



BlackOak Energy LLC

Gifts and Hospitality Policy

Approved by: Executive Leadership Team

Effective Date: January 1, 2025

1. Purpose

The purpose of this Gifts and Hospitality Policy is to provide clear guidance on the giving and receiving of gifts, entertainment, and hospitality to ensure that all business practices of **BlackOak Energy LLC** are conducted with integrity, transparency, and in compliance with anti-bribery and corruption laws. This policy supports our commitment to ethical conduct and safeguards our reputation in the energy industry.

2. Scope

This Policy applies to:

- All employees, officers, and directors of BlackOak Energy LLC
- Contractors, consultants, agents, and any third parties acting on behalf of the Company

It covers all business-related interactions with clients, vendors, government officials, and other external parties.

3. Policy Statement

BlackOak Energy LLC permits the giving and receiving of modest gifts and hospitality in the normal course of business only when it is:

- **Reasonable and proportionate**
- **Infrequent and not lavish**
- **Transparent and properly recorded**
- **Not intended or likely to influence business decisions**

Gifts or hospitality must never be offered or accepted where they could be perceived as a bribe or create a conflict of interest.

4. Acceptable Gifts and Hospitality

Examples of acceptable gifts or hospitality include:

- Promotional items of nominal value (e.g., pens, calendars)
- Modest meals and refreshments in a business setting
- Invitations to industry events, trade shows, or networking functions, provided attendance is relevant to business

Thresholds:

- Any gift or hospitality valued over **\$100 USD** must be reported and approved by a line manager.
 - Anything over **\$250 USD** must receive executive-level approval and be logged in the Gifts and Hospitality Register.
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5. Prohibited Gifts and Hospitality

The following are strictly prohibited:

- Cash or cash equivalents (e.g., gift cards, vouchers)
 - Gifts or entertainment during or around the time of a bidding process or contract negotiation
 - Offers to or from government officials without prior executive approval
 - Any gift or hospitality that could damage the Company's reputation or be perceived as excessive, inappropriate, or intended to gain an improper advantage
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6. Offering Gifts or Hospitality

When offering gifts or hospitality:

- Ensure it aligns with local laws and cultural norms
- Confirm it does not violate the recipient's own organization's policies
- Seek pre-approval when the value exceeds defined limits

7. Receiving Gifts or Hospitality

If offered a gift or invitation:

- Politely decline if it could appear improper or create an obligation
 - Report any unsolicited high-value gifts to your manager and follow return or donation procedures
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8. Gifts and Hospitality Register

All gifts or hospitality above the threshold must be recorded in the **Gifts and Hospitality Register**, maintained by the Compliance Officer or designated staff. The register will be reviewed quarterly for transparency and compliance.

9. Breach of Policy

Any breach of this policy may lead to disciplinary action, including termination of employment or contract, and may trigger legal consequences. The Company will not tolerate retaliation against anyone who reports a concern in good faith.

10. Review and Oversight

This Policy will be reviewed at least annually and updated as necessary to reflect changes in law, industry standards, or company operations.
