



dana
PETROLEUM



Safety
Respect
Integrity

Corporate Business Control Document

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Anti-Bribery & Corruption Policy

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Addition of Failure to Prevent Fraud Offence, reporting lines for Ethics & Compliance
Committee in line with Terms of Reference

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1 Introduction

This Anti-Bribery & Corruption Policy is intended to ensure that our businesses and our directors, officers, employees and contractors provided with a Dana email address (referred to as "Employees") do not breach the Bribery Act 2010, the Economic Crime and Corporate Transparency Act 2023, the US Foreign Corrupt Practices Act 1977 and internationally established anti-bribery principles.

Dana also endeavours to ensure that third parties (persons and companies) who perform services for us (referred to as "Service Providers") when acting on our behalf, and all companies or entities who we enter into a joint venture, consortium or similar relationship with (referred to as "Joint Venture Partners"), when conducting business in partnership with us, comply with our Anti-Bribery & Corruption Policy.

This policy applies irrespective of the country in which business is being conducted. Where there are differences between the local law and this policy, you must apply those which set the highest standard of behaviour.

1.1 Anti-Bribery & Corruption Legislation

The Bribery Act applies to both British and foreign companies and citizens if they do any business in or with the UK. Individuals risk up to **10 years imprisonment** and/or an **unlimited fine** if they breach the UK's bribery laws. Companies face unlimited fines where bribery is committed by their senior managers, or if bribery occurs and they do not have in place adequate procedures to prevent bribery by Employees and Service Providers.

The US Foreign Corrupt Practices Act or FCPA also prohibits bribery and corruption anywhere in the world. Individuals risk up to **20 years imprisonment** and/or a **fine up to five million dollars (\$5,000,000)**. Companies face unlimited fines and are often fined several millions of dollars.

We wish to guard against deliberate and also accidental breaches of bribery laws.

1.2 Anti-Bribery & Corruption Policy Statement

We do not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world, either with public officials or people in the private sector.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a private or public sector role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantage to any public official or third party connected to a public official with the intention of influencing the public official to our business advantage.

- Our Service Providers must not give or receive bribes in connection with our business.
- We do not allow Employees to accept money, gifts, hospitality and other advantage from business associates, actual or potential suppliers or service providers which are intended to influence a business decision or transaction in some improper way.
- Any Employee found to be in breach of these principles will face disciplinary action.
- No Employee will suffer demotion, penalty, or other adverse consequence for refusing to pay or accept bribes, even if it may result in us losing business.
- We will avoid doing business with others who do not commit to doing business without bribery.
- We are committed to a programme to counter the risk of us being involved in bribery.

1.3 Failure to Prevent Fraud Legislation

The UK's Economic Crime and Corporate Transparency Act 2023 applies to both British and foreign companies if they do any business in or with the UK. This Act includes a new strict liability offence of failure to prevent fraud which applies to large organisations where no knowledge of the fraud will be required in order to prove the offence. If guilty of an offence, a company may be liable to pay an **unlimited fine**.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly.
- We will have the correct segregation of duties in place for our Employees to minimise the risk of fraud.
- Any Employee found to be in breach of these principles will face disciplinary action.
- No Employee will suffer demotion, penalty, or other adverse consequence for refusing to engage in the sale or purchase of services and goods where they suspect or know fraud to be taking place.
- We expect that none of our Employees, Service Providers or Joint Venture Partners will engage in any fraudulent activity.
- We will avoid doing business with others who have committed fraud.
- We are committed to a programme to counter the risk of fraud within our business.

1.4 Ethics & Compliance Committee

The Ethics & Compliance Committee has oversight of this Anti-Bribery & Corruption Policy, subject to its reporting obligations. After each quarterly Ethics & Compliance Committee meeting the Chairperson will provide an update to Dana's Executive Committee on compliance matters in respect of this Policy.

