



ANTI-MONEY LAUNDERING, ANTI-TERRORIST FINANCING, ANTI-CORRUPTION, AND TRANSNATIONAL ANTI-BRIBERY COMPLIANCE POLICY

Content

I) <u>SCOPE</u>	3
II) <u>OBJECTIVE</u>	3
III) <u>POLICY HOLDER</u>	3
IV) <u>RESPONSIBLE BODIES</u>	3
V) <u>COMPLIANCE POLICY</u>	4
VI) <u>ANTI MONEY LAUNDERING AND ANTI TERRORIST FINANCING.</u>	6
A. ENGAGEMENT WITH THIRD PARTIES	6
B. TRANSACTIONS IN CASH	7
C. RISK EVALUATION AND DUE DILIGENCE AD FOR KNOWLEDGE OF THE COUNTERPARTY (KYC).	7
VII) <u>ANTI-CORRUPTION AND ANTI-BRIBERY</u>	8
A. GIFTS, HOSPITALITY, AND ENTERTAINMENT	8
B. COMPENSATIONS, BONUSES, AND COMMISSION PAYMENTS TO CONTRACTORS.	10
ANY PAYMENT OF COMMISSIONS CONTRARY TO THE PROVISIONS OF THIS POLICY IS PROHIBITED.	10
C. REMUNERATION AND PAYMENTS TO EMPLOYEES	10
THE COMPANY HAS A REMUNERATION POLICY THAT REGULATES EMPLOYEE REMUNERATION AND PAYMENTS.	10
D. DONATIONS AND POLITICAL CONTRIBUTIONS	10
E. ANTI-CORRUPTION AND TRANSNATIONAL ANTI-BRIBERY RISK ASSESSMENT ,AND DUE DILIGENCE.	11
F. GUIDELINES FOR CONDUCT AND GOOD PRACTICES IN RELATIONS WITH PUBLIC OFFICIALS.	12
VIII) <u>CONTROLS ANTI ML/TF/FP, ANTI-CORRUPTION AND ANTI-TRANSNATIONAL BRIBERY AND COMMITMENTS FOR BUSINESS ASSOCIATES</u>	13
XI) <u>TRAINING AND QUALIFICATION</u>	14
XII) <u>INTERNAL CONTROL AND RECORD KEEPING</u>	14
XIII) <u>WARNINGS</u>	14

<u>XIV) REPORTING MECHANISMS</u>	15
<u>XV) DELEGATION FOR DECISION MAKING</u>	15
<u>XVI) SANCTIONING REGIME</u>	16
<u>XVII) DISSEMINATION</u>	16
<u>XVIII) RELATED DOCUMENTS</u>	17
<u>ANNEX 1 - DEFINITIONS:</u>	18



i) Scope

This Compliance Policy that includes the Anti-Money Laundering, Anti-Terrorist Financing, and Anti-Corruption and Anti-Transnational Bribery System (hereinafter the "Compliance Policy") is applicable to all Business Partners (understood as members of the Board of Directors, Senior Management, process leaders, employees, customers, suppliers, consultants, partners, contractors, and subcontractors) of TUSCANY OILFIELD HOLDINGS LTD, its affiliates and subsidiaries (hereinafter referred to as TUSCANY, or the Company), as well as all shareholders and other stakeholders; and in general to all those with whom, be it directly or indirectly, any commercial, contractual or cooperative relationship is established in each of the jurisdictions where TUSCANY operates.

ii) Objective

To establish the general rules, guidelines, and responsibilities for the administration and management of the risks of Money Laundering, Terrorist Financing, and Financing of the Proliferation of Mass Destruction Weapons (ML/FT/FP) and Corruption and Transnational Bribery to prevent TUSCANY, in the performance of its operations, from being used whether directly or indirectly as an instrument for the concealment, handling, investment, or use of any form of money or any other asset derived from illicit activities, or as a vehicle for direct or indirect corruption.

This Compliance Policy fosters the coordinated development of an efficient, transparent, and participative management, and is intended to promote a culture in agreement with ethical, institutional principles and values as a tool to fight inappropriate conducts, and as Good Governance practice.

iii) Policy Holder

The Compliance Policy is approved by the Board of Directors of TUSCANY OILFIELD HOLDINGS LTD, highest corporate body (the "Board of Directors"), as the holder of the Policy.

iv) Responsible Bodies

The Board of Directors, the Audit Committee (the "Audit Committee"), the Chief Executive Officer ("CEO") of Tuscany, the Senior Management, the Responsible Officer, the Compliance Officer of Tuscany South America Ltd Sucursal Colombia ("TSA Colombia"), and the Business Associates are responsible for the understanding, compliance, and application of the Compliance Policy requisites related to their role in the organization.

The functions of the Board of Directors, Legal Representative, Statutory Auditor, or External Auditor (in the jurisdictions in which it is applicable) of TUSCANY and the Compliance Officer of TSA Colombia are those set out in the applicable regulations for each relevant company.

v) Compliance Policy

TUSCANY is committed to the fight against ML/TF/FP and Corruption and Transnational Bribery and, therefore, has adopted and promotes among its shareholders, governing and administrative bodies, business partners and stakeholders, the culture and commitment to activities for the prevention of ML/TF/FP and Corruption and Transnational Bribery, based on compliance with the provisions of the laws applicable to TUSCANY, the regulations applicable in the jurisdictions where the Company conducts its activities and the international recommendations of good practices in this area, such as FATF, GAFILAT, and other international organizations. This policy is a complement to the Code of Business Conduct and Ethics (CBCE) and is the reference framework for establishing, reviewing, and achieving the objectives of the fight against ML/TF/FP and Corruption and Transnational Bribery.

