



**YELLOW DOOR ENERGY
ANTI-BRIBERY AND CORRUPTION POLICY**

Document Review	
Frequency	Annually
Legal & Compliance	Tania Jarjur
Human Resources	Sabrina Gobet
Date of Creation	Signature(s) of author(s)

Change History Record			
Version Number	Description of content change	Author	Date of Issue
1.0	Original Version	TJ	TBC
2.0	Amendments		TBC
3.0			
4.0			
5.0			
6.0			

Minor changes in wording do not need to be recorded in the table above.

FOREWORD

This Anti Bribery and Corruption Policy (“**Policy**”) sets out the general rules and principles relating to anti-Bribery and corruption to which Yellow Door Energy and its subsidiaries (“**Yellow Door Energy**”) will adhere to at all times. It will be communicated to all businesses and employees overseen by Yellow Door Energy’s board (“**Board**”), as well as any relevant third parties. Those who work in areas within our business that have been identified as being high risk will receive additional training and support in identifying and preventing bribery and corrupt activities.

Through the procedures explained in this policy Yellow Door Energy can maintain its high ethical standards and protect its reputation against any allegations of bribery and corruption. The successful implementation of this policy requires pro-active adoption at the following levels:-

- **You** – as an employee of Yellow Door Energy, are required to read and understand all aspects of this Policy, and abide by it.
- **Compliance Officer** – the Compliance Officer (as part of the Compliance Steering Committee as further defined below) is responsible for overseeing the implementation and compliance of the Policy throughout all departments, providing all necessary training, updating the policy in conjunction with the Human Resources department, and supervising the monitoring and review processes.
- The Board – has overall responsibility for implementation of the Policy within Yellow Door Energy together with monitoring and compliance of the Policy.
- Any reference to the term “**Company**” in this Policy, shall mean reference to Yellow Door Energy.

1. INTRODUCTION

Yellow Door Energy recognises that bribery and corruption has a detrimental effect on communities, businesses, and economies all over the world. If bribery and corruption becomes ingrained, it can threaten the fabric of society by undermining laws, democratic processes and basic human freedoms, leading to the impoverishment of states and damaging trade and competition. Corruption is often associated with organised crime, money laundering and on occasions the financing of terrorism.

It is Yellow Door Energy's policy to maintain the highest level of ethical standards in the conduct of its business affairs and Yellow Door Energy together with its Board has a zero tolerance of bribery and corruption. This Policy has been fully adopted by Yellow Door Energy and its Board and is to be communicated to everyone involved in our business to ensure their commitment to it. Any breach of this policy will be regarded as a serious matter by Yellow Door Energy, and is likely to result in disciplinary action, including the possibility of immediate termination of employment.

This is not only a working culture commitment on the part of Yellow Door Energy, it is a moral issue and a legal requirement. Bribery is a criminal offence in most countries in which Yellow Door Energy operates, and corrupt acts can expose Yellow Door Energy and its employees (as defined below) to the risk of prosecution, fines and imprisonment, as well as endangering Yellow Door Energy's reputation in the market. In an extreme case, Yellow Door Energy could be forced to close down its business operations.

2. WHAT IS A BRIBE?

Yellow Door Energy defines a bribe as the offer, promise, giving, accepting or soliciting of a payment or benefit to a person intended as a reward or inducement to act contrary to the proper exercise of their duty, good faith or impartiality when carrying out business transactions.

In the business world bribes are generally used to obtain, retain, or direct business. This may involve sales processes, such as tendering and contracting, or it may involve the handling of administrative tasks such as licences, customs, taxes or import/export matters. A bribe could be:-

- the direct or indirect promise, offering, or authorisation, of anything of value;
- the offer or receipt of any kickback, loan, fee, reward or other advantage; or
- the giving of aid, donations or voting designed to exert improper influence.

3. THE LAW

The UK Bribery Act 2010 ("**Act**") is used as the basis for this Policy, but it should be noted that "in country legislation" may also apply to any act of bribery and corruption. The Act is recognised internationally, as being amongst the strictest legislation on bribery and corruption. There are four types of offences under the Bribery Act, that of:

- bribing another person;
- being bribed;
- bribing foreign public officials; and
- failure of commercial organisations (companies) to prevent bribery.

