



Supplier's Conduct Guidelines

Version Management

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Introduction and Purpose

At BB Energy, we believe that sustainability and ethical business practices are fundamental to long-term success and to building trust with our stakeholders. Our Supplier's Conduct Guidelines "the Guidelines" serves as a cornerstone of our commitment to responsible and transparent operations across our global value chain. It establishes the minimum standards and expectations that we expect from our suppliers, contractors, and business partners, ensuring that our shared activities are conducted with integrity, accountability and respect for people and the planet.

Our approach to sustainability is rooted in empowering people, communities, and businesses by responsibly trading traditional, transitional, and renewable energy. We recognize that as the energy sector evolves, our responsibilities extend beyond operations to the impact we have on society and the environment. By integrating sustainability principles into our procurement and supplier management practices, we aim to drive positive change and promote shared value throughout our supply chain.

Guided by our ESG pillars: environmental stewardship, social responsibility, strong governance and a commitment to safe working practices, we are committed to respecting and protecting human rights, ensuring the health and safety of all individuals involved in our operations, safeguarding the environment, and upholding the highest standards of corporate governance.

Through this Guidelines, BB Energy seeks to foster a network of suppliers who share our values and commitment to sustainable growth. We expect all our partners to not only meet the standards outlined herein but also to embrace the spirit of responsibility, transparency, and ethical conduct that defines our company's purpose.

1. Requirements for Suppliers

BB Energy expects all suppliers, contractors, and business partners to uphold high standards of integrity, sustainability, and ethical conduct. As a minimum expectation, every supplier must comply with all applicable laws, regulations and standards and where applicable to comply with the principles and provisions set out here in. Suppliers are also encouraged to communicate the principles to their employees, subcontractors, and any other parties working on projects or providing services directly or indirectly to BB Energy.

In cases where a supplier has not yet developed an appropriate Guidelines, they should develop and implement a clear, time-bound plan to align with its requirements. This implementation plan should outline specific actions, timelines, and responsible parties to achieve compliance. BB Energy Group views this as a process of continuous improvement and will work collaboratively with suppliers to support progress toward these sustainability objectives.

Where relevant, we may request information or engage in discussions to understand how suppliers or subcontractors are meeting these guidelines. We aim to take a collaborative and

proportionate approach to assurance activities. If significant concerns are identified, we will seek to work with suppliers to address them. In rare cases where issues cannot be resolved, it may be necessary to review the business relationship.

Where adherence to the Guidelines may create a potential conflict with applicable laws or regulations, suppliers are expected to promptly notify BB Energy Group of the situation and provide a clear explanation of how they intend to continue operating responsibly and ethically within the legal framework. Transparency and open communication in such cases are essential to maintaining mutual trust and integrity in our business relationships.

2. Anti-Bribery and Corruption

At BB Energy, we are firmly committed to conducting our business with integrity, fairness, and transparency in every jurisdiction where we operate. Upholding the highest ethical standards is essential to maintaining the trust of our customers, suppliers, partners, and regulators. We strictly prohibit all forms of bribery and corruption, whether direct or indirect, in both the public and private sectors. This commitment applies to all employees, officers, contractors, intermediaries, and any third parties acting on behalf of the company.

2.1 International Anti-Bribery Laws and Their Importance

Global anti-bribery and corruption laws—such as the UK Bribery Act (2010), the U.S. Foreign Corrupt Practices Act (FCPA), the OECD Anti-Bribery Convention, and corresponding local regulations—establish clear prohibitions against offering, promising, giving, requesting, or accepting anything of value to improperly influence business decisions. These laws are designed to promote transparency, fair competition, and public trust in commercial and governmental processes.

Compliance with these international standards is not only a legal obligation but also a moral and strategic imperative. Violating anti-bribery laws can expose individuals and companies to severe criminal, civil, and financial penalties, including imprisonment, heavy fines, and exclusion from public tenders or financing. Beyond legal consequences, involvement in bribery or corruption can cause irreparable reputational damage, eroding stakeholder confidence and jeopardizing long-term business sustainability.