In this vein, the Company declares itself as zero tolerant to ML/TF/FP and Corruption and Transnational Bribery and will undertake all necessary actions to prevent or to be used as a vehicle for performance of such conducts, in accordance with the pertinent organizational values and principles and those provided for by the law. Hence, the Company prohibits any act of Corruption, Transnational Bribery, Money Laundering, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction, and all its source crimes by its Business Associates or any third party having any kind of relationship with the Company.

TUSCANY promotes internally and externally a firm rejection of any criminal activity or conduct involving ML/TF/FP and Corruption and Transnational Bribery activities, and is committed to collaborate with the respective authorities in each of the jurisdictions where it operates, by means of:

- Active participation in programs to address and minimize the risks of ML/TF/FP and Corruption and Transnational Bribery offenses.
- Collaboration with competent authorities and control bodies.
- The dissemination, formation, and training of its Shareholders, Business Associates and stakeholders in relation with the knowledge, execution, and compliance with this Policy.
- The prohibition of conducting business, operations, and activities that have or have had ties with illegal operations or activities, with persons or companies that have fictitious or inaccurate names, or with whom it is not possible to obtain sufficient information to establish the levels of risk to which the Company is exposed with such relationship.

- Refraining from conducting business and commercial or labor transactions with individuals or legal entities that do not comply with the requirements of the law and the Company's regulations, and without having complied with the established procedures, without having provided all the necessary information depending on the nature of the relationship, and without having documented it pursuant to that set forth by the Company.
- The performance of permanent activities for continuous improvement of the Compliance Policy.

The Company is committed to comply with the requirements of the Compliance Policy and will take the necessary measures to ensure compliance, so that it has defined requirements for the linking and updating of information of its Business Associates and stakeholders, risk analysis, and due diligence processes, guidelines, and resources for the protection of personal data, confidentiality of information, training programs, and applicable technological infrastructure, added to guidelines for the conservation of documents and records in accordance with the requirements of the legal system in the jurisdictions where the Company operates.

The Company monitors the operations, with the pertinent control measures pertaining to the financial reporting process and business or contracts with third parties that expose it to ML/TF/FP and Corruption and Transnational Bribery risks, according to their risk profile, due to the activities they perform, or whose characteristics qualify them as unusual according to the criteria established by the Company.

The Company and the Business Associates are committed to and will ensure compliance with the guidelines for the prevention of ML/TF/FP and Corruption and Transnational Bribery risks, placing them before the business objectives that may arise with the development and growth of the Organization.

All and each of the Company's employees, Senior Management, the Board of Directors, as well as the officer responsible for Compliance (the "Responsible Officer") undertake to know and put into practice the BCCE (CCEE in Spanish), the Company's principles and values, and undertake to comply with and perform the functions or responsibilities that by position they must exercise with respect to ML/TF/FP and Corruption and Transnational Bribery.

The members of the management and control bodies, as well as any employee, shall collaborate with the administration of justice, responding in a timely manner to the express requirements of the competent authorities and assisting them in the fight against ML/TF/FP and Corruption and Transnational Bribery crimes, in accordance with the applicable regulations in force.

No Business Associate shall suffer retaliation, discrimination, or disciplinary action on account of:

- Reports made in good faith or on the basis of a reasonable belief of actual or suspected violation of the Company's Compliance Policy.
- For refusing to participate in or for declining any activity in which it is reasonably believed that there is more than a low risk of ML/TF/FP and Corruption and Transnational Bribery that has not been mitigated by the organization.
- For refusing to participate in ML/TF/FP and Corruption and Transnational Bribery acts, even if such refusal could result in the loss of business for the organization (except when the individual participated in the violation).
- Reports associated with conduct related to violations of TUSCANY's BCCE (CCEE in Spanish), and especially conducts associated with harassment at the workplace.

vi) ANTI MONEY LAUNDERING AND ANTI TERRORIST FINANCING.

This chapter includes specific considerations of the Compliance Policy that covers the risks of ML/TF/FP.

a. Engagement with third parties

It is a violation of this Policy and of the BCCE (CCEE in Spanish) guidelines to engage in business communications with third parties for the purpose of acquiring personal gain or promoting any type of illegal activity.

The Company has mechanisms to identify Publicly Exposed Persons (PEPs) and to analyze the level of risk exposure they represent, added to the guidelines for their management according to the segmentation criteria established.

The Company in any event

- (a) will report to the Third Parties its commitment of complying with ML/TF/FP laws.
- (b) will take reasonable measures to the extent possible to make sure its Business Associates comply with anti ML/TF/FP laws and practices.
- (c) will obtain commitments of reciprocal compliance from such Business Associates. Any violation or suspicion of violation by Business Associates in relation with transactions with the Company or commitments in which the Company has any interest, must be reported immediately to the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer through the reporting channels established by the Company.

b. Transactions in cash

The Company's cash transactions are limited and regulated in the Cash Management and Expense Reimbursement Policy. Any breach of this policy must be reported to the Compliance Officer of TSA Sucursal Colombia, or to the Responsible Officer through the reporting channels established by the BCCE (CCEE in Spanish).

c. Risk evaluation and due diligence ad for knowledge of the counterparty (KYC).

