

Code of Conduct

Guiding Principles for Professional Excellence



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CEO	Ahmed Elkerrami	Approval	01-07-2025
OHNV Board	Code of Conduct draft	Approval	17-07-2025
OHNV Board	Responsible Payment Practices section	Approval	16-04-2026

Welcome Message from the Oilinvest Group Chief Executive Officer

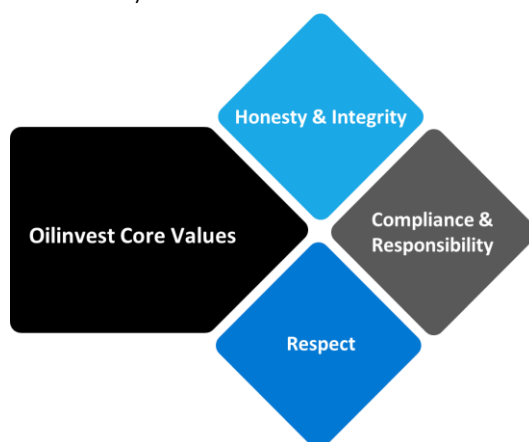
Dear Colleagues,

One of the most critical success factors for Oilinvest and its affiliate companies is the trust and confidence that our customers, business partners and other key stakeholders have in our ability to conduct business reliably, efficiently and in a manner that complies with legal and ethical requirements.

This trust and confidence come from a reputation that has taken Oilinvest management and employees many years to cultivate, and which we must continuously strive to protect and enhance through our individual and collective behaviours and our business conduct.

We all – employees, managers and directors alike – have the duty to safeguard and protect Oilinvest Group's image and reputation. With this objective in mind, an Oilinvest Group Code of Conduct has been drafted to act as a point of reference for us all and includes a set of minimum professional and ethical standards and guiding principles on how we should manage and conduct our day-to-day business affairs. We are all expected to personify and adhere to these in everything that we do, whilst at the same time supporting and guiding others to act in the same way.

The Code of Conduct is designed around the Group's 3 core values and long-standing traditions that everyone should share, irrespective of where they work or what they do:



In this context, it is imperative that each member of the Oilinvest Group 'family' carefully reads and understands this important document and ensures compliance with the respective policies, principles and guidelines outlined herein.

For any questions or clarifications about the Code of Conduct or how it applies to your job, please do not hesitate to raise these with your direct line manager, local Senior Management, HR Team and/or the Oilinvest Compliance Team, whose contact details are provided in this document.

Oilinvest's shareholders and directors are committed to upholding the Group's reputation and core values and we invite everyone to share and uphold these same commitments and work collectively to ensure that Oilinvest continues to be a leader in the market and a Group we can all be proud of.

Thank you for your continued commitment and contribution to the Oilinvest Group.

Sincerely,



Ahmed Elkerrami
Chief Executive Officer
Oilinvest Group

Code of Conduct | Introduction

As an international Group, active in the Energy Sector, Oilinvest faces complex legal, commercial and regulatory challenges every day. Our operations and business activities can give rise to numerous risks both to Oilinvest's employees and to Oilinvest itself, which may jeopardize the achievement of our corporate objectives and harm our reputation and work environment. As such, it is imperative that we behave and act in an honest, ethical, respectful and responsible manner in our day-to-day business interactions and:

- Promote continuous business success
- Maintain our image and reputation
- Protect Oilinvest and its people from any potential risks and harm
- Ensure compliance with applicable laws, regulations, customs and business practices in the various jurisdictions in which we operate

In this context, a Code of Conduct (the "Code") has been drafted for the Oilinvest Group. The Code of Conduct establishes a common understanding for all those who work at Oilinvest across the different affiliate companies as well as for everyone who interacts and does business with the Group. It sets out the minimum professional and ethical standards that everyone is expected to demonstrate whilst conducting their day-to-day business affairs and making decisions; everyone is expected to personify and adhere to the Code in everything they do, while at the same time supporting and guiding others to act in the same way.

CODE OF CONDUCT KEY PRINCIPLES:

- Applies to Oilinvest (Holdings) N.V., and all entities / affiliate companies, directly or indirectly wholly owned, majority-owned or controlled by it consisting of Oilinvest (Netherlands) B.V. Group of companies and Vimbridge DMCC Group of companies (severally or jointly referred to as "Group"/ "Oilinvest"/ "Tamoil"/ "Company")
- Applies to every board member, officer, director and employee employed by the Group and/or its affiliate companies, as well as parties acting on behalf of the Group or its affiliates including consultants, agents, suppliers, and representatives.
- The Code should be utilised as a guide in relation to the Company's policies, standards and procedures
- Everyone is expected and required to adhere to the rules set out in the Code and maintain high professional and ethical standards in the way they manage and conduct their day-to-day business
- Apart from adhering to the Code of Conduct themselves, members of the Management Team are also responsible for providing guidance and support to their subordinates, ensuring that they understand and apply the Code in practice
- Employees are accountable for their behaviour at work and disciplinary action may be taken in cases where the Code of Conduct is not adhered to
- As an international Group, we operate in various different jurisdictions, each with its own laws and regulations to which everyone is required to adhere. Where the Code of Conduct deviates from the requirements of national legislation, the requirements of the national laws and regulations prevail.

Code of Conduct | Our Core Values

The Code of Conduct has been designed based on the Group's Core Values. These Core Values are at the forefront of everything we do; they are the DNA of our Group. They are a set of fundamental beliefs and guiding principles which all our people, irrespective of where they work or what they do, are expected to demonstrate in their work and should guide their every business action and decision. They support our Group's vision and business strategy, shape our corporate culture but also serve as a commitment to our people, customers, stakeholders, and the community in general, about how we behave in our business interactions.

