

Policy: Pecan Energies Anti-Corruption Policy

BMS-LC-PO-0001

Rev.	Date	Reason for Issue	Author	Reviewer	Approver
01	28.01.2021	Issued for Review	Mari Engh Brekke	Håvard Garseth	Board of Directors
02	04.05.2021	Issued for Use	Mari Engh Brekke	Håvard Garseth	Board of Directors
03	08.04.2022	Issued for Use	Adobea Quayson	Kent Harald Liane-Unsgaard	Board of Directors
04	13.11.2023	Issued for Use	Adobea Quayson	Edward Ayree	Board of Directors

REVISION RECORD SHEET

All changes after rev. 01 will be highlighted in the revision record sheet and by revision markers within the margins of the document.

Revision	Section	Description of change
01		This document and its reference documents replace the Aker Energy Anti-Corruption Procedure (AKE-Z-KA-0007), rev 01, dated 10.10.2019
02		No updates, Issued for Use
03		Document updated with CEO's details
04		Updated to reflect Pecan Energies

Pecan Energies Anti-Corruption Policy

This policy is based on Pecan Energies' defined values and Code of Conduct. The policy applies to Pecan Energies AS and 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, such as those set out in the OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions.
- Prohibit for anyone representing the company, the 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 paid, no matter how small they may be, unless not paying constitutes an immediate threat to 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, 10.11.2023

Eiliv Gjesdal
Chief Executive Officer
Pecan Energies