance for any symptoms or cases of corruption and abuse, which may take the forms or nature specified in section 3 of this Policy.
- 3.2. **Bribery**, meaning demanding, accepting or promising financial or personal benefits, as well as giving or promising to give financial or personal benefits in exchange for abuse of granted powers or failure to fulfil duties, which may cause financial harm to Exalo Drilling Group companies or constitute an act of unfair competition or an impermissible preferential act for the benefit of a buyer or receiver of goods, services, or benefits, is strictly prohibited. The above does not apply to the acceptance and giving of gifts permitted under the rules specified in the Gift Policy.
- 3.3. **Bribery**, meaning giving or promising financial or personal benefits to a person holding a public function in connection with the performance of that function, is prohibited. Actions aimed at inducing a person holding a public function to violate legal regulations or giving or promising to give such a person financial or personal benefits for violating legal regulations are also strictly prohibited. The above does not apply to the acceptance and giving of gifts permitted under the rules specified in the Gift Policy.
- 3.4. **Paid protection in business activities**, meaning invoking influence and position in Exalo Drilling Group companies or creating the belief in another person or reinforcing their belief in the existence of such an influence and undertaking to mediate in resolving a matter in exchange for financial or personal benefits or their promise, is strictly prohibited.
- 3.5. **Paid protection in public administration**, meaning giving or promising to give financial or personal benefits in exchange for mediation in resolving a matter in a state institution, local government, international or national organisation, or foreign organisational unit managing public funds, involving unlawful influence on a decision, action, or omission by a person holding a public function in connection with the performance of that function, is strictly prohibited.
- 3.6. **Bid rigging**, including actions taken with the aim of gaining a financial or personal benefit by sabotaging or interfering with a tender or procurement process, or colluding with another person to the detriment of the asset owner or the individual/institution for whom the tender or procurement is conducted, is strictly prohibited. In connection with tenders or procurement procedures, it is also prohibited to spread misleading information or withhold material facts relevant to the conclusion of the agreement in question, or to collude with another person to the detriment of the asset owner or the entity/institution for whom the procurement is conducted.

- 3.7. **Sports corruption**, meaning demanding, accepting or promising financial or personal benefits, as well as offering or promising such benefits in exchange for unfair actions that may influence the outcome or course of sports competitions organised by a sports association or an entity acting under an agreement with such an association or with its authorisation, is strictly prohibited.
- 3.8. **Maintaining dishonest financial records**, meaning causing financial damage to the Exalo Drilling Group company by failing to maintain business activity documentation or maintaining it dishonestly or untruthfully, particularly by destroying, removing, hiding, or falsifying documents related to the company's activities, is strictly prohibited.
- 3.9. **Acts that harm the resources** of the Exalo Drilling Group company, including theft, appropriation, destruction, damage, or any use of the resources of Exalo Drilling Group companies that is inconsistent with legal regulations, internal rules, or the intended purpose of these resources, are strictly prohibited.
- 3.10. **Favouritism and nepotism**, meaning the abuse of a position or mutual support among representatives of a group (e.g., due to kinship, closeness, or belonging to the same political, religious, professional, ethnic organisation, etc.) to gain financial or personal benefits based on connections rather than substantive criteria specified in the rules applicable to Exalo Drilling Group companies, are strictly prohibited.
- 3.11. **Making contributions to political party funds**, meaning contributions made by Exalo Drilling Group companies to domestic or foreign political parties, movements, or their supporters, regardless of their form, is strictly prohibited.
- 3.12. **Exerting pressure or influence** is strictly prohibited, meaning that sponsorship, barter, and donation activities carried out by Exalo Drilling Group companies must not take the form of exerting pressure or influence on the beneficiary's decision-making process.
- 3.13. Other behaviours prohibited by universally applicable law, including fraud, document falsification, and misrepresentation, are also strictly prohibited.
- 3.14. No negative consequences may be imposed by Exalo Drilling S.A. on any entity acting in line with this Policy, where, as a result of such compliance, the entity did not succeed in, e.g., acquiring or retaining a client, completing a sale of a product or service, achieving a target, or generating any economic or reputational benefit for the Exalo Drilling Group.
- 3.15. In case of any doubts regarding the prohibited behaviours listed above, one should immediately contact their direct supervisor or the anti-corruption coordinator at the Exalo Drilling Group company.

4. Responsibilities of Management Boards, Employees, and External Representatives of ORLEN Group Companies

- 4.1. The management boards of Exalo Drilling Group companies are obliged to:
 - 4.1.1. implement the Policy and enhance the effectiveness of formal and organisational solutions aimed at reducing the risk of corruption and abuse, as well as demonstrate and promote honest and transparent principles of conduct.

