

Corruption Prevention Policy

Transform Exploration is committed to operating to the highest ethical standards and levels of personal integrity. We apply a "zero tolerance" approach to acts of bribery and corruption by any of our employees and contractors, or by agents or business partners acting or working on our behalf.

We conduct our business ethically at all times, and adopt and advocate principles, practices and standards that combat corruption. This is achieved by:

- Conducting operations to the highest ethical standards and levels of personal integrity, as detailed in the Company Code of Conduct.
- Prohibiting the offering, giving, solicitation or acceptance of any bribe or facilitation payment to or from any person or company by any individual employee, agent or other person or body acting on our behalf.
- Not engaging in any form of corrupt business practice.
- Complying with the US Foreign Corrupt Practices Act and the UK Bribery Act, and all other similar or equivalent anti-corruption and/or anti-bribery laws of any jurisdiction applicable to Transform Exploration and our subsidiaries.
- Performing proper and appropriate anti-corruption due diligence checks before entering into an agreement with any business partner or contractor who may act, or may appear to act, on behalf of Transform Exploration or of a subsidiary company with regard to a government official.
- Implementing industry best practices and guidelines, particularly in regards to transparency and good governance.
- Supporting the Extractive Industries Transparency Initiative, which promotes improved governance in resource-rich countries by requiring the verification and publication of company payments to, and government revenues from, oil, gas and mining activities.
- Supporting and enacting Principle 10 of the United Nation's Global Compact.
- Selecting and engaging contractors whose policies and management systems are of the highest standard, and whose commitment to this Policy is clearly and continuously demonstrated.
- Providing appropriate training, instruction and supervision to personnel to enable them to undertake their roles and responsibilities in a manner consistent with this Policy.
- Continually monitoring, reviewing and improving the elements of the Transform Exploration Management System that relate to anti-corruption principles and measures.

All employees and contractors working for Transform Exploration have the responsibility to ensure that their actions, and those of their colleagues, are consistent with this Policy.

A handwritten signature in blue ink, appearing to read "Agu Kantsler".

Agu Kantsler

Chief Executive Officer