A fundamental part of this Policy is the obligation to perform a risk assessment and due diligence on knowledge of the counterparty prior to engagement of new Business Partners, establishment of commercial relationships, participation in business transactions, or in the normal course of business, to identify the levels of exposure to ML/TF/FP risks, and identify possible situations of relationship with legal or natural persons that may be linked to ML/TF/FP activities.

The ML/TF/FP risk evaluations will be performed:

- When identifying significant changes in the business context, Objectives, Strategies, processes, procedures, standards or regulations that may affect the levels of exposure to ML/TF/FP risks.
- When identifying the occurrence of ML/TF/FP events in the company, or others in which the company or any of its business associates are involved.
- At least once a year.

The ML/TF/FP risk assessments will determine the level of exposure to such risks and the effectiveness and efficiency of the controls in place, which are required for their mitigation, including risks associated with import/export issues, and with bidding, tendering, and contracting processes. Records and documentation of each risk assessment are maintained as part of the Compliance Policy.

The review in restrictive, national, and international lists of all Business Associates is performed before their engagement, with the frequency determined by the applicable procedures; see procedure GCU-PR-009.

In the event that a Business Associate appears on such lists, the person responsible for each process must inform the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer, who must:

- Conduct an extended due diligence process to analyze the case, recommend appropriate measures to mitigate the associated risk, and report it to the competent authorities as necessary.
- Notify the CEO for approval of actions to be taken, and subsequent report to the Audit Committee of the Board of Directors.

The hiring or engagement of a Business Associate who appears in restrictive lists must be reviewed by the Responsible Officer or by the Compliance Officer of TSA Colombia to evaluate whether the reported alerts are material or not, and in all cases documentation of all situations, analyses, decisions and actions must be kept.

vii) ANTI-CORRUPTION AND ANTI-BRIBERY

This chapter includes specific considerations of the Compliance Policy that covers the Corruption and Transnational Bribery risks.

a. Gifts, hospitality, and entertainment

The purpose of gifts, hospitality, or entertainment is to create a good and solid working or business relationship. The purpose should never be to have or gain an unfair or undue advantage from a relationship. TUSCANY prohibits the payment of any amount for meals, travel, lodging, or entertainment for a corrupt purpose, or for the purpose of gaining an improper advantage.

This Policy recognizes that business courtesies include entertainment, meals, hospitality and, in limited circumstances and for reasonable values, modest or token gifts.

Rules for giving or receiving gifts or hospitality:

- Gifts given or received must not exceed a value of USD\$200. If the gift exceeds this amount, it must be reported to the Compliance Officer of TSA Sucursal Colombia, or to the Responsible Officer through the form GCU-FO-014 Declaration of gifts, hospitality and entertainment.
- Any invitation or attention offered, given or received must not (i) be recurring to the same person; nor (ii) exceed a value of USD\$500. Otherwise, the gift, present, invitation, and entertainment must be reported to the Compliance Officer of TSA Sucursal Colombia, or to the Responsible Officer for its documentation using the GCU-FO-014 Declaration of gifts, hospitality and entertainment.
- Business Associates undertake to take measures aimed at ensuring that none of their relatives in any degree of consanguinity offers, delivers, accepts, or receives, be it directly or indirectly, any type of money, gift, or invitation intended to influence the actions or decision making related to the Company's business, and to report any of these situations that are identified.
- Any suspicion of attempted bribery of a third party or Supplier must be reported immediately to the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer, or through the reporting channels established in the BCCE (CCEE in Spanish).

TUSCANY prohibits the following conducts:

- Offering, giving or receiving cash or cash equivalents (e.g., readily redeemable securities, purchase vouchers, debit cards) as gifts to or from third parties, customers, or suppliers.
- Offering, giving or accepting gifts, entertainment, hospitality, or other things of value that may have the purpose of seeking to influence or have a material effect on any business transaction of the Company (actual or potential), or that may otherwise give rise to a conflict of interest, or influence objective decision-making by any business associate in favor of the Company's interests.
- No Employee shall offer, give, or accept, be it directly or indirectly, any kind of money, gift or invitation that is intended to influence the actions or decision making related to the Company's business, or that could lead the third party or Supplier to believe that they are requesting or could benefit or gain an advantage in any way.
- Offer, give or accept any type of bribery, present, or inappropriate payment to or from any person, including Suppliers or customers, in exchange for the promise of doing or refraining from doing something that would benefit any of the parties.

Rules for offering, giving, or receiving gifts, invitations or hospitality to or from Public Officers and other third parties:

- The gifts, expenses or hospitality must be of a modest or symbolic cost, both individually or when considered together with gifts or invitations offered, given, or received to or from the same party, according to the rules set out above.
- These will not be offered or given with the aim of unduly influencing a Public Officer, or with the aim of influencing actions or decisions, or to obtain a commercial benefit for the Company. The following gifts, invitations or hospitality are never permitted:
- Gifts, invitations, hospitality or other valuable things that are offered, given to, or received from third parties, customers or Suppliers for obtaining something in exchange.
- Gifts, invitations, hospitality or other valuable items that are offered, given to, or received from third parties that carry out or participate in a public or private bid process in which the Company is involved.
- Any gift in the form of cash or cash equivalent.
- Gifts, invitations, hospitality, or other items of any value that are frequently given to the same person or organization.
- Gifts, invitations, hospitality or other valuable items that are excessive or extravagant, inappropriate, or that may affect negatively the Company's reputation.