YELLOW DOOR ENERGY prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from

any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

any individual employee, agent or other person or body acting on YELLOW DOOR ENERGY's behalf

in order to

gain any commercial, contractual or regulatory advantage for YELLOW DOOR ENERGY in a way which is unethical

or in order to

gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

Bribery is a criminal offence and carries criminal penalties. If Yellow Door Energy is convicted of an offence the employee who acted, together with the senior officer/manager in charge (assuming the employee acted with the consent or connivance of the senior officer/manager), and Yellow Door Energy can all be punished. For the employee and/or the senior officer/manager this can be up to ten (10) years' imprisonment and an unlimited fine. For Yellow Door Energy this can amount to an unlimited fine.

4. **THE POLICY**

This Policy prohibits any form of inducement which results in a personal gain or advantage to a recipient or any person or body associated with a recipient and which is intended to influence that recipient to take action which may not be solely in the interests of Yellow Door Energy, or of the person or body employing them, or whom they represent.

Inevitably, determining whether something is a bribe or not may not always be easy. Therefore, this Policy contains procedures and guidance to assist you when faced with those situations where there is a risk of bribery, and also details of who to contact in the event that you have any concerns or doubts.

Note: Not all bribes are obvious, and therefore it is important that if You suspect any suspicious activity or unusual behaviour, whether from a third party customer, supplier or contractor, or from a fellow employee, that you report such behaviour, whether in accordance with the reporting process contained within this Policy or via the Yellow Door Energy Whistle Blowing Policy relating to conduct of fellow employees.

5. **SCOPE**

The adoption of Yellow Door Energy and its Board to a zero-tolerance approach to all acts of bribery and corruption applies to all full-time and part-time employees on a permanent unlimited, non-fixed term contract, and to those on fixed term contracts with Yellow Door Energy. It also applies to secondees, and consultants and others employed under a contract of services receiving a salary or payment to perform work for the Company ("**Employee**"). Given the subject matter of this Policy, this Policy also extends to agents, contractors,



representatives or other parties acting on behalf of Yellow Door Energy, in any country that we operate.

Yellow Door Energy also encourages the application of a zero-tolerance policy on bribery and corruption in any subsidiary where it does not have a controlling interest.

At Yellow Door Energy we expect our business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and/or corruption and we will, where appropriate, include clauses to this effect in relevant contracts.

6. COMPLIANCE STEERING COMMITTEE RESPONSIBILITIES

A Compliance Steering Committee has been specifically set up by the Board of Yellow Door Energy, to further oversee the implementation of this Policy, in conjunction with the Compliance Officer.

The Compliance Steering Committee's responsibilities shall entail, but shall not be limited to:

- a) Risk Assessment: Monitoring and directing business areas and the Compliance Officer in conducting annual risk assessments to identify and prioritize the internal and external corruption risks faced by the business, and following on from such risk assessments, identifying potential areas for improvement in Yellow Door Energy's internal structures and procedures and recommending actions to mitigate the identified risks.
- b) Monitoring: Directing and overseeing the implementation of the Yellow Door Energy's Internal Anti-Bribery and Corruption policies. These assessments will involve the Compliance Officer carrying out evaluations and audits of how well all relevant internal policies and procedures relating to anti-bribery and corruption are being implemented and adhered to throughout the Company.
- c) Procedures and Governing Documents: The Committee shall, in conjunction with the Compliance Officer, be involved in the revision of Yellow Door Energy's anti-bribery and corruption policies and procedures, and approve any proposed amendments put forward by the Compliance Officer. Although it will be up to the Compliance Officer, and the Legal Department to ensure that all relevant input and any necessary amendments to the Policy are carried forward to the updating of the Policy, which will then be re-issued to all Employees by the HR Department.
- d) Communication and Training: Assistance with the preparation of the ethics and anti-corruption training programmes for all Yellow Door Energy personnel, including personnel working in other offices. Any requisite training for the duly appointed Compliance Officer together with assisting the Compliance Officer in identifying the Yellow Door Energy personnel who should participate in more frequent anti-corruption training and workshops, such as Employees working in high risk countries or in high risk functions, and preparing material and communicating information throughout Yellow Door Energy related to ethics and anti-corruption and compliance. A note of what training the Compliance Officer undertakes, or any training that an Employee undertakes, should be notified to the HR department.
- e) Due Diligence: Conducting due diligence on counterparties in a potential business relationship (other than the existing Yellow Door Energy KYC internal process). This includes scoping out the level of information required of the counter party, analysis of information obtained, identifying corruption risks, and recommending appropriate risk mitigation measures.
- f) Guidance: Providing guidance on anti-corruption issues, anti-corruption laws, regulations, policies and procedures.

