



BlackOak Energy LLC

Anti-Corruption Policy

Approved by: Executive Leadership Team

Effective Date: January 1, 2025

1. Purpose

BlackOak Energy LLC ("the Company") is committed to conducting its business with integrity, transparency, and in compliance with all applicable anti-corruption laws and regulations. This Anti-Corruption Policy ("Policy") is designed to prevent bribery and corruption in all business dealings and applies to all employees, officers, directors, consultants, agents, contractors, and any other third parties representing or acting on behalf of the Company.

2. Scope

This Policy applies globally and to all areas of the Company's operations, including its interactions with:

- Government officials and agencies
 - Private sector business partners
 - Contractors, suppliers, and intermediaries
 - Joint venture partners and agents
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3. Core Principles

BlackOak Energy LLC upholds the following values:

- **Integrity:** We do what is right, not what is easy.
- **Transparency:** We operate with openness and accountability.
- **Compliance:** We obey the law and uphold international standards, including the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and other applicable anti-bribery legislation.

4. Prohibited Conduct

The following actions are strictly prohibited under this Policy:

- **Bribery:** Offering, promising, giving, requesting, or receiving anything of value (financial or otherwise) to influence a decision or gain an improper advantage.
 - **Facilitation Payments:** Even small, unofficial payments to expedite routine government actions are forbidden.
 - **Kickbacks:** Receiving or providing secret payments in return for business opportunities.
 - **Improper Gifts and Hospitality:** Providing or accepting gifts, entertainment, or hospitality that are intended to influence or could appear to influence a decision improperly.
 - **Political and Charitable Contributions:** Making contributions on behalf of the Company to political parties or charities as a way to improperly influence any business decision or outcome.
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5. Third Parties

All third parties acting on behalf of BlackOak Energy LLC must undergo due diligence to assess corruption risk. Contracts with third parties must contain anti-corruption clauses and allow for termination in the event of non-compliance.

6. Books and Records

The Company shall maintain accurate books, records, and accounts that reflect all transactions in a transparent and detailed manner. No undisclosed or unrecorded funds or accounts may be established for any purpose.

7. Training and Communication

Employees and relevant third parties will receive regular training on anti-corruption laws and the application of this Policy. This Policy will be made available on the Company's intranet and website and will be provided during onboarding and contract initiation processes.



8. Reporting Violations

Employees and partners are required to report any suspected violations of this Policy. Reports may be made anonymously through the Company's whistleblower hotline or email at [insert confidential reporting method]. BlackOak Energy LLC strictly prohibits retaliation against anyone who reports concerns in good faith.

9. Enforcement and Disciplinary Measures

Violations of this Policy may result in disciplinary action, including termination of employment or contract, and may also result in civil or criminal penalties. The Company will fully cooperate with authorities in any investigation of corruption-related matters.

10. Review and Updates

This Policy will be reviewed annually or as required to ensure continued compliance with applicable laws and alignment with best practices in the energy sector.
