

# SOZALA ENERGY CONSORTIUM BUSINESS CODE OF CONDUCT

At Sozala Energy Consortium, we are steadfast in our commitment to conducting business with the highest standards of integrity, transparency, and ethical conduct. Our Business Code of Conduct serves as a guiding compass, reflecting the core values that define who we are as a company, the expectations we hold for every member of our team, and the goals we strive to achieve in our daily operations.



# **OUR VALUES**

Integrity, Excellence, Collaboration, and Innovation are the pillars that underpin our organisational culture. We believe in conducting our affairs with honesty, maintaining a commitment to excellence in all that we do, fostering collaboration among our diverse team members, and driving innovation to shape the future of the energy sector.

# **OUR EXPECTATIONS**

The Business Code of Conduct outlines our expectations for every individual associated with Sozala Energy Consortium, whether they are employees, contractors, consultants, or partners. We expect each member of our team to act with honesty, fairness, and respect in all professional interactions. Upholding these principles creates a workplace culture that is inclusive, accountable, and conducive to the success of both individuals and the organisation as a whole.

# NAVIGATING WITH INTEGRITY, OUR ROADMAP TO EXCELLENCE



# GOALS OF THE BUSINESS CODE OF CONDUCT



#### **Ethical Decision-Making**

Encourage and guide individuals to make ethical decisions in their daily business activities, considering the impact on stakeholders and the broader community.



# **Compliance with Laws and Regulations**

Ensure strict adherence to all applicable laws and regulations governing our industry, fostering a culture of compliance within our organisation.



# **Protection of Company Reputation**

Safeguard the reputation of Sozala Energy Consortium by promoting behaviors that are consistent with our values and ethical principles.



#### **Respect for Diversity and Inclusion**

Foster a diverse and inclusive work environment where individuals are treated with dignity and respect, valuing the unique perspectives each person brings to our organisation.



# **Environmental and Social Responsibility**

Encourage practices that prioritise environmental sustainability and social responsibility, aligning with our commitment to corporate citizenship.



# **Conflicts of Interest Management**

Provide guidelines for the identification and management of conflicts of interest, ensuring that personal interests do not compromise the best interests of Sozala Energy Consortium.

The principles outlined in the Business Code of Conduct are not mere guidelines; they are integral to every facet of our operations. Whether engaging with clients, collaborating with colleagues, or making strategic decisions, these principles are the foundation upon which we build trust, foster innovation, and drive sustainable growth.

By upholding the Business Code of Conduct, each member of Sozala Energy Consortium contributes to the creation of a workplace that reflects our values and achieves our shared goals. As we embark on this collective journey, we affirm our commitment to maintaining the highest standards of ethical conduct, ensuring the long-term success and positive impact of Sozala Energy Consortium in the global energy landscape.

# MODERN SLAVERY AND HUMAN RIGHTS STATEMENT

#### Introduction

Sozala Energy Consortium is committed to upholding fundamental human rights and combating modern slavery in all its forms. This statement outlines our commitment to ethical conduct, responsible business practices, and the protection of human rights throughout our operations and supply chain.

# **Supplier and Contractor Due Diligence**

Sozala Energy Consortium conducts due diligence on its suppliers, contractors, and business partners to assess and mitigate the risk of involvement in modern slavery and human rights abuses. This includes evaluating supplier practices, conducting site visits, and requiring adherence to our Supplier Code of Conduct, which prohibits forced labor and child labor.

#### **Training and Awareness**

Sozala Energy Consortium provides training and awareness programs to employees, suppliers, and contractors on modern slavery, human rights, and ethical business practices. This education is designed to raise awareness of the risks associated with modern slavery and empower individuals to identify and report any concerns or violations.

#### **Collaboration and Advocacy**

Sozala Energy Consortium collaborates with industry partners, government agencies, non-governmental organizations, and other stakeholders to combat modern slavery and promote respect for human rights. We support initiatives aimed at raising awareness, improving supply chain transparency, and strengthening legal protections for vulnerable individuals

# **Modern Slavery Policy**

Sozala Energy Consortium has a zero-tolerance approach to modern slavery and human trafficking in all its forms. We condemn any form of forced labor, child labor, bonded labor, human trafficking, or other violations of human rights, and we are committed to preventing and addressing such abuses wherever they may occur.

# **Employee Rights and Welfare**

Sozala Energy Consortium respects the rights and dignity of its employees and provides a safe and healthy work environment free from discrimination, harassment, and exploitation. We uphold the principles of fair labor practices, freedom of association, and collective bargaining, and we comply with all applicable labor laws and regulations.

