

ANTI-CORRUPTION POLICY		
Code: GERG-FOR-009	Date: 03-02-2016	Version: 004

ANTI-CORRUPTION POLICY

DATE OF PREPARATION: 03/02/2016	DATE OF REVIEW: 03/02/2016	DATE OF APPROVAL: 03/02/2016
RESPONSIBLE: HSEQ Coordinator	RESPONSIBLE: Management Representative	RESPONSIBLE: General Manager

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7 SEAS ENERGY S.A.S. is committed to combating corruption in all its forms, including extortion and bribery, within its administrative, operational, and financial frameworks during the execution of daily activities.

Any improper conduct by employees or stakeholders that goes against the principles and ethics of the organization will be completely rejected and sanctioned according to the internal work regulations and other applicable legal provisions.

Considering the activities most exposed to corruption risk, the following guidelines are established:

- The company strictly prohibits bribery in any form, whether directly or indirectly, through an agent or third party, and whether it involves a public official or a private individual.
- It will not grant or accept any type of gift that could be interpreted as exceeding normal business or courtesy practices, or as an attempt to obtain favorable treatment in any activity involving the company.
- No political contributions may be made on behalf of the company, either directly or indirectly, through payments, promises of payment, or the offering of anything of value (monetary or otherwise) to candidates for public office, political parties, party officials, or any organization or person connected to an election or political campaign.
- The company does not authorize the making, offering, or accepting—directly or indirectly—of any payments or benefits intended to expedite services, processes, or obtain any undue advantage beyond what is lawfully established.
- Preventive actions are part of our corporate culture. Therefore, if any employee, partner, supplier, client, or third party observes behavior or an act aimed at circumventing a legal provision to the detriment of 7 SEAS ENERGY S.A.S., it must be reported to management so that corrective actions can be taken in accordance with the Anti-Corruption Manual.
- The company and its subsidiaries will keep books, records, and accounts that accurately, objectively, and reasonably reflect all transactions and asset dispositions. It is strictly forbidden for officers, employees, or other individuals, directly or indirectly, to falsify or cause others to falsify any book, record, or account.
- The company will comply with all laws and main anti-corruption regulations. The principal Colombian anti-corruption rules are established in the Criminal Code (Law 599 of January 2000) and Law 1474 of 2011, which include provisions prohibiting corruption and bribery. Additionally, the company is subject to the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), where applicable, and the anti-corruption laws of other countries in which 7 SEAS ENERGY S.A.S. operates.

All directors, stakeholders, employees, representatives, and affiliated companies of 7 SEAS ENERGY S.A.S. must read, understand, and comply with all the provisions of this Anti-Corruption Policy.



MANUEL ERNESTO ROJAS ROMAN

Legal Representative

Reviewed on May 15, 2025.

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CHANGES AND MODIFICATIONS

Version	Date	Description of Change	Responsible for Change	Approved by
001	03/02/2016	Policy creation	Not applicable	Not applicable
002	02/08/2016	Logo change	HSEQ	General Manager
003	15/10/2021	Update	HSEQ	General Manager
004	15/05/2023	Update including stakeholders and reference to Anti-Corruption Manual	HSEQ	General Manager