Risks associated with Anti-Bribery & Corruption and Failure to Prevent Fraud are contained within an overarching Ethics & Compliance Risk Register which is assessed on a periodic basis by the Ethics & Compliance Committee. In the event that any risks on the Risk Register materialise, a review of the Risk Register will be conducted to ascertain what further mitigations are required to be put in place.

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If you have any specific questions relating to this policy, concerns relating to a breach of this policy or general queries on bribery and corruption or fraud matters, please contact the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com).

1.5 Anti-Facilitation of Tax Evasion Policy

Dishonest tax evasion deprives governments of the revenues they need to provide vital public services. We expect the businesses and people we engage with to comply with their tax obligations. We will not tolerate any of our Employees, agents or business partners knowingly assisting or encouraging tax fraud by any of customers, suppliers or others that we do business with anywhere in the world.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly.
- We will not provide services or sell goods where we know or suspect them to be being misused or abused by a customer for the purposes of fraudulent tax evasion.
- We will not buy services or goods from any supplier where we know or suspect them not to be properly declaring their income and any relevant tax and duties in connection with those activities.
- Any Employee found to be in breach of these principles will face disciplinary action.
- No Employee will suffer demotion, penalty, or other adverse consequence for refusing to engage in the sale or purchase of services and goods where they suspect or know tax evasion to be taking place. Our clear policy is not to engage in transactions where tax evasion is present or suspected to be present, even if it may result in us losing business.
- We expect our agents and others who represent us also to commit to these principles.
- We are committed to a programme to counter the risk of our being involved in the facilitation of tax evasion.

Further information is available in our [Tax Evasion Policy](#).

1.6 Sanctions

Sanctions are used to fulfil a range of purposes, including protecting national security, meeting foreign policy objectives and complying with international obligations. They are also designed to keep unauthorised parties from obtaining certain items and, as a result, limit the item's export and import to restricted countries, parties or use.

Sanctions may be imposed by the UK government, the European Union and/or other national authorities in jurisdictions where Dana conducts business. Sanctions may be imposed autonomously or in compliance with United Nations or other international obligations.

Engaging in unlawful activities with or for the benefit of: (i) countries subject to sanctions (**sanctioned countries**); and/or (ii) persons (e.g. individuals, corporations, organisations) subject to sanctions, whether specifically identified, falling within a prescribed category of person, or by reason of connection to a

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prescribed country (**sanctioned parties**); can expose Dana and its employees, agents or business partners to significant fines and penalties, including in the most serious cases, imprisonment.

Activities or proposed activities with or for the benefit of sanctioned countries and/or sanctioned parties must be reviewed and approved by Dana's Executive Committee. Advice and assistance in relation to dealing in a sanctioned country and/or with a sanctioned party must be obtained from the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com). Employees, agents or business partners should not deal or continue to deal with or for the benefit of a sanctioned country and/or sanctioned party until they have received advice and assistance. Any and all instructions and guidance issued by the Ethics & Compliance Committee must be strictly adhered to.

If an existing or prospective Service Provider or a Joint Venture Partner is or becomes subject to sanctions which may affect their dealings with Dana, Employees, agents or business partners should immediately bring this to the attention of either their line manager or the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com) and provide any information they may have. The matter will be investigated further with input from Dana's Treasury team who will manage any impact on financing arrangements and Dana's Executive Committee (with advice from the Ethics & Compliance Committee) will ultimately decide whether or not Dana may continue to engage with such Service Provider or Joint Venture Partner along with any other steps considered necessary to ensure that Dana is fully compliant with its legal obligations at all times.

