



Supplier
**Code of
Conduct**



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Introduction

Purpose

Puma Energy is committed to a responsible procurement policy that is inline with its Code of Business Conduct. Our values are demonstrated in our conduct and we conduct our business by obeying all applicable laws and regulations wherever we operate; never avoiding or circumventing them.

We are always honest, straightforward and trustworthy with everyone and everything involved in day to day Puma Energy activities. We strive to protect human rights and fundamental freedoms, health and safety, the environment and good corporate governance.

This Supplier Code of Conduct (“Code”) defines what we expect of firms and individuals that provide contracting, intermediary, agency, vendor or other third party services (“Suppliers”) to Puma Energy and any of its subsidiaries, regardless of location. It serves as a guide on how to:

- Ensure compliance with laws and regulations that govern Puma Energy’s business.
- Exercise good business judgment in all circumstances.
- Promote honest and ethical conduct that reflects positively on Puma Energy.

Requirements for Suppliers

As a minimum, all Puma Energy Suppliers must comply with this Code and communicate the requirements found herein to those working with and for you in relation to your activities for Puma Energy. If there is non-compliance to any of the requirements then there must be a clear time-line for full implementation of these requirements within your organisation and your associated Suppliers and sub-contractors.

Suppliers are expected to self- assess their performance against this Code of conduct and its relevant requirements, expectations, and where we encourage you to adhere to best practice. Puma Energy remains available to answer queries related to this supplier Code of conduct.

Puma Energy reserves the right to audit any of its Suppliers and your sub-contractors to confirm that the requirements set out in this Code are in force. Failure to permit such an audit may result in the termination of any supply contract with Puma Energy.

Should any audit identify non-compliance to this Code, the Supplier will be required to provide a detailed remedial action plan within 30 days, which must be presented to the Procurement Team and Global Head of Compliance.

If the Supplier refuses to comply with the agreed actions, Puma Energy reserves the right to terminate the commercial relationship.

Where compliance with this Code could lead to a conflict with or a violation of applicable laws or regulations, the Supplier shall promptly notify Puma Energy of the situation and explain how it intends to operate in a responsible manner.

The Code cannot cover all scenarios. We expect all Suppliers to embrace the spirit of the Code with common sense and to always seek guidance where there is any doubt whatsoever.

Business Continuity

Puma Energy acknowledges that from time to time a Supplier might face disruptions of its business (e.g. natural disasters, terrorism, software viruses and pandemics), therefore Suppliers are required to be prepared for such disruptions. This preparedness includes disaster recovery plans to ensure as far as reasonably possible continued supply to Puma Energy and to minimise the effects of possible disasters that arise within the domain of operations to a Supplier’s employees and the environment.



R G Y

Business
Conduct



Bribery and Corruption

Ensuring you understand anti-bribery laws

It is important you appreciate, in any given situation, all applicable anti-bribery laws. You must make it your business to understand relevant local laws, as well as being alert to the extra-territorial application of anti-bribery laws. Almost all countries have criminal laws that prohibit bribery and corruption.

The law on bribery and corruption has worldwide reach. Over 140 countries are party to international conventions whose purpose is to prosecute bribery and corruption. Some countries' laws (including those of the USA and the UK) will allow any one to be prosecuted in their jurisdictions even if the crimes occurred in other countries.

A breach of anti-bribery laws is a serious offence. Not only are the legal penalties severe for the company and for individuals, you should also be aware of the severe damage to Puma Energy's reputation that can result from a breach of anti-bribery laws - even the appearance of a breach could cause real harm on Puma Energy. You run the risk of being prosecuted in your personal capacity if you bribe or tolerate bribery.

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Bribery

Bribery is the giving or receiving (or the offer or promise to do so) of a financial or other advantage with the intention of bringing about the improper performance of a function or activity; for example, by improperly influencing the behaviour of someone in government or business in order to obtain commercial advantages. Corruption is the abuse of entrusted power.

Puma Energy's Zero Tolerance Policy strictly prohibits the offer, acceptance or request of a bribe in any form, including kickbacks or the use of any route of which the intention is to provide improper benefits to third parties, in both public and private sectors, whether made directly or indirectly.

This policy extends to all Puma Energy's business dealings and transactions in all countries in which it or its subsidiaries, associates and Suppliers operate. It is also Puma Energy's policy to comply with the laws and regulations in all the countries in which it, or its subsidiaries, associates or Suppliers operate.

No Supplier may promise, offer, or give any benefit or advantage to influence the behaviour of someone in government, a public official, someone capable of influencing a governmental or public official; or someone in the private sector to obtain commercial advantages on Puma Energy's behalf or to obtain business from Puma Energy.

No Supplier may accept any benefit or advantage directly or indirectly to influence that Supplier's own behaviour.

There are many forms of bribery including, but not limited to, the giving, offering or receiving of cash, gift items, credits, discounts, travel, accommodation and services.