# **Reporting Mechanisms**

Sozala Energy Consortium maintains confidential reporting mechanisms for employees, suppliers, and other stakeholders to report suspected cases of modern slavery or human rights abuses. Reports are thoroughly investigated, and appropriate actions are taken in accordance with company policies and legal requirements.

# **Transparency and Accountability**

Sozala Energy Consortium is committed to transparency and accountability in its efforts to combat modern slavery and uphold human rights. We regularly review and update our policies, practices, and disclosures to ensure compliance with legal requirements and alignment with international standards and best practices.



# CONFLICTS OF INTEREST POLICY

#### **Commitment to Ethical Conduct**

Sozala Energy Consortium is committed to upholding the highest standards of ethical conduct in all aspects of its business operations. Central to this commitment is the avoidance of conflicts of interest, which could compromise the integrity of our organization.

#### **Definition of Conflicts of Interest**

A conflict of interest arises when an individual's personal interests or activities interfere or appear to interfere with the interests of Sozala Energy Consortium. This includes situations where an employee, officer, or director has a financial or personal interest that may influence their decision-making or actions within the company.

# **Disclosure Requirements**

All employees, officers, and directors of Sozala Energy Consortium are required to promptly disclose any actual or potential conflicts of interest to the appropriate department or authority within the company. This disclosure should include sufficient detail to allow for a thorough assessment of the situation and determination of appropriate actions.

# **Assessment and Management**

Upon receiving a disclosure of a conflict of interest, Sozala Energy Consortium will conduct a thorough assessment to determine the nature and significance of the conflict. Based on this assessment, appropriate measures will be taken to manage, mitigate, or eliminate the conflict, ensuring that the company's interests are protected.

#### **Prohibited Actions**

Employees, officers, and directors of Sozala Energy Consortium are prohibited from engaging in activities or transactions that create, or appear to create, a conflict of interest with the company. This includes, but is not limited to, engaging in business dealings with family members or close associates, accepting gifts or favors that could influence decision-making, and participating in activities that could undermine the company's reputation or interests.

# **Reporting and Resolution**

Any concerns or suspicions regarding potential conflicts of interest should be reported promptly to the appropriate department or authority within Sozala Energy Consortium. Reports will be thoroughly investigated, and appropriate actions will be taken to address any identified conflicts in accordance with company policies and applicable laws and regulations.

# **Training and Awareness**

Sozala Energy Consortium will provide regular training and awareness programs to employees, officers, and directors on identifying, disclosing, and managing conflicts of interest. This education is crucial to ensuring that all individuals within the organization understand their responsibilities and obligations in maintaining the company's integrity and reputation.

# **Compliance and Enforcement**

Compliance with this Conflicts of Interest Policy is mandatory for all employees, officers, and directors of Sozala Energy Consortium. Violations of this policy may result in disciplinary action, up to and including termination of employment or removal from office, as well as potential legal consequences.

#### Conclusion

By adhering to the Conflicts of Interest Policy, Sozala Energy Consortium reaffirms its commitment to ethical business practices and integrity in all aspects of its operations. This policy serves to protect the interests of the company, its stakeholders, and the broader community, ensuring that decisions are made in the best interests of all concerned parties.

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# GIFTS, ENTERTAINMENT AND HOSPITALITY POLICY

#### **Purpose and Scope**

The Gifts, Entertainment and Hospitality Policy of Sozala Energy Consortium establishes guidelines and procedures regarding the giving and receiving of gifts, entertainment, and hospitality by employees, officers, and directors of the company. This policy aims to ensure transparency, integrity, and compliance with legal and ethical standards in all interactions with external parties.

#### **Definitions**

For the purposes of this policy:

"Gifts" refer to any items of value given or received by individuals associated with Sozala Energy Consortium, including but not limited to merchandise, services, discounts, or other benefits.

**"Entertainment"** encompasses activities or events provided to or attended by individuals associated with Sozala Energy Consortium, such as meals, tickets to events, recreational outings, or similar activities.

**"Hospitality"** pertains to the provision or receipt of accommodations, travel expenses, or other amenities extended to individuals associated with Sozala Energy Consortium.

#### Compliance and Transparency

All gifts, entertainment, and hospitality offered or accepted by employees, officers, or directors of Sozala Energy Consortium must comply with applicable laws, regulations, and company policies. Transparency is paramount, and any instances of giving or receiving such benefits must be accurately recorded and reported in accordance with established procedures.

#### Permissible Gifts, Entertainment, and Hospitality

Reasonable and customary gifts, entertainment, and hospitality may be given or received in the ordinary course of business, provided they do not create a conflict of interest or the appearance of impropriety. Gifts, entertainment, or hospitality of significant value, or those that could reasonably be perceived as influencing business decisions, require prior approval from appropriate management or compliance personnel.