2 Field of Application

<i>Country</i>	Corporate
<i>ODMS part(s)</i>	Legal, Ethics & Compliance
<i>Asset(s)</i>	Corporate
<i>Dana Standard(s)</i>	KNOC: Ethics ISO-4.2, 4.3.2, 4.5.2
<i>Organisation</i>	All Dana Personnel
<i>Requirement(s)</i>	ISO-4.2 Policy ISO-4.3.2 Legal and other Requirements ISO-4.5.2 Compliance Measurement Bribery Act 2010 Criminal Finances Act 2017 Sanctions and Anti-Money Laundering Act 2018 Economic Crime and Corporate Transparency Act 2023

3 Policy

3.1 Bribery & Corruption

Bribery is the offer, promise, giving, requesting or acceptance of a thing of value as an inducement for doing something improper in carrying out work or performing a public function.

Corruption is the misuse of public office or a business position for private gain.

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Acts of bribery or corruption are designed to influence an individual in the performance of their duties and to act in a way contrary to how their employer, their organisation or the public would expect them to act.

The person being bribed is generally someone who will be able to obtain, retain or direct business or who can help us with an administrative or legal process. This may involve securing contracts, machinery or land, or the handling of legal or administrative tasks such as licences, planning, customs, taxes or import/export matters.

3.1.1 What is a Bribe?

A bribe is anything of value which is given to get someone, directly or via a third party, to do something wrong or to influence them to our business advantage. Bribes usually take the form of improper payments or personal "commissions". They can, however, take on many different shapes and forms, such as gifts, loans, holidays, reimbursement of travel and other expenses, *per diem* payments for expenses, secret rebates, charitable or political donations, job offers, scholarships and excessive hospitality.

In respect of a foreign public official, a bribe can be anything of value that is offered or given with the intention of influencing the foreign public official to obtain or retain business or a business advantage.

A "Foreign Public official" is:

- any person who exercises a public function for or on behalf of a government, a government agency, or a local or public authority of any country or territory;
- a politician or a candidate for political office in any country or territory;
- a person who works for a public international organisation (for example, the United Nations, World Bank or World Food Programme);
- an official exercising any public function in a state-owned company in any country or territory; and
- any person, whether elected or appointed, who holds a legislative, administrative or judicial position of any kind in a country or territory.

3.2 Fraud

Fraud generally refers to an intentional misrepresentation of material fact made by one person to another, with knowledge of its falsity. Fraud can involve schemes to defraud or obtain money or property through false pretences. A person making such a false statement does not need to obtain a benefit for it to constitute fraud, an attempt can be enough. As part of Dana's commitment to act with integrity, we maintain a zero tolerance approach to fraud.

3.2.1 What is Failure to Prevent Fraud?

The failure to prevent fraud offence means that Dana may be held criminally liable if it benefits from fraudulent conduct committed by our Employees, agents, subsidiaries or other 'associated persons' who provide services on Dana's behalf unless we can demonstrate that reasonable fraud prevention procedures were in place at the time the offence was committed.

Although the failure to prevent fraud offence only applies to corporate entities, individuals participating in committing fraud may still be prosecuted under the existing common law and statutory provisions for the underlying fraud.

Dana has reasonable procedures in place, with a top level commitment from the Directors and Senior Management to prevent fraud. These reasonable procedures include:

- fraud prevention activities to include audit programmes;
- a dynamic Ethics & Compliance Risk Assessment;
- appropriate policies and procedures;
- training of all Employees;
- appropriate due diligence of new suppliers and partners;
- communication from Senior Managers aligning with our Code of Conduct; and
- monitoring and reviewing mitigation strategies and identifying potential threats of fraud, in particular for new country entries.

This Anti-Bribery & Corruption Policy also forms part of the reasonable procedures Dana has implemented, and all Employees must comply with this Policy.

3.3 What is expected of you?

Employees: all Employees must read and adhere to the requirements of this Anti-Bribery & Corruption Policy. Employees must also act in line with our value of integrity and comply with all applicable laws, whether or not specifically covered by this policy or any of our other policies. Employees should also report suspected non-compliance to the Ethics & Compliance Committee.

