

Anti-Bribery, Anti-Corruption (ABC) and Anti-Money Laundering (AML) Policy

Company: Enertrade Energy Ltd

Registered Office: London, United Kingdom

Policy Owner: Head of Compliance / MLRO

Version: 2026.1

1. Statement of Commitment

Enertrade Energy Ltd ("the Company") conducts its business with the highest standards of integrity. We have a **zero-tolerance** policy toward bribery, corruption, and money laundering. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

2. Scope and Legal Framework

This policy applies to all employees, directors, officers, and "Associated Persons" (agents, brokers, and intermediaries) acting for Enertrade Energy Ltd. It is designed to ensure compliance with:

- **The UK Bribery Act 2010**
- **The Proceeds of Crime Act (POCA) 2002**
- **The Money Laundering Regulations 2017** (as amended)
- **UK Sanctions Regimes** (administered by OFSI)

3. Anti-Bribery and Anti-Corruption (ABC)

3.1 Prohibited Conduct

The Company prohibits:

- **Active Bribery:** Offering, promising, or giving a financial or other advantage to induce or reward improper performance.
- **Passive Bribery:** Requesting, agreeing to receive, or accepting a bribe.
- **Facilitation Payments:** Small "unofficial" payments made to low-level officials to secure or expedite routine actions (e.g., customs clearance). These are **illegal** under UK law.

- **Trading in Influence:** Using a third party to influence a public official.

3.2 Gifts and Hospitality

All gifts and hospitality must be:

1. **Transparent:** Recorded in the Company's Gifts & Hospitality Register.
2. **Proportionate:** Reasonable in value and not extravagant.
3. **Bona Fide:** For legitimate business purposes only (e.g., a modest business lunch). *Any gift exceeding £150 must receive prior written approval from the Compliance Officer.*

4. Anti-Money Laundering (AML) & Counter-Terrorist Financing

As an energy trader dealing with high-value commodities, Enertrade Energy Ltd is at risk of being used for money laundering.

4.1 Know Your Counterparty (KYC) & Due Diligence

No trade shall be executed without completing the **Customer Due Diligence (CDD)** process, which includes:

- **Identification:** Verifying the legal identity of the buyer/seller.
- **Ultimate Beneficial Ownership (UBO):** Identifying individuals who own or control more than 25% of the counterparty.
- **Sanctions Screening:** Checking against UK (HMT), EU, and US (OFAC) sanctions lists.
- **PEP Screening:** Identifying Politically Exposed Persons who may pose a higher corruption risk.

4.2 Prohibited Payment Methods

- **Cash Payments:** The Company does not accept cash payments.
- **Third-Party Payments:** Payments must be made to/from the bank account of the contracted counterparty. Payments to "tax havens" or offshore accounts with no commercial link to the trade are strictly prohibited.

5. Sanctions Compliance

Given the geopolitical nature of oil and gas, Enertrade Energy Ltd will not engage in transactions involving:

- Sanctioned countries or territories.
- Sanctioned vessels (vessel screening is mandatory for every cargo).

- Entities owned or controlled by sanctioned persons.

6. Reporting and the "Whistleblowing" Channel

Employees are required to report any suspicious activity (Red Flags) to the **Money Laundering Reporting Officer (MLRO)** immediately.

- **Confidentiality:** Reports will be treated with the strictest confidence.
- **Protection:** No employee will suffer detrimental treatment for reporting concerns in good faith, as per the *Public Interest Disclosure Act 1998*.

7. Penalties

A breach of this policy is a serious disciplinary offense and may result in dismissal. Under the UK Bribery Act, the Company can face **unlimited fines**, and individuals can face up to **10 years in prison**.