Our Core Values



Honesty & Integrity

- We comply with applicable national laws, regulations and standards, as well as the Code of Conduct
- We reject bribery, corruption, fraud, anti-competitive practices, money laundering, as well as all other criminal activity
- Violations will not be tolerated and Oilinvest will take all necessary actions to address these and act with honesty and integrity
- We must avoid situations in which individual interests diverge from the interests of the Group or with those of our business partners



Compliance & Responsibility

- We conduct our business in accordance with the laws and regulations that protect the environment and natural resources
- We are committed to protecting health and to respecting safety and security; we consider occupational health and safety at work to be just as important as providing safe and quality products
- We use our IT systems responsibly and securely; we respect and protect the data privacy of our employees, business partners and other stakeholders
- We comply with the applicable labour and immigration laws and do not condone or support child labour or any form of forced labour
- We reject every kind of illegal employment
- We are sensitive to the principle of corporate social responsibility and are mindful of economic, social and environmental issues



Respect

- It is at the core of our business dealings to treat each other, our customers and our business partners in a respectful manner
- We respect internationally recognized human rights as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Fundamental Conventions.
- We give everyone an equal opportunity and do not tolerate any unlawful discrimination
- We maintain a transparent and honest work environment; open and transparent communication with all our employees plays an important role in our business

It is essential to adhere to and exercise these Core Values in our day-to-day business to ensure compliance with legal commitments, promote continuous business success, and protect us all from harm. Each of us plays a vital role in safeguarding and further enhancing our business operations and reputation.

Code of Conduct | Roles & Responsibilities

Oilinvest Group

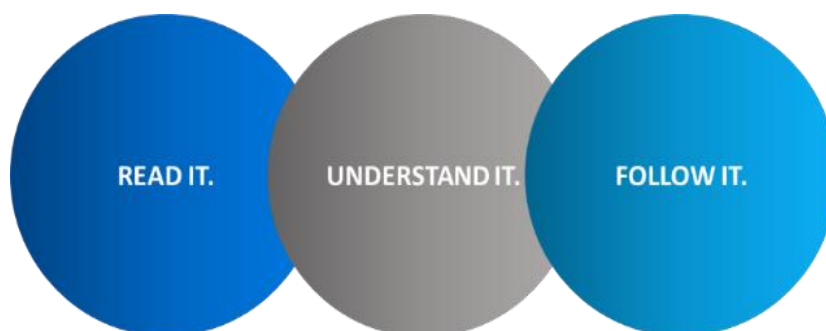
Oilinvest Group is committed to acting as a free, fair and ethical business and offering its people a safe and secure workplace. We are also committed to respecting and ensuring compliance with the laws and regulations, customs and business practices of the various jurisdictions in which we operate.



Employees

Whichever affiliate company you work for, whatever your hierarchical level or job position/role in Oilinvest, you are expected to adhere to the current Code of Conduct in the way you act and conduct yourself in your everyday work. Specifically, you are expected to:

- Carefully **read** and **understand** the current Code of Conduct
- Think about how the Code of Conduct applies to your job position
- **Comply** with the related professional and ethical standards, rules and guiding principles included herein as well as the related legislation
- Support and **guide** your colleagues or other business associates to act in a similar manner
- Work in such a manner that protects you as well as the Group from any risk or damage to its image and reputation
- **Speak up** and contact your direct line manager and/or local Compliance Officer for any questions, requests or to report a possible violation of the Code of Conduct



The Code of Conduct provides the key guidelines and principles which should guide your behaviour, actions and decisions but cannot provide specific recommendations or proposed actions for every situation, dilemma or decision that must be made. If in doubt, ask yourself some questions to help you understand and guide you in the right direction:

When in doubt, ask yourself these questions:	
Is what I am doing allowed?	Is what I am doing legal?
Am I acting in line with the Group's Core Values?	Am I authorised to do this?
Am I following the principles and guidelines of the Code of Conduct?	Are there any potential risks to what I am doing?
Is my behaviour in line with company procedures?	Am I behaving correctly?
If my actions were made public, would I be comfortable?	
If the answer to any of these Questions is NO, then STOP and SEEK ADVICE!	
If you have concerns or have questions about what the 'right thing to do is' or how and want to seek advice on how to manage a situation or resolve a potential issue seek advice from: • Direct manager • Local Senior Management Team • HR Team • Oilinvest Compliance Team	

Management Team

We depend on our managers to show true leadership, promoting our ethical standards, acting as role models and fostering a culture of ethical behaviour and transparency amongst their teams. Hence, apart from adhering to the Code of Conduct themselves, we also expect our Management Team to:

- Ensure that everyone is aware of the Group's Code of Conduct and associated principles and rules
- Provide guidance and support to their teams about what is expected of them and what the 'right thing to do' is
- Ensure that they create a working environment where people feel confident and safe to speak up and report any concerns or potential violations
- Identify any potential Code of Conduct violation risks which may arise in their business, Division / Function, Department or Team and identify ways to mitigate these
- Never compromise our company's integrity or values for business results
- Never retaliate against anyone who raises a concern in good faith and/or cooperates in an investigation.



Oilinvest Compliance Team

To ensure the implementation of the Code of Conduct and provide any support required, we have set up a dedicated Oilinvest Compliance Team, which consists of a Group Compliance Officer and local Compliance Officers in the various affiliate companies.

Compliance Team	Email
Oilinvest Group Compliance	groupcompliance@oilinvest.com
Local Compliance function	Each subsidiary should maintain a dedicated email address for compliance-related questions and concerns. Access to this mailbox should be restricted to authorised personnel to ensure confidentiality. The mailbox should be monitored regularly, ideally by at least two designated individuals, to ensure continuity and timely handling of compliance matters.

Code of Conduct | Violations & Reporting

Violations

Violations and failure to comply with the principles of the Code may have severe consequences for the employee concerned, including disciplinary action up to and including dismissal, as per the respective Policy and Procedure of the affiliate company.

In some cases, depending on the severity, Oilinvest may even be required to report a violation to the relevant authorities which could lead to legal action being taken, fines or even imprisonment.

Reporting Concerns

Open communication about the Code is fundamental to its integration into our culture and daily activities. We therefore encourage employees to discuss ethics openly with their peers and seek advice from their line managers or other members of the local or Group Management Team about the right course of action when a questionable situation arises, to share any concerns or report possible violations. However, if an employee does not feel comfortable speaking openly and directly about their concerns or reporting an infringement, there are several other options available:

HOW TO REPORT CONCERNS	
Online	 Submit a concern through our dedicated reporting portal. You may choose to report anonymously: https://oilinvest.integrityline.app/
Email/Phone	Contact your HR Department or local Compliance Officer by email or telephone. You may also contact Group Compliance directly at groupcompliance@oilinvest.com



Employees are specifically requested to report any incidents that may contravene United Nations Guiding Principles on Human Rights, whether within the Group or involving third parties such as suppliers or stakeholders.