Gifts or hospitality must be offered, given, or received on behalf of the Company, and not in a personal capacity.

The Company strictly prohibits its Business Associates from making or accepting facilitation payments, understood as illegal or unofficial payments in exchange for services that the payer is legally authorized to receive without making such payment,

normally made to public officials or persons with certification functions seeking to secure or expedite the course of a necessary procedure or action.

b. Compensations, bonuses, and commission payments to contractors.

Compensations and payment of commissions to Contractors: The Company does not have established any bonuses or commissions to contractors. In the event that they were to be exceptionally established, any bonuses or commissions to contractors shall be previously approved by Tuscany's CEO. All national and international negotiations or transactions shall be in writing and following the guidelines of the Due Diligence Policy as part of the controls set out to minimize the risk of Corruption and Transnational Bribery.

Payments for remuneration will be processed through bank transactions, duly supported by invoices, bills prepared pursuant to the terms established in the contract or purchase order in such a way that they are deposited in the bank account registered by the contractor at the time of the contracting process.

No payments to third parties other than those involved in the contractual relationship are permitted, with the exception of assignment of invoices that have previously complied with the respective internal approval process.

Any payment of commissions contrary to the provisions of this policy is prohibited.

c. Remuneration and payments to employees

The Company has a Remuneration Policy that regulates employee remuneration and payments.

d. Donations and political contributions

All donations made by the Company must have a lawful purpose and shall be made pursuant to the procedures established for their formalization. The CEO shall approve and report at least annually any donations made to Tuscany's Board of Directors.

The Company refrains from making direct or indirect donations to political parties, Governmental Entities and Organizations, Public Officials, or individuals involved in politics. No donations or contributions shall be made in exchange for obtaining advantages in the Company's business or in its transactions of a commercial nature.

The Company does not make charitable donations that could be characterized or construed as bribes. All charitable donations, regardless of value, must:

- Be reported to the Compliance Officer of TSA Sucursal Colombia, or to the Responsible Officer by the Human Resources Manager, to determine the risk level of the donation, who will provide a recommendation on such donation. The Compliance Officer of TSA Sucursal Colombia or the Responsible Officer will perform due diligence based, at least, on the following items:
 - the history and/or legitimacy of the charity or the charitable cause
 - the motivation for making the charitable donation
 - the likely purpose for which the charitable donation will be used in terms of its placement, direction, or channeling, and its ultimate beneficiary
 - any known or suspected connection or affiliation between the charity or charitable cause and a Public Official, or a close associate of a Public Official
- In the case of TSA Sucursal Colombia, verified by the Compliance Officer.
- In all cases, be analyzed and approved (in writing) by the Company's General Counsel and then by the CEO, who examine all circumstances related to the donation considering corruption and MLTF risks.
- Be reflected as such in the books and records of the company in a transparent, accurate manner.
- Be accompanied by reasonable detail, including a description of the circumstances under which the donation was made.

Charitable donations will always be made in kind, not transferable to cash or other monetary form, and their concept will be determined by the Human Resources Manager according to the purpose of the donation and the beneficiary for whom it is intended.

e. Anti-corruption and transnational anti-bribery risk assessment ,and due diligence.

Corruption and Transnational Bribery risk assessments will determine the level of exposure to such risks, and the effectiveness and efficiency of the controls in place and required for their mitigation, including risks associated with import/export issues and the bidding, tendering, and contracting processes. Records and documentation of each risk assessment are maintained as part of the Compliance Policy.

For the mitigation of Corruption and Transnational Bribery risks, and with respect to Internal Audits or due diligence procedures, TUSCANY will determine if there are changes in the risks of Transnational Bribery and Corruption, to adopt, through the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer, or its Internal Audit, as appropriate, the relevant modifications to this Compliance Policy.

Due Diligence is understood as the process of constant and periodic (annual) review and evaluation to be conducted by the Compliance Officer of TSA Sucursal

Colombia, or the Responsible Officer on the Compliance Policy, taking into account the Transnational Bribery and Corruption Risks to which TUSCANY is exposed.

This Due Diligence does not refer to the Due Diligence procedures as for knowledge of the counterparty, which are used in other risk management systems (ML/TF/FP), which performance is ruled by different regulations.

Due Diligence to identify Corruption and Transnational Bribery risks of TUSCANY has the following characteristics:

- It is intended, exclusively, to the identification and evaluation of Corruption Risks related to the activities performed by TUSCANY, which are especially related to the adequate review of the specific qualities of each Contractor, their reputation, and relations with third parties.
- It is recorded in writing so that it can be easily accessed and understood by the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer.
- It provides elements of judgment to rule out that the payment of a very high remuneration to a Contractor hides indirect payments of bribes or gifts to national or Foreign Public Servants, corresponding to the higher value recognized to a Contractor for its intermediation work.
- It is performed by employees with the required ability, or by third parties who are specialized in these tasks.

f. Guidelines for conduct and good practices in relations with public officials.

