

Code of Conduct



JB Energy



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A Message from the CEO

“BB Energy is committed to adhering to the highest legal and ethical standards in its global business activities. “



As one of the World’s leading independent energy trading companies, BB Energy is committed to adhering to the highest legal and ethical standards in its global business activities. Our ability to operate as a global business is dependent on our reputation.

BB Energy’s Code of Conduct (“The Code”) governs the commitment of BB Energy Group being BB Energy Group Holding Ltd and its subsidiaries, wherever incorporated (the “Group”) to conduct its business activities in the highest ethical and professional manner. The Code sets out the core values to which BB Energy expects its employees, directors, consultants, contractors and temporary workers to adhere to and it communicates clearly the behaviour expected and provides a guide on what action to take when a potential violation of the standards is witnessed.

Mohamed Bassatne
Group CEO
BB Energy Group Holding Ltd.

What are our Values



Integrity



Transparency



Honesty



Equal opportunity



Privacy



Valuing diversity

These values act as a guide to the everyday actions of all BB Energy Employees in order for each and every one to carry out their professional responsibilities in line with the operating principles of the company in good faith and with integrity and respect for the law and ethical rules.

BB ENERGY CODE OF CONDUCT

BB Energy's integrity is one of its most important assets and is instrumental to its business success.

BB Energy's business is founded on effective risk management and strong corporate values. While this Code will cover a wide spectrum of its business activities, practices and procedures, it does not cover every issue that may arise in the course of BB Energy's business activities. Rather it sets out the basic principles intended to guide BB Energy's employees, directors, consultants, contractors and temporary workers are expected to comply with the principles of this Code and policies applicable to their function and status.

All BB Energy employees and directors regardless of their position are responsible for upholding and maintaining high ethical and professional standards. They must endeavor to avoid and prevent any improper behaviour. Any violation of this Code may result in disciplinary action to the maximum extent permitted by the applicable law.

Compliance with Laws and Regulations

BB Energy is a company that takes pride in being a good corporate citizen and will continuously strive to maintain the highest standards of ethical conduct and corporate responsibility. We recognise and are committed to

“It is critical that BB Energy and its employees comply with all applicable laws, rules and regulations.”

adhering to applicable national and international laws and standards, including those set out by international organisations. It is critical that BB Energy and its employees comply with all applicable laws, rules and regulations. Employees are expected to refer to the guidance contained in each relevant policy document and relevant procedures to maintain compliance with these laws and regulations and to seek advice from the Compliance Department as necessary.

Market Abuse

Our company is committed to maintaining the highest standards of integrity and transparency in all of our activities, and as a part of this commitment any practice that harms or undermines market integrity and erodes public trust is prohibited by our company. This applies to all employees, contractors and agents of the company.

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Trade Sanctions

BB Energy is committed to complying with all applicable economic sanctions laws, regulations, embargoes or restrictive measures (Sanctions) to which it's business or activities are subject. We are committed to maintaining effective measures to ensure both compliance and awareness of all applicable Sanctions related obligations.

“BB Energy is committed to complying with all applicable economic sanctions laws”

Anti-Trust and Competition Law

Antitrust and competition laws are designed to ensure that businesses are conducted in an open, competitive atmosphere and that the competition is not unfairly or unreasonably restricted by our actions. BB Energy strictly prohibits any behaviour that unfairly restricts trade or causes injury to competition.

Anti-Money Laundering and Terrorist Financing

BB Energy has a zero tolerance approach to money laundering and dealing with the proceeds of crime. We are committed to ensuring that we have and continue to have adequate controls to counter Money Laundering and Terrorist Financing activities. To this end, we have in place risk sensitive policies and procedures to anticipate and prevent money laundering and terrorist financing. We are committed to training our staff on the legislation and what to watch out for.

All employees are to report suspicions of money laundering or terrorist financing activities to the Compliance Department.

Anti-Bribery and Corruption

At BB Energy, we are committed to conducting our business with integrity and in compliance with all applicable laws and regulations. We have a zero-tolerance approach to bribery and corruption, and we expect all employees, contractors, and business partners to uphold this commitment.

