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**SPEAK UP**

**POLICY**

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Date: 01/07/2024



## CC-GBL-002 – Speak Up

<b>Issued on:</b> 01 July 2024	<b>Supersedes:</b> All prior
<b>Owner:</b> Compliance Department <b>Signed by:</b> Rhibetnan Yaktal – Global Head of Compliance	<b>Approved by:</b> Puma Energy Board <b>Signed by:</b> Hadi Hallouche

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### 1. 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, bribery, corruption or abuse relating to the Company’s accounting, internal accounting controls, auditing matters; or the Anti-Bribery management System (ABMS); (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 in section 8 below.

### 2. Objectives

Subject to and in accordance with applicable laws and regulations, the objectives of this policy are:

- To facilitate the detection, reporting, prevention of Unethical Business Conduct;
- To protect employees from retaliation as a result of them having reported an Integrity Concern;
- To provide procedures for Stakeholders to disclose information relating to Integrity Concerns;
- To ensure that Reported Concerns are investigated; and
- To ensure appropriate confidentiality protections for Reporter(s) and the Person(s) implicated.

### 3. 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 Human Resources (HR) representative is typically the appropriate channel for you to use to report concerns about your employment or how you have been treated. If it becomes clear that the concern is a Grievance, Safety or HR related issue, employees are encouraged to refer their concerns to the relevant department.
- This policy does not replace any legislation on the protection of Whistle-blowers, and stakeholders are encouraged to familiarize themselves with the specific legislation in their respective jurisdiction.

### 4. Roles and Responsibilities

#### 4.1 Employee Role

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The employee should:

- Be familiar with the Code of Business Conduct as well as all 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.

### 4.2 Manager Responsibilities

Managers at all levels are responsible for:

- 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.
- Every manager who receives a report regarding Unethical Business Conduct is expected to treat the concern or allegation with discretion, and to treat the Employee who raised the concern with respect. The manager is expected to escalate this concern in line with the Puma Energy escalation criteria.

## 5. Abbreviations and Definitions

<b>Concerns or Integrity Concerns</b>	Refers to any formal report about suspected or alleged Unethical Business Conduct, through any Formal Reporting Channel.
<b>Employee</b>	Any person who has entered into a contract of employment with Puma Energy and who receives or received or is entitled to receive remuneration
<b>Reporting Channels</b>	Authorized internal procedures in Puma Energy whereby Stakeholders can make disclosures of any Unethical Conduct. The Formal Reporting Channels are further described below under section 8 of this policy
<b>Good Faith</b>	Encompasses a sincere and reasonable belief that the information disclosed, and allegations contained are substantially true. It relates to coming forward with all the information you have about a situation that you believe violates the Puma Energy’s Code of Business Conduct., a Puma Energy Policy, or the law and being motivated by a genuine concern of suspicion that unethical or unlawful conduct is occurring. Note that local laws applicable to Puma Energy operations may provide other



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	requirements regarding whether a concern is made in good faith and thus a Reporter is subject to protection from retaliation.
<b>Person(s) Implicated or Implicated Person</b>	Is the person who is accused of Unethical Business Conduct in a reported concern made through the Formal Reporting Channels. Being mentioned in a concern does not necessarily make a person “implicated”.
<b>Policy</b>	Is the Puma Energy’s Speak Up Policy
<b>Reporters or Whistle-Blower</b>	Is a Stakeholder who reports a concern regarding alleged or potential Unethical Conduct to Puma Energy in good faith through any of the Reporting Channels.
<b>Puma Energy</b>	Means Puma Energy Holdings Pte Ltd
<b>Stakeholder(s)</b>	Include all directors, officers and employees of Puma Energy, as well as all employees and other persons (including applicants for employment, contractors, suppliers and any other third party) who have dealings with Puma Energy.
<b>Speak Up Helpline</b>	Refers to an online reporting channel managed independently by an external third party.
<b>Unethical Business Conduct</b>	Is any conduct which represents a breach, wrong doing of any of the behavioral standards noted or described in the Puma Energy Code of Business Conduct, Supplier Code of Conduct, Company policies, Company Shared Values, and breaches of laws and/or regulations; it includes but is not limited to criminal activity, misconduct, discrimination, harassment, conflict of interest, corruption or bribery, theft, fraud, property damage, falsification, unlawful destruction of or tampering with Puma Energy official documents, financial misreporting, accounting, internal accounting controls, tax or auditing concerns, internal business practices that are inconsistent with generally accepted accounting principles, collusion with competitors, data protection infringements, improper use of company resources, insider trading, retaliation or victimization for reporting a concern.
<b>Contract employee</b>	Means any person who works for or worked for Puma Energy as an independent contractor, consultant or agent or who renders services to Puma Energy while being employed by temporary employment service.