- 4.1.2. monitor and identify risks of corruption and abuse in business processes, particularly by overseeing the application of control mechanisms in supervised business processes.
 - 4.1.3. ensure transparency in interactions with counterparties and public administration, to the extent that does not violate trade secrets.
 - 4.1.4. ensure support, cooperation, and participation in the exchange of information within the Exalo Drilling Group regarding risks related to corruption and abuse.
 - 4.1.5. ensure communication and training to raise awareness among employees, external representatives, and counterparties of Exalo Drilling Group companies on combating corruption and abuse.
- 4.2. Employees and external representatives of Exalo Drilling Group companies are obliged to:
 - 4.2.1. comply with the principles set out in this Policy, including avoiding prohibited behaviours, and reporting any information about such behaviours or suspicion of such behaviours to their supervisors, either personally or anonymously through the channels for reporting legal violations in ~~ORLEN~~ Exalo Drilling Group companies, including the Exalo Drilling S.A. Security Office.
 - 4.2.2. adhere to the applicable laws in all countries where Exalo Drilling Group companies conduct their business activities.
 - 4.2.3. abide by the ethical standards adopted within Exalo Drilling Group companies and avoid conflicts of interest in all activities undertaken – particularly in business transactions involving individuals, contractors, public institutions, and civil society organisations,
 - 4.2.4. apply anti-corruption clauses and declarations in dealings with counterparties, confirming that the counterparties' anti-corruption and ethical standards comply with the requirements of Exalo Drilling Group companies.
 - 4.2.5. apply control mechanisms and ensure transparency in the processes mentioned in section 5.1 of this Policy.
- 4.3. In business processes where employees or external representatives of Exalo Drilling Group companies may or do influence the selection of a counterparty due to decisions made or opinions issued, the following principles should be adhered to:
 - 4.3.1. equal access for counterparties to information from conducted activities.
 - 4.3.2. limited access for unauthorised persons to information from conducted activities.
 - 4.3.3. preventing the acquisition of undue financial or personal benefits.
 - 4.3.4. exercising due diligence in the execution of business activities,
 - 4.3.5. abstaining from activities in situations where there is even a potential conflict of interest.
- 4.4. The coordination and reliable, timely evaluation (testing) of control mechanisms limiting corruption and abuse in individual business processes are the responsibility of process owners.

5. Control Mechanisms in Business Processes at Exalo Drilling S.A.

- 5.1. Control mechanisms are applied in all business processes where the risk of corruption and abuse is identified, including:
 - 5.1.1. wholesale and retail purchases and sales of materials, goods, products, and services,
 - 5.1.2. investments,
 - 5.1.3. sponsorship, marketing, advertising, leasing, franchising, and acquiring, transferring for free, donating, leasing, and renting assets,
 - 5.1.4. mergers and acquisitions,
 - 5.1.5. financial activities,
 - 5.1.6. human resources and payroll,
 - 5.1.7. information security management,
 - 5.1.8. investor relations management,
 - 5.1.9. cooperation with public administration and supervisory bodies,
 - 5.1.10. auditing and control activities,
 - 5.1.11. consulting services,
 - 5.1.12. counterparty verification,
 - 5.1.13. contract conclusion and amendments.
- 5.2. It is recommended not to establish business relations with counterparties if:
 - 5.2.1. reliable information has been obtained indicating that the counterparty acts in a manner violating legal requirements, especially if information has been obtained about the counterparty or a person in the counterparty's governing bodies or holding a managerial position being convicted by a final judgment for crimes specified in Article 228-230a and Article 250a of the Polish Penal Code, Articles 46-48 of the Act of 25 June 2010 on Sport, or Article 54(1-4) of the Act of 12 May 2011 on the Reimbursement of Medicines, Foodstuffs for Particular Nutritional Uses, and Medical Devices,
 - 5.2.2. the counterparty refuses to sign an anti-corruption clause or proposes anti-corruption provisions not accepted by the anti-corruption coordinator of Exalo Drilling S.A.
- 5.3. When assessing the risk of corruption, the following circumstances are considered:
 - 5.3.1. business relations involve a counterparty from a country with a high corruption perception index, such as published by Transparency International (www.transparency.org),
 - 5.3.2. individuals in the counterparty's governing bodies are connected to persons holding politically exposed positions as defined by anti-money laundering and counter-terrorism financing regulations,
 - 5.3.3. the counterparty demands the acceptance of non-standard contractual provisions or payment terms;
 - 5.3.4. there are other symptoms indicating the occurrence of corruption or abuse risks in connection with the counterparty.