- g) Legislation: Monitoring the development of anti-corruption legislation and other regulatory requirements in countries where Yellow Door Energy has, or plans to have business activities.

7. **RECORD KEEPING**

We must ensure that we maintain accurate books, records and financial reporting within all Yellow Door Energy departments, and that all third-party representatives working on our behalf also fully understand the need to maintain accurate books, records and financial reporting. All accounts, invoices, memoranda and other documents and records must be prepared and maintained with strict accuracy and completeness. No accounts may be kept “off-book” in order to facilitate or conceal improper payments. All assets, liabilities, revenues and expenses must be recorded, using the proper general ledger accounts, in the regular books of the Company. All accounting records, expense reports, invoices, vouchers and other business records must be accurately and fully complete, properly retained and reliably reported and recorded.

8. **FACILITATION PAYMENTS**

These are payments paid to businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer already has a legal or other entitlement e.g. to expedite a visa application, or clear goods through customs. In many countries, it is customary business practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process. Payments that are legitimate under the local law of the public official, where there is no intention to influence the public official are not facilitation payments. However, You must still report such payments to the Compliance Officer, who will keep a record of any and all such payments.

In all circumstances a receipt for the payment should be obtained. If you are in doubt about the legitimacy of any such request for payment, prior approval should be sought from the Compliance Officer. No payment should be made without approval from the Compliance Officer.

Yellow Door Energy recognises that corrupt foreign officials demanding payments may put our Employees, business partners, suppliers and contractors who are not otherwise corrupt in very difficult positions. Payments not legitimately requested may be a bribe and as such are prohibited and will result in immediate dismissal, except for medical or safety emergencies, where:

- a) The payment is legitimately required; and
- b) There is no intention to bring about the improper function of the official's role or to influence the official to act in such a way as to obtain or retain business for Yellow Door Energy.

Under no circumstances should a payment be made to an official where there is any doubt about the legitimacy of the payment.

9. **GIFTS AND HOSPITALITY**

The giving or receiving of gifts or hospitality could influence or be perceived to be capable of influencing a transaction and as such could be considered a bribe especially if they are lavish, inappropriate and not proportionate to the business venture. On no account should gifts be accepted, which by their nature have the potential to cause reputational damage to the Company.

Yellow Door Energy appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be



acceptable in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable, what the intent is behind the giving of the gift or hospitality, and what public perception would be if the information was published given the Employee's role and circumstances. The intention behind the gift should always be considered.

Detailed guidance on what are acceptable gifts and hospitality is set out in the Yellow Door Energy - Gifts & Hospitality Policy and Procedures.

The Compliance Officer shall maintain a Gifts and Hospitality Register of all gifts and hospitality received from, and given to third parties by Yellow Door Energy personnel.

10. **POLITICAL CONTRIBUTIONS**

A political contribution is a contribution, financial or in-kind, to support a political cause. Examples of financial contributions include donations and loans. Examples of in-kind contributions include gifts, the loan or use of property, provision of services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events and contributions to organisations or 'think-tanks' with close associations with a political party. The risk of political contributions is that they may be used, or be perceived to be used, as a cover for bribery to retain or obtain a business advantage, such as to win a contract.

Yellow Door Energy does not allow political contributions in any form whether to political parties, causes, or to support political candidates. Strict aggregate financial limits, to cover certain categories of political expenditure which could be defined as political contributions, have been approved by our shareholders to protect Yellow Door Energy from any inadvertent violation of the law. Nonetheless, Yellow Door Energy does not intend to make political contributions.

