



LIT ENERGY

Code of Business Integrity.

## Our Code of Business Integrity.

### Director Letter

We work hard every day to build on best cultural and business practices. This document is a foundation to a strong foundation of integrity. Over the years, we have earned our reputation as a safe, reliable, and honest business partner. Our commitment to operating ethically always has served us well and is critically important to our success going forward. Our Code of Business Integrity has been created to provide you with the valuable information and insight you need to navigate compliance and ethics questions, to promote an overall culture of compliance, and to arm you with the knowledge and resources required to make sure we keep our commitments to all our stakeholders.

Our Code cannot cover every possible scenario we might face, but it does contain helpful guidance for many of the more common issues that can arise. Most importantly, our Code provides a framework for asking questions and highlights the resources we have in place to report concerns. At a minimum, we are all responsible for speaking up when something doesn't seem quite right, or we believe misconduct has occurred.

Please familiarize yourself with these reporting resources and know that the company does not tolerate any type of retaliation against those who speak up in good faith about potential issues.

I hope that you feel, as I do, that our strong foundation of integrity is a key asset that we must preserve and enhance.

These standards embody our commitment to maintaining that foundation.

Thank you!

Abdulrahman,

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### **1.1 Our Code's purpose:**

We believe that fairness, transparency and trust drive growth and prosperity for all parties involved – employees, customers, suppliers, markets – and the communities that encompass them all.

Adhering to those qualities brings out the best in us, inspires the best in our business partners, reduces our exposure to legal risk and helps build and sustain a positive corporate reputation. Not only is behaving ethically the right and legal thing to do, it is good business.

This Code of Business Integrity (“our Code”) provides guidance on how we as Lit EnergyLtd management and staff employees will conduct ourselves with each other and with customers, suppliers, governments, other businesses and our environment. While our Code cannot address every question or issue that may come up, it does provide us clear guidance on many compliance and ethical challenges we may face.

If you have specific concerns, please consult our company policies as highlighted in our Code or seek guidance from your manager, the Legal & Compliance department, or the Human Resources department.

Our Code applies to everyone at Lit EnergyLtd, including directors and officers, all employees and to all Lit Energy LLC, or Group’s majority-owned subsidiaries and affiliates across all locations. We also expect our subcontractors and other stakeholders to know and follow the standards described in this document as it applies to their roles. We follow the law, so we are bound by all local laws governing our business operations wherever we are located.

If there is a conflict between the law and our Code or company policy, we will follow the stricter standard within the framework of the applicable laws. If you are unclear about which laws or policies apply to you and your job, then please consult your line manager or the Legal & Compliance department.

1.2 Our Shared Commitment Compliance and ethics touch every role at Lit Energy LLC, so we all play a part in creating an ethical work environment. We show our commitment by familiarizing ourselves with our Code, our policies and any applicable laws or regulations.

This will help us spot potential issues and make sure we conduct business ethically and legally. We also speak up when we have questions and concerns. Failure to follow our Code can mean endangering employees, business operations, the environment, the communities in which we work, our business relationships and our company’s reputation. In cases of serious misconduct, it can also expose us to significant legal penalties, including fines and criminal or civil prosecution

### **1.3 If You See Something, Say Something**

If you have questions about an issue that is covered in our Code, or any issue you feel involves potential misconduct or violation of our Code, our policies, or the law, you should promptly raise your concerns with your manager or the Legal & Compliance department.

Your manager is a valuable resource and your first point of contact for sharing or discussing any concerns. If you don’t feel comfortable approaching your manager, you may make a report to another resource or report anonymously where allowed by local law.

Some of our reporting resources include: -

- Your Compliance Officers & Compliance Champions
- The Legal & Compliance Department
- The Human Resources Department
- An email to the integrity hotline
- A dedicated web portal designed to receive concerns.

#### **1.4 Retaliation Is Prohibited**

We can all report concerns and participate in official investigations without fear of punishment. Lit Energy LLC, strictly prohibits retaliation against someone reporting an issue or concern in good faith. The company may take serious disciplinary action against employees found retaliating, up to and including termination of employment.

#### **1.5 What Happens When You Report?**

When you make a good faith report, Lit Energy LLC, opens a confidential investigation. All concerns are treated fairly and dealt with quickly and in accordance with data protection legislation. If you do not wish to be identified while raising a concern, you can report anonymously where it is legal.

