

The background of the page features a photograph of two workers in safety gear. One worker in the foreground is wearing a blue hard hat, safety glasses, and a blue high-visibility jacket with yellow reflective stripes. The other worker is wearing an orange hard hat and safety glasses. They are standing in an industrial setting with a hazy, sunset-like background. A white rectangular box is overlaid on the image, containing the title text.

**ETHICAL CODE OF
CONDUCT ANTI-BRIBERY
AND ANTI-CORRUPTION
POLICY**





ETHICAL CODE OF CONDUCT

1. Introduction

At NES ENERGY, we are committed to maintaining the highest standards of integrity, responsibility, and ethical conduct in all aspects of our business. This Ethical Code of Conduct outlines the values and principles that guide our behavior and decisions. It applies to all employees, management, contractors, and any third parties representing NES ENERGY.

2. Purpose

The purpose of this Code is to ensure that all individuals associated with NES ENERGY act with honesty, respect, and integrity in every business decision. This Code serves as a foundation for creating a responsible and ethical work environment and upholding our commitment to compliance with the law and regulations.

3. Core Values

Our core values are the pillars of our ethical standards:

Integrity:	We conduct business honestly and transparently.
Respect:	We treat all individuals, colleagues, partners, and communities with dignity and fairness.
Responsibility:	We are accountable for our actions and decisions.
Sustainability:	We strive to minimize our environmental impact and operate sustainably.
Excellence:	We are committed to delivering high-quality products, services, and solutions.

4. Ethical Standards

4.1 Compliance with Laws

All NES ENERGY employees and partners must comply with applicable laws, rules, and regulations in the countries where we operate.

4.2 Conflicts of Interest

Employees must avoid situations where personal interests conflict with the interests of NESAS ENERGY. Any actual or perceived conflict must be disclosed to management.

4.3 Confidentiality

Employees are expected to maintain the confidentiality of sensitive company information and protect the privacy of NESAS ENERGY's employees, customers, and partners.

4.4 Health, Safety, and Environment

We are committed to providing a safe and healthy workplace. All employees must adhere to safety regulations and report on any hazardous conditions. Environmental sustainability is a priority, and we strive to minimize our environmental footprint.

4.5 Anti-Discrimination and Equal Opportunity

NESAS ENERGY is dedicated to creating an inclusive and diverse work environment. We do not tolerate any form of discrimination or harassment based on race, gender, age, religion, disability, or any other protected characteristic.

4.6 Fair Competition

We believe in fair and transparent competition. Any deceptive, unethical, or anti-competitive behavior is strictly prohibited.

4.7 Respect for Human Rights

NESAS ENERGY is committed to upholding human rights and will not tolerate forced labor, child labor, or any other human rights abuses in our operations or supply chain.

4.8 Ethical Sourcing

Our suppliers and partners are expected to follow ethical standards consistent with this Code. We require due diligence in supplier selection to ensure compliance with labor, environmental, and anti-corruption laws.

5. Reporting Concerns

Employees and third parties are encouraged to report unethical behavior, violations of this Code, or any illegal activities. Reports can be made confidentially to management or via NESAS ENERGY's whistleblower hotline without fear of retaliation.

6. Consequences of Violations

Failure to adhere to this Ethical Code of Conduct may result in disciplinary action, including termination of employment or contract, and potential legal consequences.



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Introduction

NESA ENERGY is committed to conducting business fairly, ethically, and in full compliance with all anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. We have zero tolerance for any form of bribery or corruption.

2. Purpose

The purpose of this Anti-Bribery and Corruption Policy is to prevent and address bribery and corruption practices in our operations and to ensure full compliance with applicable anti-corruption laws.

3. Scope

This policy applies to all employees, directors, contractors, agents, suppliers, and third parties acting on behalf of NESA ENERGY.

4. Definitions

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| Bribery: | Offering, giving, or receiving something of value to influence a decision or gain an improper advantage. |
| Corruption: | The misuse of power for personal or corporate gain. |
| Facilitation Payments: | Small, unofficial payments made to expedite routine governmental actions. These are strictly prohibited. |

5. Prohibited Practices

5.1 Bribery

NESA ENERGY prohibits all forms of bribery, whether direct or indirect, including offering, promising, giving, or accepting bribes, kickbacks, or illicit payments.

5.2 Facilitation Payments

Facilitation payments, even if customary in certain regions, are prohibited. The only exception is if payment is required to protect an employee's health, safety, or liberty, in which case it must be reported immediately.

5.3 Gifts and Hospitality

NESA ENERGY employees and representatives may offer or accept reasonable gifts and hospitality, provided they are not intended to influence decision-making and are not excessive in value.

Any gift or hospitality that could be interpreted as a bribe or that exceeds a pre-defined value must be reported and approved by the Compliance Officer.

5.4 Political Contributions and Charitable Donations

NESA ENERGY does not make political contributions to gain a business advantage. Charitable donations are permitted but must be transparent and never used as a disguise for bribery.

5.5 Money Laundering

NESA ENERGY strictly prohibits all forms of money laundering and requires full compliance with all applicable anti-money-laundering (AML) laws, regulations, and internal controls.

6. Due Diligence in Third Parties

NESA ENERGY will conduct due diligence on third parties, including agents, suppliers, and partners, to ensure they uphold similar standards of anti-bribery and corruption.

7. Responsibilities

7.1 Employee Responsibilities

All employees must avoid engaging in or facilitating bribery or corruption. Employees are required to report any suspicions or actual violations of this policy.

7.2 Management Responsibilities

Management must ensure compliance with this policy and actively promote a culture of ethical behavior within the company.

8. Reporting Violations

All employees and third parties are encouraged to report any concerns or suspicions regarding bribery or corruption. NESA ENERGY provides confidential reporting mechanisms, and no one will be subject to retaliation for reporting in good faith.



9. Training and Awareness

NESA ENERGY will provide regular awareness and training to all employees to ensure understanding and compliance with this policy.

10. Monitoring and Review

NESA ENERGY will regularly monitor and review the effectiveness of this policy, including conducting internal audits and risk assessments to identify potential areas of concern.

11. Consequences of Non-Compliance

Any violation of this policy may result in disciplinary action, including termination of employment or contracts. Serious breaches may result in legal action and regulatory penalties.

Approved by:

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Jeroen Mijlof
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COO

Signed by:
Roger Antonsen
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Ex Chairman

1/8/2026

These policies and codes ensure that NESA ENERGY operates with the highest ethical standards, fosters a positive work environment, and complies with global anti-corruption laws.