



## Whistleblower Protection Policy

GES Global Energy Services, Inc. and its subsidiaries and affiliates (collectively, “**GES**”) require their directors, officers, and employees (collectively, “**Employees**”) to maintain the highest level of integrity and ethics, complying with the letter and the spirit of all applicable laws and regulations.

This policy creates an ethical and open work environment, ensures that GES has a governance and accountability structure that supports its mission, and encourages and enables Employees to raise legitimate concerns about potential illegal or unethical acts within GES. This policy does not create an employment contract and does not modify the employment relationship between GES and any Employee, nor does it change the at-will employment status you enjoy with GES.

**Reporting Responsibility:** All Employees have a responsibility to report any action or suspected action that is illegal, unethical, or violates any GES policy (“**Violations**”).

Anyone reporting a Violation must act in good faith, without any malice, and have reasonable grounds for believing that the information reported indicates that a Violation has occurred. An Employee who makes a report does not have to prove that a Violation has occurred. However, if an Employee (a) makes a report for malicious reasons or (b) has good reason to believe a report is false, the Employee will be subject to disciplinary action, which may include termination for cause.

**No Retaliation:** No Employee will suffer retaliation or other adverse employment consequence for good faith reporting or cooperation in the investigation of a Violation. Applicable law prohibits retaliation or other adverse employment consequence for good faith reporting or cooperation in the investigation of a Violation. Any Employee who retaliates against another Employee for reporting a Violation or cooperating in the investigation of a Violation is subject to disciplinary action, which may include termination for cause.

If you believe that an Employee who reported or cooperated in the investigation of a Violation is suffering retaliation or other adverse employment consequences, contact the Compliance Officer.

**Reporting Process:** All Employees should address their concerns relating to a Violation to any person within GES who can properly address the concerns. Generally, your immediate supervisor is the person best suited to address a concern. However, if you are uncomfortable bringing this matter up with your supervisor, or you do not believe the supervisor has dealt with the matter properly, you should raise the matter with the Compliance Officer or to anyone in senior management you feel comfortable approaching. All inquiries, however reported, will be handled on a confidential, “need-to-know” basis.

If you choose to communicate in writing, send your letter to Global Energy Services, Inc., Attention: Compliance Officer, 11616 North Galayda Street, Houston, Texas 77086 with “Privileged and Confidential, Submitted Pursuant to GES’ Whistleblower Protection” on the back of the envelop. If you prefer to remain anonymous, you may call 281-878-8739 and leave a message for the Compliance Officer. The Compliance Officer may also be contacted via confidential email at [compliance@glb-energy.com](mailto:compliance@glb-energy.com).

**Compliance Officer:** The Compliance Officer should be immediately notified of every Violation. The Compliance Officer is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken.

The Compliance Officer shall report regularly to the CEO regarding any compliance activity.