In view of the different situations that may arise when dealing with public officials, the following conduct guidelines are established:

- In meetings or direct conversations with public officials, it is desirable that at least two company collaborators are present. These must be held when deemed necessary and/or pertinent for the business performance.
- To the extent possible, meetings with public officials must be held at the Company facilities or the headquarters where said officer works.
- With respect to the eventual request for a meeting or direct conversation by the public official with no purpose or not pertinent, the collaborator must report it to the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer and the Direct Supervisor for the respective evaluation and approval.

In case of suspicion or confirmation of irregular or abnormal situations related to engagement with public officials, such situation is to be reported immediately to the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer, or Internal Audit, using the mechanisms set out by the Company for such purpose.

viii) Controls Anti ML/TF/FP, Anti-Corruption and anti-Transnational Bribery and commitments for Business Associates

All Affiliates and Subsidiaries of TUSCANY OILFIELD HOLDINGS LTD, as part of the adoption of the Compliance Policy, shall consider the implementation of the following controls, added to any pertinent additional control, for managing the **Corruption and Transnational Bribery** and ML/TF/FP risks to which they are exposed in performance of contracts or transactions with Business Associates:

- If more than one risk has been identified under **Corruption and Transnational Bribery** or ML/TF/FP in the relationship with a Business Associate, it must be determined in such Business Associate has controls in place for the mitigation of said risks, and demand from the Business Associate the implementation of controls if not already in place.
- All Business Associates must undertake to prevent **Corruption and Transnational Bribery** and ML/TF/FP, by or on behalf of, or for its own benefit, with respect to an operation, project, activity, or trade and contractual relationship with the Company, by means of a certification in writing as defined in Form GCU-FO-012 Declaration of Responsibility for business associates.
- The organization shall assess the termination of trade and contractual relationships with any Business Associate in case of suspicion or events related to **Corruption and Transnational Bribery** and ML/TF/FP, by or on behalf of, or for the benefit of the Business Associate and if said suspicions or event are associated with the current trade or contractual relationship.

ix) Management of Anti-Corruption and anti-Transnational Bribery and ML/TF/FP inadequate controls

When the Company determines that the **Corruption and Transnational Bribery** and ML/TF/FP risks cannot be managed with the existing controls, and the Company cannot or does not want to implement better or additional controls, or take adequate measures, the Company must:

- In the event of a transaction, project, activity or existing relationship, take adequate measures related to ML/TF/FP, Corruption and Transnational Bribery, and the nature of the transaction, project, activity or relationship to terminate, suspend, or withdraw from it as soon as possible.
- In the event of a new proposal for transaction, project, activity or relationship, postpone or refuse to continue with it.

x) Accounting Records

The Company has records and accounts that reflect in an exact, accurate manner the transaction and disposal of assets in its transactions.

Company officials cannot change, omit, or mislead records to hide inappropriate activities, or those not representing correctly the nature of a recorded transaction. Tuscany has adequate internal controls to prevent concealing or disguising other inappropriate payments in transactions such as commissions, payment of fees, sponsorships, donations, representation expenses, or any other item that is used to hide or conceal the inappropriate nature of such payment.

xi) Training and Qualification

The Company will define formation and training programs intended for Business Associates with respect to prevention, identification and procedures related to Corruption and Transnational Bribery and ML/TF/FP risks. Said programs shall consider the dissemination of policies and guidelines of the Compliance Policy, roles and responsibilities, and reporting procedures for suspicion of or materialization of Corruption and Transnational Bribery and ML/TF/FP risks. The training shall be conducted by the Compliance Officer of TSA Sucursal Colombia and/or the Responsible Officer and/or Internal Audit, as a minimum once a year.

xii) Internal control and record keeping

The Company and the Business Associates undertake to protect the confidentiality of all the information gathered and reported on Corruption and Transnational Bribery and ML/TF/FP and to uphold such confidentiality pertaining to the information received and provided through available channels set for communicating and reporting purposes, with adequate control measures that guarantee their security and availability to address any requirement from the competent authorities.

Conduction of activities, business and contracts are prohibited unless there is due internal or external support, dated and authorized for those who are involved therein or in their preparation.

xiii) Warnings

Warnings are qualitative and quantitative indicators that allow timely and/or prospective identification of atypical behavior of relevant variables, previously determined according to risk factors. The foregoing may include facts, situations, events, amounts and any other relevant information from which it may be inferred that it is an unusual or suspicious operation.

The Company has adopted a Compliance Manual that includes details on warning signs.

In the event that any TUSCANY Business Associate detects one of the warning signs described in this Manual, they must immediately report it to the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer and Internal Audit.

xiv) Reporting mechanisms

Business Associates and Stakeholders must report to the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer, through the mechanisms established by the Company in the BCCE (CCEE in Spanish), when they discover, suspect, or become aware of acts of Corruption and Transnational Bribery or ML/TF/FP that are being planned, attempted, or executed. Likewise, these mechanisms will be enabled to receive comments for the continuous improvement of the Compliance Policy, and to request guidance on the Policy or any other element.

All reports will be treated confidentially, and anonymity will be maintained, if so required by the informant, and no information related to the case will be disclosed to third parties other than those responsible for the investigation in question. Likewise, the Company respects the right to submit reports in good faith and without risk of retaliation.

The Company will not admit false or reckless allegations or complaints. In the event that the complaint is proven to be false or reckless, or not made in good faith, such conduct shall be considered a violation of the BCCE (CCEE in Spanish).