The appointment of any politician, government official or former politician as a consultant, Employee or officer of Yellow Door Energy requires approval by the Board and is subject to applicable laws. If Yellow Door Energy does use a politician, government official or former politician as a consultant, then the Compliance Officer shall review the appointment to ensure that it will not create a conflict of interest for the consultant, and that any fees paid are appropriate and proportionate to the work to be undertaken.

11. **CHARITABLE DONATIONS**

Yellow Door Energy only makes charitable donations that are legal and ethical under local laws and practices. No donation over US Dollars Five Thousand (US\$5,000) must be offered or made without the prior approval of the Compliance Officer.

12. **DEALINGS WITH THIRD PARTIES**

Yellow Door Energy's Anti-Bribery and Corruption Policy shall be communicated to all third-parties with whom Yellow Door Energy has business dealings.

Sales and Purchases:

Yellow Door Energy shall ensure that in contracting for the sale/purchase of goods or for the supply of services by/to Yellow Door Energy that these transactions are conducted in an honest, fair and transparent manner. Yellow Door Energy shall endeavor to contract with parties who have similar policies in place. In any event, all Yellow Door Energy contracts shall contain the appropriate provisions/clauses which make it clear that Yellow Door Energy has a strict no tolerance approach to bribery and corruption, and should any wrong doing be discovered during any business transaction once a legally binding contract has been entered into by both parties, Yellow Door Energy shall have the ability to terminate such contract with immediate effect.

Agents and intermediaries:



The Company has adopted a “Know Your Client” (“**KYC**”) process as part of its due diligence, and the process mentioned below must be followed for the appointment of a supplier, an agent, an intermediary, a contractor, or when engaging with a new customer. This process must also be repeated when contracts are renewed with these suppliers, agents, intermediaries, contractors, or customers, and at regular six (6) monthly intervals, or at the very minimum annual intervals. Please note that the full process for KYC is set out in Yellow Door Energy’s KYC Policy.

The KYC Process and Due Diligence:

The potential supplier, agent, intermediary, contractor, or customer shall be required to provide a copy of its current commercial trade license, and certificate of incorporation. All shareholders should also be properly identified, and an identity check should be carried out on any shareholder that holds more than ten percent (10%) of the shares in any company. The identity check should consist of the shareholder providing a copy of its photographic identification document, such as a passport, together with a copy of a utility bill illustrating the address of the shareholder.

In addition to the KYC checks, the supplier, agent, intermediary, contractor, or customer may be asked to complete a due diligence questionnaire to provide further information, including further details of its shareholders, directors, other clients, or any involvement or relationship (business or familial) with public officials, and whether it has the resources, and possesses the capabilities to perform the services required.

If a prospective supplier, agent, intermediary, contractor or customer is unwilling to provide the requested information or is offended by the request, then this may itself represent a red flag and an alternative supplier, agent, intermediary, and contractor should be sought. Any negotiations/discussions with a potential new customer should confirm Yellow Door Energy’s zero tolerance and strict approach to bribery and corruption.

The full KYC process is set out in the Company’s KYC policy, and if you are an Employee dealing with third parties, it is imperative that you familiarize yourself with this policy.

Appointing an Agent:

To protect against agents being appointed for corrupt purposes or behaving corruptly, an Employee that wishes to appoint a particular agent, must first put forward a business case to the relevant business head setting out the reasons for appointing that agent, and the business case must be reviewed by the business heads using consistent criteria set by the management of the Company, and ratified by the Board.

The appointment should then be further reviewed, discussed, and finally approved by the CEO, prior to any appointment.

All appointments must be notified to the Compliance Officer along with supporting KYC documentation and the details of the agent, together with the proposed working relationship, and details of the due diligence carried out.

Fees, commissions and expenses paid to an agent must be reasonable and proportionate in relation to the services provided. The fees shall be compared against those paid to other agents, and the market trends in the country and industry.

Adherence to the policy:

All agents shall receive a copy of Yellow Door Energy’s Anti-Bribery and Corruption Policy.

In areas that are high risk for bribery the appointed agent shall be offered additional training as determined by the Compliance Officer.

All contracts shall contain provisions requiring adherence to these policies and sanctions in the event of a breach of this policy including the ability for Yellow Door Energy to immediately terminate the contract.

The agent shall be informed as to the nature of any sanctions and the circumstances in which they would apply including any right of appeal.



