



ANTI-BRIBERY POLICY

Version:	01	Effective date:	1 February 2022
Applicable to:	All employees	Control (C):	yes
Approved by:	Board of Directors	Date of approval:	28 January 2022



Introduction and Purpose

Elementum Energy Group (“**Elementum**” or “**Company**”) commits to powering a transition to a carbon-free society with affordable, reliable, sustainable and modern energy. We also commit to ensuring that our environmental, societal, economic and governance decisions benefit future generations.

To comply with the highest international ethical anti-bribery and anti-corruption standards as well as to avoid any potential corruption risks, Elementum adopted this anti-bribery policy and other internal regulations (the “**Manual**”)

This anti-bribery policy (the “**Policy**”) summarises the key principles of Elementum’s strategy and policy fundamentals to follow the applicable legislation, as well as our approach to fair and transparent conduct of the business.

The provisions in this Policy purports to enhance compliance with effective local laws and requirements of legal acts issued in other jurisdictions, as well as generally accepted standards and principles of and approaches to taxation.

Scope

This Policy applies to all Elementum employees, regardless of their department and the position they hold.

Where Elementum participates in existing joint ventures as a non-controlling shareholder, Elementum will make the other shareholder(s) specifically aware of the significance of this Policy to Elementum and encourage such shareholder(s) to implement this Policy or one of a similar standard in the joint venture.

For new minority joint venture cooperation under consideration, Elementum will strive to commit the other shareholder(s) to adopt this Policy or one of a similar standard for the joint venture.

Policy Statements

PRINCIPLES OF ANTI-CORRUPTION POLICY

Identification of risks and business partners

Elementum regularly analyses whether any corruption-related risks arise as a result of its activities and properly identifies its counterparties.

Elementum conducts legal compliance risk assessments regularly. As part of the regular risk assessment, Elementum undertakes proper due diligence of third parties who have a business relationship with us.

Gifts, Hospitality and Entertainment

Gifts, hospitalities or entertainment cannot be accepted or given, if this leads or may lead to change in decision of a person or their behaviour regarding conducting business.



Charity, Sponsorship, and Social Responsibility

Elementum cares about communities and supports them in responsible manner. At the same time, In no way should donations serve as a vehicle to conceal payments made to influence politically exposed persons in a corrupt way.

We conduct our donations and support for social projects in transparent and fully documented way.

Outside Activities and Personal Relationships

Upon joining Elementum, all new employees disclose on the conflicts and potential access to all boards they serve and all outside business and charitable activities, which involve a substantial time commitment.

Personal interests of an employee may never be part of a decision to choose a particular vendor or service provider.

Politically Exposed Persons (PEPs)

Our employees are required to disclose whether they or any of their family members and/or close associates are politically exposed persons.

Whistleblowing and Grievance

The policies ensure all our employees can speak up in all cases they have concerns or an indication of a potential violation of the Policy or the Manual.

Elementum aims to encourage openness and supports anyone who raises genuine concerns in good faith. We further commit to ensure that no one suffers any detrimental treatment because of refusal to take part in bribery or corruption, or because of reporting in good faith his or her suspicion.

Our aim is to set the golden standard when it comes to compliance.

This Policy meets the requirements of:

- Local laws and regulations;
- The Manual.

Members of Elementum Energy Group include:

Elementum Energy Limited; and
Subsidiaries of Elementum Energy Limited.



Body/Function/Individuals	Roles and Responsibilities
Board of Directors	Approves the Policy.
General Counsel	Policy Owner: owns, endorses, and ensures the implementation of this Policy. Advises on policy content and ensures relevant and correct communication of policy efforts to internal and external stakeholders.
Management, employees, and contract workers of Elementum	Responsible for adhering to this Policy. Comply with the letter and spirit of the Policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the Policy.

Deviations

No exemptions from this Policy can be granted unless there are exceptional circumstances or the Policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

Policy Revision

This Policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of the Board of Directors. In the event of any discrepancies between the English version of this Policy and a translated version, the English version will prevail.

Contact

For more information, please contact General Counsel.