#### **Prohibited Practices**

Employees, officers, and directors of Sozala Energy Consortium are prohibited from soliciting or accepting gifts, entertainment, or hospitality that could compromise their integrity, impartiality, or judgment in performing their duties. Similarly, offering or providing such benefits with the intention of influencing business decisions or gaining unfair advantage is strictly prohibited.

#### Reporting and Approval Procedures

Any offers, requests, or instances of giving or receiving gifts, entertainment, or hospitality that may raise concerns should be promptly reported to the appropriate department or authority within Sozala Energy Consortium. Requests for approval of significant or potentially sensitive interactions should be submitted in advance and documented accordingly.

#### **Training and Awareness**

Sozala Energy Consortium will provide regular training and awareness programs to employees, officers, and directors on the Gifts, Entertainment and Hospitality Policy, including guidance on identifying and addressing potential ethical dilemmas. This education is essential to fostering a culture of integrity and accountability throughout the organization.

#### Compliance Monitoring and Enforcement

Compliance with this policy is mandatory for all individuals associated with Sozala Energy Consortium. Violations of the Gifts, Entertainment and Hospitality Policy may result in disciplinary action, up to and including termination of employment or removal from office, as well as legal consequences where applicable.

#### **Conclusion**

By adhering to the Gifts, Entertainment and Hospitality Policy, Sozala Energy Consortium demonstrates its commitment to ethical business practices, transparency, and integrity in all interactions with external parties. This policy serves to safeguard the reputation and interests of the company, its stakeholders, and the broader community.

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# **ANTI-BRIBERY POLICY**

#### Commitment to Ethical Conduct

Sozala Energy Consortium is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations. Central to this commitment is the prohibition of bribery and corrupt practices in any form.

# **Definition of Bribery**

Bribery is the offering, giving, receiving, or soliciting of anything of value, whether directly or indirectly, to improperly influence the actions or decisions of individuals or entities in a position of trust, including government officials, business partners, or employees of other organizations.

#### **Prohibited Activities**

Sozala Energy Consortium strictly prohibits bribery, kickbacks, facilitation payments, or any other form of corrupt behavior in all aspects of its business operations. This includes but is not limited to:

- Offering, promising, or giving anything of value to influence a decision or gain an improper advantage.
- Accepting or soliciting anything of value in exchange for preferential treatment or to influence a decision.
- Making facilitation payments to expedite routine government actions, which are illegal and unethical.

# **Compliance with Laws and Regulations**

Sozala Energy Consortium adheres to anti-bribery laws and regulations in all jurisdictions where it operates, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant legislation. Compliance with these laws is mandatory for all employees, officers, and directors of the company.

#### **Due Diligence and Risk Assessment**

Sozala Energy Consortium conducts due diligence on its business partners, suppliers, agents, and other third parties to assess and mitigate the risk of involvement in bribery or corrupt activities. Any indications of potential risk must be thoroughly investigated and addressed promptly.

# **Reporting Procedures**

Employees, officers, and directors of Sozala Energy Consortium are encouraged to report any suspected or actual instances of bribery or corrupt behavior promptly through the company's reporting mechanisms. Reports will be treated confidentially and investigated thoroughly by the appropriate authorities.

# **Training and Awareness**

Sozala Energy Consortium provides regular training and awareness programs to employees, officers, and directors on the risks associated with bribery and corruption, as well as their responsibilities in preventing such activities. This education is essential to fostering a culture of compliance and integrity within the organization.

# **Compliance Monitoring and Enforcement**

Compliance with the Anti-Bribery Policy is mandatory for all individuals associated with Sozala Energy Consortium. Violations of this policy may result in disciplinary action, up to and including termination of employment or removal from office, as well as legal consequences where applicable.

#### Conclusion

By adhering to the Anti-Bribery Policy, Sozala Energy Consortium reaffirms its commitment to ethical business practices, integrity, and transparency in all its dealings. This policy serves to protect the company's reputation, maintain the trust of its stakeholders, and contribute to a fair and competitive business environment.

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# **Purpose and Scope**

The purpose of this Sanctions Compliance Policy ("Policy") is to outline the procedures and guidelines to ensure that Sozala Energy Consortium ("Company") complies with all applicable international and national sanctions laws and regulations. This Policy applies to all employees, contractors, agents, and third parties acting on behalf of the Company.

#### **Definitions**

- **Sanctions:** Economic and trade restrictions imposed by governments or international bodies to achieve foreign policy and national security objectives. **Restricted Parties:** Individuals, entities, or countries subject to sanctions.

# **Compliance Responsibilities**

All employees, contractors, and agents of Sozala Energy Consortium are responsible for understanding and complying with sanctions laws and regulations relevant to the Company's operations. Compliance with this Policy is mandatory, and violations may result in disciplinary action, including termination and legal consequences.

