



## Speak Up Policy

<b>Speak Up Policy</b>			<b>No. 2020.11.16</b>
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**Introduction**

Puma Energy (“Puma Energy” or the “Company”) is committed to fostering an open and trusting environment in which employees are encouraged to ask questions when they are unsure about what to do in a particular situation and feel comfortable raising integrity concerns in good faith. Puma Energy will evaluate and respond as appropriate to allegations that the Company is not meeting its legal or ethical obligations, or that an employee has violated laws, the Puma Energy’s Code of Business Conduct or Company policies or procedures.

In particular, Puma Energy encourages employees of the Company who are or become aware of (a) suspected misconduct, illegal activities, fraud, or abuse relating to the Company’s accounting, internal accounting controls, or auditing matters; (b) possible violations of laws or government regulations; (c) possible violations of the Puma Energy’s Code of Business Conduct; or (d) possible violations of Puma Energy’s internal policies to report such matters using any of the channels listed below.

**Scope of Policy**

This Policy applies to all employees within the Company. This Policy covers situations where an individual raises a question about what to do in a particular situation or reports in good faith a concern about suspected or known misconduct or wrongdoing.

This Policy is not designed to facilitate questioning Puma Energy’s business decisions that are clearly legitimate, even if you might disagree with those decisions. Also, please keep in mind that your local P&C representative is typically the appropriate channel for you to use to report concerns about your employment or how you have been treated.

**Non-Retaliation**

Puma Energy **will not** tolerate any form of retaliation against an employee who raises an integrity concern in good faith or who cooperates in an investigation into a reported concern. An employee makes a report in “good faith” if he or she reasonably believes that a misconduct, violation of company policy, law, regulation or ethics has occurred, is occurring or may occur in future. If you experience retaliation or suspect another employee is being retaliated against for speaking up, you should report your concern.

**Roles and Responsibilities****Employee Role**

The employee should:

- Be familiar with the policies and procedures applicable to their work;
- Promptly raise any integrity concern using one of the channels listed below and consider reporting using an additional channel if appropriate (such as if a reported concern is not resolved within a reasonable time);
- Retain all documents that could be relevant to an investigation of the concern, cooperate fully in Company investigations, and strictly observe the confidentiality requirements regarding reports of integrity concerns and related investigations; and
- Report concerns in good faith – never knowingly making a false report.

**Manager Responsibilities**

Managers at all levels are responsible for:



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- Creating and continually promoting an environment and corporate culture that:
  - Promotes ethical and compliant behavior;
  - Encourages employees to freely raise integrity concerns in good faith; and
  - Prohibits retaliation for raising integrity concerns in good faith.
- Treating concerns raised to them with discretion, and treating the employee who has raised the concern with respect; and
- Acting promptly on all integrity concerns brought to their attention and escalating the concern in accordance with the Company escalation criteria.

### Reporting Channels

There are different channels within Puma Energy that employees can use to raise any integrity concern. The specific channel used is not as important as **ensuring that the matter is promptly reported and not ignored**. Reports may be made anonymously (through the "Speak-Up" helpline), where allowed by local law. Employees are encouraged to discuss integrity concerns promptly with their managers, but may use any of the means described below. The important thing is to speak up and not ignore a concern. An employee who has a question about what to do in a particular situation or knows of, or suspects, wrongdoing or misconduct should promptly raise the question or report the integrity concern using one of the channels listed below.

Reach out to (orally or in writing):

- Your line manager
- Another member of line management
- People and Culture
- The Legal Department
- The Compliance Department
  - Code Ambassador
  - Compliance Officer
  - Ethics and Compliance Committee
- The Puma Energy "Speak-Up!" helpline:

The "Speak-Up!" helpline is a confidential service and can be contacted online at [www.pumaenergyspeakup.com](http://www.pumaenergyspeakup.com) or by telephone. The local dial-in numbers for countries are listed at [www.pumaenergyspeakup.com](http://www.pumaenergyspeakup.com).

### Self-reporting

If you believe that you have been personally involved in an instance of non-compliance, you are still expected to speak up; it is better to self-report than to be the subject of another person's reported concern.

### Confidentiality

Puma Energy will treat questions and concerns raised in confidentiality to the fullest extent possible. The Company will limit the sharing of confidential information about reported concerns and related investigations as appropriate, consistent with the Company's legal obligations.

While the company can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the report. The company is not able to provide anonymity where in-country legislation does not allow anonymity.

The company is not accountable for maintaining anonymity where the individual raising the concern has told others of the alleged concern.

Privileged and confidential



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Whilst the company encourages employees raising concerns to identify themselves, anonymous calls will nevertheless be taken seriously and investigated fully. However, the effectiveness of any speak up enquiry may be limited where an individual chooses not to be identified.

### **After reporting a concern:**

There will be no adverse consequences for anyone who reports a concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.

The employee who has raised the concern will be informed of the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions in general. The outcome of an investigation is not subject to an appeal. A confidential record of the steps taken will be kept and this will be in accordance with the Data Protection regulations.

### **Focal Point**

If you have any questions concerning this document, please:

- Speak to your line manager
- Speak to your Code Ambassador
- Contact Compliance department – send an e-mail to [compliance@pumaenergy.com](mailto:compliance@pumaenergy.com)