



Policy: Anti-Corruption Policy

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Page: 3 of 3

## Anti-Corruption Policy

This policy is based on Pecan Energies' defined values and Code of Conduct. The policy applies to Pecan Energies and its subsidiaries under its control and Pecan Energies activities, including those undertaken by contractors.

### Pecan Energies is committed to:

- Conduct our business with ethics and integrity.
- Work proactively to prevent corruption in all forms, direct and indirect, active, and passive, in both private and public sector.
- Strive to ensure that our business partners adhere to anti-corruption laws and adhere to ethical standards consistent with those of Pecan Energies.

### Pecan Energies shall:

- Take all necessary steps to comply with applicable anti-corruption laws.
- Seek to comply with best practice principles on anti-bribery and corruption, such as those set out in the OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions and applicable laws and regulations of all the jurisdictions in which it has an office.
- Prohibit anyone representing the company from offering, giving, accepting, or receiving anything of value as an inducement for the other party to do something that is dishonest, illegal or a breach of trust.
- Prohibit direct and indirect bribery and shall not permit any business partner or other counterparty to do anything on Pecan Energies' behalf that Pecan Energies may not legally do.
- Prohibit facilitation payments and ensure that no facilitation payments are made, no matter how small they may be, unless not paying constitutes an immediate threat to the health and safety of a person.
- Prohibit trading in influence and include this aspect in the company's anti-corruption efforts.
- Be vigilant to prevent any use of illegal proceeds and avoid support to money laundering and other illegal financing activities.
- Maintain a neutral position on party politics. Neither Pecan Energies nor anyone representing Pecan Energies shall make political contributions on behalf of Pecan Energies. This does not preclude Pecan Energies from supporting political views in the interest of Pecan Energies.
- Implement a suitable and risk-based "anti-corruption compliance program" with procedures, training, and guidelines to prevent corruption in its organization and among its business partners and to mitigate corruption risk by controlling high-risk activities.
- Encourage a speak-up culture and not impose any form of retaliation against anyone for making a good-faith report on concerns of non-compliance.
- Establish, maintain, and communicate a speak-up channel where staff, other representatives and third parties may report concerns. Properly founded allegations or evidence of violations of this policy shall be investigated and responded to.

Oslo, 04<sup>th</sup> March 2026

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Acting Group Chief Executive Officer

Pecan Energies