Managers: all managers should also read and adhere to the requirements of this Anti-Bribery & Corruption Policy and should work to create an environment that encourages compliance with it. Supervision of responsible business practices is as important as supervision of performance. For any new work that is being tendered for or existing work that is being re-tendered for, managers should carry out suitable due diligence to identify any bribery or fraud risks associated with the work. Periodic reviews of the bribery and fraud risks associated with ongoing work should also be carried out.

Service Providers and Joint Venture Partners: we expect and encourage our Service Providers and Joint Venture Partners to adhere to our Anti-Bribery & Corruption Policy. Service Providers and Joint Venture Partners must also act with honesty and integrity and comply with all applicable laws, whether or not specifically covered by this policy or any of our other policies.

All: we expect all Employees, Service Providers and Joint Venture Partners to never engage in any form of bribery or corruption, except in circumstances where there is a real and imminent threat to the health, safety, personal security or welfare of any member of Employees, Service Provider or Joint Venture Partner or a member of their family. We also expect that none of our Employees, Service Providers or Joint Venture Partners will engage in any fraudulent activity.

3.4 Service Providers

Dana could be found to be criminally liable if a Service Provider engages in bribery or fraud.

Service Providers must be carefully selected, subject to a written contract and their performance monitored throughout the duration of the contract term.

All fees and commissions paid to Service Providers who act for or on our behalf must be legal, proportionate and objectively justified.

3.4.1 Selection & Verification of Service Providers

We adopt a "risk based" approach to the selection and verification of Service Providers. Appropriate due diligence should be carried out for all prospective Service Providers. Existing Service Providers should be subject to periodic audits of the bribery and fraud risks associated with the services they provide Dana.

3.4.2 Informing Service Providers about our Anti-Bribery & Corruption Policy

All Service Providers can access a copy of this Anti-Bribery & Corruption Policy on our website under "Suppliers Corner". Service Providers are contracted within our terms and conditions to comply with this Policy.

3.4.3 Contractual Controls for Service Providers

All new Service Providers should enter into a written agreement with us which contains appropriate anti-bribery and anti-fraud wording. You should contact the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com) if you need help with this.

3.4.4 Monitoring of Service Providers

Invoices and receipts - services provided and payments made to and by Service Providers should be monitored. A receipt or invoice should be provided by the Service Provider, which should set out in reasonable detail the goods or services for which payment is requested. All receipts and invoices should be scrutinised by the person who receives the receipt or invoice and by the person who approves the payment.

Red flags - Employees should look out for bribery "red flags" (see 3.4.5 below).

Reviews - Service Providers will be reviewed for anti-bribery and anti-fraud compliance periodically by Dana's internal auditor as part of Dana's annual audit programme, and following identification of any non-compliance. If any issues are found they are to be reported to the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com).

Audits - Dana's internal auditor will carry out anti-bribery and anti-fraud audits on a periodic basis. The due diligence information gathered for Service Providers will be sampled during these audits.

3.4.5 Red Flags

There are certain things which you may discover while gathering information on a current or prospective Service Provider, or which you may come across in the course of working with a Service Provider, which are recognised warning signs of bribery. These are called "red flags". Red flags may in themselves not be sufficient grounds for suspicion of wrongful activities but must be investigated further.

Any "red flags" should be reported immediately to the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com).

Red flags include:

- Requests by a public official or business decision maker for us to use the services of a specific Service Provider;
- Apparent lack of qualifications, resources or experience on the part of the Service Provider to perform the proposed services;
- A person employed by a government or public body involved in issuing a licence, consent or approval also works for the Service Provider;
- The Service Provider is, or is related to, an active or retired public official;
- The Service Provider is owned in whole or in part by a public official or a relative of a public official;
- The Service Provider, or a director, shareholder or employee of the Service Provider, has a personal, family or business relationship with a public or government official;
- The Service Provider refuses to confirm that it will comply with our Anti-Bribery & Corruption Policy or refuses to accept an anti-bribery clause in its contract with us;
- The Service Provider makes reference to political or charitable contributions as a way of influencing the action of public officials, public bodies or others;
- The Service Provider has an undisclosed principal, or undisclosed associates or subcontractors with whom it splits fees;
- A request by a Service Provider for an unusual or substantial commission or payment;