We prohibit the offering, giving, solicitation, or acceptance of any bribe or corrupt payment, whether in cash or any other form. This includes gifts, hospitality, and entertainment that could be perceived as an attempt to influence business decisions or gain an unfair advantage.

“This anti-bribery and corruption policy statement is a clear expression of an organization's commitment to ethical business practices and can help to establish a culture of integrity and accountability within the organization.”

We conduct our business in a transparent manner and maintain accurate records of all transactions. We do not engage in any activity that may support or facilitate bribery and corruption.

We have implemented appropriate policies and procedures to prevent and detect bribery and corruption in our operations. We also encourage all employees, contractors, and business partners to report any concerns they may have about bribery and corruption.

Gifts and Entertainment

It is prohibited for employees or any other person or organisation working for or representing BB Energy to offer, promise or receive, or authorise others to offer, promise, give or receive anything of value, either directly or indirectly to any party in order to improperly obtain business or to otherwise gain an improper business advantage.

In addition, there are strict laws (including criminal laws) that govern the provision of gifts and entertainment, including transportation and lodging, to public officials. Employees or individuals representing BB Energy are prohibited from providing gifts or anything of value to public officials or their employees or family members in connection with BB Energy's business for the purpose of obtaining or retaining business or a business advantage. Further details can be found in the Global Anti Bribery and Corruption Policy.

Conflicts of Interest

Conflicts of interest may arise when a person's private interest clashes with or appears to clash with the interest of BB Energy. These conflicts may arise where the employee or any person closely connected with the employee, not limited to family members or members of their household, takes an interest in a counterparty or potential service provider in a way that may influence the decision making of the employee not to act in the best interest of the Group.

Employees shall avoid any conflict of interest or the appearance of a conflict of interest. Employees shall disclose any actual or potential conflicts of interest to their direct manager or Compliance Department, and shall refrain from engaging in any activities that would compromise the interests of the BB Energy.

Confidentiality

BB Energy's employees and directors have an obligation of confidentiality to BB Energy. Confidential information includes non-public information that might be of use to competitors and non-public information relating to BB Energy and/or one of its counterparties, customers or any other third party that may be obtained in the course of their duties within BB Energy.

All employees shall protect confidential information of the BB Energy, including but not limited to, trade secrets, financial data, and customer information. Employees shall not disclose any confidential information to unauthorized parties, and shall use such information solely for business purposes.

“Employees shall not disclose any confidential information to unauthorized parties, and shall use such information solely for business purposes.”

This obligation does not limit employees from reporting possible violations of law or regulation to a regulator or from making disclosures.

Behaviour in the workplace

BB Energy does not tolerate harassment, bias or inappropriate conduct. Employees that witness such behaviour must raise this confidentially to their direct manager, HR or the Compliance Department.

Diversity and Talent

BB Energy affords equal opportunity to all qualified applicants and existing employees regardless of race, disability, religion, national origin, colour, gender, sexual orientation, age, marital status, political affiliation or any other basis that would be in violation of any applicable rules or regulation.

“BB Energy affords equal opportunity to all qualified applicants and existing employees .“

Responsibility and Ethics

BB Energy recognises its responsibility to society, and engages in socially responsible practices. BB Energy has in place, policies and procedures to ensure compliance with all applicable environmental and safety regulations, and shall strive to minimize its environmental impact.

Human Rights

In BB Energy’s business dealings, we expect our counterparties and service providers to adhere to principles consistent with ours. We prohibit discrimination, forced, trafficked and child labour and are committed to safe and healthy working conditions.

“We prohibit discrimination, forced, trafficked and child labour and are committed to safe and healthy working conditions .“

Reporting violations

All employees who become aware of any violations of this Code or any of the BB Energy Policies are required to report any illegal or unethical conduct that they become aware of. Employees should contact the Compliance Department in the first instance. BB Energy shall investigate all reported violations, and take appropriate corrective action where necessary. BB Energy will not retaliate or discriminate against any employee who does so in good faith.

Further guidance and advice

Any employee that needs further guidance after reading through this Code can contact the Compliance Department.



BB Energy



<https://bbenergy.com/about-us/code-of-conduct/>