
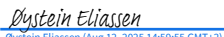




Anti-Bribery and Corruption Procedure

Document No.: CON-001-MGM-PR-002

Document Owner: Managing Director

The signatures below certify that this document has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision

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Revision History

Rev	Date	Reason for Issue	Prepared	Checked	Approved
01	12.08.2025	First issue	Erik Klausen	Øystein Eliassen	Geir Lunde

Revision Control

Revision:	Paragraph /Section	Change Description

This sheet must be completed in detail, at each revision once this document has been approved. Details must include revision number, description and indication of which pages and paragraphs have been revised, date of revision approval and approval indication.

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1 Introduction and Purpose

The business of Concedo AS (Concedo) is currently limited to the Norwegian Shelf, nevertheless, anti-bribery and corruption procedures are an important part of its business conduct. Concedo recognises that bribery and corruption have a detrimental effect on communities where they occur. If ingrained, they can threaten the fabric of society by undermining laws, democratic processes and basic human freedoms, leading to the impoverishing of states and damaging trade and competition. Corruption is often associated with organised crime, money laundering and on occasions the financing of terrorism or impacting decisions even if no money is handed over.

It is Concedo's policy to maintain high levels of ethical standards in the conduct of our business affairs, ref. Concedo's [CON-001-MGM-PH-003 Code of Conduct Policy](#), and Concedo has a zero tolerance of bribery and corruption. This policy has been adopted by Concedo and is to be communicated to everyone involved in Concedo's business to ensure commitment to it. Any breach of this policy will be regarded as a serious matter by Concedo and is likely to result in disciplinary action.

This is not only a cultural commitment of Concedo, but also a moral issue and a legal requirement. Bribery is a criminal offence in most countries, and corrupt acts expose Concedo and its personnel to the risk of prosecution, fines and imprisonment, as well as endangering Concedo's reputation.

Exposure to bribing, corruption, extortion etc, shall be a natural part of a risk management process if entering new business and/or geographical areas.

Concedo follows the Norwegian policy and regulations concerning the sanctions. Sanctions can be applied to country, entity, individual, organisation and vessel. The business of Concedo is limited to Norway but have suppliers that might not be Norwegian.

2 Application and Scope

This anti-bribery and corruption procedure applies to:

- Members of the Board of Directors
- Managers and executive leadership
- All employees (permanent and temporary)
- Consultants, contractors, and subcontractors
- Suppliers and business partners acting on behalf of Concedo

Concedo's zero tolerance of bribery and corruption applies to Concedo and any subsidiary, of which Concedo has effective control, in any country that Concedo may operate. Concedo also encourages the application of a zero-tolerance policy on bribery and corruption in any subsidiary in which Concedo does not have a controlling interest.

Concedo expects its clients, business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in contracts.

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3 Roles and Responsibilities

Role	Responsibility
Board of Directors	Ultimate responsibility for the anti-bribery and corruption oversight
Managing Director and Executive Management	Ensure leadership and support for ethical culture.
HSEQ Manager	Act as Chief Compliance Officer, maintain and monitor implementation, training
Managers	Model ethical behaviour, provide training, and support open dialogue
All Employees	Read, understand, and comply with the anti-bribery and corruption procedure at all times

4 Acronyms, Abbreviations and Definitions

Acronym/ Abbreviation	Term / Word	Definitions
AML	Anti-Money Laundering	
	Concedo	Concedo AS
EITI	Extractive Industries Transparency Initiative	
ESG	Environmental, Social and Governance	
FCPA	Foreign Corrupt Practices Act (USA)	
GDPR	General Data Protection Regulation	
HSSE	Health, Safety, Security, and Environment	
MOC	Management of Change	The systematic process for dealing with changes to manage HSE risk.
OECD	Organisation for Economic Co-operation and Development	
OFAC	Office of Foreign Assets Control, USA	
	Norwegian General Civil Penal Code	Lov om straff (straffeloven)

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Acronym/ Abbreviation	Term / Word	Definitions
	Sanction	Sanctions are protective restrictive measures, such as asset freeze or block, investment or travel bans, financial sanctions, arms and trade embargoes. There are lists of major sanctions updated by OFAC (Office of Foreign Assets Control, USA), EU and UN
SDG	Sustainable Development Goals	
UN	United Nations	

5 Statutory Requirements

All statutory requirements relevant to the activities outlined in this procedure will prevail and take precedence in case of conflicts between statements in documents referred to in this document.