2.2 Definition of Bribery

Bribery is defined as the act of offering, promising, giving, soliciting, or receiving any financial or other advantage to influence, or appear to influence, the actions of another person in order to obtain or retain business or secure an improper benefit. Bribery can take many forms, both tangible and intangible, including:

- Cash or cash equivalents
- Gifts or gift items
- Credits or excessive discounts
- Hospitality, travel, accommodation, or entertainment that is lavish or disproportionate
- Personal services or favors offered to decision-makers or their family members
- Kickbacks or commissions intended to improperly influence a transaction

It is important to understand that the intent behind the action, rather than the amount or value, is what determines whether conduct constitutes bribery. Even a small or symbolic benefit may be considered a bribe if it is offered with the purpose of securing an improper advantage.

2.3 Facilitation of Payments

BB Energy explicitly prohibits facilitation payments, which are small, unofficial payments made to public officials or other individuals to expedite or secure routine governmental actions (such as but not limited to processing permits, visas, customs clearances, utility connections, etc). Although such payments may be common in some regions, they are illegal under most anti-bribery laws, including the UK Bribery Act.

Facilitation payments are a form of bribery because they undermine transparency, perpetuate corruption, and distort fair competition. They also expose both the company and the individual involved to serious legal and reputational risks. Instead, employees and representatives of BB Energy are required to report any situation in which such payments are requested, so that it can be addressed through lawful and compliant channels.

2.4 Definition and Risk of Corruption

Corruption is defined as the abuse of entrusted power for personal or business advantage. It includes any activity intended to improperly influence decisions, secure unfair business benefits, or gain preferential treatment. While professional relationships often involve social interaction, gifts and hospitality can become a form of corruption when they are used, or perceived to be used, to influence a business outcome or decision. Even small gestures, if offered frequently or inappropriately, can create an expectation of reciprocity or raise suspicions of impropriety.

2.5 Consequences of Bribery and Corruption

Engaging in bribery or corrupt activities has serious consequences for both the individual and the company. Potential repercussions include:

- Criminal prosecution and imprisonment for individuals involved Substantial fines and penalties imposed on both individuals and the company
- Loss of business licenses or government contracts
- Permanent damage to corporate reputation and stakeholder trust
- Disciplinary action, including termination of employment or contracts

At BB Energy, there is zero tolerance for any form of bribery, corruption, facilitation or unethical conduct. We expect all employees, suppliers, and business partners to adhere to the principles of this Guidelines, exercise sound judgment, and immediately report any suspected or actual violations through our established compliance channels.

By maintaining a strict anti-bribery stance, BB Energy reinforces its commitment to ethical business, regulatory compliance, and responsible energy trading, ensuring that every decision and transaction reflects our core values of integrity, accountability, and respect.

3. Gifts, Hospitality and Entertainment

Our relationships with suppliers, customers, and business partners must be based solely on merit, fairness, and mutual respect, never on personal gain or undue influence. As part of our broader commitment to sustainability and ethical governance, we expect our suppliers and partners to uphold the same principles when offering or accepting gifts, hospitality, or entertainment.

3.1 Definition of Hospitality and Tendency to Raise Expectations

Hospitality refers to the provision of meals, refreshments, entertainment, travel, or accommodation to build or maintain professional relationships. While modest hospitality can be part of normal business courtesy, it carries the risk of creating an undue sense of obligation or raising expectations of preferential treatment. Excessive or lavish hospitality, particularly when unrelated to legitimate business purposes, can compromise the integrity of the relationship and may be viewed as an attempt to influence decision-making.

Suppliers should therefore exercise sound judgment, moderation, and transparency when offering or accepting hospitality on behalf of BB Energy or in connection with its business. Each situation should be assessed based on context, intent, and proportionality.

3.2 Permissible Business Courtesies

BB Energy Group recognizes that reasonable gifts and entertainment are a customary part of developing professional relationships and are not prohibited when they are:

- Infrequent, modest in value, and appropriate to the occasion;
- Transparent, properly recorded, and not concealed;
- Directly related to legitimate business activities; and
- Not intended, or perceived, to influence a decision or create an obligation.

