

## **SCANTIME ENERGY**

### **ANTI-BRIBERY AND CORRUPTION PROGRAM**

Scantime is committed to conducting our business activities with the utmost honesty and integrity and in compliance with all legal and regulatory requirements. We do not pay bribes in furtherance of our business and expect that employees will not do so on our behalf. This commitment comes from the highest levels of management and employees are expected to meet this standard.

Scantime's Anti-Bribery and Corruption Policy outlines our zero tolerance approach towards bribery and prohibits employees from offering, promising, giving or receiving anything of value to improperly influence a decision or to gain an improper or unfair advantage in promoting, enhancing, obtaining or retaining business. The Policy also includes guidance on ensuring that joint venture partners, agents, contractors, and other third-parties that we engage, do not pay bribes on our behalf and for reporting suspected violations. Employees who violate this Policy are subject to disciplinary action, up to and including termination of employment and, if warranted, legal proceedings.

Scantime has implemented an Anti-Bribery and Corruption Program that is designed to prevent and detect bribery and corruption, as well as comply with the various bribery related laws and regulations in the jurisdictions in which we operate. The program includes written policies and procedures related to program governance, tone at the top, risk assessment, due diligence for acquisitions and third-parties, training, internal controls, and reporting and monitoring processes.

We conduct bribery risk assessments across our business and seek to ensure that appropriate risk mitigation strategies are implemented. An important part of our mitigation strategy is our employees' understanding of the bribery risks that we face and of the policies and procedures we have in place to mitigate that risk. As such, all of our employees complete anti-bribery and corruption training on an annual basis. We have a reporting hotline that is managed by a third-party and provides for anonymous reporting of suspected violations of our policies and procedures, which is available to our employees and external parties. We conduct due diligence on contractors, joint venture partners, agents and other third-parties to establish their anti-bribery credentials and, where warranted, implement additional risk mitigation strategies, such as including anti-bribery language in legal agreements, when appropriate. Regular reporting on our program and incidents, if applicable, is provided to management and the Risk Management Committee of our Board of Directors.

The Program is regularly reviewed and tested under the direction of the Risk Management Group, with improvements implemented, as required.