- Unusual payments made by a Service Provider;
- Remuneration of a Service Provider that is substantially in excess of the going market rate, or not justifiable or commensurate with the work done;
- The Service Provider requests the payment of "administration" or "consultancy" fees or a "commission" to another third party, or something similar;
- An invoiced amount from a Service Provider that exceeds the agreed amount or reflects undocumented expenses or expenses of an unreasonable amount or kind;
- The Service Provider refuses to give us access to its books and records when this is reasonably requested and required by us; and
- Requests for payments to a Service Provider to be:
 - o In cash;
 - o Paid to or through another entity;
 - o Paid to bank accounts in countries other than the country where services are performed;
 - o Paid to offshore bank accounts;
 - o Paid in a currency other than the local currency;
 - o Paid in advance of the services being performed.

3.5 Joint Venture Partners

Joint Venture Partners are all companies or entities which we enter into a joint venture, consortium or similar relationship with.

We could be criminally liable if a Joint Venture Partner engages in bribery or fraud.

Joint Venture Partners must be carefully selected, subject to contractual controls and monitored.

We do not, and our Joint Venture Partners should not, pay consultancy fees to public officials and we do not pay employees or contractors of private sector businesses or public bodies to which we are tendering or with which we are seeking to do business.

It is important that we only work with Joint Venture Partners that we are confident will not engage in bribery or fraud.

Before entering into a Joint Venture, thorough due diligence may need to be conducted on a prospective partner by obtaining a third party risk report. You should contact the legal department for help with obtaining a third party risk report and the level of due diligence to conduct.

Any agreement entered into with a Joint Venture Partner must contain anti-bribery and anti-fraud wording.

3.6 Financial Payments and Bookkeeping & Accounting

All financial payments (other than facilitation payments under duress, as set out below) must be accurate, clearly accounted for and objectively justified.

3.6.1 Facilitation Payments

We make no distinction between bribes and so-called "facilitation", "grease", "speed" or "dash" payments.

Facilitation payments are typically small unofficial payments paid to public officials personally to speed up an administration process or to secure a routine government action by an official (e.g. customs clearance).

Employees and Service Providers must not make facilitation payments in connection with our business. The only exception to this would be in circumstances where there is a real and imminent threat to the health, safety, personal security or welfare of any member of Employees or Service Provider or a member of their family. An example of this would be where a Customs Official makes a demand for payment together with a threat that if payment is not made, the person may be detained. If your personal safety is threatened we would not expect you to refuse to make payment.

If you decide to make a payment due to such a threat, this exceptional circumstance must be reported immediately to your line manager and followed up in writing to your line manager and the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com). The payment should be accurately recorded as an "Extortion Payment".

Legitimate fast track payments to a public body for which a receipt is provided are not considered to be facilitation payments.

3.6.2 Political Contributions & Events

Dana does not make contributions to political parties, organisations or individuals engaged in politics or public life as a way of obtaining an advantage in business.

This policy does not prevent any individual from choosing, in a personal capacity, to join, support or make a donation to a political party provided that it is done in such a way that there is no connection with our business, and that in the circumstances it could not reasonably be perceived by others as being a donation or involvement by Dana, or for any business advantage.

3.6.3 Charitable Donations

While Dana wishes to support charities, particularly those in the communities it operates in, proposed donations to charity can be used as a front for paying bribes. Donations should only be given to reputable, legitimate and registered charities.

Charitable donations should not be made in the following circumstances:

- the charity refuses to issue a receipt, or suggests that the donation be made anonymously;
- the account for the proposed donation is in a different country from where the charity is located;
- an officer, director, or employee of the charity has family or other ties to a public official who is or may be involved in the issuing of a licence, consent, approval or contract to us;
- the donation and intended recipient are suggested by a public official.