#### **1.6 A Manager's Role.**

If you are a manager, you must support and foster a workplace that recognizes our values and demonstrates ethical conduct. This involves following and modelling our Code and making certain your direct reports both understand their responsibilities under our Code and are comfortable speaking up with their questions and concerns. It is expected from a manager to promptly and properly escalate any concern raised or report made by any employee, as well as monitor and enforce your team's adherence to our Code, our policies and the law

#### **1.7 We Make Ethical Decisions**

Our Code cannot cover every circumstance, and it is not always easy to know the right thing to do in a challenging situation. If you are ever unsure about a decision or action you're considering, ask these questions:

- Is it inconsistent with our Lit Energy LLC, Lit Energy LLC Group's values?
- Does it violate our Code or policies, or local laws or regulations?
- Do you feel uneasy about it?

Would you feel uncomfortable if your family, friends, colleagues, or the public found out about it?

- Could it damage your or Lit Energy LLC, reputation if it were described in the media/social media?

If you answer "yes" to even one of these questions, the action or decision you are considering may be unethical and you should not proceed with it. Instead, consult with your manager or the Legal & Compliance department for guidance on how to handle the issue.

#### **1.8 We Protect Privacy**

While doing business, we collect and manage the personal information of employees and our customers, suppliers, and others.

Our careful handling of this personal information is one of the reasons we are a trusted employer and business partner.

Our company complies with all privacy laws in the countries in which we do business, and we acquire, process, use and retain only the personal data that is required for effective company operations to the extent allowed by applicable law.

If your role involves interacting with sensitive personal or customer data, you may not process, use or disclose the information except as needed to perform your job.

You may not disclose to any customer or other entity any confidential or proprietary information about another customer without that customer's specific, written permission and the approval of your manager. Additionally, you must comply with all non-disclosure agreements (NDAs) and data processing agreements concerning confidential or personal information provided by any business partners or other companies.

## **2. Our Commitment to our teams.**

We believe our strength lies in the diversity of our people. Inclusion is one of our core values, and we are committed to creating and maintaining a safe, professional and inclusive work environment in which all employees are treated with respect and dignity.

Our company complies fully with applicable labor and employment laws, and we do not tolerate discrimination or harassment against anyone based on race, color, religion, gender, gender identity, national origin, age, disability, veteran status, pregnancy or sexual orientation.

We also provide equal employment opportunity, and we recruit, hire, promote and compensate people based solely on merit and ability. At our group, you must not engage in any discriminating or harassing behavior, and you are expected to speak up of any conduct you believe to be discrimination or harassment to your manager, Human Resources representative, the Legal & Compliance department, or the Integrity Hotline.

If you are a manager, in addition to adhering to the principles above, you must help create an inclusive environment in which different backgrounds and viewpoints are respected and valued. Managers will not retaliate against any individual who complains of discrimination or harassment or who participates in an official investigation. Managers will not use their position to extract inappropriate favors from or engage in a abusive relationship with any employee they directly or indirectly supervise.

If you engage in a consensual romantic relationship with a subordinate, we advise you to immediately coordinate with your manager or human resources representative so that appropriate actions, such as change of reporting lines, etc., may be taken.

### **1. 2.2 We Work Safely**

Safety, health, care for the environment and quality are all pre-requisites for any business we undertake. Safety is a key value for us and we demonstrate our focus on good conduct and continuous improvement in all business processes and programs. Lit Energy LLC, Lit Energy LLC, Lit Energy LLC groups has developed comprehensive safety, security and environmental policies, standards and procedures for work processes

to enable employees around the world to execute their jobs safely. As a Lit Energy employee, you should familiarize yourself with the policies and procedures that apply to your role. If you are unsure what might apply, contact your manager or your regional Safety, Health, Environment and Quality (SHEQ) representatives.

You must also recognize and report any unsafe practices or work conditions, hazardous material spills, potential permit compliance issues, accidents and injuries to your manager or regional SHEQ representative.

You are also expected to properly handle and dispose of any waste in accordance with company environmental guidelines and all applicable laws. If you are a manager, you are also required to promptly record all incidents that may have failed to comply with environmental permits and laws and regulations, then report them to your SHEQ representative.

You should alert your manager or Corporate Security at any workplace where you notice the presence of anyone who may be unauthorized.

Taking safety seriously also involves coming to work free from the influence of any alcohol or illegal drugs and never using any alcohol or illegal drugs at work. A safe work environment is also free of threats and intimidation, so we never use or threaten to use violence in the workplace.

### **3. Our Commitment to our Company.**

As Lit Energy Ltd employees, we must keep our personal business pursuits separate from those of the company's. Otherwise, we may cause a conflict of interest if we, a family member, or any person of a similar close relationship have a personal interest that competes or interferes with our duties or could otherwise negatively affect a company interest.