The Company shall maintain permanent communication channels with the Business Associates to secure communication with the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer, in a timely manner, regarding eventualities or risks encountered in the normal performance of their duties.

The Company has also adopted Whistleblower Procedures that provide guidelines for reporting questionable conducts. A copy of the Whistleblower Procedure is available in the Integrated Management System and may be requested at any time from the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer.

The Company will report to the competent authorities according to that provided for in current regulations of the countries where the Company operates.

xv) Delegation for decision making

In the event of any actual or potential Corruption and Transnational Bribery and ML/TF/FP risk situation, the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer shall analyze the situation and submit their recommendation regarding prevention, mitigation, and response strategies for the risks or events identified to the CEO, who is empowered to decide on the actions to be taken, or to request guidelines for action by the Audit Committee of the Board of Directors.

In cases where employees, advisers, attorneys-in-fact, contractors, subcontractors, and suppliers are linked to or involved in activities that constitute Corruption and Transnational Bribery and ML/TF/FP risk, the decision on the actions to be taken or to request action guidelines from the Audit Committee shall be the responsibility of the CEO, the person in charge of the Human Resources area, and the Responsible Officer.

In cases where a member of Senior Management is linked to or involved in activities that constitute ML/TF/FP and Corruption and Transnational Bribery risk, the decision on the actions to be taken or to request guidelines for action by the Board of Directors shall be made by the Audit Committee.

In any event, the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer shall report to the Audit Committee and the Board of Directors on the Corruption and Transnational Bribery and ML/TF/FP risk situations identified and addressed.

In case of materialized events, the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer will inform the CEO and the Audit Committee, who will decide on the internal actions to be taken as appropriate.

xvi) Sanctioning regime

The company establishes that employees who fail to comply with the guidelines set forth in the policies, manuals, and procedures of the Compliance Policy will be subject to sanctions, including the termination of their employment contract, in accordance with the provisions of the Internal Labor Regulations and the Substantive Labor Code. Any violation of this Policy by a Business Associate without an employment relationship with the Company will lead to the termination of established contracts and business agreements, all without prejudice to any legal recourse that the Company may have against such stakeholder.

The Company shall apply disciplinary measures fairly and promptly and in proportion to the violation, in accordance with the procedures of the Compliance Policy and will bring to the attention of the competent authorities any suspicious operation or knowledge of violation related to anti ML/TF/FP and Anti-Corruption and anti-Transnational Bribery laws, pursuant to that provided by the regulations in force. By decision of the Audit Committee, following the pronouncement of the Compliance Officer of TSA Sucursal Colombia or the Responsible Officer, TUSCANY will bring to the attention of the competent authorities any violation of the anti ML/TF/FP and Anti-Corruption and anti-Transnational Bribery Rules that it becomes aware of in the course of its activities.

xvii) Dissemination

The dissemination of the Policy will be performed through its incorporation in the Tuscany Intranet and website, ensuring its access and knowledge by the general public. Likewise, it will be delivered to the Business Associates within a reasonable time after joining the Company, who must sign the certification of the GCU-FO-012 Declaration of Responsibility Form for Business Associates, as a sign of understanding and adoption of the Compliance Policy.

The members of the Board of Directors, Senior Management and those requested by the Compliance Officer of TSA Sucursal Colombia, or the Responsible Officer must sign the GCU-FO-012 Declaration of Responsibility Form for business associates at least once a year, as confirmation of understanding and adoption of the Compliance Policy and no knowledge of ML/TF/FP and Corruption and Transnational Bribery acts in the Company.

The Policy shall be made available as ML/TF/FP and Corruption and Transnational Bribery documented information to all Shareholders, Business Partners, and Stakeholders, who shall receive related training when deemed appropriate.

xviii) Related documents

- Code of Conduct and Business Ethics
- GCU-MA-001 Compliance Manual, which incorporates the SAGRILAF Manual and the Transparency and Business Ethics Plan of TSA Sucursal Colombia.
- GCU-PR-002 Procedure for publicly exposed persons.
- GCU-PR-007 Procedure for Whistle blowing Investigations
- GCU-PR-008 Communication and Dissemination Plan
- GCU-PR-009 Monitoring procedure
- GCU-PR-011 Third Party knowledge procedure
- GCU-FO-001 Compliance Risk Matrix
- GCU-PO-003 Cash Management Policy
- GCU-FO-012 Declaration of Responsibility for Business Associates
- GCU-FO-014 Declaration of gifts, hospitality and entertainment

The Board of Directors of Tuscany Oilfield Holdings Ltd., unanimously approved the update to the Policy to prevent risks associated to AML/CFT and Corruption (SARLAF Policy), as evidenced in minutes dated 15 August 2019.

This updated document (Compliance Policy) is approved by means of the unanimous decision of the Board of Directors of Tuscany Oilfield Holdings Ltd. adopted on March 17, 2025.

ANNEX 1 - DEFINITIONS:

Administrators: The legal representative, the liquidator, the members of the board of directors or steering councils, and those who, according to the bylaws, have these functions.

Senior Management: GCU-MA-001 Compliance Manual, which includes within its Annexes the SAGRILAFT Manual and the Transparency and Business Ethics Plan of TSA Sucursal Colombia.

Risk Analysis: Systematic use of information available for determining how frequently can such specific events occur and the magnitude of their consequences.