# **Screening Procedures**

Sozala Energy Consortium will implement robust screening procedures to check customers, suppliers, business partners, and other relevant parties against government-issued sanctions lists. The Company will regularly update these lists and ensure that all relevant employees are trained on the screening process.

# **Reporting Obligations**

Employees are required to report any potential sanctions-related issues promptly. This includes any transactions or interactions with parties that may be subject to sanctions. Reports should be made to the designated compliance officer or department.

# **Due Diligence**

Prior to entering into business relationships, Sozala Energy Consortium will conduct due diligence to assess and mitigate the risk of dealing with restricted parties. This includes assessing the potential impact of sanctions on proposed transactions and business activities.

# Recordkeeping

The Company will maintain accurate and up-to-date records related to sanctions compliance, including screening results, due diligence documentation, and any communications or reports related to potential sanctions issues.

# **Training**

Sozala Energy Consortium will provide regular training sessions to employees to ensure a clear understanding of sanctions laws, regulations, and internal compliance procedures. Training will be mandatory for all employees involved in relevant business activities.

# Continuous Monitoring and Review

This Policy will be subject to regular review and updates to ensure alignment with changes in sanctions laws and regulations. The Compliance Officer will lead periodic assessments to verify the effectiveness of the Company's sanctions compliance program.

#### Conclusion

Sozala Energy Consortium is committed to conducting its business activities with the highest ethical standards and in full compliance with sanctions laws and regulations. Any questions or concerns regarding sanctions compliance should be directed to the designated Compliance

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# **INSIDER TRADING POLICY**

At Sozala Energy Consortium, we strictly prohibit insider trading. Dealing in securities while in possession of material non-public information is a serious breach of our ethical standards and legal obligations.

# **Prohibition of Insider Trading**

Employees are explicitly prohibited from using confidential information as a basis for buying or selling securities, including those of Sozala Energy Consortium. This prohibition extends to all individuals who have access to material non-public information.

#### **Confidential Information**

Confidential information must not be disclosed to others, whether within or outside the organization, for the purpose of trading securities or for any other unauthorized reason. Safeguarding the confidentiality of sensitive information is paramount.

# **Compliance with Insider Trading Regulations**

Sozala Energy Consortium adheres to all relevant insider trading regulations. The process for dealing in Sozala Energy Consortium securities and the Group's Disclosure Control Process provide clear guidance to employees, ensuring compliance with legal requirements.

#### **Guidance on Dealing in Securities**

The process for dealing in Sozala Energy Consortium securities outlines the procedures employees must follow when engaging in transactions involving company securities. This includes obtaining necessary approvals and adhering to blackout periods.

#### **Group's Disclosure Control Process**

Our Disclosure Control Process is designed to ensure accurate and timely disclosure of information to the public. Employees involved in disclosure activities must adhere to the established controls and procedures to maintain transparency and compliance.

# **Reporting Violations**

Employees who become aware of any potential violations of insider trading policies or suspect misconduct are encouraged to report such concerns through the designated reporting channels. Whistleblower protections are in place to ensure confidentiality and protection from retaliation.

# **Consequences of Violations**

Violations of insider trading policies will result in severe consequences, including disciplinary action and legal proceedings. Sozala Energy Consortium is committed to maintaining the highest standards of integrity and expects all employees to adhere to these principles.

# **Education and Training**

Regular training sessions will be conducted to educate employees on the importance of compliance with insider trading regulations. Awareness programs will emphasize the consequences of non-compliance and the significance of ethical behavior in financial markets.

#### Conclusion

The prohibition of insider trading is essential to maintain trust, integrity, and fairness in the financial markets. We rely on the commitment of our employees to uphold these principles and contribute to a culture of transparency and compliance at Sozala Energy Consortium.

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# ADHERENCE TO TAX LAWS AND REGULATIONS POLICY

# **Commitment to Responsible Tax Practices**

Sozala Energy Consortium is committed to acting responsibly in managing its tax affairs. The company recognizes the importance of contributing to the societies in which it operates and strives to arrange its tax affairs efficiently.

# Mandatory Compliance with Tax Laws and Regulations

Compliance with tax laws and regulations is mandatory for all employees and entities within Sozala Energy Consortium, irrespective of the jurisdictions in which the company operates. This commitment extends to all aspects of tax, including but not limited to corporate income tax, value-added tax (VAT), and other applicable taxes.

# **Cooperative Relationship with Tax Authorities**

Sozala Energy Consortium fosters a cooperative relationship with tax authorities in all jurisdictions where the company conducts its business. Open communication and collaboration with tax authorities are essential to ensuring compliance and resolving any queries or concerns promptly.