The Group takes all reports seriously. Confidentiality and anonymity will be maintained to the fullest extent possible, provided this does not conflict with local laws. Information will only be shared to the extent required to investigate and address the matter.

Non-Retaliation Policy

Our Group is committed to fostering an ethical culture in which individuals feel comfortable making reports or raising concerns regarding illegal or unethical conduct, without fear of retaliation. For this reason, any form of punishment, disciplinary action or retaliation taken against anyone for raising a concern in good faith about possible illegal or unethical conduct in the workplace or for participating in an investigation procedure will not be tolerated. Such actions will be considered a violation of our Code and ethical principles and will be subject to disciplinary action, up to and including dismissal.

If you feel you or someone you know has been subjected to retaliation for raising a concern or making a report regarding illegal or unethical conduct, please contact your local Compliance Officer and/or HR Officer immediately.



Code of Conduct | Doing Business Ethically & Professionally

We value doing the right thing!



DOING BUSINESS ETHICALLY & PROFESSIONALLY

In the volatile and rapidly changing industry in which we operate, ethical and professional practices mitigate risks but also position our Group for long-term success.

We emphasize the way we should 'do business', ensuring that all business interactions are executed in a legal, ethical and professional manner. This entails treating all stakeholders – customers, partners, employees and competitors – in a fair, respectful and transparent manner, and ensuring that our core values of 'Honesty & Integrity', 'Compliance & Responsibility' and 'Respect' guide our every business action and decision. Additionally, we focus on ensuring that our business practices adhere to all applicable laws and regulations of the countries in which we operate and that transparency, accountability and responsible decision-making are at the forefront of our operations.

Within this Section you will find information related to the following:

- Complying with Competition and Antitrust laws
- Complying with Trade Sanctions and International trading Practices
- Avoiding and/or Managing Conflict of Interest
- Fighting Corruption & Bribery
- Accepting and/or Offering Gifts & Entertainment
- Complying with Anti-Money Laundering Requirements
- Acting responsible in personal political activity
- Engaging in other employment / business activities
- Using Social Media

Complying with Competition and Antitrust laws

At Oilinvest, we believe in and support free and fair competition and as such, conduct our business in a fair way, in compliance with all applicable competition and antitrust laws and regulations.

Competition and Antitrust laws prohibit business practices and behaviours that reduce the intensity of competition, limit trade or restrict other companies' commercial freedom to act.

The Competition and Antitrust laws combat illegal practices such as:

- Price-fixing
- Market-sharing or bid-rigging conspiracies
- Exchange of confidential information with competitors
- Other behaviours aimed at achieving or maintaining a monopoly

Infringements of Competition and Antitrust laws constitute a major risk and may have severe consequences for all concerned as well as for Oilinvest's global business, including, among others, high fines for Oilinvest (potentially up to 10% of Oilinvest's annual global turnover), or for individuals involved in such infringements, payment of damages, invalidity of agreements, substantial reputational damage, etc.

Your Role & Responsibilities

- Follow the applicable internal guidelines and policies for complying with Competition & Antitrust laws
- Exercise particular care when dealing with competitors
- Keep Oilinvest's sensitive information in strict confidence

Complying with Trade Sanctions and International Trading Practices

As a global organisation, Oilinvest Group is obliged and strongly committed to complying with the laws and regulations in the countries in which we operate, related to international export and import controls, customs regulations, economic sanctions and levies.

We do not conduct any business involving individuals or entities listed under applicable sanctions rules. In our business transactions, we are required to comply with any sanctions issued by the official authorities in the respective countries and should not conduct any business involving individuals or entities designated by the said official authorities. Failure to comply with the applicable laws could lead to civil and criminal liabilities, fines, delays, seizure of goods or loss of Oilinvest's export or import privileges, as well as damage to our reputation or even imprisonment for any involved parties.

As such, in order to eliminate any risk of exposure, we must be aware of and adhere to any national and international customs trade and/or export control rules and regulations which are applicable to our job roles.

Your Role & Responsibilities

- Follow the internal applicable guidelines and policies with regard to Trade Sanctions
- Ensure that the required and prescribed Know-Your-Counterparty-Checks are performed
- Be aware that your transaction might require approval of one or several authorities
- Do business with known and reputable partners

Avoiding and/or Managing Conflict of Interest

Maintaining the highest standards of integrity and transparency is paramount to Oilinvest Group. We must never allow our personal political beliefs/affiliations (referring to an individual's personal views, opinions, or associations related to political parties, ideologies, or movements) or other interests or considerations to influence our ability to act in the best interest of the Group or to make objective and impartial business decisions. We are expected to use good judgment, avoiding situations which could lead to or be perceived as a conflict of interest.

A “Conflict of Interest” occurs when an individual’s relationships or personal interests (e.g., financial, social, political, family) influence or are perceived to influence their actions or business decisions.

Indicative Examples of Conflicts of Interest:

Personal Financial Interest

- Financial interest or participation in direct competitors, vendors, suppliers or customers
- Employment with a direct competitor, supplier or vendor
- Access to and utilisation of confidential or proprietary information obtained through your job role for personal gain

Personal relationships

- Personal or family relationship with a representative of a business partner or competitor
- Supervising or hiring of a family member
- Dating someone you supervise
- Conducting company business with a family member

Conflicts of interest, whether real or perceived, can create an appearance of impropriety which can have adverse consequences on the Company including, among others:

- Damage to the Company’s reputation
- Undermining of the confidence of customers and other stakeholders in the Company and the employee
- Damage to client relationships
- Loss of business and customers
- Potential risk of lawsuits

As such, we are all responsible for taking the necessary steps to avoid undue conflicts of interest.