Not only do conflicts of interest raise doubts about our integrity and the quality of the business decisions we make, but even a perceived conflict of interest can damage our company's reputation or harm its business interests.

So, we avoid conflicts of interest, or even the appearance of a conflict of interest, at all times. Anyone with an actual or apparent conflict must actively disclose it to a manager or the Legal & Compliance department to discuss, manage and document it.

#### **3.1 We Avoid Conflicts of Interest**

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### **3.2 We Keep Accurate Records**

Accurate financial recording We are accountable at Lit Energy LLC, and shareholders, financial analysts, creditors, lenders, and other members of the public rely on us to provide them with reliable information regarding the company's operations, performance, and outlook.

Our credibility is measured by the integrity of our books, record-keeping and financial reporting.

We provide fair, accurate, timely and clear disclosure and financial reports. All stakeholders of the public should have equal access to the same honest and accurate information, and we implement and maintain effective business controls to ensure that Lit Energy LLC, financial reporting is reliable.

#### **Managing Records "Data house"**

A strong records management program helps our company keep its commitment to safeguard our business information and that of our business partners. We must retain or destroy records, including hard copy documents and emails, according to applicable record retention schedules.

Your role as an employee is to make sure you understand and comply with our Records Management policy and any records retention schedules for the documents under your control. Also, you may not destroy or alter any records upon either learning of an actual or threatened lawsuit or investigation, or receiving a legal hold order, regardless of your division's records retention schedule.

### **3.3 We Protect Our Assets.**

Company assets should be used for legitimate business purposes and not for any employee's personal benefit. Damaged, stolen, misused, or wasted company assets have a negative impact on all Lit Energy LLC stakeholders and on the company's operational and financial performance.

Assets can be physical objects, such as computers and other hardware, office furniture and the products we manufacture, as well as intangible items, such as software, intellectual property (IP), confidential business information and trade secrets.

You should report suspected fraud, theft or misuse of company assets promptly to your manager or other resource in this Code.

In addition to using company assets for legitimate business purposes, the company may determine from time to time on a regional level, if you may access company computer resources for personal reasons if use is limited to an incidental level that does not interfere with your job performance. Keep in mind that the use of the company's computer, data and systems are subject to the rules set forth in the Lit Energy LLC, Lit Energy LLC, IT security policies.

### **3.4 We Protect Data and Confidential Information**

Our company owes part of its success to the confidential and proprietary information we develop and use. Therefore, we do not share confidential information with anyone unless there is a valid business reason for them to have it and they sign a non-disclosure or a confidentiality agreement with Lit Energy or its subsidiaries.



Our responsibility to safely secure confidential and proprietary information remains in effect even after we leave the company. Additionally, we always comply with applicable laws designed to protect confidential information.

As a Lit Energy LLC, Group's employee, you must follow all the company's computer security guidelines, particularly regarding creating safe passwords and using them effectively (including not allowing others to use yours), as well as being using proper precautions in emailing confidential or proprietary information to a third party.

You are responsible for following the Lit Energy LLC, IT security policies and procedures that apply to your role. These security obligations also apply to confidential and proprietary information that customers, suppliers and others entrust to Lit Energy LLC, we never leave confidential or proprietary information unsecured nor do we dispose of it improperly, such as in a public trash receptacle. Because there is always a risk in public or in other places that you might be overheard, be always aware of your corporate responsibility and do not discuss confidential or proprietary information at such places. Sometimes it may be hard to determine if information is confidential or proprietary. Do not guess if you are uncertain; consult with the Legal & Compliance Department. If you know or suspect that confidential and proprietary information belonging to Lit Energy LLC, has been improperly disclosed, you should report it immediately to your manager or another resource in this Code.

### **3.5 We Select Our Partners Diligently**

Our suppliers and other third parties play a critical role in our ability to operate and provide products and services to our customers. Because of our business partnerships with them, our suppliers' actions and practices reflect on us as well. Therefore, we choose suppliers carefully based on merit and a due diligence process. We require suppliers to comply with legal requirements and to act in a manner that is consistent with our values, the principles in our Code and the law.

### **3.6 We Provide Limited Gifts and Entertainment**

While the exchange of gifts can build understanding, community, and goodwill in everyday business life, giving and receiving gifts can also create the perception of a conflict and potentially compromise our decision-making or the decision-making of our partners. Therefore, we must use caution in how we exchange gifts, meals and entertainment. A general rule at Lit Energy LLC is that the exchange of gifts and entertainment is an exception in business transactions. No employee should offer, give or accept a gift, entertainment or other favor if it will influence or could even appear to influence either party's independent business judgment. Furthermore, employees must take special care regarding entertaining or giving or receiving anything of value to government (or public) officials.