3.6.4 Bookkeeping & Accounting

Books, records and accounts must be kept which accurately and fairly reflect all transactions.

Employees and Service Providers must not make, approve or process any payment which relates to our business with the intention, understanding or suspicion that any part of the payment is to be used for any purpose other than that described by the documents supporting the payment. No "off the books" or unrecorded funds or accounts are permitted.

Examples of prohibited record keeping activities include:

- Making records appearing to show a payment to one person when, in fact the payment was made to, or intended for, someone else;
- Submitting inaccurate expenses;
- Records that inaccurately characterise or inaccurately describe the true nature of transactions or payments (for example, recording a bribe as a "commission" or "marketing expense", or a payment as an "overhead expense" instead of a "commission"); and
- Claims for services, products or equipment not received.

3.7 Non-Compliance

Dana does not tolerate non-compliance with this Anti-Bribery & Corruption Policy.

3.7.1 Reporting Suspected Non-Compliance

Employees must report any breaches or potential breaches of this policy as soon as possible. You can report your concerns to your line manager, the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com) or in accordance with the steps outlined in our Integrity Policy, including making use of our confidential integrity hotline. We will not tolerate any retaliation or discrimination of any kind against anyone reporting a concern with a reasonable belief that this Policy may have been, or will be, breached.

Any Service Provider or Joint Venture Partner who suspects or is aware of any breach of this policy must immediately notify their contact at Dana.

We will take all reported concerns seriously and will confidentially investigate to determine if the law or this Anti-Bribery & Corruption Policy has been contravened.

3.7.2 Consequences of Non-Compliance

We may take appropriate disciplinary action, up to and including termination of employment, against any Employee who fails to comply with this Anti-Bribery & Corruption Policy or applicable laws. In addition, an Employee who breaks the law may be reported to the police and may face criminal proceedings, fines or imprisonment.

For Service Providers and Joint Venture Partners, non-compliance with this Anti-Bribery & Corruption Policy and any applicable laws will be considered to be a material breach of contract and may result in the termination of any relationship with us and the matter being reported to the police.

3.8 E:Learning

Training on Anti Bribery & Corruption and fraud is provided within the mandatory Code of Conduct training that all Employees are required to complete. Failure to complete this mandatory training within 30 days of commencement of employment will result in the Employee's Line Manager being informed.

Our Code of Conduct underpins how we do business. It is a guide to help each of us when making day-to-day business decisions on behalf of Dana and to help us "Do the Right Thing". It is a central part of our commitment to conducting all our business to the very highest ethical standards.

Training on the Code of Conduct is required to be completed every year and Employees will receive a link to complete the training and, upon completion of the course and reading our Code of Conduct, a Certificate will be issued.

For queries regarding the Code of Conduct training, please contact the Ethics & Compliance Committee (ethics.compliance@dana-petroleum.com).

4 Related Documents

4.1 Internal References

<i>Document Title</i>		<i>Document Number</i>
1	KNOC Global Policy	N/A
2	Code of Conduct	DP-DP-LG-LEG-STD-0002
3	Tax Evasion Policy	DP-DP-LG-LEG-GID-0003
4	Integrity Policy	DP-DP-LG-LEG-POL-0008

4.2 External References

<i>Document Title</i>		<i>Reference Number</i>
1	Bribery Act 2010 https://www.legislation.gov.uk/ukpga/2010/23/contents	N/A
2	Foreign Corrupt Practices Act https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act	N/A
3	Criminal Finances Act 2017 http://www.legislation.gov.uk/ukpga/2017/22/contents/enacted	N/A
4	Sanctions and Anti-Money Laundering Act 2018 https://www.legislation.gov.uk/ukpga/2018/13/contents	N/A
5	Economic Crime and Corporate Transparency Act 2023 https://www.legislation.gov.uk/ukpga/2023/56/contents/enacted	N/A

Appendices

<i>Appendix Title</i>	
-	N/A