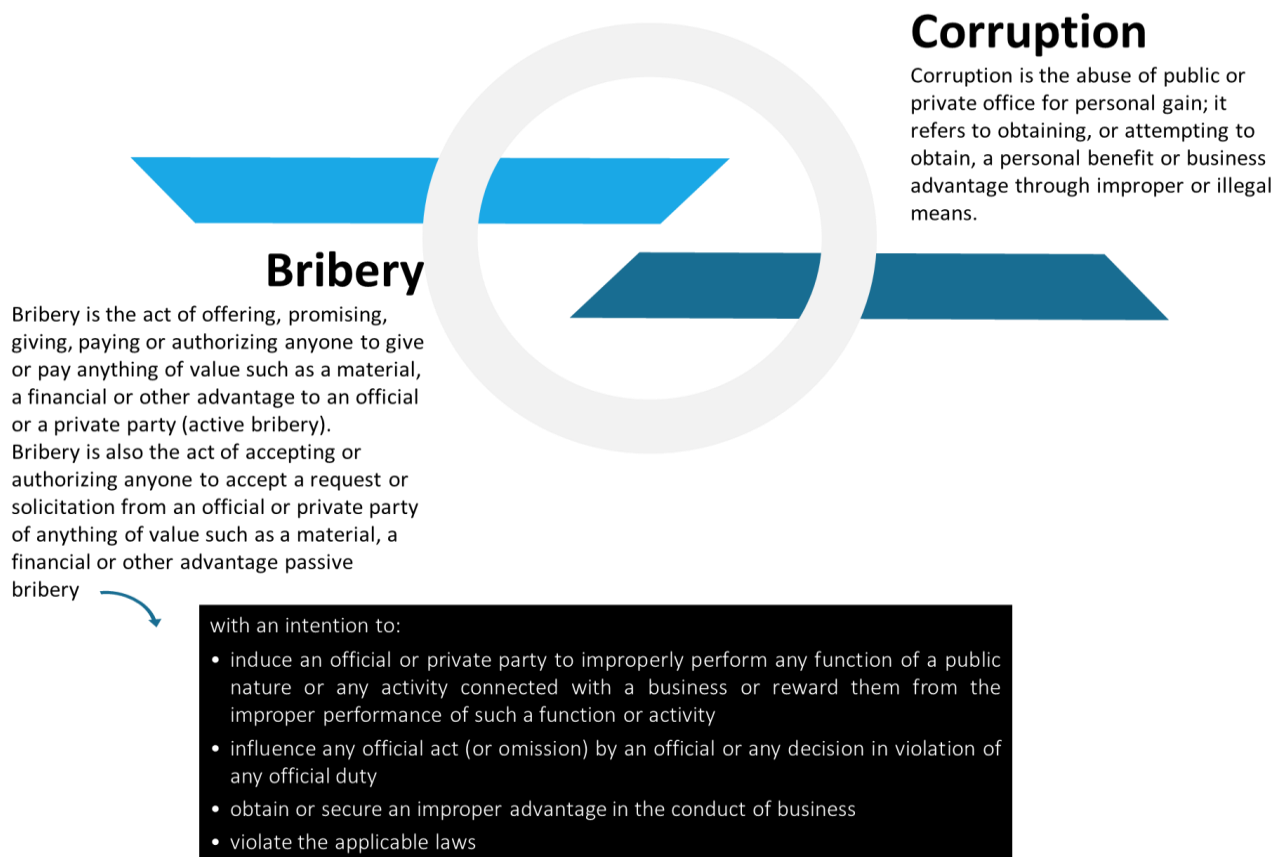
Your Role & Responsibilities

- Withdraw from decision-making processes that may create, or be perceived to create, a conflict of interest
- Disclose potential conflicts to your line-manager
- Follow the company’s Talent Acquisition Policy & Practices
- Follow the requirements for reporting a conflict of interest
- If in a situation of actual or potential conflict, ensure that you inform your line manager or the local Compliance Officer to manage the conflict.

Fighting Corruption & Bribery

Oilinvest Group does not tolerate any form of corruption or bribery by its people or any other party it does business with, whether in the private or public sector.

In this context, we are expected to comply with the rules and regulations set out herein so as to successfully prevent, detect, investigate and manage any form of corruption and bribery.



Accepting and/or Offering Gifts & Entertainment



Gifts, meals, entertainment or anything else of value must not be given or received with the aim of rewarding or receiving preferential treatment or influencing a business decision without reasonable business justifications; such actions could create or be perceived to create a conflict of interest or an act of bribery.

We do, nevertheless, recognise that the occasional acceptance or offer of modest gifts, sharing of meals or entertainment is common in business and is considered a way of building strong and constructive business relationships with clients and/or other stakeholders.

Can I accept or offer a gift?

Acceptable Gifts...

- Gifts of small value
- Symbolic gift (e.g. branded items)
- Occasional meals from customers / associates / vendors, provided that they will also be present and the cost is reasonable

Non-Acceptable Gifts...

- Cash payments or cash equivalents (e.g. gift certificates, vouchers)
- Personal services
- Loans
- Gifts or hospitality of an inappropriate nature and/or in inappropriate venues
- Gifts or invitations during periods when important business decisions are being taken (e.g. during a tendering process)
- Gifts, hospitality and/or events exceeding the value or duration limits described in the applicable internal anti-corruption and bribery guidelines and policies



Your Role & Responsibilities

- Adhere to the applicable internal rules, guidelines and policies of the Group with regard to Anti-Bribery and Corruption
- Never accept or offer any gift, payment or other benefit that may influence, or be perceived to influence, a business decision or your judgment
- Disclose any significant gift and/or invitation and contact your line manager or the local Compliance Officer if you have any questions or are unsure about something or to report any suspected non-compliant practices or corruption or bribery

Complying with Anti-Money Laundering requirements

We are committed to conducting business in a way that prevents the use of our business for transactions by those who might use it for illicit purposes and do not condone, facilitate or support money laundering or terrorist financing activities in any way. We comply with all applicable laws, rules and regulations and have the internal controls and mechanisms in place to successfully prevent, detect and investigate any suspicious money laundering activities.

Money Laundering

- Act of concealing the source and disguising the nature of unlawfully obtained funds and making them appear legitimate
- Use of legitimate funds in order to support criminal activities, including the financing of terrorism

Red Flags



- Payments made in currencies other than those specified on the invoice
- Request for overpayments or underpayments
- Attempts by business partners to make payments in cash or cash equivalents
- Unapproved payments by or to someone not a party to the contract
- Use of an irregular bank account for the business relationship
- Entities with unknown beneficiaries or in jurisdictions of questionable reputation

Money laundering can potentially occur in any business relationship, including those with customers, suppliers, and with other third parties where funds are transferred or received. Before entering any business relationships or executing a contract with an external partner, we are required to carry out appropriate, risk-based due diligence checks to verify the counterparty's identity, integrity and reputation.