#### **Prevention of Tax Evasion**

The company is dedicated to preventing tax evasion and will comply with all laws and regulations aimed at preventing such activities. Employees are expected to conduct their duties with the utmost integrity and transparency, avoiding any actions that could be construed as facilitating tax evasion

# **Key Resources for Tax Matters**

Key resources for managing tax matters at Sozala Energy Consortium include the Global Tax Strategy and Management Policy, various policies and procedures specific to different tax types and jurisdictions, and designated contacts for tax-related inquiries. These resources are designed to provide guidance and ensure consistent adherence to tax laws.

# **Employee Responsibilities**

All employees are responsible for understanding and adhering to the company's tax policies and procedures. Any uncertainties or questions regarding tax matters should be directed to the appropriate contacts identified in the company's resources.

# **Training and Awareness**

Sozala Energy Consortium will provide regular training and awareness programs to employees on tax laws, regulations, and the company's policies. This education is crucial to maintaining a high level of awareness and ensuring compliance at all levels of the organization.

#### **Conclusion**

By adhering to tax laws and regulations, Sozala Energy Consortium demonstrates its commitment to ethical business practices and responsible corporate citizenship. This policy is integral to our overall governance framework and contributes to the company's long-term sustainability.

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# COMPETITION LAW AND ANTI-TRUST POLICY

#### **Purpose**

Sozala Energy Consortium is committed to conducting its business in full compliance with competition laws and anti-trust regulations. This Competition Law and Anti-Trust Policy is designed to ensure fair competition, prevent anti-competitive practices, and foster an environment that promotes innovation and consumer welfare.

#### **Compliance with Laws**

Sozala Energy Consortium and its employees shall comply with all applicable competition laws and anti-trust regulations, including but not limited to those governing restrictive trade practices, abuse of dominance, and mergers and acquisitions.

#### **Fair Competition**

Sozala Energy Consortium is dedicated to fair competition in all markets in which it operates. The company prohibits any activities that may restrict, distort, or prevent fair competition, including price fixing, market allocation, bid rigging, and other anti-competitive practices.

# **Avoidance of Monopolistic Behavior**

Sozala Energy Consortium will not engage in any behavior that could be interpreted as an abuse of dominant market position or an attempt to monopolize markets. Unfair practices, such as predatory pricing and exclusive dealing, are strictly prohibited.

# **Collaboration and Information Sharing**

Collaboration and information sharing within the company must be done in compliance with competition laws. Discussions or agreements with competitors regarding prices, market strategies, customer allocation, or other sensitive information that may impact competition are strictly forbidden.

# **Mergers and Acquisitions**

Sozala Energy Consortium will conduct thorough reviews and assessments of any proposed mergers, acquisitions, or collaborations to ensure compliance with competition laws. All necessary approvals will be sought from relevant authorities before proceeding with such transactions.

# Training and Awareness

To promote compliance with competition laws, Sozala Energy Consortium provides regular training to employees involved in sales, marketing, and procurement. Employees are educated on the legal implications of anti-competitive practices and the importance of fair competition.

# **Reporting Violations**

Employees are encouraged to promptly report any concerns or potential violations of competition laws to their supervisors, legal department, or a designated compliance officer. Sozala Energy Consortium is committed to investigating and addressing reported violations promptly and appropriately

# **Legal Counsel**

Sozala Energy Consortium seeks legal counsel to ensure ongoing compliance with competition laws. Legal experts will be consulted to provide guidance on potential legal risks and to review business practices to ensure adherence to anti-trust regulations.

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# COMPETITION LAW AND ANTI-TRUST POLICY

# **Record-Keeping**

Accurate and detailed records related to pricing, contracts, and other relevant business activities will be maintained. This documentation is essential to demonstrate compliance with competition laws and to facilitate any necessary audits or investigations.

# **Continuous Monitoring and Improvement**

Sozala Energy Consortium will continuously monitor its business practices to identify and rectify any potential risks of non-compliance with competition laws. The company is committed to making improvements to its policies and procedures as needed.

#### **Consequences of Non-Compliance**

Non-compliance with this Competition Law and Anti-Trust Policy may result in disciplinary action, legal consequences, and damage to the company's reputation. Sozala Energy Consortium is dedicated to taking appropriate action against any employee or business partner found to be in violation of competition laws.

By adhering to this Competition Law and Anti-Trust Policy, Sozala Energy Consortium aims to contribute to fair and open competition, foster innovation, and maintain the trust of its customers, shareholders, and regulatory authorities.

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# ANTI-MONEY LAUNDERING (AML) AND COMPLIANCE POLICY

#### **Purpose**

Sozala Energy Consortium is committed to preventing money laundering and ensuring compliance with legal requirements in all its business operations. This Anti-Money Laundering and Compliance Policy outlines the principles and procedures in place to conduct due diligence on customers, suppliers, and partners, and to report any concerns regarding the legality of funds or assets.