## 6. Standards

### 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. No one will be retaliated against for refusing to participate in unethical or corrupt conduct. An employee makes a



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report in “good faith” if he or she reasonably believes that misconduct, a 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.

- Puma Energy does not tolerate retaliation. No one will be retaliated against for raising any concern about misconduct including concerns about bribery and corruption. No one will be retaliated against for refusing to participate in unethical or corrupt conduct.
- Retaliation or victimization can take many forms, whether directly or indirectly, as a positive act or an omission, whether expressly or tacitly and includes (but is not limited to) threats, intimidation, harassment, bullying, humiliation, or change in work responsibilities or conditions.
- Should anyone within Puma Energy attempt to retaliate against or victimize an employee for speaking up and raising an integrity concern in good faith or victimizes a witness or anyone else for assisting in the investigation of a reported concern, then such a person will face disciplinary action, up to, and including dismissal.
- Any employee who suspects that they are being victimized or retaliated against as a result of having reported a concern, or for assisting in an investigation, should immediately speak up by providing all the details of the alleged victimization or retaliation to Compliance.

### What to report

#### The Puma Energy Speak Up should be used to:

- Report Unethical Business Conduct;
- Raise concerns over any conduct that seems to violate a law, Puma Energy Code of Business Conduct or any other company policy; or
- Report a wrongdoing, misconduct or behavior that conflicts with generally accepted ethical standards.

#### The Puma Energy Speak Up should not be used to:

- Report events which present an immediate threat to life or property. These emergency situations should be reported to the local authorities or Puma Energy Security Services;
- Report any personal work-related grievances that you may have in relation to your terms of employment that do not involve Unethical Business Conduct, as these must be referred to the Human Resources Department unless the grievance relates to allegations of retaliation and/or the conduct has significant implications beyond immediate relationship with the Reporter (s);
- Settle personal disputes;
- Make accusations which you know are false;



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- Bypass or circumvent any process that is already underway, (example a grievance, arbitration, mediation or legal action) or to replace other mechanisms put in place to manage certain workplace issues.
- Stakeholders who knowingly raise misleading or false concern, or who raise a concern without a reasonable belief as to its truth or accuracy, will not be protected by this Policy and may be subject of a disciplinary process or other appropriate action.
- If the Global Head of Compliance becomes aware that the concern reported relates to an issue which is already in an official business or legal process, the Global Head of Compliance may elect to close the issue and allow the initial process to follow its natural course before deciding on further action, if any. The employee that raised the concern will be advised that the issue has been closed and be provided reasons for the closure.

### Reporting Channels

There are different channels within Puma Energy that employees can use to seek guidance and advise as well as 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.

An employee who has a question about what to do in a particular situation including potential bribery or corruption 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
- Human Resources (HR)
- 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).

As indicated above, it is possible for an Employee to raise a concern related to Unethical Conduct with his or her Line Manager, however in order to have the Unethical Conduct investigated in accordance with this Policy the information related to the Unethical Conduct must also be recoded as a Speak Up by using one of the Formal Reporting Channels mentioned above.

All concerns reported via the different channels will be promptly and fully investigated in a thorough, timely, objective and professional manner.



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### 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.

### Anonymity:

At no time may the identity of the Reporter, or any elements allowing for the identification of the Reporter, be disclosed without the Reporter's prior consent, unless Puma Energy is required by law to disclose such information.

Where a person opts to remain anonymous, the reporter should ensure that they provide as much information as possible to facilitate a full investigation.

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.

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

### Confidentiality

Whilst the company encourages employees raising concerns to identify themselves, anonymous calls are taken seriously and investigated fully. However, the effectiveness of any speak up enquiry may be limited when there is not enough information to investigate. 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.

Relevant information in respect of the reported concern will only be shared on a need to know basis and only with observance or appropriate confidentiality protections

### 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 person who has raised the concern will be informed of the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions. 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 and documentation retention requirements

### Feedback

On conclusion of the investigation, the Speak Up site should be updated with the outcome of each and every investigation conducted to maintain confidence in the investigation process and that all concerns reported are





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taken seriously and addressed adequately. The feedback to the Speak Up Platform must be concluded within 14 days of the finalization of the investigation.

Reporters of any concerns are encouraged to contact the Speak Up helpline using the reference number provided to them when they made the initial report, in order to obtain feedback of the outcome of the investigation.

## 7. Conclusion

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)