## **4. Our Commitment to our Communities:**

### **4.1 We Do Not Bribe**

We succeed through fair and honest dealings based on our integrity, Lit Energy LLC's reputation and our products and services. We do not seek to gain or give an unfair advantage by providing bribes or kickbacks. Such unethical and illegal conduct can create legal exposure for the company and for you personally and can result in criminal prosecution and substantial monetary fines. We do not tolerate the use of kickbacks or bribery in any form, and we prohibit third parties acting on our behalf from giving or accepting bribes, directly or indirectly. The company does not make or allow our representatives to make facilitation payments even if such payments may be permitted under certain national laws. If you are in a position to hire or supervise vendors or other third parties, you must conduct appropriate due diligence, complete a formal contract and otherwise assure yourself that the other company will not make bribes on our behalf.

You are not permitted to establish an illegal on-book or off-book fund in order to make payments or provide anything of value to a third party, nor may you hire a foreign government official or a family member of a foreign government official to perform services for the company without prior written approval from the Legal & Compliance Department.

### **4.2 We Compete Fairly**

In supporting vigorous, lawful, and ethical competition, Lit Energy LLC, complies with competition and antitrust laws wherever we do business. We do not engage in anti-competitive behavior or misconduct.

We never seek out or accept a competitor's confidential or proprietary information, nor do we discuss with competitor's sensitive business strategies that may be valuable to them, such as plans for divestiture, joint venture or acquisition.

You must plan in advance for any meetings with competitors and get approval from your manager and the Legal & Compliance Department to attend a trade association, professional society or certification organization for standards-setting or project. Have the Legal & Compliance Department review and approve materials you're sharing or presenting at the gatherings mentioned above. If a competitor tries to involve you in an inappropriate conversation or suggests you do something you suspect is illegal, you must announce your refusal to participate in the misconduct before immediately leaving the conversation and promptly contacting the Legal & Compliance Department to report the encounter. If you have questions concerning antitrust law issues, you should consult with the Legal & Compliance Department.

### **4.3. We Comply with Trade Regulations and Laws**

All countries regulate the way products are exported and imported across international borders. Certain types of products, software and information cannot be directly or indirectly exported to specified countries. Other items can require a permit, license, valuation, end-user certificate/end-use screening or record-keeping, and may require us to file for and receive them before they can be imported or exported. Laws may also prohibit or restrict exporting, importing or re-exporting products based on factors such as the product's origin, classification, dual-use potential or the customer's identity.

Trade and sanction laws and regulations can be complex and ever-changing. If your job responsibilities involve the import, export or transfer of hardware, technology, software, and information, you must be aware of these regulations as well as the applicable Lit Energy LLC, groups policies and procedures that

cover your work. Doing business in embargoed countries, or with embargoed persons or organizations, may be illegal or subject to restrictions. Violations of these trade laws and sanctions can carry serious penalties, including fines and civil or criminal prosecution. If you have any questions regarding exporting or importing (including carrying by hand) of any Lit Energy LLC, Lit Energy LLC, Lit Energy LLCgroups 's products or technologies, consult the Legal & Compliance Department or the trade compliance group.

#### **4.4. We Are Committed to Human Rights**

We recognize every person's innate humanity and treat everyone with dignity and respect. In supporting the protection and promotion of human rights worldwide, Lit Energy LLC, abides by the principles of the International Bill of Human Rights enacted by the United Nations, and does not condone nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair employment practices. We adhere to these Human Rights principles and we expect everyone with whom we conduct business to observe similar standards.

#### **4.5. We Are Good Corporate Citizens**

Lit Energy LLC, Lit Energy LLC, Lit Energy LLCgroups 's corporate responsibility philosophy is based on the company's vision, values, and principles: to demonstrate responsible behavior towards each other, our communities, and our environment. This means we are committed to developing the communities in our operation regions that combine customer benefit with sustainability, we actively support educational and training projects related to our core business areas, and we provide accountability to all our stakeholders at every business location.

#### **5. Waiver**

Any waiver of our Code must be made by the Board of Directors.

#### **6. Business Integrity Certification**

Please document your commitment to uphold the principles described in this Code of Business Integrity.

I certify that I have read and understand Lit Energy LLC, Lit Energy LLC,'s Code of Business Integrity and that I have and will continue to comply with these standards.

Print Name: Abdulrahman

Print Business: Lit Energy LLC

Unit Signature Date: 1/5/2025

*Abdulrahman*