Business Associate: Members of the Board of Directors, Senior Management, process leaders, employees, customers, suppliers, consultants, partners, contractors and subcontractors, and any other third party that has a binding relationship with the Company.

Close associates: These are the legal entities that have as administrators, shareholders, controllers or managers any of the PEPs listed in Article 2.1.4.2.2.3. of Decree 1081 of 2015 and the regulations that modify, substitute, or add to it, or that have constituted autonomous estates or trusts for their benefit, or with whom commercial relations are maintained, to whom due diligence shall be applied in accordance with the regulations in force.

Final Beneficiary(ies): For the purposes of this Policy, natural person(s) who ultimately owns or controls, be it directly or indirectly, a client and/or the natural person on whose behalf a transaction is made. It also includes the persons who exercise final effective control on a company or another juridical structure.

Corruption: The intentional abuse of power and influence to obtain one's own benefits making them and those of close associates prevail. The following are classified as acts of corruption, among others: bribery, transnational bribery, coercion, private concussion, and facilitation payments.

Private Concussion: The demand made to a third party to grant, promise, or offer money or any other benefit in exchange for performing an act inherent in or contrary to its functions.

Conflict of Interest: This occurs when in the decisions or actions of a direct collaborator or contractor of the company, the private interest prevails rather than that of the company. Thus, this person or third party involved would obtain an unfair advance that is detrimental to the interests of the Company.

Counterparty: any natural or legal person with whom the Company has commercial, business, contractual or legal ties of any kind. Counterparties are, without limitation, associates or shareholders, collaborators, customers, contractors, and suppliers of Company Products.

Due Diligence: It is the process through which the Company adopts measures for the knowledge of the Counterparty, its business, operations, products, and the volume of its transactions.

Enhanced Due Diligence: It is the term used to suggest to public or private companies to take additional measures or precautions when establishing a contractual or business relationship, based on the behavior of a good parent or a good businessman, to identify possible risks or possibly hidden activities.

Risks Assessment: A process used to determine risk management priorities by comparing a given level of risk against predetermined standards, target risk levels, or other criteria.

Terrorist Financing (TF): These are all those actions that are conducted to support or finance in any way terrorism or those who promote, plan, or are involved in it, with goods or funds of licit or illicit origin, for example through the provision, collection, delivery, receipt, management, custody, or direct or indirect saving of funds, property, or resources.

Financing for proliferation of weapons of mass destruction (FP): It is any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionating, transportation. Transfer, deposit, or dual use for illegitimate purposes in contravention of national laws or international obligations, when the latter is applicable.

Fraud: Any intentional omission or act performed by one or more persons designed to deceive others to misappropriate, take advantage of, or appropriate another's property, be it tangible or intangible, in an improper manner, to the detriment of another.

Responsible Officer: This is the natural person appointed by TUSCANY's Board of Directors who is in charge of promoting, developing, and ensuring compliance with the specific procedures for the prevention, updating, and mitigation of ML/TF/FP and Corruption and Transnational Bribery risks.

Public Officer: Any person holding a legislative, administrative, or judicial office or exercising a public function, including for a public agency or a public Company, or any officer or agent of a national or international public organization, or any candidate for public office, including employees of government-controlled entities or employees of private Companies on commission exercising public functions. An entity is

considered a public company if it is majority owned or controlled by a government, and if it is only partially and minority owned and controlled by a government.

In the event that there is difficulty in determining whether a person (or entity) is a Public Official, the CEO or Responsible Officer should be contacted.

Foreign public official (also foreign public servant): Any public official of a foreign government or department of a foreign government, agency, board, commission, or other body established to perform work or functions on behalf of a foreign State, and any public official in the foreign State, or any person holding the aforesaid capacity of any officer or agent of a public international organization.

Considering that TUSCANY OILFIELD HOLDINGS LTD. is a company with residence in Canada, the operations and transactions performed in the countries where Tuscany has operations are considered foreign operations and, therefore, the FCPA law is applicable.

FATF (GAFI in Spanish): Acronym for the Financial Action International Task Force. Intergovernmental organization whose purpose is to develop and promote measures to combat money laundering and terrorist financing.

GAFILAT: Acronym of the Financial Action Task Force of Latin America. It is the regional group of the FATF (GAFI) that promotes the fight against money laundering and terrorist financing. The country where TUSCANY performs its operations are active members of GAFILAT.

Jurisdiction: The place or geographic location where the company's products are promoted, sold, or services are provided, whether local or international.

National and international lists: Published lists of persons who possibly have links with money laundering or terrorist financing.

Money Laundering (ML) It is the process through which people or companies seek to give the appearance of legality to resources coming from illicit activities or for acquiring, safeguarding, investing, transporting, transforming, guarding, or managing assets that are of an illicit origin.

ML/TF/FP: Abbreviation used to refer to Money Laundering, Terrorist Financing, and Financing of the Proliferation of Weapons of Mass Destruction.

FCPA Act: Law for the Prevention of Foreign Corrupt Practices Abroad (Foreign Corrupt Practices Act - FCPA) The FCPA establishes that it is a crime to pay or offer anything of value, be it directly or indirectly, to a government official to obtain or retain business, or to obtain an inappropriate business advantage.

