

Anti Bribery and Corruption Policy

Corporate standards of conduct

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1 Purpose and commitment

EcoEnergy Consulting LLC has zero tolerance for bribery, corruption, kickbacks and improper influence. We conduct our business honestly and comply with applicable anti-bribery and anti-corruption laws in Montenegro and every jurisdiction in which we operate. We will refuse or withdraw from a business opportunity when securing it would require prohibited conduct.

2 Scope and responsibilities

This Policy applies to management, employees, temporary staff, consultants and anyone acting for or on behalf of the Company. Equivalent obligations must be communicated to relevant subcontractors, suppliers, agents and business partners and included in contracts where appropriate. The Policy also applies to entities under the Company's effective control.

The Executive Director is responsible for implementation, proportionate resources, communication and review. Everyone covered by the Policy must understand the rules, raise concerns promptly and cooperate with checks and investigations. Management must lead by example and must not approve an exception to the prohibition of bribery.

3 Prohibited conduct

No person may offer, promise, give, request, agree to receive or accept anything of value to improperly influence a decision or obtain an unfair advantage. This prohibition applies to dealings with public officials and private organisations, whether directly or through an intermediary. It covers cash, gifts, services, travel, employment opportunities, donations and other benefits.

Facilitation payments, kickbacks, concealed commissions and the use of personal funds or third parties to bypass these rules are prohibited. Legitimate administrative fees must have a documented legal or contractual basis and be paid through authorised channels against a receipt. If a demand involves an immediate threat to personal safety, personnel must prioritise safety and report the circumstances as soon as it is safe to do so.

4 Business controls

The following controls apply throughout the Company's work, including procurement, consultancy assignments, permitting support, technical advice and dealings with clients and authorities.

Gifts hospitality and travel

Cash, cash equivalents and benefits intended to influence a decision are prohibited. Other gifts, hospitality or sponsored travel must be modest, infrequent, lawful, transparent and directly related to a legitimate business purpose. Non-routine benefits require written approval before they are offered or accepted and must be recorded. Benefits linked to a tender, permit, inspection or other pending decision must be declined if they could compromise, or appear to compromise, impartiality.

Political contributions donations and sponsorships

Company funds, assets and services must not be used for political contributions. Personal lawful political activity must be kept separate from Company business. Charitable donations and sponsorships require a documented purpose, checks on the recipient and prior written approval. They must never be used to obtain a contract, approval or preferential treatment.

Conflicts of interest and recruitment

Actual or potential conflicts of interest must be disclosed promptly and before the affected decision is taken. The Company must record the conflict and apply measures such as recusal or independent review. Recruitment, selection of experts, remuneration, bonuses and benefits must follow documented professional criteria. Positions or benefits must not be offered to influence a client, official or business partner.

Business partner due diligence

Before engaging an agent, subcontractor or other relevant partner, the Company must assess the integrity risks proportionately to the assignment. Checks should address identity, ownership, relevant reputation, conflicts, the purpose of the engagement and the reasonableness of fees. Unexplained commissions, requests for payment to unrelated accounts and refusal to provide basic information require resolution before approval. Contracts must define services, payment terms and appropriate integrity obligations.

Financial and non financial controls

Payments must be supported by a contract or authorised instruction, evidence of services or goods and an invoice or receipt. False records, undisclosed accounts and undocumented cash payments are prohibited. Tender submissions, permits, expenses and partner selection must be traceable. Approval must be obtained from an authorised person who is not conflicted; a person must not approve their own expense or benefit. Where separation of duties is limited, an additional review by an unconflicted authorised person must be documented.

5 Reporting and protection from retaliation

Employees and other stakeholders are encouraged to seek advice and report suspected bribery or misconduct promptly. Concerns may be raised with the Executive Director in person, by telephone on +382 67 567 737, or in writing to office@ecoenergy-consulting.com or to Marka Đukanovića 9, apartment 3, 81000 Podgorica, Montenegro. Written reports should be marked confidential. Anonymous concerns will be considered to the extent that the information permits an assessment.

The Company prohibits retaliation against anyone who raises a concern in good faith, refuses a bribe or assists an investigation. Information must be handled discreetly and access limited to those who need it for assessment, investigation or a lawful reporting obligation. A report that is not substantiated does not by itself amount to misconduct. Lawful external reporting channels remain available, including where the concern involves the person receiving the report.

6 Response and accountability

Credible concerns must be assessed promptly, recorded and investigated fairly by persons without a conflict of interest. The Company must preserve relevant evidence, take proportionate interim measures and document findings and corrective actions. Allegations involving the Executive Director require an independent assessment. Breaches may lead to disciplinary or contractual measures, including termination where permitted, and referral to competent authorities where required.

7 Communication review and publication

On adoption, the Company must communicate this Policy to personnel and relevant business partners, provide induction and proportionate refresher briefings, and retain acknowledgement or training records. The approved Policy must be published on the Company website and made available to employees, business partners and other stakeholders on request.

The Executive Director must review bribery risks and the operation of these controls at least annually and after a material incident or change in activities. The review must record any improvements, responsible persons and follow-up actions. Where proportionate, an independent unconflicted reviewer may assess the controls. The approved version, approval date, publication record and revision history must be retained.

Approval

For and on behalf of EcoEnergy Consulting LLC
Danilo Barjaktarović
Executive Director

Approval date: 01.08.2025
Signature and company stamp

