

REAL GROWTH ENERGY CO., LTD.

Room No. 2006, Level -20, Office Tower (2), Times City, (7) Quarter, Kamayut Township, Yangon, Myanmar

DOCUMENT CODE: RGE-GOV-ABC-2026-V1

ANTI-CORRUPTION & SANCTIONS COMPLIANCE POLICY

1. PURPOSE: To set high ethical standards between Real Growth Energy Co., Ltd. (RGE), its personnel, and external stakeholders—including suppliers, state enterprises, commercial clients, and regulatory authorities.

2. SCOPE: Applies to all permanent, contract, or temporary personnel, directors, consultants, contractors, third-party agents, and subsidiaries associated with RGE, regardless of location.

3. DEFINITIONS:

- **Corruption:** Any act intended to give an unlawful advantage inconsistent with official duty.
- **Bribery:** Giving, offering, or promising anything of value to improperly influence a commercial or official decision.
- **Facilitation Payments:** Small unofficial payments to government personnel to expedite routine administrative tasks (strictly prohibited by RGE).
- **Money Laundering:** Concealing the illicit origin of funds to make them appear legitimate.

4. CORE COMPLIANCE MANDATES

- **Prohibition of Bribes:** Personnel must not offer, approve, request, or accept bribes, secret commissions, facilitation payments, or illicit financial advantages.
- **Government Officials:** Giving cash, improper gifts, or excessive entertainment to public or state officials is prohibited.
- **Political & Charitable Contributions:** Political donations on behalf of RGE are strictly forbidden. Charitable donations must be legal, ethical, and pre-approved by the Board of Directors.

- **Due Diligence on Partners:** RGE must perform anti-corruption due diligence before entering joint ventures, supply deals, or trade relationships. Partners must sign anti-corruption declarations.

5. RECORDKEEPING & AUDIT CONTROLS

RGE keeps accurate financial records and internal controls verifying the commercial reason for all third-party payments. All expense claims for hospitality or gifts must be documented, approved by Finance, and recorded transparently. The RGE Audit Committee regularly audits these internal controls.

6. EMPLOYEE PROTECTION & REPORTING

RGE encourages personnel to raise compliance concerns early. No employee will suffer adverse consequences or retaliation for refusing to participate in bribery or reporting concerns in good faith.

Approved by the Board of Directors — Real Growth Energy Co., Ltd.