

Nairobi, 01.05.2022

ANTI-BRIBERY POLICY

Dear Valued Partner,

We at Equator Energy, including all companies of our group, operate under strict anti-bribery and anti-corruption policies.

Please read this policy carefully. It applies to you whilst you are working for us or with us. It also applies to any persons associated with you or any other persons performing the services or providing goods in connection with your dealings with us.

DEFINITIONS

Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company (wherever they are situated and whether they are a public official or body, or a private person or company), by an individual employee, agent or other person or body acting on another's behalf.

Corruption is the abuse of entrusted power or position for private gain.

Facilitation payments are any payments made (except where comprised in a lawful and published tariff or general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement.

POLICY

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships in all jurisdictions in which we operate and implementing and enforcing effective systems to counter bribery and corruption.

We do not make, and will not accept, facilitation payments of any kind.

It is not acceptable for you or someone on your behalf to:

Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;

Offer or accept a gift to or from government officials or representatives, or politicians or political parties without our prior approval.

You, and the people working with you or for you, shall:

Comply with all applicable laws, statutes, regulations and codes relating to anti-bribery and anti-corruption (the "Relevant Requirements");

Not do or omit to do any act that will cause or lead us to be in breach of any of the Relevant Requirements;

Indemnify us against any losses, liabilities, damages, costs (including but not limited to legal fees) and expenses incurred by or awarded against us as a result of any breach of this clause by you or any breach of provisions equivalent to this clause in any subcontract by any subcontractor.

You must raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of our policy has occurred or may occur, you must notify us as soon as possible.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

This document does not form part of any contract and we may amend it from time to time. Your continued work for us and/or on our behalf constitutes your acceptance of our anti-bribery policy. We may terminate our relationship with you and/or your organisation if you/they breach our anti-bribery policy.

The Management

Equator Energy Ltd.