Your Role & Responsibilities

- Always adhere to the respective national and international laws, rules and regulations as well as the Company's internal anti-money laundering applicable guidelines and policy
- Carry out the appropriate, risk-based due diligence checks to verify the counterparty's identity, integrity and reputation
- Familiarize yourself with the payment procedures
- Be alert for any signs of money laundering or any other unusual activities which may appear suspicious
- Immediately report any suspicious circumstances, irregularities or incidents to your line manager or the local Compliance Officer

Acting responsibly in personal political activity

Everyone has the right to take an active interest in and participate in political affairs and activities. However, all political activities must be done in a responsible manner and in line with the local legislation. Specifically, political activities must not interfere with an employee's work directly and must not, in any manner, reflect unfavourably on the Company or impact its interests or reputation.

As such, employees engaging in political activities are expected to do so as private citizens and not as representatives of Oilinvest. Any political activities must be conducted outside of normal working hours and the use of Oilinvest facilities, property, equipment or channels to carry out or support any personal political activity is strictly forbidden. Additionally, when undertaking such activities and expressing their views, employees should ensure that it is clear that they are speaking in a personal capacity and their views do not represent the views of Oilinvest.

Engaging in other employment / business activities

As a principle, the engagement in other business activities or other employment is allowed for employees within all hierarchical levels, unless it creates a conflict of interest.

In cases where other employment or business activity is undertaken, this must be lawful and must not, under any circumstances:

- Create a conflict of interest
- Overlap with your employment duties, responsibilities and/or working schedule at Oilinvest
- Affect your performance whilst at work
- Make use of Oilinvest resources (e.g. property, equipment, knowledge)
- Bring Oilinvest into disrepute

Using Social Media

Our people are the greatest ambassadors of Oilinvest and are thus encouraged to support and promote our Group through their personal accounts or social media. However, it is important that the use of social media occurs in an

Your Role & Responsibilities

- Re-post / re-share news-oriented content that the Group has already published and released to the public, in order to further promote Oilinvest
- Never disclose any confidential business information related to the Group or any related entities or business partners, customers, employees, associates and/or the competition
- Do not post conversations or information that is pre-decisional, internal, proprietary or confidential
- Never post any illegal material or any other post that might be considered as derogatory, bullying, threatening or harassing
- Do not make any questionable statements or speak negatively about the Group or any related entities or business partners, customers, associates and/or the competition
- Do not acknowledge or cite customers or refer to specific products / projects, unless prior permission is obtained
- Ensure that when expressing your views, it is clear that you are speaking in a personal capacity and that your views do not represent the views of Oilinvest
- Do not share the names, videos or photographs of customers and/or employees engaged in business activities without express prior approval from the relevant individuals

accurate, safe and appropriate manner, as this can significantly affect the Group's business interests and reputation.



Code of Conduct |

Protecting our People

We recognize and protect our people!



PROTECTING OUR PEOPLE

At Oilinvest, we consider our people our most important asset and an integral component of our success and we aim to create an exceptional and memorable employee experience, providing good working conditions which focus on ensuring their safety and health, both physical and mental.

We ensure the provision of fair employment terms and conditions for our people, create a safe and healthy workplace and foster an environment where every individual is treated with dignity, respect and in a fair manner.

Within this Section you will find information related to the following:

- Complying with labour law and immigration laws
- Providing equal opportunities
- Promoting Diversity & Inclusion
- Creating a respectful, harassment-free working environment
- Ensuring the health, safety and security of our people
- Promoting a substance-free and alcohol-free workplace

Complying with labour law and immigration laws

We strive for excellence in the way we treat our people and are committed to offering fair terms and conditions of employment and safeguarding employees' rights, in accordance with the related labour and immigration laws in the countries in which we operate. We do not tolerate any employment conditions that do not meet the minimum legal or ethical business standards, including, among others, child labour, child exploitation, discrimination with respect to employment and occupation or any other form of forced labour, and take the necessary steps to address these risks in our operations and supply chains.

We respect employees' freedom of association and right to join or form trade unions and bargain collectively and hence we are committed to creating a culture of mutual trust and constructive dialogue with workers' rights organisations. In cases where the right to freedom of association and collective bargaining is restricted under law, we are committed to facilitating alternate means of independent and free association and bargaining for our people.

Providing equal opportunities

We pride ourselves on offering equal opportunities to our people. We believe that every employee is entitled to equal opportunities in all aspects of their employment relationship with Oilinvest, starting from the recruitment and selection process, assignment of work, work-time allocation, working conditions, learning and development, compensation, administration up until retirement. As such, we ensure that any employment and people-related decisions are based on clear and objective criteria (e.g. skills, knowledge, merit, competence, aptitude, qualifications, performance).



Promoting Diversity & Inclusion

As a global entity with operations across numerous countries, diversity is the cornerstone of our values, practices and behaviours. Our commitment to fostering an inclusive environment is deeply embedded in our mission to respect and embrace the unique perspectives of individuals from all backgrounds.

As an employer, we are committed to creating a diverse and inclusive culture and working environment, where everyone, regardless of any personal characteristics or differences in terms of gender, race, religion, colour, ethnic background, family situation, disability, sexual orientation, age or other personal characteristics, is treated with dignity and respect and feels comfortable and supported to be themselves. We respect and value the unique contribution that each individual has to bring to the Group and appreciate the importance and power it has for Oilinvest in supporting creativity, innovation and promoting diverse ideas and perspectives. Everyone at Oilinvest is expected to behave professionally and ethically and create a collaborative, positive and healthy working environment that supports mutual respect, acceptance and diversity.

Your Role & Responsibilities

- Treat everyone with respect, fairness and dignity
- Listen to and learn from others' views and opinions
- Show understanding and respect for human and cultural differences
- Encourage open communication and make others feel comfortable to voice their opinion or any concerns
- Recognize your own personal assumptions, blind spots and biases
- Never engage in bullying, discrimination, non-sexual or sexual harassment
- Speak up if you experience or encounter any inappropriate behaviours

Additionally, as a Manager...

