

VENDOR CODE OF CONDUCT

Midwestern Oil & Gas Company Limited (“MWOG”) is committed to conducting business in an ethical and honest manner, and in a way that promotes corporate, social and environmental responsibility. This includes responsible vendor selection by conducting business with vendors who share MWOG’s values of commitment to health, safety, quality, environment, sustainability and integrity. We understand that the business practices and actions of a vendor may impact MWOG, hence, we require our vendors, their employees, agents and suppliers to operate by following the principles and ethical standards contained in this Vendor’s Code of Conduct and communicate the same to their staff, partners and their own vendors.

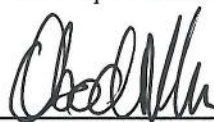
We expect MWOG Vendors to

- Adopt health and safety management practices that provide a high level of safeguard for their workers, MWOG employees and assets.
- Comply with all applicable local and global environmental laws and requirements.
- Ensure that they do not use child labor and/or forced labor in their operations.
- Ensure that discrimination, harassment, and bullying do not exist in their workplace and while working for MWOG.
- Ensure prompt payment of their workers for work done which must be in line with all applicable legislation, regulations and industry standards.
- Have zero-tolerance regarding bribery, corruption, misrepresentation, and any other type of corrupt actions to obtain or retain business or to obtain an unfair or improper advantage.
- Conduct their business in full compliance with anti-corruption and economic crime laws that govern the jurisdictions in which they conduct business.
- Comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, or shared.
- Ensure that they do not utilize any family, social, or political connections to gain an advantage in respect of business dealings and notify MWOG of any potential conflicts of interest.
- Ensure that management systems and practices are in place to prevent Money Laundering, financing of Terrorism and proliferation of arms.
- Work collaboratively with MWOG to deliver goods and services in a cost-effective, timely & innovative manner, while adhering to agreed contract terms and conditions as well as applicable statutory regulations.
- Conduct self-audit and assessments of their facilities and operations, and the facilities and operation of their own vendors to ensure compliance with this Code and existing legal/regulatory requirements.
- Maintain documents and records to ensure regulatory compliance.
- Establish and maintain a management system that ensures compliance with this Vendor Code of Conduct and applicable laws, that identifies and mitigates related operational risks, and facilitates continuous improvement and prompt corrective action.

MWOG reserves the right to investigate instances of non-compliance with this Vendor’s Code of Conduct which may include a vendor’s site audit.

For clarification on any issues in this Vendor’s Code of Conduct, please contact:

- MWOG Contract and Procurement Group at buyer@midwesternog.com ; or
- Internal Audit Group at internalaudit@midwesternog.com

A handwritten signature in black ink, appearing to read "Oboden V. Ibru".

Oboden V. Ibru
MD/CFO

21-MARCH-2024

Date

