

## INTRODUCTION AND PURPOSE

This 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 enhancing compliance.

To comply with the highest international ethical standards as well as to avoid any potential risks, Elementum adopted anti-money laundering and countering the financing of terrorism manual and other internal regulations (the **"Manual"**).

## POLICY STATEMENTS

**A risk-based approach to business partner identification.** We enter into business relations only with identifiable persons upon risk-based evaluation of the partner and the jurisdiction of its activities.

**Zero tolerance to sanctioned business partners.** We do not establish partnerships with counterparties subject to sanctions and avoid jurisdictions on the Financial Action Task Force blacklist.

**Organizational arrangements.** We try to ensure our business partners commit to the highest compliance standards and carry out risks assessment. The up-to-date AML Register is available for all employees involved in the relations with the business partners.

## GENERAL PRINCIPLES FOR INTERNAL POLICIES

These General Principles for Internal Policies (the **"Principles"**) apply to all policies of Elementum Energy Limited unless the relevant policy includes an express derogation from the Principles approved in accordance with the terms of these Principles.

**Our commitment.** Elementum Energy Limited and its subsidiaries (**"Elementum"**, the **"Group"** or **"we"**) commit to powering a transition to a carbon-free society with affordable, reliable, sustainable and modern energy-production technology and ensuring that our environmental, societal, economic and governance decisions benefit future generations.

**SDGs 7 & 13.** We believe that fulfilling our commitments helps to address the global challenges and achieve the UN Sustainable Development Goals (SDGs). Elementum embeds the SDGs in its business strategy with SDG 7 'Clean Energy' and SDG 13 'Climate Action' as our key goals.

**Purpose.** The policy sets out general principles to ensure that all Elementum's corporate activities are carried out in a sustainable way, contributing to the achievement of the SDGs, and rejecting actions that contradict or hinder them.

The general principles and set forth in the Policy are further developed and specified in specific environmental, social and corporate governance procedures and other documents.

**Reporting.** We are committed to reporting on our sustainable development policies, goals and progress, striving for the prudent practices to continually improve our sustainability performance and contribute to a more sustainable future.

We commit to transparently reporting our ESG performance to the public, institutions and other stakeholders in the Elementum's sustainability reports.

**Application.** The Principles apply to all employees of Elementum, regardless of their department and the position they hold as well as to outsourced staff.

Where Elementum participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) must be made specifically aware about the significance to Elementum of the Principles and shall be encouraged to apply the same policy or a similar standard to the joint venture.

**Deviations.** No exemptions from the policy can be granted unless well documented and there are exceptional circumstances or the policy is obviously not applicable.

**Policy Revision.** The 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 Board of Directors. In the event of any discrepancies between the English version of the Principles and a translated version, the English version will prevail.