Documentation:

The Compliance Officer shall maintain a register of its agents which shall include details of the agent, and of the relationship together with details of the due diligence carried out.

Every step of the procedure in the appointment and monitoring of an agent shall be documented, including records of negotiations, payments, meetings, reviews, inspections and audit.

Contractors:

All contractors shall be required to adhere to Yellow Door Energy's Anti-Bribery and Corruption Policy and a copy shall be provided to them. Where appropriate contractors shall be required to participate in Yellow Door Energy's induction programme, and receive appropriate training. Contracts shall contain provisions requiring adherence to these policies and sanctions in the event of a breach of this policy including the ability for Yellow Door Energy to immediately terminate the contract.

Employees

The HR Department will be responsible for ensuring that a KYC check is carried out on any potential new employee of the Company. Such KYC check will only be commissioned once an offer of employment has been sent out to a potential Employee, and the potential Employee has accepted such offer of employment.

13. **EMPLOYMENT PROVISIONS**

All new Employees shall have a provision in their contract of employment requiring them to comply with this Policy. This provision shall state that breach of this Policy is a disciplinary offence, that could result in immediate dismissal on the grounds of gross misconduct.

A copy of this Policy shall be included in staff handbooks and the contents of the Policy shall be discussed and explained in all staff inductions as part of the onboarding process.

The HR Department will be responsible for ensuring that a copy of this Policy is given to each and every Employee to read, understand and sign off on. By signing off as having read and understood this Policy, it will mean that you cannot later claim that you had no knowledge of the Policy's existence, or its content.

Staff working in roles that are considered high risk for exposure to bribery (e.g. marketing, sales and purchasing), shall receive additional training as determined by the Compliance Steering Committee and the Compliance Officer, specifically targeting how to deal with instances of bribery and how to avoid conduct that may be perceived as bribery. All supervisors shall be given additional training in the implementation of this Policy in their respective departments.

This Policy does not form part of any Employee's contract of employment and may be amended at any time.

14. **TRAINING**

All Yellow Door Energy Employees are required to attend periodic anti-bribery and corruption training to ensure that Yellow Door Energy's ethical values and anti-bribery and corruption policies and processes are understood and implemented at all levels. In addition, Yellow Door Energy Employees whose job functions or tasks expose them to greater corruption risks are required to attend in-depth training as further described below.

Additional Training of Yellow Door Energy Employees in High Risk Functions or Areas:

- a) Yellow Door Energy Employees who, by virtue of their work, are particularly exposed to corruption risk will receive additional periodic anti-corruption training pursuant to national and international anti-corruption laws and regulations.



- b) The Compliance Steering Committee and the Compliance Officer is responsible for identifying and coordinating the training of Yellow Door Energy Employees, including Employees working in high-risk functions or areas, such as senior advisers and persons working in certain staff functions, including legal and finance; personnel with procurement, contracting and marketing responsibilities; personnel who regularly interact with Public Officials, such as those responsible for obtaining licenses and permits and clearing goods through customs; and personnel working in geographic areas deemed to have a high risk of corruption.

15. DISCIPLINARY PROCEDURES

Any breach of this Policy is a serious matter and will be considered grounds for disciplinary action, and may result in immediate termination of employment on the grounds of gross misconduct. Any disciplinary action will be taken according to Yellow Door Energy's Disciplinary Policy.

16. REPORTING PROCEDURES

You should report any and all issues relating to anti-bribery and corruption to the Legal and Compliance Department whose email address is:- compliance@yellowdoorenergy.com.

A copy of any email sent to the Legal and Compliance Department should be copied to the current Compliance Officer, Tania Jarjur at tania.jarjur@yellowdoorenergy.com
Telephone number: 00 971 56 219 6933.

It is the responsibility of each Employee to comply with both the letter, and also the spirit of the Policy. If an Employee becomes aware of any conduct that he/she believes may violate this Policy, the Employees must report the activity immediately.

If an Employee becomes aware of conduct that he/she believes may violate the Policy whilst negotiating/doing business with third parties, the Employee should immediately report the conduct to the Compliance Officer within the Legal and Compliance department, and should refrain from further negotiations/discussions, if, and until the all clear is given by the Compliance Officer to continue. The Compliance Officer should always be made aware of any possible non-compliance with this Policy, as the Compliance Officer will be keeping a register of all reported acts of non-compliance and mis-conduct.

