

Anti-Bribery and Anti-Corruption Policy

abridged version

KMG International N.V's Anti-Bribery and Anti-Corruption Policy outlines the conduct expected from group employees and collaborators to maintain ethical standards and business integrity. This includes the prohibition of any acts intended to influence parties to act dishonestly, illegally, or unethically. It also forbids receiving or providing anything of value with the aim of inducing improper behavior, gaining improper advantages, or rewarding such behavior.

As a multinational company operating in different countries, the Group is subject to laws of the country or territory where it is operating. In accordance with the applicable legislation, attempted or actual acts of bribery are considered a crime punishable with substantial penalties for both companies and employees, including fines and/or imprisonment or civil penalties. If Local Group entities determine that their local legislative requirements exceed the provisions of this policy, the higher conditions must be applied.

The policy provides guidelines for dealing with gifts and hospitality, public officials, third parties, and political contributions:

- Gifts and hospitality: Providing or receiving these is permissible if certain requirements are met, such as not exceeding the value of \$130 or equivalent in local currency, being disclosed to the line manager and Group Internal Control & Forensics Function, and not being provided with an intention to improperly influence, induce or reward. The intention, timing, and local customs of the gift should be considered.
- Public officials: Direct or indirect provision of gifts or hospitality to influence a public official is forbidden.
- Third parties: Risks of bribery and corruption associated with third parties must be mitigated through rigorous due diligence and approval process.
- Political contributions: It is forbidden to make political contributions or donations on behalf of the Group or using the Group's resources, as these can constitute bribes.

The Group encourages all employees and collaborators to raise concerns to Group Internal Control & Forensics Function, about any suspicions of bribery or corruption whilst guaranteeing confidentiality where requested, using the following email addresses:

- internalcontrol@rompetrol.com (internal control & forensics function)
- speakup@rompetrol.com (whistleblower reporting tool).

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