Examples may include token gifts bearing a company logo, modest meals during business discussions, or attendance at industry events where participation has a clear professional purpose. However, suppliers should always ensure that such courtesies comply with both their own internal policies and applicable laws.

3.3 Special Care when dealing with Government Officials

Particular caution must be exercised when interacting with government officials, public employees, or representatives of state-owned enterprises. What may be considered acceptable hospitality in the private sector can be strictly prohibited under public sector or anti-corruption laws. Even small gifts or courtesies may be interpreted as attempts to improperly influence official decisions.

Suppliers must not offer or provide any gifts, hospitality, travel, or entertainment to government officials, their relatives, or associates. In all cases, transparency and documentation are essential to demonstrate legitimate business intent and to prevent any perception of undue influence.

BB Energy expects all suppliers and business partners to act with integrity, professionalism, and discretion when engaging in any form of gifting or hospitality. Such practices must support—not undermine, our shared commitment to ethical conduct, sustainability, and responsible business.

4. Money Laundering

At BB Energy, we are committed to maintaining the highest standards of financial integrity and ethical conduct. We strictly prohibit any form of money laundering and expect the same unwavering commitment from all our suppliers, contractors, and business partners. Our reputation as a responsible global energy company depends on the transparency and legality of every financial transaction we undertake.

4.1 Definition of Money Laundering

Money laundering is the process of concealing or disguising the origin of funds obtained through criminal or illegal activities in order to make them appear legitimate. It typically involves three stages: placement, where illicit funds are introduced into the financial system; layering, where transactions are structured to obscure their origin; and integration, where “cleaned” money re-enters the economy as seemingly lawful assets or income.

Money laundering can occur through various methods, including false invoicing, cash transactions, over- or under-invoicing of goods and services, use of intermediaries, or the transfer of funds across jurisdictions with weak regulatory oversight. Even unintentional involvement in such activities can expose individuals and companies to severe criminal, civil, and reputational consequences.

4.2 BB Energy Commitment

BB Energy does not condone, facilitate, or support any form of money laundering. We are committed to full compliance with all applicable anti-money laundering (AML) laws and regulations in every country in which we operate, including international frameworks established by the Financial Action Task Force (FATF) and other relevant authorities.

We have established internal AML policies and controls designed to detect and prevent illicit financial activity. These include due diligence on customers, suppliers, and counterparties, and the requirement to report any suspicious or unusual activity to the relevant compliance or legal authorities.

4.3 Suppliers Expectations

BB Energy expects all suppliers and business partners to adopt and maintain effective AML compliance programs aligned with international standards. This includes:

- Conducting appropriate due diligence on their own customers, subcontractors, and business associates;
- Avoiding any receipt, transfer, or handling of cash or cash equivalents that may originate from criminal or illegal activities;

- Ensuring that all payments related to business with BB Energy are transparent, traceable, and made through legitimate banking channels;
- Keeping accurate and verifiable records of all transactions;
- Provision of relevant training to employees; and
- Reporting any suspicious behavior, irregular payments, or transactions to the relevant authorities and to BB Energy's Compliance Team.

Adherence to domestic and international money laundering laws is mandatory. Any breach, whether deliberate or through negligence can result in criminal prosecution, substantial financial penalties, and irreparable harm to corporate and personal reputations.

4.4 Shared Responsibilities

Money laundering undermines economic stability, weakens governance, and fuels corruption and crime. BB Energy's zero-tolerance approach reflects our broader commitment to sustainability, ethical governance, and the rule of law. We rely on our suppliers and partners to act as the first line of defense by remaining vigilant, maintaining transparent business practices, and immediately reporting any concerns or red flags.