Compliance with applicable laws and regulations is mandatory, including:

- [Norwegian Penal Code](#), [Working Environment Act](#), [Petroleum Act](#), [Transparency Act](#)
- [EU GDPR](#)
- [OECD Anti-Bribery Convention](#)
- [The UK Bribery Act](#)
- [US Foreign Corrupt Practices Act \(FCPA\)](#)

5.1 The Law – General

Bribery is a criminal offence in Norway and most other countries. There are laws, providing that bribery taking place anywhere in the world, that can be prosecuted as a criminal offence in Norway, the UK and the USA. It is worth noting that criminal penalties will apply, depending on the situation, and that individuals can face unlimited fines and several years in prison for bribery offences.

The [Norwegian General Civil Penal Code](#) provides for offences in Norway of foreign bribery and aggravated bribery. It also provides for compensation to be claimed against a person or company, which has suffered damage because of corruption.

'[Protect your Business](#)' is a manual/guideline in Anti-bribery and Corruption for the Norwegian business sector, established by Transparency International. The manual is available in English and Norwegian languages; see [link](#).

[The UK Bribery Act 2010](#) and enhanced UK law on bribery including foreign bribery and is now among the strictest and most comprehensive legislation on bribery.

The [U.S. Foreign Corrupt Practices Act 1977](#), when applicable, criminalises active bribery of foreign (non-U.S.) officials.

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Concedo employees' behaviour, and the behaviour of those providing services to Concedo may create criminal liability for Concedo. Such offence may come under rule of any Authority dependent on the nationality and circumstances. Where a company is concerned in bribery conduct, the person or people who acted in that conduct, senior officer(s) in the company, and the company itself may all be punished. Connivance by a senior officer could be constituted by merely turning a blind eye to conduct or choosing not to ask obvious questions about what was happening. Criminal penalties for an individual can be up to ten years imprisonment and/or an unlimited fine. For a company there can be an unlimited fine.

The UN Security Council can impose sanctions that are legally binding under international law on states, persons or entities.

In addition, the Council of the EU can impose restrictive measures on specific states, persons or entities. Norway is obliged under international law to implement sanctions adopted by the UN Security Council, and can choose to align itself with the EU and impose the same restrictive measures after a case-by-case evaluation.

The Norwegian law of implementing international sanctions ([Sanksjonsloven](#), Lov -2021-04-16-18).

6 Standards, Guidelines and Recommended Practises

Concedo use standards, guidelines and recommended practices as part of the governing documents. In the event of conflicts between statements in documents referred to in this document the following hierarchy applies;

1. NORSOK Standards
2. Offshore Norge Guidelines
3. Other Standards and Guidelines

Reference	Description
Transparency International Norge	"Protect your Business» Handbook" , "Beskytt din virksomhet» Håndbok"

7 Exemptions and Deviations from this Document

Exemption from requirements in this document is only acceptable after approval of an exemption application, which must be handled in Concedo's quality system; see:

- CON-001-HSE-QA-002 Report and handle nonconformities, incidents and improvement proposals

The process for an exemption classified as 'minor' is quite simple, but an exemption classified as 'major' trigger a Management of Change (MOC) process which requires more analyses and more documentation.

A deviation from a requirement in this document (i.e. identified after the activity has been performed) is classified as a non-conformity and must be handled accordingly; see the same process.

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8 Anti-Bribery and Corruption

Concedo's policy related to anti-bribery and corruption prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the person or body employing them or whom they represent (including Concedo).

Inevitably, determining whether something is a bribe or not may not always be easy. This anti-bribery and corruption procedures contains guidance to deal with specific situations where there is a risk of bribery and details of who to contact. Should an individual have any concerns or doubts in any situation about a proposed step or action, receive, or become aware of a request or suggestion that may present a bribery risk he or she should refer the matter to Concedo's Managing Director or HSEQ Manager.

8.1 Facilitation Payments

Facilitation payments are payments, usually small, made by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement, e.g. to expedite a visa application. In many countries, it is customary business practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process.

Such payments are bribes and, as such, are prohibited by Concedo, except for medical or safety emergencies. Where such medical or safety emergency occurs, prior approval must be sought from the Managing Director, or if not practicable, the payment should be made first and then a record of such payment should be kept and immediately reported to the Managing Director.