- 5.4. The decision on cooperation between Exalo Drilling S.A. and a counterparty not recommended for anti-corruption reasons is made by the process business owner, excluding procedures conducted under regulations governing public procurement and considering the conditions of competition and energy law.
- 5.5. Agreements with counterparties include an anti-corruption clause that includes anti-corruption standards applicable to each party to the contract and information about the methods adopted by the parties to report legal violations related to the conclusion and execution of the agreement.
- 5.6. The anti-corruption clause does not apply to agreements between ORLEN Group and Exalo Drilling Group companies or to employment contracts concluded by Exalo Drilling S.A. in connection with hiring employees.
- 5.7. When establishing relationships with a counterparty in the business processes referred to in section 5.1 of this Policy, which are expected to result in an agreement with an estimated value exceeding PLN 1 million or its equivalent in another currency determined by the National Bank of Poland's exchange rate, the person responsible in Exalo Drilling S.A. for the given procedure is required to request the Exalo Drilling S.A. Security Office to assign an economic security expert. Detailed rules for the participation of the economic security expert in the procedures are specified in separate internal organisational acts, including those related to the procurement area at Exalo Drilling S.A. Lack of feedback on the assignment of an expert within two business days means that the expert's participation in the procedure is not required.
- 5.8. The process of selecting a counterparty, the content of the agreement, and its amendments must be documented electronically in the available IT systems of Exalo Drilling Group companies to ensure the traceability of the review and decision-making process.
- 5.9. Each obligating agreement concluded by Exalo Drilling S.A. must be assigned an agreement supervisor as defined by a separate internal organisational act regarding the implementation of the *Central Agreement Register Procedure at Exalo Drilling S.A.*
- 5.10. Agreements should not be concluded, nor powers of attorney granted based on them, to entities whose participation in the executed business processes may raise justified suspicions of bias or any financial, economic, or personal interest other than the interest of Exalo Drilling S.A. For already concluded agreements, the responsibility for verifying the entity representing Exalo Drilling S.A. lies with the business area responsible for the process covered by the signed agreement.
- 5.11. Electronic registers of powers of attorney, commercial agreements, and counterparties are maintained by Exalo Drilling S.A.
- 5.12. Exalo Drilling S.A. implements and maintains clear rules and internal regulations in compliance with the law and standards regarding taxes, accounting, debt collection, asset management, customer service, internal control, information protection, collaboration with supervisory bodies of public administration, and document circulation.
- 5.13. Exalo Drilling S.A. implements and maintains clear rules and internal regulations in compliance with the law and standards regarding the division of responsibilities between organisational units and human resource management, including defining recruitment principles and employee duties.

- 5.14. Exalo Drilling S.A. enables the reporting of legal violations and protects whistleblowers from retaliatory actions. At least one channel for reporting legal violations must allow for anonymous submissions and confidentiality of identifying data in the case of non-anonymous reports, according to a separate internal organisational act.
 - 5.15. Management staff and individuals involved in business processes leading to the selection of a counterparty at Exalo Drilling S.A. are required to submit statements on legal or factual connections that may raise justified doubts as to their impartiality, in accordance with the rules set out in the Conflict of Interest Management Policy or other internal organisational acts.
 - 5.16. Giving and receiving gifts in Exalo Drilling S.A. is permissible under the principles outlined in the Gift Policy.
 - 5.17. When participating in merger and acquisition projects, Exalo Drilling S.A. conducts audits to assess the risk of assuming responsibility for violations of anti-corruption and abuse regulations. The risk analysis results based on the findings of such audits should be considered in the decision-making process and the formulation of contractual clauses aimed at limiting Exalo Drilling S.A.'s liability for violations of anti-corruption and abuse regulations.
 - 5.18. Suspected cases of corruption and abuse are clarified following the principles adopted by Exalo Drilling S.A. for conducting verification or control procedures.
- 6. Subject to the specificity of the activities of Exalo Drilling Group companies, control mechanisms at Exalo Drilling Group companies are implemented, monitored, and updated, taking into account the results of risk analysis for the area of anti-corruption and abuse prevention in business processes, as well as conclusions from audits and controls where cases of corruption and abuse were identified. **Communication, Training, and Reporting****
- 6.1. Subject to the specificity of the activities of Exalo Drilling Group companies, control mechanisms at Exalo Drilling Group companies are implemented, monitored, and updated, taking into account the results of risk analysis for the area of anti-corruption and abuse prevention in business processes, as well as conclusions from audits and controls where cases of corruption and abuse were identified.
 - 6.2. To ensure an adequate level of stakeholder awareness of the Policy, the main assumptions of the Policy are published in internal media and on the websites of Exalo Drilling Group companies.
 - 6.3. In Exalo Drilling Group companies, mandatory training on corruption and abuse prevention is provided for employees and external representatives.
 - 6.4. Training on corruption and abuse prevention is mandatory for all employees of Exalo Drilling Group companies, conducted cyclically every two years. The training may take the form of e-learning.
 - 6.5. The training programme on corruption and abuse prevention is developed in consultation with the Anti-Corruption Coordinator at ORLEN S.A.
 - 6.6. The exchange of information between Exalo Drilling Group companies within the scope regulated by this Policy must not violate the legal requirements and internal organisational acts of the Exalo Drilling Group concerning personal data protection, trade secrets, and company confidentiality.

