

# Anti-Bribery & Corruption

## Purpose

White Energy (“Company”) is committed to operating in an ethical manner and in compliance with applicable anti-bribery laws and regulations of the respective jurisdictions in which it operates. The purpose of this policy is to ensure that directors, officers and employees of the Company conduct business dealings in an ethical manner and understand and adhere to all applicable anti-bribery laws and best practices. Third parties (including business partners, vendors, suppliers, agents, consultants and intermediaries) are also subject to this policy and must comply with the policy when doing business with or on behalf of the Company.

## Definitions and Reporting

- Bribery is offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. It is important to understand that a corrupt act has occurred even if the bribe does not succeed, or a person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid. “Anything of value” includes, but is not limited to: Cash, cash equivalents (such as gift certificates/cards), stock, personal property and assumption or forgiveness of a debt. Gifts, meals, entertainment and travel may also be considered bribery. Any corporate travel, gifts, entertainment and meals must be proportionate to the occasion and comply with the gift & entertainment policy/standards applicable to your location. Political contributions and/or charitable contributions, if made to a charity or political group at the direct request of a government official or private business partner, could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantages. Offers to Government Officials (or their relatives) can present a risk of violating a anti-bribery or anticorruption laws and regulations. Management must be consulted prior to making such offers.
- Corruption is dishonest or fraudulent conduct by those in power and typically involves acts of extortion, collusion, breach of trust, abuse of power, embezzlement, and fraud.
- Employees and representatives of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk.

## Reporting Violations

- Those covered by this policy are expected to raise concerns about any issue or suspicion of policy violation at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with a member of management or Human Resources.
- The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.
- If you believe that you have suffered any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith, you should inform a member of management or Human Resources immediately.
- Violations can be reported directly to a member of management or Human Resources, or anonymously by using the SafeHotline number at 855-662-SAFE (7233).