8.2 Political Contributions

A political contribution is a contribution, financial or in-kind, to support a political cause. Examples of financial contributions include donations and loans. Examples of in-kind contributions include gifts, the loan or use of property, provision of services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events and contributions to organisations or 'think-tanks' with close associations with a political party. The risk of political contributions is that they may be used or be perceived to be used as a cover for bribery to retain or obtain a business advantage such as to win a contract.

Concedo does not allow political contributions in any form whether to political parties, causes or to support candidates.

The appointment of any politician or former politician as a consultant, employee or officer of Concedo requires approval by Managing Director and is subject to applicable laws. If Concedo does use a politician or former politician as a consultant, then any fees paid shall be appropriate for the work undertaken.

8.3 Extortion

Same requirements apply as for Facilitation payments, ref. 8.1 above.

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8.4 Charitable Contributions and Sponsorship

Charitable contributions and sponsorships, include financial and in-kind benefits. Examples include cash donations, gifts, the loan or use of property, provision of services, advertising or promotional activities and the purchase of tickets to or the participation in fundraising events.

Concedo only makes charitable donations that are legal under the relevant law. Before any charitable contribution can be made, the following procedure must be followed:

- the Managing Director must be notified of the intention to make a charitable contribution;
- the Managing Director must check that the charity is reputable, that there are no public officials connected with the charity, and that there are no potential conflicts of interest; and
- the contribution must be approved by the Managing Director. In cases of doubt, the contribution shall be rejected.

All charitable contributions must be paid by bank transfer and not in cash to ensure proper recording and accounting. Concedo shall publish all charitable contributions and sponsorships in the notes of the annual statement.

8.5 Hospitality

Concedo employees can give and accept hospitality. However, hospitality needs to be handled with 'common sense'. The following minimum requirements apply:

- No Concedo employee shall offer/give nor accept hospitality involving any parties in a tendering/contract situation.
- Hospitality considered lavish shall not be offered/given or accepted.
- Hospitality shall be arranged locally.
- Hospitality offered/given or accepted shall be transparent/reported.
- Hospitality given shall be recorded as hospitality on expense forms and specify the involved personnel and guests.
- Concedo personnel or individuals acting on behalf of Concedo, can accept hospitality if there is a clear business reason. Travel, accommodation and other expenses for the individual themselves in connection with such hospitality must always be paid by Concedo.
- Particular care must be taken in dealings with public officials.
- Concedo personnel must not, directly or indirectly, accepts gifts of any value above NOK 3000.

8.6 Employment Provisions

All Concedo personnel shall have a provision in their contract of employment requiring them to comply with the current version of the Concedo Anti-Bribery and Corruption Policy. A copy of the Anti-Bribery and Corruption Policy will be provided to the employee on entry into their contract of employment and the valid version of the policy will always be available in the intranet, and any updates will be announced.

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Those with older employment contracts not having the provision of Anti Bribery and corruption clause shall sign the anti-bribery and Corruption agreement enclosed in [Appendix A](#).

Any breach of Concedo’s Anti-Bribery and Corruption Procedure is a serious matter and will be considered grounds for disciplinary action. The full range of disciplinary actions shall be available for any breach of this policy, including summary dismissal.

8.7 Consultants and Contractors

Contractors and consultants will be required to adhere to the principles in Concedo’s Anti-Bribery and Corruption Procedure, and where appropriate a copy will be provided to them. According to the Managing Director’s discretion and consideration, contractors and consultants may be asked to sign the anti-bribery and corruption agreement enclosed in [Appendix A](#).

In the event of a material breach of this procedure, any such contract will be terminated immediately.

8.8 Dealing with Partners

Concedo’s Anti-Bribery and Corruption Procedure shall be communicated to partners whom Concedo has asset transactions and business deals with. The Managing Director shall consider from time to time if consultants or other business partners shall be asked to sign the Anti-bribery and corruption agreement enclosed in [Appendix B](#).

New business partners shall be required to complete a due diligence questionnaire (enclosed in [Appendix C](#)) to provide various information including anti-bribery and corruption. Partners in Licences adhering to standard licence agreements on the Norwegian Continental Shelf shall not be requested to sign Anti-Bribery and Corruption forms, agreements or due diligence questionnaire. It is the responsibility of the Norwegian Authorities to decide or approve and qualify partners to Concedo in licences on the Norwegian Continental Shelf.

The completed questionnaire shall be reviewed by the HSEQ Manager to check for any red flags. If necessary external companies can be contacted in order to verify or check the information provided in the questionnaire. If a prospective 3rd party service provider is unwilling to provide the requested information, or is offended by the request then this may itself represent a red flag and an alternative 3rd party service provider or agent should be sought.