- Be aware of local legislation and cultural factors that may impact employment decisions
- Ensure that when you are making people-related decisions (e.g. related to recruitment, compensation, assignment of tasks, learning and development), you are acting impartially and fairly and that the decision is based on clear and objective criteria
- Create an inclusive and collaborative working environment
- Adjust the working environment or working conditions to accommodate any personal differences (e.g. disability)
- Take immediate actions if you witness or are informed of any discriminatory behaviours or harassment in the workplace

Creating a respectful, harassment-free working environment

We are committed to creating a respectful working environment for our people. As such, any behaviours or comments that create or encourage an intimidating, offensive or hostile working environment will not be tolerated. Specifically, any kind of actual or threatened violence, harassment, bullying or any other action or behaviour by employees which constitutes or can be perceived as inappropriate, humiliating, intimidating or hostile will be treated very seriously and will be subject to disciplinary action.

Harassment

- Psychological, verbal or sexual harassment, bullying, racism or any other actions/behaviours that may offend or cause distress
- Derogatory comments based on racial or ethnic characteristics
- Unwelcome sexual advances or requests for sexual favours
- Offensive remarks, jokes or lewd behaviours
- Any form of physical threat or physical intimidation
- Demeaning or patronizing comments about a person's appearance, age, race, sexual orientation or disability
- Unsolicited questions about a person's personal life
- Spreading malicious rumours or insulting someone directly
- Threatening violence or engaging in violent acts

Your Role & Responsibilities

- Treat everyone with respect
- Do not demonstrate any behaviours of psychological, verbal or sexual harassment, bullying, racism or any other actions which are inappropriate, humiliating, intimidating or hostile
- Report any kind of violence or harassment you witness or experience

Ensuring the health, safety and security

The health, safety and security of our people, visitors, customers and the general public are important to Oilinvest.

We are committed to ensuring that all our activities are carried out safely and securely, in compliance with the specific laws and regulations of all countries in which we operate. As such, we work continuously to prevent and manage any risks or hazards so as to ensure a safe, productive and stimulating working environment for everyone.

BECAUSE WE CARE...

- We ensure safe technologies and a safe working environment with healthy working conditions
- All our offices and working areas are designed in such a way so as to avoid injury or accidents
- We offer our people the necessary technologies, resources and tools to protect them from any dangerous activities
- We train our people on health and safety on a regular basis
- We abide by the work schedule and required rest periods, as indicated by the applicable law
- We proactively identify and evaluate health and any other related risks in the workplace that may potentially adversely affect our people, business partners or other third parties
- We have in place clear preventive and protective measures to eliminate or mitigate any risks

Your Role & Responsibilities

- Adhere to the applicable health and safety laws, regulations and company and/or the respective affiliate company policies
- Take reasonable care for your own safety and for the safety of other people who may be affected by your actions
- Keep your workplace free of hazards
- Report any incidents which have led and/or may lead to injury or damage
- Report any incidents, potential hazards, unsafe working conditions or violations of policies that may threaten the health, safety and security of people to your line manager and/or responsible individual (e.g. Health & Safety Officer, local Compliance Officer)
- Cooperate with any investigations and/or actions which need to be taken to prevent incidents or accidents
- Complete any required health and safety training or exercises which may be applicable

Promoting a substance-free and alcohol-free workplace

Oilinvest is deeply committed to promoting a safe and healthy working environment for its people.



Smoking, including the use of electronic cigarettes of any kind, is prohibited at all Oilinvest's premises, including offices, conference rooms, restrooms, staircases and any semi-enclosed areas which form part of our offices. Smoking is only permitted during work breaks and only in the designated smoking areas.

Substance abuse in the workplace is strictly forbidden at all times. The possession, distribution and/or misuse of illegal drugs or other dangerous substances is strictly forbidden during working hours, while conducting business on behalf of Oilinvest, while at company premises, and/or while operating equipment/machinery, as such activities may impair the ability to conduct work safely and effectively.

Note: The use of any prescription medications which may interfere with the execution of work and/or impair alertness or judgement must be reported

Alcohol consumption during working hours and executing your duties whilst under the influence of alcohol are strictly forbidden, as such actions may influence the safe performance of duties and may put you and others at risk. Limited alcohol consumption may be authorised, at times, by the Management Team, outside of designated alcohol-free sites (e.g. during official Company events, business meals, entertainment, after-work drinks). Employees are expected to drink responsibly, avoid driving under the influence and be mindful of the impact on their behaviour.



Code of Conduct |

Engaging with Stakeholders

We establish responsible relations
with our stakeholders!

OILINVEST'S RESPONSIBILITIES TOWARDS THE COMMUNITY AND THE ENVIRONMENT

We are committed to maximising the value of our business through ethical practices and sustainable growth. Equally, we recognise the importance of protecting the environment and fostering strong, enduring relationships with the communities in which we operate. To achieve lasting, shared value, we maintain open lines of communication and adapt to the evolving needs of society and our community.

Our dedication to offering quality products and services ensures the development of mutually beneficial relationships. We manage our partnerships with integrity and respect, ensuring that our collaborations are productive and sustainable. Furthermore, we support the local communities in which we operate, recognising their vital role in our success and striving to contribute positively to their development and well-being.

Within this Section you will find information related to the following:

- Offering top quality products and services
- Managing relationships with our business partners
- Respecting the local communities in which we operate

Offering quality products and services

Oilinvest's business success and reputation are built on offering our customers quality products and services, in compliance with the agreed stringent specifications and standards as well as the associated regulatory and legal requirements.

Quality is a key component of our business success and a shared responsibility of every employee and business partner and is assured throughout the entire product lifecycle and spectrum of our services, including product development, sourcing, storage, distribution and customer service offerings.

We have a deep commitment and responsibility for our customers, and continuously monitor, adjust and improve our production standards, services and distribution of products to meet their evolving needs and expectations.

Managing relationships with our business partners

At Oilinvest, similarly to our people, our business partners (e.g. customers, suppliers, agents, joint venture partners) are also treated with respect and integrity and we conduct all our business and interactions with them in an impartial and fair way, within the legal framework. In the context of our cooperation, we also require our business partners to comply with our rules and regulations and share our principles and core values.

Before entering a contractual relationship, we adopt stringent selection and monitoring processes for our business partners, so as to ensure that their ethical standards are in alignment with our own core values, and that we have complete and transparent information about them.