Facilitation payments as a form of bribery

Facilitation payments are small payments of cash or anything else of value to a government official to secure or speed routine, nondiscretionary transactions. It is important to note that in the cases of routine, nondiscretionary transactions, all the needed documentation must be in order.

Puma Energy regards such payments as a form of bribery and they are prohibited by our policy. Puma Energy suppliers must not pay facilitation payments for Puma Energy activities, even if customary and despite possible adverse consequences of not paying.

Gifts, Hospitality and Entertainment

There is a fine line between making gifts, providing acceptable hospitality and bribery and corruption. If any form of hospitality is intended to raise an expectation of, or in fact raises the expectation of an improper benefit in return, then it is likely to be a bribe.

The value of the hospitality is irrelevant. Even an offer of hospitality (and not actually giving it), can give rise to bribery if an expectation is raised. Corruption is the abuse of entrusted power and gifts and hospitality, if misjudged, can give rise to corruption.

Puma Energy's zero tolerance policy to bribery and corruption prohibits the offer or receipt of gifts and entertainment intended to affect the outcome of a business transaction or if they are not reasonable and are bona fide expenditures.

Reasonable gifts or entertainment, as part of normal business courtesy and hospitality are not prohibited. For example, modest occasional meals with someone with whom we do business, occasional accompanied attendance at sports events or theatre and other cultural events are considered reasonable. Care must be taken to ensure that any social activity undertaken or gift must not affect or appear to influence a regular decision-making process.

Special care must be taken when dealing with government officials as many countries do not allow officials to accept gifts or entertainment.

Political and Charitable Contributions

Puma Energy does not support individual political parties or individual politicians. Puma Energy and its Suppliers must not make direct or indirect contributions on behalf of Puma Energy to political parties, organisations or individuals engaged in politics.

You are free to participate in democratic political activities, but this should be done in your own time, using your own money, and without reference to your relationship to Puma Energy.

Suppliers who could be considered to represent Puma Energy should refrain from political activity in countries where we operate and where they are not entitled to exercise political rights.

Whilst Puma Energy does make charitable donations, they are independent of all business relationships. Any supplier working for and with Puma Energy is not authorised to commit Puma Energy to engage or finance these activities unless expressly authorised by contract to do so.

Money Laundering

Money laundering is the process by which individuals or entities try to conceal illicit funds, or otherwise make these funds look legitimate. Puma Energy will not condone, facilitate or support money laundering.

Money laundering is illegal and both domestic and international laws contain numerous anti-money laundering provisions which apply to Puma Energy's business.

Puma Energy supports anti-money laundering policies to avoid receipt of cash or cash equivalents that are the proceeds of crime or that could be deemed as money-laundering.

As a Puma Energy Supplier you are required to adhere to all money-laundering laws that are applicable to you and to Puma Energy.

True and Accurate Records

Suppliers must keep financial records that accurately and fairly record business transactions and the disposition of Puma Energy, transactions, assets and property.

It is against Puma Energy policy to make entries that intentionally conceal or disguise the true nature of any transaction. No funds or accounts should be kept for purposes not fully and accurately disclosed. Unrecorded or "off the books" transactions, funds or assets should not be made by any Puma Energy Supplier on its behalf.

Sanctions and Trade Restrictions

Countries periodically impose sanctions and restrictions on international trade with certain other countries, entities and individuals. Puma Energy's suppliers are required to comply with all applicable international trade laws and regulations, including import, export, and re-export controls regulations, as well as applicable embargoes, sanctions, and anti-boycott laws.

Subcontract or Third Party Contracting

If you are allowed under your agreement with Puma Energy to subcontract or use a third party to help you work as our supplier, you must:

- conduct appropriate due diligence to confirm that the third party is of good reputation and will comply with regulatory requirements, including but not limited to anti bribery and corruption regulations, modern slavery legislations and all other applicable laws;
- contractually require it to comply with them;
- monitor its compliance in a risk-based way; and
- make such third party aware of Puma Energy's stance in respect to complying with all applicable rules and regulations.





Respecting
**The Environment,
Human Rights,
Modern Slavery
and Forced Labour**

Environment and Climate Change

Puma Energy is committed to supporting global efforts to combat climate change and the overall health of our environment. We promote growth and innovation while striving to preserve and conserve environment and nature where possible throughout our operations and are encouraging business partners, contractors and suppliers to do the same.

Puma Energy's suppliers are required to comply with all applicable environmental laws, regulations, and standards and minimize any adverse impact on the environment.

Puma Energy seeks to minimize its impact on the environment and generate positive impact for the communities in which we operate in. As such we have set herewithin our Climate Change expectations, which are standards and processes we encourage our suppliers to adhere to .

Reduction of resource consumption

Suppliers are encouraged to put in place processes and systems that will minimise waste of all types, including but not limited to water, energy, fuel and raw materials.

Emissions

Suppliers are expected to ensure that emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are characterized, monitored, controlled and treated as required prior to discharge or disposal.