8.9 Reporting Procedure

It is the responsibility of each individual, contractors, consultants or 3rd parties to comply with both the letter and the spirit of this policy. If any of the above becomes aware of any conduct that may violate this policy, this shall be reported directly to:

- The Managing Director of Concedo or
- The HSEQ and Operations Manager of Concedo or
- The Safety Delegate (Verneombud) at his/her discretion if reporter is employee of the company and wish to be anonymous

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It is important to state that reporting violation of the above policy shall have no consequences for the reporter.

8.10 Monitoring and Audit

It is the responsibility of the Management, in conjunction with the Managing Director, to ensure adherence to this policy.

The HSEQ Manager will devise and implement any internal control procedures deemed necessary. These may include, but are not limited to monitoring and reviewing measures where appropriate for:

- appropriate education for new personnel on introduction;
- the delivery of education programmes to personnel and contractors performing out-sourced services;
- the updating and/or repeating of education at appropriate intervals;
- confirming that clear policies exist in the areas identified by the risk assessment;
- monitoring whether these policies are followed in practice;
- managing how incidents of bribery are dealt with and which sanctions are applied.
- Implementing financial audits (including the use of software) that identify any unusual or irregular payments made or received and highlights these for further investigation.
- Perform necessary audits of 3rd parties verify that they comply with relevant anti-bribery and corruption requirements.

The HSEQ Manager will also update relevant policies and procedures to reflect changes in Concedo's business or environment and conduct analysis of incidents and violations of this procedure. If appropriate, the HSEQ Manager, will obtain external verification (testing the effectiveness of the measures in place) and assurance (of the adequacy of the design and implementation) of this procedure.

8.11 Review

Ultimate responsibility for overseeing the implementation and review of this Anti-Bribery and Corruption Procedure lies with the Managing Director. Reports on the results of regular monitoring summarising the findings of internal audits, identified deficiencies, initiated actions and recommendations will be submitted to the HSEQ Manager, who, together with the Managing Director, will decide whether such actions are appropriate to deal with the risks and to improve the effectiveness of the Anti-Bribery and Corruption Procedure and consider as to whether external verification would be appropriate. This should form the basis of regular reports to the Managing Director on the effectiveness of the Anti-Bribery and Corruption Procedure describing any areas for improvement and recommendations.

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8.12 Sanctions

Concedo will to the best of its ability keep itself updated on sanction regulations and sanction lists. One practical way to implement this is to obtain KYC information from suppliers and partners. All Licence partners are qualified under the Norwegian regulations.

8.13 Record Keeping

Concedo will maintain accurate books, records and financial reporting and for all 3rd party representatives working on its behalf. All accounts, invoices, memoranda and other documents and records must be prepared and maintained with strict accuracy and completeness. No accounts may be kept “off-book” in order to facilitate or conceal improper payments. All assets, liabilities, revenues and expenses must be recorded, using the proper general ledger accounts, in the regular books of Concedo. All accounting records, expense reports, invoices, vouchers and other business records must be accurately and fully complete, properly retained and reliably reported and recorded.

It should be noted that Norway has implemented the EITI ([Extractive Industries Transparency Initiative](#)). **This implies that an annual report is being issued publishing what** the oil companies (including Concedo) pay to the Government and what the respective government agencies (incl. Havtilsynet, Sökkeldirektoratet, Ministry of Energy, etc.) have received.

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9 References

Table 1 – Document references

No	Title	Issued by	Document No.	Revision	Date
/1/	Code of Conduct Policy	Concedo	CON-001-MGM-PH-003	01	18.07.2025
/2/	“Protect your Business» Handbook” , “Beskytt din virksomhet» Håndbok”	Transparency International Norge			
/3/	Norwegian General Civil Penal Code				
/4/	Working Environment Act				
/5/	Petroleum Act				
/6/	Transparency Act				
/7/	The UK Bribery Act				
/8/	EU GDPR				
/9/	OECD Anti-Bribery Convention				
/10/	US Foreign Corrupt Practices Act (FCPA)				

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Appendix A

EMPLOYEE AND CONSULTANT CONFIRMATION FOR HAVING READ AND UNDERSTOOD KEY CONCEDO DOCUMENTS

Name of employee / consultant: NN


I hereby confirm that:

- I have read and understood the
 - [CON-001-MGM-PH-001 HSEQ and Social Impact Policy](#)
 - [CON-001-MGM-PH-003 Code of Conduct](#)
 - [CON-001-MGM-PR-002 Anti-bribery and Corruption Procedure](#)
- I commit to complying with their principles in my role at Concedo AS.
- I am aware of the disciplinary consequences for non-compliance.