Responsible Payment Practices

We are committed to fair and responsible business conduct in our relationships with suppliers. We aim to pay suppliers within agreed contractual payment terms and in accordance with applicable laws, including EU rules on late payments.

Payment practices are supported by internal financial controls and are periodically monitored to ensure compliance with agreed terms and legal requirements. Payment performance may be assessed through internal metrics and reporting processes.

Respecting the local communities in which we operate

At Oilinvest we are committed to actively contributing to the promotion of the quality of life and the socioeconomic development of the communities in which we operate as well as the development of our human resources and capabilities, while conducting our business activities according to standards that are compatible with fair commercial practices.

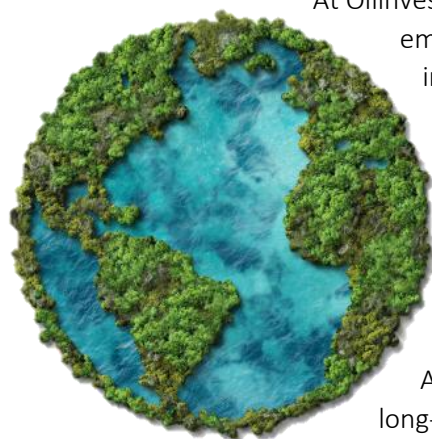
We respect the rights of people and communities, by recognizing and enhancing their lifestyles and culture and by identifying, preventing and mitigating any impact on their environment and way of life.

Social Sponsorship and Donation

At Oilinvest, we are committed to social sponsorship and participation in charitable activities and causes, in a transparent manner, ensuring that no improper payments or bribes are made, or are perceived to be made, and that no conflicts of interest arise, or are perceived to arise. Our sponsorships and donations are limited to social and humanitarian projects such as sports, education, culture and science, and we do not make donations or contributions to politicians or political parties. All charitable contributions made on the Company's behalf are carefully reviewed and approved by the appropriate team, ensuring alignment with our core values and the respective policies and procedures.

Protecting the Environment

At Oilinvest, we are committed to minimizing our environmental impact by reducing waste, emissions, and discharges, while producing safe, high-quality products. We implement robust systems to prevent environmental harm and ensure compliance with all relevant regulations.



As part of the energy sector, we are committed to supporting the transition to a lower-carbon economy. We are investing in cleaner fuels, renewable energy opportunities, and technologies that help reduce the environmental footprint of energy use and production, while ensuring energy security and affordability.

Across all operations, we prioritize energy efficiency, responsible resource use, and long-term environmental stewardship. Environmental performance is integrated into our governance framework, with clear responsibilities across all levels of the organization. We regularly monitor and report greenhouse gas emissions, continuously improving our practices to meet climate targets. We recognize the importance of protecting biodiversity and natural ecosystems. Our activities are planned and executed to avoid harm to sensitive environments and to promote restoration where impacts occur.

We also conduct regular evaluations to ensure progress and policy compliance, aiming to eliminate local pollution and other negative impacts.



Code of Conduct |

Managing & Protecting our Assets & Information

We protect our assets and ensure
we handle information securely!

MANAGING & PROTECTING OUR ASSETS & INFORMATION

Protecting our assets, data and information is paramount to maintaining security and sustaining the business operations of Oilinvest Group. For this reason, we implement robust cybersecurity measures and ensure that sensitive data is protected from unauthorized access, and we implement processes that safeguard our assets and property.

Everyone is personally responsible for the appropriate and efficient use and protection of the assets and property as well as the protection of confidential information. Our employees' awareness, diligence and commitment are crucial in safeguarding sensitive information and maintaining the integrity of our resources.

Within this Section you will find information related to the following:

- Protecting Company Assets & Property
- Managing Information Technology (IT) Resources
- Maintaining Confidentiality and Ensuring Data Protection & Privacy
- Maintaining Business Information & Records



Protecting Company Assets & Property

Oilinvest's physical, financial, information and intellectual assets and property are fundamental and valuable for its business and achievement of strategic priorities and goals, and must be preserved, protected and properly managed. Corporate assets and property include, among others, buildings and office premises, equipment, machinery, computers, information technology resources, funds as well as intellectual property (e.g. know-how, trademarks, patents, trade secrets, etc.).

Oilinvest assets must only be used for business purposes; the use of these assets for personal benefit or for the benefit of anyone else is prohibited. Limited personal use of Company assets may be accepted in some situations to accommodate employee needs in certain situations, provided that such use is in accordance with any locally approved guidelines (e.g. personal use of a company car, use of a company phone for making a personal call or checking personal emails).

Everyone is personally responsible for the appropriate and efficient use as well as for the protection of these assets and property. Waste, loss, damage, fraud, misappropriation, theft, infringement, abuse or misuse is considered unacceptable.

All assets, documents, hardware and software provided to the employee by the Company for business use and any data or documents (including copies) produced, maintained or stored on the Company's computer systems remain the property of the Company. In the event of termination of employment at Oilinvest, employees are required to return all Company assets.

Managing Information Technology (IT) Resources

Oilinvest provides employees with the required equipment as well as the necessary software, tools, resources, communication facilities and associated accessibility, so as to effectively carry out their work duties.

Inappropriate use of information technology can lead to unauthorized access to our network and data, damage to software systems and possible leakage of confidential information. For example, websites aimed at personal use are increasingly being used to spread viruses, spyware and other malicious software designed to exploit vulnerabilities in personal computers and IT networks. Additionally, unauthorised installation of software may also endanger information security.

As such, we expect that high ethical and business conduct standards and extra caution are observed by our people and that all information technology resources are used in a responsible and professional manner.

Internet Access

Access to the internet may be provided to employees, for business use and execution of their daily tasks. In such cases, employees are expected to use the internet in a reasonable and responsible way. Specifically, the use of the internet is strictly forbidden for:

- Sending confidential information and files (exceptions may apply e.g. banks, authorities, auditors etc.)
- Political activity
- Gambling
- Accessing internet chat rooms
- Accessing web pages or downloading any images/files which could be regarded as illegal, offensive or immoral
- Disseminating offensive or illegal material

Monitoring of Devices

Oilinvest reserves the right, in accordance with local laws and regulations, to monitor, access or review information technology resources provided to employees for business purposes (e.g. computer, mobile phone), related applications and technologies (e.g. internet browser, work email account) as well as materials created and kept by these (e.g. incoming, outgoing or deleted emails and attachments, computer files and folders, websites accessed, etc.), if deemed necessary. Reasons for such monitoring may include, among others, solving technical issues, existence of any security issues or potential breaches, investigation of fraud, theft or loss of the device and/or when leaving the Company.