Chemical and hazardous substances

All chemical or other substances that pose potential hazard, if released to the environment should be clearly identified as such and suppliers should ensure the safe handling, movement, storage, use, recycling and/or reuse and environmentally-friendly disposal of such substances.

Climate change

Suppliers are strongly encouraged to align with best practise climate change and environmental initiatives and approaches, where possible. This includes but not limited to:

- Develop ambitious strategies, fit for purpose policies and integrate climate change considerations into relevant governance structures.
- Measure your climate and environmental impact and set associated timebound targets for impact reduction. This includes estimating and reporting on GHG emissions (scope 1, 2 and 3) in line with the GHG protocol and/or relevant industry standards
- Undertake climate change risk and opportunity analysis and integration in line with TCFD
- Deploy environmental and climate change impact reduction initiatives
- Disclose material activities to leading platforms such as CDP
- Collaborate and engage with value chain stakeholders on their environmental impact and management.
- Engage responsibly with policy makers and industry associations

Safety

Puma Energy's suppliers have a responsibility to providing a safe, comfortable and productive work environment and conducting operations in compliance with applicable health and safety laws and regulations. Puma Energy also requires its suppliers to know, understand, and comply with all applicable laws governing product safety and quality. All Suppliers and your employees must familiarise yourself and adhere to Puma Energy's Health, Safety, Security and Environmental (HSSE) Policy and site specific requirements during the course of conducting normal business.

Maintaining a Fair Work Place and Respecting Human Rights

Puma Energy is committed to labour practices which are fair and ethical. Puma Energy strictly prohibits the use of modern slavery and human trafficking, as well as the use of corporal punishment of any kind in its supply chains. Puma Energy recognises the responsibility it shares with you to operate in an ethical way to mitigate and eradicate any cases of human rights violations and expects you to take appropriate steps to ensure that you and your suppliers subscribe to the same principles and practices, this includes and not limited to;

- Policy against the use of child labour, slavery and human trafficking; and the use of corporal punishment;
- The recognition of the right of employees to freedom of association, organisation and collective bargaining;
- The commitment to avoiding any form of unfair discrimination and ensuring a work environment free of inhuman treatment and inappropriate behavior;

- The provision of equal opportunities without discrimination on the basis of age, colour, creed, disability, ethnic origin, gender, marital or family status, religion or sexual orientation.
- The payment of wages in line with applicable wage laws;
- The adherence to local regulations regarding maximum working hours and acceptable living conditions;
- We encourage our suppliers to align with relevant leading standards such as the UN Guiding Principles on Business and Human Rights; UN Global Compact; and Voluntary Principles on Security and Human Rights.



Protecting
**Puma Energy's
Reputation
and Assets**



Proprietary and Confidential Information

Suppliers must take the necessary steps to protect the confidentiality of any information acquired in the course of your contract. You may not disclose such information unless expressly authorised to do so by Puma Energy. Your obligations in this regard remain in effect even after the expiration of your contract.

Conflicts of Interest

A conflict of interest arises in any situation where there is a potential for divided loyalties between a Supplier's obligations to Puma Energy and that Supplier's own interests.

All of your decisions must be made in the best interests of Puma Energy and must not create a conflict of interest between your interests and the interests of Puma Energy. As Puma Energy's supplier, you must not become involved in relationships that cause or be seen to cause a conflict or that could in any way have a negative effect on your own freedom of action or judgement. You must avoid activity that involves even the appearance of a conflict of interest. Any actual or apparent conflict of interest should be disclosed.

Data Privacy

The Supplier shall ensure compliance with laws and directives providing for the processing, protection, transfer, access and storage of personal information. Data the Supplier obtains from Puma Energy should only be processed for the purpose for which it was collected. Any Puma Energy data the Supplier has must be returned to Puma Energy upon termination of the relationship and information that is still in the possession of the Supplier should be deleted/destroyed/de-identified responsibly and not be kept by the Supplier unless required by law.



Speaking Up



Speak Up

Puma Energy suppliers should raise any questions about this Code or any concerns about its possible violation to your Puma Energy contact; however, if you are uncomfortable doing so you can send an email to:

✉ compliance@pumaenergy.com

Alternatively, where allowed by local legislation, you can raise the concern through the Puma Energy Speak Up line at:

Web access:

✉ www.pumaenergyspeakup.com

Or by phone -Phone numbers can be found at:

✉ www.pumaenergyspeakup.com

Reports on the website or via phone can be made in multiple languages and you can choose to remain anonymous, where permitted to do so by local laws. Unless otherwise required by local law, Puma Energy will treat reports as confidential.

Please note that the more information you provide, the easier it will be for Puma Energy to investigate and appropriately respond to your report.

Puma Energy has a non-retaliation policy prohibiting its employees from retaliating against anyone who, in good faith, has made a complaint, raised a concern or reported misconduct.



*Speak Up
& Be Heard*

