



ANTI-BRIBERY & CORRUPTION POLICY

Corporate Policy Manual

Entity: EMES Ventures Inc.

Applicable to Oil & Gas Operations

Issued by: Board of Directors

Effective Date: June 23rd, 2024

Version: 2.1



1. Purpose

Establish clear prohibitions and controls to prevent bribery, kickbacks, facilitation payments, and corrupt practices.

2. Scope

Applies to all personnel and third parties acting for or on behalf of EMES Ventures Inc. in all jurisdictions.

3. Prohibited Conduct

- Offering, promising, giving, requesting, or accepting anything of value to improperly influence a decision.
- Facilitation payments are strictly prohibited.
- Indirect bribery through agents, distributors, consultants, or JV partners.
- Off-book accounts, false invoices, or mischaracterized expenses.
- Offering, promising, giving, requesting, or accepting any type of incentive, including cash, gifts, favors, services, employment opportunities, sponsorships, travel, or benefits in kind in exchange for facilitation, processing, or preferential treatment is strictly prohibited.

4. Gifts, Hospitality, Travel, and Expenses

Permissible only if modest, infrequent, lawful, for a legitimate business purpose, not cash or cash equivalents, and pre-approved if over the threshold. Public-official interactions require heightened scrutiny and prior Compliance approval.

5. Charitable & Political Contributions

Charitable donations and sponsorships require due diligence, documented purpose, and approval. Political contributions are prohibited unless expressly approved by the Board and legal counsel.

6. Books & Records

All transactions must be accurately recorded with sufficient detail to reflect their true nature and supported by original documentation.



7. Responsibilities

Employees must complete training, seek approvals, maintain records, and report suspected violations immediately to Compliance.

8. Enforcement

Breaches may result in disciplinary action, termination of contracts, recovery of losses, and reporting to authorities.

9. Anti-Money Laundering & Illicit Resources

EMES Ventures Inc. strictly prohibits engaging in transactions involving resources of illicit origin or destination, including money laundering or terrorist financing. All financial transactions must have a legitimate business purpose and verifiable origin of funds.