# **Prohibition of Money Laundering**

Sozala Energy Consortium strictly prohibits any form of money laundering in its activities. Money laundering is a criminal activity that involves the processing of illegally obtained funds to make them appear legitimate. All employees, partners, and stakeholders are required to adhere to this policy.

# **Due Diligence on Customers, Suppliers, and Partners**

Due diligence is conducted on all customers, suppliers, and partners to ensure compliance with legal requirements. This includes verifying the identity of individuals and entities involved in transactions with Sozala Energy Consortium. The due diligence process is designed to identify and mitigate any potential risks associated with money laundering.

#### **Reporting Concerns**

Any concerns about the legality of funds or assets must be promptly reported to line management or Group Forensics. Employees are encouraged to be vigilant and report any suspicious transactions or activities that may indicate money laundering.

#### **Whistleblower Protection**

Sozala Energy Consortium is committed to protecting whistleblowers who report concerns about money laundering or other illegal activities. Employees who make good faith reports will be safeguarded against any form of retaliation.

# **Training and Awareness**

To ensure compliance with this policy, Sozala Energy Consortium provides regular training to employees on recognizing and preventing money laundering. Awareness programs are conducted to keep employees informed about the latest developments in anti-money laundering regulations.

#### **Legal Compliance**

Sozala Energy Consortium is committed to complying with all relevant local and international laws and regulations pertaining to anti-money laundering. The company will stay updated on changes in legislation and adjust its policies and procedures accordingly.

#### **Internal Controls**

Internal controls are in place to monitor and enforce compliance with this Anti-Money Laundering and Compliance Policy. Regular audits and reviews will be conducted to assess the effectiveness of these controls and make any necessary improvements.

#### **Cooperation with Authorities**

Sozala Energy Consortium will cooperate fully with law enforcement and regulatory authorities in the investigation and prosecution of any money laundering activities. The company is committed to being transparent and assisting authorities in maintaining the integrity of the financial system.

By adhering to this Anti-Money Laundering and Compliance Policy, Sozala Energy Consortium aims to uphold the highest standards of ethical conduct and legal compliance in its business operations. Violations of this policy may result in disciplinary action, legal consequences, and termination of business relationships.

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# PROCUREMENT AND SUPPLY CHAIN MANAGEMENT POLICY

#### Introduction

Sozala Energy Consortium recognizes the critical importance of efficient and ethical procurement and supply chain management practices in achieving its business objectives. This policy establishes guidelines and procedures to ensure transparency, integrity, and sustainability throughout the procurement process and supply chain operations.

# **Compliance with Laws and Regulations**

Sozala Energy Consortium is committed to complying with all applicable laws, regulations, and industry standards governing procurement and supply chain management in all jurisdictions where it operates. This includes but is not limited to laws related to labor practices, environmental protection, anti-corruption, and fair competition.

#### **Supplier Selection and Evaluation**

Sozala Energy Consortium conducts thorough due diligence when selecting suppliers and contractors to ensure they meet the company's standards for quality, reliability, and ethical conduct. Factors considered during supplier evaluation include financial stability, compliance history, environmental practices, and adherence to labor standards.

#### Fair and Transparent Procurement Processes

All procurement activities undertaken by Sozala Energy Consortium are conducted in a fair, transparent, and competitive manner. This includes the use of clear selection criteria, competitive bidding processes where appropriate, and equal opportunities for all qualified suppliers to participate.

#### **Ethical Conduct in Supplier Relationships**

Sozala Energy Consortium expects its suppliers and contractors to adhere to the highest standards of ethical conduct in their interactions with the company and other stakeholders. This includes refraining from bribery, corruption, conflicts of interest, and any other unethical behavior that could compromise the integrity of the procurement process or supply chain.

# **Environmental and Social Responsibility**

Sozala Energy Consortium is committed to promoting environmental sustainability and social responsibility throughout its supply chain. This includes encouraging suppliers to adopt environmentally friendly practices, respect human rights, and ensure safe and fair working conditions for their employees.

#### **Risk Management**

Sozala Energy Consortium conducts ongoing risk assessments to identify and mitigate potential risks within its supply chain, including but not limited to disruptions in supply, geopolitical instability, labor disputes, and compliance issues. Contingency plans are developed and implemented to address identified risks and ensure business continuity.

#### **Continuous Improvement**

Sozala Energy Consortium continuously monitors and evaluates its procurement and supply chain management practices to identify areas for improvement and optimization. Feedback from stakeholders, including suppliers, employees, and customers, is actively solicited and used to drive innovation and enhance efficiency.