Maintaining Confidentiality and Ensuring Data Protection & Privacy

At Oilinvest, we recognise the need to treat any confidential information and personal data (verbal, written, physical or electronic) in an appropriate, transparent and lawful manner.



The protection of confidential information and personal data of employees, clients or other external parties is of utmost importance to Oilinvest. We are committed to safeguarding data protection and security, protecting the Company from potential confidentiality and personal data breaches and ensuring respect and adherence to the requirements of the related laws and regulations (e.g. General Data Protection Regulation (GDPR)).



Confidential Information

Confidential information refers to any information that may be learned, received and/or developed in the context of work but that has not been disclosed or is publicly available.

Confidential information may include:

- Strategic, financial and business plans
- Commercial strategies
- Major management changes
- Mergers and acquisitions
- Technical specifications
- Financial data
- Sales and marketing strategies
- Pricing strategies and information
- Research and development practices
- Personal data about clients, associates and/or employees
- Information which, if disclosed, would likely be harmful (e.g. give competitors an advantage, impact business or reputation)



Personal Data

Personal data refers to any information about an individual from which that person can be easily identified.

Personal Data collected and maintained is usually related to employees, customers and/or other external parties, and may include:

- Personal data (e.g. names, addresses, contact details, home and mobile telephone numbers, date of birth, identification card or passport number)
- Personal sensitive data (e.g. sexual orientation, financial situation, disabilities)
- Important medical Information (e.g. emergency contacts, medical conditions)
- Other information (e.g. vehicle registration number, emergency contact information)
- Educational & employment background (e.g. academic background, certifications, registrations, reference letters, interview notes)
- Absence, maternity, paternity and annual leave records, salary history, disciplinary and grievance proceedings, records

Managing Confidential Information

Employees are strictly prohibited from disclosing any confidential information obtained during their employment at Oilinvest to anyone outside the company, including relatives and friends, except when disclosure is authorized or legally mandated. Even when disclosure of such information is authorised and required for business purposes, appropriate steps must be taken to prevent misuse of the information (e.g. signing of a confidentiality or non-disclosure agreement). This applies both whilst working at Oilinvest and after the end of their employment or completion of a specific engagement/project.

Managing Personal Data

Any personal information received in the context of our business operations related to our people, customers or other external parties must be collected, processed, recorded, stored and used in accordance with applicable data privacy laws, policies and guidelines, and only be used for specific authorised purposes, which include, among others:

- In the course of legitimate business activities
- To carry out any legal obligations (e.g. in the field of employment and social security and social protection law (i.e. for completing relevant processes for obtaining work permits and/or visas))
- To assess working capacity on health grounds, subject to appropriate confidentiality safeguards
- If needed or required to protect an individual's or the public's interest
- In relation to legal claims / proceedings

Any personal data collected must be used fairly and for specific and legitimate purposes and only be retained for as long as is necessary for the purpose for which it was initially collected, in line with the respective regulations.

Personal information must only be shared with others when there is a business or legal need to do so. In such cases, it is important to ensure that the disclosure of such information complies with the applicable data privacy laws, policies and guidelines and that anyone receiving personal data from us understands the importance of protecting such data.

Your Role & Responsibilities

- Treat documents with personal or sensitive data confidentially and protect them from misuse
- Protect your passwords and user IDs
- Be aware of and adhere to the applicable laws and regulations concerning personal data
- Collect, use, store or share personal data only insofar as is absolutely necessary for the specific purpose and only if you are allowed to do so by law

Maintaining Business Information & Records

We are deeply committed to maintaining the accuracy, completeness and reliability of all Company records and accounts, ensuring that they provide a true representation of the Company and are in alignment with the relevant laws and regulations. Recording, processing and analysing accurate, complete and understandable information about the business is the responsibility of the Company, its specialised teams and individuals (e.g. Finance & Accounting Team, Legal Team), as well as each individual employee.

It is essential that we maintain accurate and complete records of all Company documents, business results and information, including, among others, financial information, non-financial reporting data, contracts, audit reports, travel and entertainment expense reports and policies, so as to effectively manage our business as well as for legal,



tax, accounting and regulatory purposes. All books and records must be supported by the required documentation so as to provide a complete, accurate, valid and auditable record of each transaction. Additionally, we have a duty to retain proper records and historical data of our business activities so as to preserve corporate memory but also to meet any legal and regulatory requirements.

All employees are required to cooperate fully with internal and external audits by providing truthful information and cooperating fully during the audit process. Any attempt to conceal or misstate information in company records is a serious offence and may be subject to disciplinary action.



Code of Conduct | Conclusion





We would like to thank you for taking the time to read through our Group's Code of Conduct. We hope the Code of Conduct has helped you to understand the key principles and guidelines which must be adhered to, the risks and challenges you may be faced with during your work, as well as your role and responsibilities.

You are encouraged to refer to the current Code of Conduct on a regular basis as well as whenever needed.

This Code is not exhaustive and cannot provide you with guidance on how to act in every situation, so whenever you are in doubt or are unsure of what you should do, don't hesitate to seek advice; speak to your line manager, your local HR Team, and/or the local Compliance Officer for any support and





Employee Signature & Acknowledgment

I, _____, confirm that I have received and carefully read through the Code of Conduct and fully understand its content.

I acknowledge that I must behave in accordance with the standards and guidelines outlined in the Code of Conduct and am responsible for my own personal behaviour as well as for reporting any actions or behaviours which involve me or others and do not comply with the provisions of the Code. I understand that failure to read the Code of Conduct does not constitute an excuse for non-compliance or deviation from the provisions outlined.

In case of doubt, I understand that I should consult with my direct manager, the HR Team or the Compliance Team for any questions I may have or alternatively go through any of the other communication channels available to me.

Name

Job Position

Employee ID

Signature

Date

*Please return a signed copy of the current 'Employee Signature & Acknowledgment' Form
to the HR Team.*