By working together to prevent illicit financial activity, we reinforce our shared values of integrity, accountability, and responsible business conduct, ensuring that BB Energy Group's operations remain lawful, sustainable, and trusted worldwide

5. True and Accurate Records

BB Energy expects all suppliers and business partners to maintain true, complete, and accurate records of every business transaction conducted on behalf of or in connection with the company. Transparency and integrity in financial and operational documentation are essential to ensuring accountability, compliance with international standards, and the prevention of fraud or corruption. Under no circumstances should suppliers create, authorize, or tolerate unrecorded, falsified, or "off-the-books" transactions, funds, or assets. Such practices undermine trust, distort business performance, and may constitute serious legal violations. All invoices, payments, reports, and supporting documentation must be properly recorded, retained, and available for review by BB Energy or any relevant authorities when required.

6. Sanctions and Trade Restrictions

Suppliers must fully comply with all applicable international laws and regulations governing import, export, customs, and trade, including embargoes, sanctions, and anti-boycott measures imposed by relevant authorities such as the United Nations, the European Union, the United Kingdom, the United States, and others. BB Energy expects suppliers to implement robust internal controls to ensure that their business activities do not involve sanctioned entities, restricted goods, or prohibited transactions. Engaging in trade that breaches these legal frameworks can expose both the supplier and BB Energy to severe criminal and civil penalties, reputational harm, and the termination of business relationships. Compliance with sanctions and trade restrictions is therefore not only a legal obligation but a vital element of responsible and sustainable global operations.

7. Subcontracting and Third-Party Contracting

BB Energy recognizes that suppliers may rely on subcontractors or third parties to fulfil certain obligations; however, any such engagement must be managed responsibly and ethically. Suppliers are expected to conduct appropriate due diligence before appointing any subcontractor, ensuring that the entity has a good reputation, sound business practices, and a proven record of compliance with all applicable laws and regulations. This includes but is not limited to anti-bribery and corruption, modern slavery, human rights, environmental, and health and safety standards. Suppliers remain fully accountable for the actions of their subcontractors and must ensure that they uphold the same ethical, legal, and sustainability principles expected by BB Energy in every business transaction conducted on behalf of or in connection with the company. Failure to exercise proper oversight may result in suspension or termination of the supplier relationship.

8. Environmental and Climate Change

BB Energy is committed to operating responsibly and promoting environmental stewardship throughout its value chain. We recognize that our suppliers play a critical role in supporting our sustainability goals and contributing to a lower-carbon, resource-efficient future. Therefore, all suppliers are strongly encouraged to adopt environmentally responsible practice and required to comply with all applicable environmental laws, regulations, and standards in the jurisdictions where they operate.

Suppliers are encouraged to establish and maintain active environmental management policies that identify, monitor, and mitigate the environmental impacts of their operations. This includes efforts to prevent pollution, protect biodiversity, and promote sustainable use of natural resources. BB Energy also encourages suppliers to develop measurable objectives for environmental performance improvement and to create a positive and lasting impact in the communities where they operate.

Where materially relevant, suppliers are also expected to implement processes and systems to minimize waste and resource consumption, covering water, energy, fuel, and raw materials, and to seek continuous efficiency improvements through innovation, cleaner technologies, and responsible sourcing. In alignment with global best practices, suppliers are expected to measure, monitor, and report their Scope 1, 2 and 3 greenhouse gas (GHG) emissions.

9. Social Responsibility

BB Energy is dedicated to fostering responsible and ethical business practices that uphold human dignity, fairness, and inclusion across our global supply chain. We expect all suppliers to share this commitment by providing and promoting a safe, fair, and respectful work environment for all individuals involved in their operations, in full compliance with all applicable health, safety, labour, and employment laws and regulations.

Suppliers have a fundamental responsibility to ensure that all workplaces are safe, secure, and conducive to well-being and productivity. This includes maintaining effective occupational health and safety management systems, conducting regular risk assessments, providing appropriate training and protective equipment, and promptly addressing any hazards or incidents. BB Energy

expects suppliers to adopt a proactive approach to injury prevention and employee well-being, ensuring that workers are treated with dignity and respect at all times.