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# PROCUREMENT AND SUPPLY CHAIN MANAGEMENT POLICY

# **Training and Capacity Building**

Sozala Energy Consortium provides regular training and capacity-building programs to employees involved in procurement and supply chain management to ensure they are equipped with the necessary skills and knowledge to fulfill their roles effectively and ethically.

#### Conclusion

By adhering to the Procurement and Supply Chain Management Policy, Sozala Energy Consortium reaffirms its commitment to responsible business practices, ethical conduct, and sustainability. This policy serves to protect the interests of the company, its stakeholders, and the broader community, while also driving long-term value creation and competitive advantage.

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#### Introduction

Sozala Energy Consortium recognizes the importance of social media as a powerful communication tool for engaging with stakeholders, promoting its brand, and sharing information. This policy establishes guidelines and best practices to ensure responsible and effective use of social media by employees and representatives of Sozala Energy Consortium.

#### **Purpose of Social Media Use**

Social media platforms may be used by Sozala Energy Consortium employees for professional purposes, including but not limited to:

Sharing company news, updates, and announcements. Engaging with customers, partners, and other stakeholders. Participating in industry discussions and thought leadership activities. Promoting Sozala Energy Consortium's products, services, and initiatives.

#### Authorized Users

Access to Sozala Energy Consortium's official social media accounts and the authority to represent the company on social media platforms is limited to authorized employees designated by the communications or marketing department. Unauthorized individuals are prohibited from posting on behalf of the company.

# **Compliance with Company Policies**

All social media activities conducted by Sozala Energy Consortium employees must comply with the company's code of conduct, confidentiality policies, intellectual property policies, and other relevant guidelines. Employees should exercise discretion and professionalism when posting on social media, bearing in mind the potential impact on the company's reputation.

#### **Personal Use of Social Media**

While Sozala Energy Consortium respects employees' rights to express themselves on personal social media accounts, employees are reminded that their online activities may reflect upon the company. Employees should refrain from posting content that could harm the company's interests or reputation, disclose confidential information, or engage in activities that may be perceived as discriminatory, harassing, or offensive.

#### **Content Guidelines**

When posting on behalf of Sozala Energy Consortium or about company-related topics, employees should ensure that the content is accurate, respectful, and relevant to the company's mission and values. Content should be reviewed and approved by the appropriate department or authority before being shared publicly.

#### Response to Comments and Feedback

Sozala Energy Consortium employees engaging with stakeholders on social media platforms should respond promptly, courteously, and professionally to comments, questions, and feedback. Disagreements or disputes should be handled diplomatically, and any issues requiring further attention should be escalated to the appropriate department for resolution.

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# SOCIAL MEDIA POLICY

# **Monitoring and Enforcement**

Sozala Energy Consortium reserves the right to monitor social media activities related to the company and take appropriate action in cases of non-compliance with this policy. Violations may result in disciplinary action, up to and including termination of employment, depending on the severity of the infraction.

# **Training and Education**

Sozala Energy Consortium provides regular training and education sessions to employees on the responsible use of social media and adherence to company policies. This training helps employees understand their roles and responsibilities in representing the company online and mitigating potential risks.

#### Conclusion

By adhering to the Social Media Policy, Sozala Energy Consortium aims to leverage the benefits of social media while mitigating potential risks to its reputation and business interests. This policy promotes responsible and ethical use of social media platforms in alignment with the company's values and objectives.

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#### Introduction

Sozala Energy Consortium recognizes the importance of media relations in shaping its public image, fostering transparency, and communicating with stakeholders worldwide. This policy outlines guidelines and procedures for interacting with the media to ensure consistent messaging, accurate representation, and protection of the company's interests.

#### **Media Contact Protocol**

All media inquiries, requests for interviews, statements, or information pertaining to Sozala Energy Consortium should be directed to the designated spokesperson or the communications department. Unauthorized employees are not permitted to speak to the media on behalf of the company without prior approval.

# **Authorized Spokespersons**

Designated spokespersons, typically members of the executive team or the communications department, are authorized to speak to the media on behalf of Sozala Energy Consortium. These individuals are trained to represent the company professionally, adhere to key messaging, and handle inquiries effectively.

# Message Consistency

Sozala Energy Consortium maintains consistent messaging across all media channels to ensure clarity, accuracy, and alignment with the company's strategic objectives and values. Spokespersons are responsible for conveying approved messages accurately and avoiding speculation or unauthorized disclosures.

#### Media Training

Sozala Energy Consortium provides media training to designated spokespersons to equip them with the necessary skills and knowledge to effectively communicate with journalists, handle difficult questions, and navigate media interactions with confidence and professionalism.

# **Handling Media Inquiries**

All media inquiries received by Sozala Energy Consortium should be promptly acknowledged and directed to the appropriate spokesperson or department for response. Responses should be truthful, factual, and consistent with the company's policies and messaging guidelines.

