## **Anti-Corruption Policy**



Wellkin Energy is committed to conducting business with the highest standards of integrity, transparency, and ethical behavior where we operate. Our success is built on the quality, innovation, and value of our products, services, and people never on unethical or illegal practices.

Wellkin Energy, its employees, and all persons or entities acting on its behalf are strictly prohibited from offering, paying, soliciting, or accepting bribes, improper payments, or anything of value intended to improperly influence any business decision or gain an unfair advantage. All business activities must comply with applicable anti-corruption laws, including but not limited to the Foreign Corrupt Practices Act (FCPA).

## Specifically:

- No employee, agent, consultant, sponsor, or third party acting on behalf of Wellkin Energy may offer, promise, give, request, or accept anything of value (whether cash, gifts, hospitality, services, or favors) to influence or reward an act, secure an improper business advantage, or retain business.
- Contributions of Wellkin Energy funds, goods, or services to political parties, political organizations, candidates for public office, or their leaders are strictly prohibited unless explicitly approved under local law and by Wellkin management.
- Wellkin Energy prohibits "facilitation payments" small unofficial payments made to expedite routine governmental actions.
- Accurate, transparent, and complete records must be maintained to reflect all business transactions. No undisclosed or unrecorded funds may be established for any purpose.
- Where required by law, Wellkin Energy will implement and monitor specific internal controls to prevent and detect corrupt practices.

Wellkin Energy maintains a zero-tolerance approach to bribery and corruption. Every employee has a duty to uphold these standards and to promptly report any concerns or potential violations.

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Hrishikesh Bagade Chief Executive Officer Wellkin Energy

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