



Anti-Corruption and Anti-Bribery Policy

Circon Energy LLC

Adopted 04/09/2024

CIRCON ENERGY LLC ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Circon Energy LLC and its subsidiaries and affiliates (collectively “Circon” or the “Company”) are committed to ethical business practices and to obeying the law. Avoiding and resisting all forms of corruption is fundamental to our values.

No Bribes. It is Circon’s policy that directors, officers, employees, and third parties (e.g. agents, consultants, contractors) acting on its behalf are prohibited from offering, paying, or receiving directly or indirectly, a bribe to or from anyone—whether government entity, commercial entity, or individual. A bribe for purposes of this policy is any money, goods, services, or anything of value offered or given with the intent to gain an improper advantage. Facilitating payments are also prohibited.¹

No excuses. Bribery or corruption may seem commonplace in certain parts of the world—but that does not justify violating this Policy or the law. What others do is not a defense, and Circon would rather lose a business opportunity than win it through bribery or corruption.

Medical Emergency or Fear of Harm. A payment is permissible if it is (i) necessary to secure governmental services (e.g., police protection, medical evacuation) in response to a medical safety emergency or (ii) you reasonably believe that you are in imminent jeopardy of serious physical harm and no other prudent alternatives are available to you. You must immediately report the incident to your manager, and officer of the Company, or the Chief Legal Officer.

Books, Records, and Internal Controls. It is Circon’s policy that all transactions be accurately reflected in its books and records. Falsification of books and records and the creation or maintenance of any off-the-record bank accounts are strictly prohibited. Circon expects all transactions to be recorded accurately and transparently and that all staff be honest and forthcoming with the Company’s auditors. Circon also mandates effective internal controls to properly account for funds and other assets and to prevent disbursements for improper purposes.

Anti-corruption Program. In connection with this Policy, the Company has established an anti-corruption program (“Program”). Compliance with this Policy and the Program is required of everyone at Circon and any third party acting on the Company’s behalf.

Reporting and Non-Retaliation. Employees and third parties on Company business are required to report any actual or suspected violations of this Policy, the Program, or the law by directors, officers, employees, or third parties acting on Circon’s behalf. Reports should be made to the Chief Legal Officer, or to an officer if the Chief Legal Officer is involved or suspected to be involved in a violation of this Policy. No one will suffer any penalty, demotion or other adverse consequence from the Company for reports made in good faith—even if the investigation finds no wrongdoing. Reports are treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation, comply with the law, and cooperate with legal authorities.

¹ Facilitating payments are cash payments made to low-level government employees or officials to expedite or secure the performance of a routine government action. These types of payments are explicitly illegal in most jurisdictions and are prohibited by the Company in all locations.

Violations. Violations of the Policy or Program will result in disciplinary action, up to and including termination of employment, or termination of business relations in the case of a third party. Where deemed appropriate, the matter may also be referred to law enforcement authorities.