



## **Anti-Bribery and Corruption Policy**

### **1. Introduction**

ASTERN ENERGY GmbH is unwavering in its commitment to conducting business ethically and in full compliance with applicable laws and regulations. To uphold this commitment, we have established an Anti-Bribery and Corruption Policy to unequivocally reject any form of bribery or corruption in all business operations.

### **2. Policy Statement**

ASTERN ENERGY GmbH categorically prohibits bribery or corrupt practices, whether involving public officials or private entities. We strictly prohibit the offering, providing, or condoning of bribes, including facilitation payments or any exchange of value, directly or indirectly, to any public or private entity.

### **3. Scope**

This policy applies universally to all individuals associated with ASTERN ENERGY GmbH, encompassing directors, officers, employees, contractors, consultants, agents, and representatives, regardless of their role within the organization. It also extends to cover any third parties acting on behalf of ASTERN ENERGY GmbH, such as suppliers, distributors, and business partners.

### **4. Prohibited Conduct**

Under no circumstances shall any individual or entity associated with ASTERN ENERGY GmbH engage in:

- Offering, providing, or authorizing bribes, facilitation payments, or any form of improper inducements to public officials or private entities.
- Requesting or accepting bribes, kickbacks, or any form of improper benefits, directly or indirectly.
- Engaging in bribery or corruption through political contributions, gifts, entertainment, monetary payments, sponsorships, charitable contributions, discounts, employment opportunities, or any other means.
- Concealing bribes or gaining improper business advantages through sponsorships, charitable contributions, or community investments.



## **5. Risk Management**

ASTERN ENERGY GmbH mitigates bribery and corruption risks through rigorous due diligence, monitoring, and review processes for all contractors and third parties. We remain vigilant for red flags indicating potential bribery or corruption and implement robust procedures for dealings with business partners, public officials, gifts, sponsorships, and donations.

## **6. Record Keeping**

All transactions are accurately recorded in accordance with ASTERN ENERGY GmbH procedures to ensure transparency and accountability. Records must accurately reflect the nature and substance of transactions to prevent any misrepresentation or concealment of improper activities.

## **7. Dealing with Government Officials**

Recognizing the heightened risk associated with interactions with government officials, ASTERN ENERGY GmbH exercises increased caution and diligence. We remain vigilant against corruption and promptly report any suspected instances to the appropriate authorities.

## **8. Employee Well-being and Safety**

ASTERN ENERGY GmbH prioritizes the safety and well-being of all employees and contractors. In the event of threats to safety or well-being, we take immediate and appropriate steps to ensure the protection of individuals involved.

## **9. Compliance and Enforcement**

Any breaches of this policy are taken seriously by ASTERN ENERGY GmbH. Consequences for violations may range from warnings to termination of employment or contract termination, depending on the severity of the breach. Third-party representatives or contractors found in violation of this policy may face termination of contracts and business relations.

Ivan Khodov

30 April 2024

A handwritten signature in blue ink, appearing to read "Ivan Khodov", is written over a light blue horizontal line.

General Director  
ASTERN ENERGY GmbH