BB Energy maintains a zero-tolerance policy toward child labor, forced labor, modern slavery, and human trafficking in any form. Suppliers are also expected to ensure that all employment relationships are voluntary and based on freely chosen work. No worker should be coerced, intimidated, or subjected to any form of abuse or exploitation. This expectation extends to all levels of the supply chain, including subcontractors and labor agents. Suppliers are encouraged to provide anti-modern slavery training for their relevant employees where appropriate.

Suppliers are also expected to uphold the principles of fair and ethical labor practices by respecting working hours, wages, and benefits as defined by local laws and industry standards. They are expected to avoid all forms of illegal discrimination based on race, gender, age, religion, disability, nationality, sexual orientation, or any other protected characteristic, and actively promote diversity, equity, and inclusion within their workforce.

BB Energy encourages suppliers to foster open communication and dialogue with employees, allowing them to raise workplace concerns without fear of retaliation. Freedom of association and the right to collective bargaining must be respected in accordance with applicable laws.

Through these commitments, BB Energy and its suppliers together promote a supply chain built on respect, fairness, and integrity, strengthening not only business performance but also the communities and societies in which we operate.

10. Ethical Governance

BB Energy is committed to conducting business with the highest standards of integrity, transparency, and accountability. We expect our suppliers to uphold these same principles and to embed strong governance, ethical behavior, and compliance practices throughout their organizations and supply chains. Ethical governance is fundamental to building trust, protecting our reputation, and ensuring the long-term sustainability of our business partnerships.

Suppliers are expected to conduct all business activities in accordance with applicable laws, regulations, and international standards, including those related to anti-bribery and corruption, fair competition, trade compliance, and financial integrity. Any form of corruption, fraud, embezzlement, extortion, or facilitation payment in every business transaction conducted on behalf of or in connection with the company is strictly prohibited. All business decisions and records must be made and maintained with honesty, fairness, and accuracy.

11. Confidential Information

Suppliers have a continuing obligation to protect and maintain the confidentiality of all proprietary, sensitive, or non-public information obtained through their relationship with BB Energy. Such information, whether commercial, technical, financial, personal or strategic, must not be disclosed, shared, or used for any purpose other than the legitimate performance of agreed contractual obligations, unless expressly authorized in writing by BB Energy. This duty of confidentiality remains in effect indefinitely, including after the termination of any business relationship.

12. Conflict of Interest

Suppliers are expected to ensure that their business decisions and activities do not create or appear to create a conflict of interest with BB Energy. A conflict of interest arises when personal, financial, or other external interests could compromise, or be perceived to compromise, the supplier's ability to act objectively and in the best interest of BB Energy.

Examples include, but are not limited to, personal relationships with BB Energy employees that influence decision-making, undisclosed financial interests, or engaging in business with BB Energy competitors under conflicting terms.

Suppliers are expected to promptly disclose any actual or potential conflicts of interest to BB Energy's Compliance Team so that appropriate steps can be taken to address the situation transparently and ethically.

13. Data Privacy and Information Protection

Suppliers are expected to ensure full compliance with all applicable data protection and privacy laws and directives governing the collection, processing, transfer, access, storage, and protection of personal information. Appropriate technical and organizational measures must be implemented to safeguard personal and confidential data against unauthorized access, misuse, loss, or disclosure.

Suppliers are expected to handle all personal data entrusted by BB Energy, its employees, customers, or third parties with utmost care and in accordance with international privacy standards, such as the EU General Data Protection Regulation (GDPR) or equivalent legislation where applicable.

By maintaining the highest standards of ethical governance, our suppliers help safeguard BB Energy's integrity, protect stakeholder trust, and strengthen the resilience and sustainability of our shared value chain.

14. Reporting and Contact

BB Energy suppliers can reach out and raise any questions about this Guidelines to the following email address: kyc@bbenergy.com

Please note that it is important to provide as much information as possible so we can respond appropriately.

15. Review of the Guidelines

This Guidelines is reviewed on an annual basis to ensure it remains relevant, practical, and aligned with evolving legal requirements and good industry practice. Any updates will be shared in a timely manner on our website so that suppliers can continue to work with us transparently and effectively.