BBL Company Anti-Bribery & Economic Crime Policy, August 2026

Policy Statement

BBL Company V.O.F. ('BBLC') is committed to conducting all business activities fairly, honestly and transparently. Bribery, corruption, fraud and other forms of economic crime have no place within BBLC, and all persons acting for or on behalf of BBLC are expected to conduct business honestly, ethically and in compliance with applicable laws, including the UK Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023.

1. Purpose and Scope

BBLC is committed to conducting its business activities fairly, honestly and transparently.

As the owner and operator of the Balgzand-Bacton Interconnector, BBLC recognises the importance of maintaining the trust of regulators, shareholders, shippers, operational service providers and other stakeholders.

This Policy establishes BBLC's standards for preventing bribery, corruption, fraud and other forms of economic crime and supports compliance with, among others, the UK Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023.

The Policy applies to all directors, employees, contractors, consultants and other persons acting on behalf of BBLC. To support compliance with the UK Bribery Act 2010, BBLC maintains proportionate procedures designed to prevent bribery, recognizing that such procedures are an important safeguard against the corporate offence of failing to prevent bribery.

Implementation of this Policy is supported by BBLC's existing governance, compliance and internal control arrangements, together with relevant policies, procedures and training where appropriate.

2. Policy Statement

BBLC maintains a zero-tolerance approach to bribery, corruption, fraud and other forms of economic crime.

No person acting for or on behalf of BBLC may:

- offer, promise, give or authorise a bribe;
- request, receive or accept a bribe;
- provide or receive any improper advantage intended to influence a business, regulatory or operational decision;
- engage in fraud, false accounting, misrepresentation, concealment of material information or any other form of economic crime;
- make facilitation payments;
- use a third party to carry out conduct that would be prohibited if undertaken directly by BBLC.

All business activities shall be conducted honestly, fairly and transparently.

3. Key Requirements

Individuals acting for or on behalf of BBLC shall:

- comply with applicable anti-bribery, anti-corruption and economic crime laws;
- act with integrity in all business dealings;
- avoid actual, potential or perceived conflicts of interest;
- ensure that all payments and transactions are properly authorised and recorded;
- raise concerns where risks of bribery, corruption, fraud or other economic crime are identified.

BBLC considers its primary risks of bribery, corruption, fraud and other forms of economic crime to arise from interactions with public authorities and regulators, the use of operational service providers and contractors, procurement and contracting activities, gifts and hospitality, conflicts of interest, and financial or operational misrepresentation.

Actual, potential or perceived conflicts of interest, including situations where personal, financial, family or other external interests may conflict, or appear to conflict, with the interests of BBLC, shall be disclosed promptly to BBLC's Managing Director or, where appropriate, to the General Meeting of Partners, and managed in accordance with BBLC's governance and compliance arrangements.

BBLC shall maintain accurate and complete books and records. All payments, transactions and approvals must be properly authorised, accurately recorded and supported by appropriate documentation. False, misleading or incomplete records are prohibited.

BBLC maintains a zero-tolerance approach to fraud and other forms of economic crime. No person acting for or on behalf of BBLC may engage in fraudulent conduct, false accounting, misrepresentation, concealment of material information, or any other activity intended to obtain an improper financial, commercial or regulatory advantage.

BBLC shall periodically assess the risks of bribery, corruption, fraud and other forms of economic crime and shall implement and maintain reasonable and proportionate procedures, controls and oversight arrangements designed to mitigate those risks and support compliance with applicable legal and regulatory requirements, including the Economic Crime and Corporate Transparency Act 2023.

4. Third Parties and Service Providers

BBLC relies on operational service providers, contractors, consultants and other third parties to support its activities.

Before entering into business relationships, BBLC shall undertake risk-based due diligence proportionate to the nature and level of risk in order to identify and assess potential bribery, corruption, fraud and other economic crime risks. This includes identifying relevant risks, implementing appropriate controls and ensuring that responsibilities for conducting and overseeing due diligence are clearly assigned, including where procurement activities are undertaken on BBLC's behalf.

BBLC shall require, through contractual or other appropriate arrangements, that third parties acting on its behalf comply with this Policy or equivalent standards.

5. Gifts, Hospitality and Public Officials

The principles set out in BBLC's Code of Conduct for Working Together also apply to gifts and hospitality.

Reasonable and proportionate gifts and hospitality may be provided or accepted where they serve a legitimate business purpose and do not influence, or appear to influence, a business or regulatory decision.

The following are prohibited:

- cash gifts or cash equivalents;
- excessive hospitality;
- gifts, hospitality or benefits intended to obtain an improper advantage.

Special care must be exercised in dealings with regulators, government officials and public authorities.

No person acting for or on behalf of BBLC may provide any benefit to a public official with the intention of improperly influencing an official decision or obtaining an improper advantage.

BBLC does not permit facilitation payments. If a payment is made under duress as a result of an immediate threat to a person's safety, health or liberty, the incident must be reported immediately and appropriately documented.

6. Reporting Concerns

Employees and third parties are encouraged and expected to report suspected bribery, corruption, fraud or other forms of economic crime.

Concerns may be raised through management, Compliance, Legal, Internal Audit or BBLC's whistleblowing arrangements (‘Speak Up Policy’).

BBLC will not tolerate retaliation against any individual who raises a concern in good faith. Concerns will be handled in accordance with the Speak Up Policy, which provides for confidential reporting arrangements and appropriate protection.

7. Monitoring and Compliance

BBLC shall provide awareness-raising activities and training on bribery, corruption, fraud and other forms of economic crime where appropriate and proportionate to the risks identified. BBLC shall monitor compliance with this Policy on a risk-based and proportionate basis.

Monitoring activities may include reviews of:

- gifts and hospitality;
- conflicts of interest;
- third-party due diligence;
- contractual anti-bribery provisions;

- training completion;
- reported concerns and incidents;
- assurance received from service providers;
- fraud-related incidents, allegations and control weaknesses.

Any identified deficiencies shall be addressed through appropriate remedial actions.

8. Consequences of non-compliance

Any suspected breach of this Policy shall be promptly investigated by BBLC.

Where appropriate, breaches may be reported to relevant authorities.

Failure to comply with this Policy may result in disciplinary action, termination of employment or contractual arrangements.

Bribery, fraud and other forms of economic crime may also expose both individuals and BBLC to civil, criminal, regulatory and reputational consequences.

9. Roles and Responsibilities

BBLC's General Meeting of Partners is responsible for approving this Policy and overseeing its implementation.

The Compliance function is responsible for supporting the implementation of this Policy, providing advice and coordinating monitoring activities.

All employees and persons acting on behalf of BBLC are responsible for complying with this Policy and reporting suspected violations.

10. Review of this Policy

This Policy shall be reviewed at least every two years and approved by BBLC's General Meeting of Partners. Earlier reviews may be undertaken where required as a result of changes in legal or regulatory requirements, organisational arrangements, identified risks or lessons learned from incidents, investigations or assurance activities.