7. Final Provisions

- 7.1. The Control and Security Office at ORLEN S.A. fulfils the business objectives of ORLEN S.A. and the entire ORLEN Group. It also cooperates with law enforcement authorities and ensures the security of companies within the ORLEN and Exalo Drilling Groups in terms of preventing and detecting corruption and abuse, as well as assessing the compliance of employee actions with applicable law and internal regulations.
- 7.2. In Exalo Drilling Group companies registered abroad, this Policy applies accordingly, to the extent consistent with the legal requirements of the registration country and international law.
- 7.3. The Policy is reviewed and updated biennially by the Security Office of Exalo Drilling S.A.

ANTI-CORRUPTION CLAUSE

1. Each Party certifies that in connection with the performance of this Agreement, it will exercise due diligence and comply with all anti-corruption laws applicable to the Parties, issued by competent authorities in Poland and within the European Union, both directly and through controlled or related business entities of the Parties.
2. Each Party certifies that it has implemented corruption and conflict-of-interest prevention procedures (or, in the absence of such implementation, declares adherence to the procedures implemented by the other Party), and that within the last three years, members of the governing, supervisory, or representative bodies of the Parties have not been convicted by a final judgment for corruption offenses.
3. Each Party further certifies that in connection with the performance of this Agreement, it will adhere to all applicable requirements and internal regulations regarding ethical standards of conduct, anti-corruption measures, lawful transaction accounting, costs and expenditures, conflict of interest, gift giving and receiving, as well as anonymous reporting and clarifying irregularities, both directly and through controlled or related business entities of the Parties.
4. The Parties ensure that in connection with the conclusion and performance of this Agreement, neither Party, nor any of their owners, shareholders, board members, directors, employees, subcontractors, nor any other person acting on their behalf, has made, proposed, or promised to make, will propose, or promise to make, nor will authorise any payment or other transfer representing a financial benefit, nor any other benefit, directly or indirectly, to any of the following:
 - (i) a board member, director, employee, or agent of the Party or any controlled or affiliated economic entity of the Parties,
 - (ii) a public official, understood as an individual holding a public function as defined in the legal system of the country where this Agreement is performed or where the registered offices of the Parties or any controlled or affiliated economic entities of the Parties are located;
 - (iii) a political party, a member of a political party, or a candidate for public office;
 - (iv) an agent or intermediary in exchange for paying anyone listed above; or
 - (v) any other person or entity – for the purpose of obtaining their decision, influence, or actions that could result in any unlawful advantage or for any other improper purpose, if such action violates or would violate anti-corruption laws issued by competent authorities in Poland and the European Union, either directly or through controlled or affiliated economic entities of the Parties.
5. The Parties are obligated to promptly inform each other of any case of breach of the provisions of this anti-corruption clause. Upon written request by either Party, the other Party shall promptly provide information and respond to reasonable questions regarding the performance of this Agreement in terms of compliance with the provisions of this anti-corruption clause.
6. Each Party certifies that during the term of this Agreement, it ensures every person acting in good faith the opportunity to report legal violations via email at: naruszenieprawa@exalo.pl

7. In cases where suspicions of corrupt activities are identified in connection with or for the purpose of executing this Agreement by any representatives of either Party, the Parties commit to cooperating in good faith to clarify the circumstances related to potential corrupt activities.

ANNUAL REPORT
on the Implementation of the ‘Policy on
Corruption and Abuse Prevention in Force at the
Exalo Drilling Group’

1.	Number of prohibited behaviours listed in the Policy identified at Exalo Drilling/Exalo Drilling Group *:	
2.	Number of reported legal violations at Exalo Drilling/Exalo Drilling Group *:	
	– including anonymously:	
3.	Number of cases referred to law enforcement authorities at Exalo Drilling/Exalo Drilling Group *:	
4.	Number of cases of abuse referred to other organisational units of Exalo Drilling/Exalo Drilling Group *:	
5.	Number of persons reporting legal violations who are protected within Exalo Drilling/Exalo Drilling Group *:	
6.	Number of identified undisclosed conflicts of interest at Exalo Drilling/Exalo Drilling Group *:	
7.	Number of registered gifts received at Exalo Drilling/Exalo Drilling Group *:	
8.	Number of registered gifts given at Exalo Drilling/Exalo Drilling Group *:	
9.	Number of inspections conducted in connection with suspected corruption, abuse, or conflicts of interest:	
10.	Number of inspections that confirmed cases of corruption, abuse, or activities involving conflicts of interest:	

* leave as appropriate.