If an Employee has reason to believe, or suspects that a fellow Employee may be in breach of this Policy, or is violating this Policy, the Employee should report such activity following Yellow Door Energy's whistle-blowing procedure, which is set out in the Yellow Door Energy Whistle Blowing Policy. We recognise that Employees may not always feel comfortable about going through a formal process, but we would encourage all Employees to use the whistle-blowing procedure, which is there to protect both Employees and the Company.

Any reports or concerns raised via the whistle-blowing process, or to the Compliance Officer are entirely confidential, and all reports are taken seriously and investigated, unless it is inappropriate to do so. No Employee is discriminated against in any way as a result of reporting a concern in good faith or for believing it was acting in the best interest of the public or the Company.

17. MONITORING AND AUDIT

It is the responsibility of each supervisor, in conjunction with the Compliance Officer, to monitor their department's adherence to this policy.

The Compliance Steering Committee and the Compliance Officer shall devise any internal control procedures deemed necessary, which shall then be implemented by the Compliance Officer. These control procedures may include, but shall not be limited to supply chain monitoring.



The Compliance Officer will direct, oversee and ensure implementation and enforcement of Yellow Door Energy's Anti Bribery and Corruption policies, which shall include random audits to ensure implementation throughout the Company.

Risk Analysis and Reporting (Internal and External):

At least once a year, the Compliance Officer, under the direction of the Compliance Steering Committee, will conduct a risk analysis amongst all employees to identify the external and internal risks of corruption that the business areas within the Company may encounter. The assessment covers the risks identified below.

In conducting a risk assessment, Yellow Door Energy considers the following external corruption risks:-

- a) *Country risks* (as evidenced by perceived high levels of corruption and an absence of effectively implemented anti-corruption legislation, among other factors);
- b) *Transaction risks* (such as those associated with social investments, interactions with public officials or transactions relating to public procurement);
- c) *Business Opportunity Risks* (such as those associated with projects involving intermediaries acting on Yellow Door Energy's behalf); and
- d) *Business Partnership Risks* (such as those associated with joint ventures and the use of intermediaries or others acting on Yellow Door Energy's behalf in transactions with public officials).

Yellow Door Energy also considers internal corruption risks, such as the risk of non-compliance with anti-corruption policies and procedures.

Based on the risk assessment, the Compliance Officer will draft a report, with input from the business, to be submitted to the Compliance Steering Committee. The report includes a description of the external and internal corruption risks faced by the business, and recommended actions to mitigate each identified risk.

The Compliance Officer shall, after receiving input from the Compliance Steering Committee, also update the policies and procedures to reflect changes in Yellow Door Energy's business or environment and conduct analysis of incidents and violations of the policies. If appropriate the Compliance Officer shall obtain external verification (testing the effectiveness of the measures in place and assurance of the adequacy of the design and implementation of the Policies).

18. REVIEW

Reports on the results of regular monitoring, which summarise the findings of internal audits, identified deficiencies, initiated actions and recommendations should be submitted to the Compliance Steering Committee by the Compliance Officer, who shall decide whether such actions are appropriate to deal with the risks and to improve the effectiveness of Yellow Door Energy's Anti-Bribery and Corruption Policy, and consider whether external verification would be appropriate. This should form the basis of regular reports to the Board highlighting deficiencies and serious matters.

Ultimate responsibility for overseeing the implementation and review of the Anti-Bribery and Corruption Policies lies with the Compliance Steering Committee. If a matter is considered to be very serious in nature, then it will be reported to the Board.

The Board shall also receive regular reports on the implementation and adherence to the internal Anti-bribery and Corruption policies, the findings of any review process, and shall inspect the Compliance Register noting any incidents or allegations of bribery, and the actions taken to correct these deficiencies. The Board may consider, if appropriate, disclosing the findings and recommendations of a report on the adequacy of the Anti-Bribery and Corruption Policies, to its shareholders.



If any employee of Yellow Door Energy becomes aware of an allegation or incident of bribery, whether external or internal, then internal legal advice shall be sought, with the possibility of instructing external legal counsel.