



BlackOak Energy LLC

Ethical Code of Conduct Policy

Approved by: Executive Leadership Team

Effective Date: January 1, 2025

1. Purpose

The purpose of this Ethical Code of Conduct is to guide the professional and ethical behavior of all employees, contractors, consultants, and representatives of BlackOak Energy LLC (“BlackOak”). It ensures integrity, transparency, accountability, and legal compliance in all aspects of our operations, partnerships, and stakeholder engagements.

2. Scope

This policy applies to all individuals working for or representing BlackOak, including employees at all levels, officers, directors, consultants, and third-party contractors.

3. Core Values

BlackOak Energy LLC operates based on the following core values:

- **Integrity:** We are honest, ethical, and trustworthy in all dealings.
- **Safety & Environmental Stewardship:** We prioritize safety and responsible environmental practices.
- **Transparency:** We communicate openly and truthfully with stakeholders.
- **Excellence:** We pursue the highest standards in everything we do.
- **Respect:** We treat colleagues, customers, communities, and partners with dignity.

4. Compliance with Laws and Regulations

All personnel must comply with:

- Applicable federal, state, and local laws
 - International regulations where relevant
 - Industry standards and environmental requirements
 - Anti-corruption and anti-bribery statutes (e.g., FCPA, UK Bribery Act)
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5. Conflicts of Interest

Employees must avoid situations where personal interests conflict—or appear to conflict—with the interests of BlackOak. All actual or potential conflicts must be disclosed to management promptly.

Examples include:

- Accepting gifts or favors from suppliers or clients
 - Holding financial interests in competitor or supplier businesses
 - Engaging in outside employment that interferes with company responsibilities
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6. Anti-Bribery and Anti-Corruption

BlackOak has a zero-tolerance policy toward bribery and corruption. No employee may offer, give, request, or accept bribes or improper payments in any form. This includes:

- Kickbacks
 - Gifts exceeding modest value
 - Facilitating payments to influence decisions
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7. Confidentiality and Data Protection

Confidential business information must be protected. Employees must not disclose proprietary information to unauthorized parties during or after employment. All data must be handled according to applicable data privacy laws.

8. Environmental and Social Responsibility

We are committed to:

- Operating in an environmentally responsible manner
 - Reducing the carbon footprint of our energy services
 - Supporting sustainable practices across our value chain
 - Respecting human rights in all jurisdictions where we operate
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9. Workplace Conduct

We maintain a respectful, inclusive, and safe workplace. Discrimination, harassment, or retaliation of any kind will not be tolerated. All individuals are expected to:

- Foster a culture of diversity and inclusion
 - Report unsafe or unethical behavior
 - Cooperate in investigations
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10. Insider Information and Fair Dealing

Employees must not use insider information for personal gain or to benefit others. Fair competition is critical to our business; we will not engage in collusive or deceptive practices.

11. Reporting Violations

Anyone who becomes aware of violations or suspected misconduct must report it through appropriate channels, including:

- Immediate supervisor
- Human Resources
- Anonymous whistleblower hotline (if available)

BlackOak prohibits retaliation against individuals who report concerns in good faith.

12. Acknowledgment and Enforcement

All personnel are required to read, understand, and sign this policy. Violations may result in disciplinary action, including termination of employment or legal action.

13. Review and Revisions

This policy will be reviewed annually and updated as necessary to ensure continued alignment with legal and ethical standards.