CFPOA Act: It is the Corruption of Foreign Public Officials in Canada Act (CFPOA), which applies to any citizen, naturalized immigrant, present or resident in Canada, and to any commercial company that does business and has a commercial domicile

in Canada or that is organized under the laws of Canada, a province, or territory of Canada. Hence, the Company may be subjected to investigation and sanctions for authorizing, leading, or participating in corruption and bribery activities under the CFPOA. Additionally, Company employees who are Canadian or resident in Canada and who are employees of or act on behalf of the Company's affiliates outside of Canada will remain subject to the CFPOA, even if the affiliate that employs them is not.

Law 1778 or Anti-Bribery Law: It is Law 1778 of February 2, 2016.

Ethics Line: It corresponds to the channel established by the company to receive complaints of violation of the Anti-Corruption and Anti-Transnational Bribery, anti ML/TF/FP Policy or Rules. The Ethics Line is established in the Company's Code of Business Conduct and Ethics.

Highest Social Body: It is known as shareholders' meeting or shareholders' assembly and it is formed when the partners or the shareholders meet, respectively.

Colombian Norms against Corruption: It is Law 1474 of 2011 (Anti-Corruption Statute) whereby regulations are issued aimed at strengthening the mechanisms of prevention, investigation, and punishment of acts of corruption or bribery, and the effectiveness of the control of public management, as well as its regulatory decrees and the regulations that modify, replace, or complement it.

Anti-corruption and Anti-bribery Norms: These are the FCPA Law, the UK Bribery Law, the Convention against Transnational Bribery of the Organization for Economic Cooperation and Development (OECD), the Colombian Anti-Corruption Regulations, and any other applicable law against corruption and bribery.

Government Body: Group or body that has final responsibility and authority for the activities, governance, and policies of an organization, and to which Senior Management reports and for which it is accountable.

Compliance Officer of TSA Sucursal Colombia: This is the natural person designated by the Board of Directors who is in charge of promoting, developing, and ensuring compliance with the specific procedures for prevention, updating, and mitigation of ML/TF/FP and Corruption and Transnational Bribery Risks.

Irregular Payments or Contracts: These are costs generally of a discretionary and/or unusual nature that do not meet the definition of payment or contract, which are within the normal performance of the business, as defined in this manual. Donations are considered irregular payments.

Payments or Contracts within the normal course of the business These are generally non-discretionary costs that are normally based on established rates or fees, or costs considered necessary for the day-to-day operation of the business. Such costs include, but are not limited to, rental fees or licenses, utilities, local taxes, income tax, and social security, annual memberships or participation fees in local associations, procedural and process fees. The costs and contracts associated with

security services obtained from the military or police are considered a normal part of business development. Donations are not considered payments that are part of the normal course of the business.

Stakeholder: Person or organization that can affect, be affected, or be perceived to be affected by a decision or activity.

Person for the Benefit of a Public Official: This definition of bribery covers the situation in which a Public Official may not receive the benefit himself, but instead arranges for the benefit to be given to a member of his family, to a political party to which he is linked, to a charity or to any other person for the benefit of the officer. As noted in the previous definition of "bribery", for purposes of this Policy, bribes paid to family members and close associates of Public Officials are treated as if they were payments made to a Public Official and, therefore, are prohibited.

Politically Exposed Persons (PEP): They are national or foreign persons who, by reason of their position, manage public resources, or have power to dispose of them, or enjoy public recognition. It includes the definition enshrined in Decree 1081 of 2015 and other regulations that modify, complement, replace, or add to it. Includes foreign PEPs and international organizations.

Political: These are the guidelines, orientation, or aspects that underpin the prevention and control of Corruption and Transnational Bribery, ML/FT/FP risks in the company, and must be part of the compliance risk management process.

Management System: Set of elements of an organization that are interrelated or interact to establish policies, objectives, and processes to achieve these objectives.

Transnational Bribery: act by virtue of which a legal entity, through its employees, administrators, associates or contractors, gives, offers, or promises to a foreign public servant, be it directly or indirectly: (i) sums of money, (ii) objects of pecuniary value, or (iii) any benefit or utility in exchange for that public servant performing, omitting, or delaying any act related to their functions and in relation with an international business or transaction.

Bribery: It is the offer, promise, delivery, acceptance, or request of an improper advantage of any valuable item, of a financial or non-financial nature, be it directly or indirectly, as an inducement or reward for a public official or other person to act or refrain from acting in relation with their obligations. It may include favors, loans, and loan guarantees, gifts, donations, the use of property, offers of employment, political contributions, or the payment of expenses or debts.

Business Partner: external party with which the Company has, or plans to establish, some type of business relationship.

Financial Information and Analysis Unit ("FIAU" - UIAF for its acronym in Spanish:) Unit attached to the Ministry of Finance and Public Credit of Colombia

whose function is to prevent and detect suspicious operations of money laundering (ML) and terrorist financing (TF) in the different economic and financial sectors. Imposes transaction reporting obligations on certain economic sectors.

Advantages within the Course of Business: The terminology "to obtain or retain an advantage in the course of business" is intended to be of broad application and to cover bribery in securing business or any inappropriate advantage in the course of business. Therefore, this will include any form of monetary gain, including being the beneficiary of a contract, reduced payment of customs duties, fees or charges, or receiving illegal preferential tax treatment. However, this will also include unlawful preferential treatment that does not directly or immediately consist of monetary gain, including a favorable review by a government inspector, advantages in bidding or auction situations, or a favorable legislative or regulatory treatment.