Name (Signature):	
Position:	
Company	

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Appendix B - Anti-Corruption Signature Sheet – NEW Business Partners

I, the undersigned, representing;

<Company>

<Street Address>

<Postal Code

>City

<Country>

<VAT No>,

confirm that my business has established anti-bribery and corruption policies and that they are inspired by the principles of loyalty, fair play, transparency, honesty and is conducted in compliance with anti-corruption laws that are applicable, e.g. the:

- the Norwegian General Civil Penal Code With subsequent amendments, the latest made by Act of 21 December 2005 No. 131,
- the UK Bribery Act of 2010,
- other laws regarding public and commercial laws against corruption that are in force in specific countries or international anti-corruption treaties, such as the Convention on Combating Bribery of Foreign Officials in International Business Transactions and the United Nations Convention Against Corruption,

I also declare, on behalf of the Principals and my employees and/or consultants, that I will abstain from (i) offering, promising, giving and paying, directly or indirectly, any sum of money, utility, benefit, whatsoever advantage, or anything of value to a Public Official or any 3rd party, and (ii) accepting, directly or indirectly, any request of a sum of money, utility, benefit, whatsoever advantage, or anything of value from a Public Official or any 3rd party as well as well as (iii) accepting, directly or indirectly, any sum of money, utility, benefit, whatsoever advantage, or anything of value from any 3rd party in violation of the above anti-corruption laws.

(Signature)

Name:	
Position:	
Company:	
Date:	

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Appendix C – Anti-Corruption Due Diligence Form

1. Company Information

Company	
Street Address	
Postal Code	
Town/City	
P.O.Box	
P.O. Postal Code	
P.O. Town/City	
Country	
Telephone/Fax	
E-mail	
Website	
VAT registration	
Main Bank (Name, Address., Phone)	
Main Auditor (Name, Address, Phone)	

2. List all Board of Directors

Name	Function	Citizenship

3. List all members of company's top management

Name	Function	Citizenship

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4. Anti-bribery and Corruption

Id.	Issue	Yes/No	Comments
1	Does your organisation have a 'Code of Conduct' or other similar document(s) which covers anti-corruption?		
2	With regards to bribery or corruption, in the last 3 years have you been, or are you currently, subject to any external investigations? If so, please provide details. <i>(Note: This also applies to investigations being carried by regulators or public international organisations, e.g. World Bank Group)</i>		
3	To the best of your knowledge, is your organisation and/or its shareholders, joint venture partners, employees, managers, or Board members subject to any sanctions imposed by the United Nations, the United Kingdom or other jurisdictions? If yes, please provide details. <i>(Note: For publicly listed companies, please refer to shareholders with ownership interest of 20 % or more)</i>		
4			

Please confirm that your compliance or anti-corruption programme covers the following, and please indicate in which of your documents this is referenced.

(Note: this may be a separate policy, or referenced in another document.)

Id.	Area	Covered? Yes/No	Title/Doc. no. of document where this is covered
1	Statements of prohibiting bribery and corruption		
2	Facilitation payments		
3	Gifts, hospitality and promotional expenditure		
4	Conflicts of interest		
5	Political contributions		
6	Charitable donations and sponsorships		

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Concedo Management System Document		CON-001-MGM-PR-002	
	ANTI-BRIBERY AND CORRUPTION	Date:	12.08.2025
		Rev.:	01

Comments to table above:

The undersigned, being duly authorised to respond to this Questionnaire, certifies that all information provided is correct and complete to the best of their knowledge; and that their organisation undertakes to inform Concedo in writing if any of the circumstances, relationships or information provided in this questionnaire changes.

The undersigned also confirm that Concedo is entitled to perform audits to verify that the Company's anti-bribery and corruption program/documents referred to in this document is established and implemented in the organisation.

(Signature)

Name:	
Position:	
Company:	
Date:	

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CON-001-MGM-PR-002 Anti-Bribery and Corruption Procedure


Final Audit Report

2025-08-12


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By:	Øystein Eliassen (oystein.eliassen@concedo.no)
Status:	Signed
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