

INTRODUCTION AND PURPOSE

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

POLICY STATEMENTS

Business partners identification. We regularly analyse whether any corruption-related risks arise as a result of our activities.

Legal compliance risk are assessed regularly. As part of the regular risk assessment, we undertakes 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.

Charity, Sponsorship, and Social Responsibility. We care about communities and support them in responsible manner. At the same time, in no way should our 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 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 or close associates are politically exposed persons.

Whistleblowing and Grievance. Our internal regulations 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.

We aim to encourage openness and support 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.

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.