#### **Crisis Communication**

In the event of a crisis or emergency situation, Sozala Energy Consortium has established protocols for managing media inquiries, providing timely updates, and protecting the company's reputation. Designated crisis communication teams are responsible for coordinating responses and ensuring consistent messaging across all media channels.

# **Confidentiality and Disclosure**

Sozala Energy Consortium employees are required to maintain confidentiality regarding sensitive information and proprietary data when interacting with the media. Unauthorized disclosures of confidential information are strictly prohibited and may result in disciplinary action.

# **Compliance Monitoring and Enforcement**

Compliance with the Global Media Policy is mandatory for all employees, particularly designated spokespersons and individuals involved in media relations. Violations of this policy may result in disciplinary action, up to and including termination of employment, depending on the severity of the infraction.

#### Conclusion

By adhering to the Global Media Policy, Sozala Energy Consortium demonstrates its commitment to transparent communication, media professionalism, and protection of its reputation and interests. This policy serves to guide employees in engaging with the media responsibly and effectively, thereby enhancing the company's public image and credibility.

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# **GLOBAL DATA PRIVACY POLICY**

#### Introduction

Sozala Energy Consortium is committed to protecting the privacy and security of personal data collected, processed, and stored in the course of its business activities. This Global Data Privacy Policy outlines the principles and practices governing the handling of personal data by Sozala Energy Consortium and its subsidiaries worldwide.

#### **Scope**

This policy applies to all personal data collected, processed, or stored by Sozala Energy Consortium, regardless of the location of the data subject or the entity responsible for processing. It covers data collected from employees, customers, business partners, and other individuals.

#### **Compliance with Data Protection Laws**

Sozala Energy Consortium complies with all applicable data protection laws, regulations, and standards, including but not limited to the General Data Protection Regulation (GDPR) in the European Union, the California Consumer Privacy Act (CCPA), and other relevant legislation in jurisdictions where the company operates.

#### Collection and Use of Personal Data

Sozala Energy Consortium collects and processes personal data only for legitimate business purposes and with the consent of the data subject where required by law. Personal data is used only for specified, explicit, and lawful purposes and is not further processed in a manner incompatible with those purposes.

#### **Data Minimization and Accuracy**

Sozala Energy Consortium collects and retains only the personal data that is necessary for the purposes for which it was collected. Efforts are made to ensure the accuracy and currency of personal data, and steps are taken to rectify or delete inaccurate or outdated information promptly.

# **Data Security and Confidentiality**

Sozala Energy Consortium implements appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction. Access to personal data is restricted to authorized individuals on a need-to-know basis, and confidentiality obligations are enforced.

#### Data Transfer

Sozala Energy Consortium may transfer personal data to third parties, including affiliates, service providers, and business partners, as necessary for the provision of services or the conduct of business operations. Such transfers are carried out in compliance with applicable data protection laws and with appropriate safeguards in place to protect the data.

# **Individual Rights**

Sozala Energy Consortium respects the rights of individuals regarding their personal data, including the right to access, rectify, erase, restrict processing, and portability, as provided by applicable data protection laws. Data subjects may exercise their rights by contacting Sozala Energy Consortium's data protection officer or designated representative.

#### **Data Breach Notification**

In the event of a data breach involving personal data, Sozala Energy Consortium will promptly assess the impact of the breach, take steps to mitigate any risks, and notify affected individuals and regulatory authorities as required by applicable data protection laws.

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# GLOBAL DATA PRIVACY POLICY

#### **Training and Awareness**

Sozala Energy Consortium provides regular training and awareness programs to employees on data privacy principles, policies, and best practices to ensure compliance and promote a culture of data protection throughout the organization.

#### **Review and Update**

This Global Data Privacy Policy is reviewed regularly to ensure its effectiveness and compliance with evolving legal and regulatory requirements. Updates may be made as necessary to reflect changes in the company's operations or the regulatory landscape.

#### Conclusion

By adhering to the principles outlined in this Global Data Privacy Policy, Sozala Energy Consortium demonstrates its commitment to protecting the privacy and security of personal data and maintaining the trust of its stakeholders. This policy serves to guide the company's practices in the collection, processing, and management of personal data in accordance with applicable laws and industry standards.

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# **CONTACT INFORMATION**

# **GENERAL ENQUIRIES**









# COMPLIANCE OFFICER









Rest assured that your privacy is of the utmost importance to us. Any information shared with us will be handled with the strictest confidence. Your trust is valued, and we are committed to maintaining the confidentiality of all reports. It is our goal to provide a safe and secure environment for all individuals who reach out to us. Thank you for placing your trust in our hands.

