

ANTI-BRIBERY POLICY

1. Introduction

Most countries have laws that prohibit bribery and corruption. A breach of these laws is a serious offense that can result in fines for companies and imprisonment for individuals. This policy sets out what we must do to prevent bribery. N.E.G. New Europe Gaz limited ("NEG" or the "Company") is fully committed to complying with the anti-bribery legislation of the countries in which operate.

2. Who is impacted?

This policy applies to all persons performing services for or on behalf of NEG or its subsidiaries, wherever located including directors, employees, agents, associates, consultants, contractors, and suppliers.

3. What is Bribery?

A bribe is a reward offered or an inducement, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. A bribe does not necessarily have to be of a large value.

4. What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift, hospitality, or any other benefit with the hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer, a payment, gift, hospitality, or any other benefit to a government official, agent or representative to facilitate or expedite a routine procedure.
- Accept payment or any other benefit from a third party that you know or suspect is offered with the hope that it will obtain a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with the hope that a business advantage will be provided by us in return.
- Threaten or retaliate against another employee who has refused to commit a bribery offense or who has raised concerns under this Policy.
- Fail to report any indication of improper payments.

5. Facilitation payments

Facilitation payments are typically small, unofficial payments made to secure or speed up the performance of a routine or necessary government action or a level of service.

Under this Policy, you must never offer, pay, solicit or accept bribes in any form, including facilitation payments or kickbacks.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reasons for the payment. If you have any suspicions or queries regarding a payment you should raise these as soon as you can with the Company by following the reporting procedures below.

6. Gifts, entertainment, and hospitality

We appreciate that the practice of giving business hospitality, gifts or entertainment varies between countries and regions and what may be normal and acceptable in one region may not be in another. However, the test to be applied is whether the hospitality, gift or entertainment is reasonable and justifiable. Gifts or hospitality should not be accepted or made if it would compromise, or appear to compromise, an individual's judgment or conduct in business decisions.

7. Your responsibilities

You must ensure that you read, understand and comply with this Policy. The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this Policy. You must notify the Company by following the procedures below as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur.

8. Suppliers and partners

This Policy forbids the making of payments through third parties. Employees must, therefore, be diligent in selecting and monitoring contractors, agents, and partners.

9. Record keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and kept with accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

10. Communication

All Employees or Officers must report any violations of this Code or of applicable laws or regulations!

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