ANTI-FRAUD POLICY STATEMENT

1. Introduction

Pixcom Energy LLC is committed to maintaining high legal, ethical, and moral standards, adhering to the principles of integrity, objectivity, and honesty. We wish to be seen as strictly opposed to fraud and corruption in the way we conduct our business. All members of staff are expected to share this commitment.

The objective of this policy is to promote a culture that deters fraudulent activity and to facilitate the prevention and detection of fraud. It also aims to develop procedures that will aid in the investigation of fraud and related offenses, ensuring that such cases are dealt with timely and appropriately. A procedure is currently in place for the disclosure of situations involving a conflict of interests.

Definitions:

- **Fraud:** This term describes a wide range of misconducts, including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering, and the concealment of material facts. It often involves the use of deception to make a personal gain for oneself, a connected person, or a third party, or to cause a loss for another. Intention is the key element that distinguishes fraud from a simple irregularity. Fraud has a potential financial impact, but it can also cause severe damage to the organization's reputation.
- **Corruption:** The abuse of power for private gain.
- **Conflict of Interests:** This exists where the impartial and objective exercise of a person's official functions is compromised for reasons involving family, emotional life, political or national affinity, economic interest, or any other shared interest.

2. Responsibilities

- Compliance / Risk Management: Overall responsibility for managing the risk of fraud and corruption has been delegated to the Human Resource and Administration Department, who has the responsibility for:

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- Undertaking a regular review of the fraud risk with the help of a risk assessment team.
- Establishing an effective anti-fraud policy and a fraud response plan.
- Ensuring staff fraud awareness and providing training.
- Ensuring that the Company promptly refers investigations to competent investigation bodies when fraud incidents occur.

- Process Owners/Managers: Managers across Pixcom Energy LLC are responsible for the day-to-day management of fraud risks and action plans, particularly for:

  - Ensuring that an adequate system of internal control exists within their area of responsibility.
  - Preventing and detecting fraud.
  - Ensuring due diligence and implementing precautionary actions in the event of suspected fraud.
  - Taking corrective measures, including any relevant administrative penalties.

- Internal Audit: The Audit Authority has a responsibility to act in accordance with professional standards when assessing the risk of fraud and evaluating the adequacy of the control framework currently in place.

3. Reporting Fraud

Pixcom Energy LLC has procedures in place for reporting fraud internally. All reports will be dealt with in the strictest of confidence and in accordance with relevant Data Protection laws. Staff reporting irregularities or suspected frauds are fully protected from reprisals. (Note: Employees are encouraged to refer to the Whistleblowing/Reporting Concerns procedure for specific reporting channels, such as HR@pixcomenergy.com).

4. Anti-Fraud Measures

Pixcom Energy LLC has put in place proportionate anti-fraud measures based on a thorough fraud risk assessment. The Company uses IT tools to detect risky operations and ensures that staff are aware of fraud risks and receive relevant anti-fraud training. Pixcom Energy LLC carries out a vigorous and prompt review into all cases of suspected and actual fraud that have occurred, with a view to improving the internal management and control system where necessary.

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5. Conclusion

Fraud can manifest itself in many ways. Pixcom Energy LLC enforces a strict zero tolerance policy towards fraud and corruption and has in place a robust control system designed to prevent and detect acts of fraud as far as is practicable, and to correct their impact should they occur. This policy and all relevant procedures and strategies are fully supported by the Board of Directors, who will proactively review and update them on a continual basis.

Managing Director

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