



Golden Sky
Energy Group

GSEG CORPORATE GOVERNANCE

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1. GSEG CORPORATE SOCIAL RESPONSIBILITY (CSR) STATEMENT

Our Vision

Our vision is to become a world class multinational conglomerate, focused on a sustainable integrated business model that is operating within the following business sectors; energy, infrastructure, agri-aquaculture, commodities trading, healthcare and finance.

We will conduct our business with Integrity, Diversity and Inclusiveness, Innovation and Sustainability to create the world we want for our communities, families and children. Good business for good society, today and tomorrow.

To make this happen our guiding principle is to work with individual and institutional ethics towards full membership of the **UN Global Compact** in accordance with the following:

1. Do business responsibly by aligning their strategies and operations with the **Ten Principles** on Human Rights, Labour, Environment And Anti-Corruption; and
2. Take strategic actions to advance broader societal goals, such as the **UN Sustainable Development Goals**, with an emphasis on collaboration and innovation.

The Ten Principles of the UN Global Compact

Our corporate sustainability starts with our value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption and align with the following **Ten Principles of the UN Global Compact**.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

GSEG specific Policy: GSEG Human Rights Policy

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

GSEG specific Policy: GSEG Labour & Modern Slavery Policy

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

GSEG specific Policy: GSEG Environmental Policy

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

GSEG specific Policy: GSEG Anti-Corruption Policy

2. GSEG Policies

2.1. GSEG HUMAN RIGHTS POLICY

Commitment to respect international human rights standards

GSEG is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions on Labour Standards.

Coverage of the policy

The GSEG Human Rights Policy applies to all GSEG employees and employees of subsidiaries and joint ventures where GSEG has a controlling interest. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors. In joint ventures where GSEG does not have overall control, the leaders and managers of those businesses are strongly encouraged to adopt the same or similar standards. If any human rights issues arise in joint ventures we will work actively with the business leaders to address them.

Expectations

GSEG expects its business partners and other parties whose own impacts may be directly linked to GSEG's operations, products or services to

respect and not infringe upon human rights, and will respond appropriately where they are not respecting human rights. If any employee believes that someone within GSEG is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager, Human Resources, Company legal counsel or Ethics Line.

Implementation mechanisms

The Board of GSEG is responsible for ensuring adherence to these commitments and our senior management has responsibility for overseeing their implementation and ensuring that any breaches of our Policy are investigated.

Due Diligence: Recognizing the United Nations Guiding Principles of Business and Human Rights, we strive to conduct human rights due diligence. Considering the impacts human rights violation can cause, we will prioritize appropriate actions to identify, prevent or mitigate those impacts in our value chains. We will regularly review and update the progress on our efforts, and annually communicate the results through our CSR report and other communication tools. Where we identify that we have caused or directly contributed to adverse human rights impacts, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

2.2. GSEG LABOUR & MODERN SLAVERY POLICY

Our Approach

We do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate in our workforce. We respect the rights of our employees and contractors, including the freedom of association and collective bargaining. Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law.

Modern Slavery

We are committed to preventing the occurrence of modern slavery and human trafficking in our assets and supply chains, regardless of their locations.

Supply Chain

We expect our business partners and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the applicable Modern Slavery legislation; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities.

Through this statement we encourage business partners and other companies we engage with to read and apply as appropriate the principles of the United Nations Global Compact.

Risk Assessment & Mitigation

We require our operations to conduct risk assessments that address human rights concerns, including those relating to modern slavery. Where a risk of violation is identified, a response strategy must be developed.

Review

We seek to regularly review the performance of our risk assessment framework. To ensure our understanding of the potential risks within our supply chains is current, we continue to rely on external references and publications such as the Global Slavery Index (GSI) as guidance to our risk-based approach. We recognise the risks of forced labour, modern slavery, human trafficking and other labour standards violations within our supply chains.

Reporting

Individuals with evidence of non-compliance with Modern Slavery legislation in connection with GSEG supply chains are encouraged to report their concerns to senior management, to use the GSEG Ethics Line procedure according to our whistleblowing Policy or use the national reporting service.

2.3. GSEG ENVIRONMENTAL POLICY

Objective

We conduct our business to minimise our footprint and the impact on the environment, wherever we operate. We work to protect the environment: our rolling target is to have no environmental incidents.

Our approach

We manage environmental risk in line with highest global and industry standards and our approach defines how to eliminate and, where this is not possible, mitigate and manage environmental risks; and determines environmental plans and management systems.

Land management

We manage land responsibly throughout the lifecycle of our assets on the regions in which we operate. By rehabilitating land, managing its biodiversity and considering the needs of local people, we can minimise the level of impacts on habitats, communities and the environment.

Managing biodiversity

Across our operations, we avoid net losses or degradation of natural habitats and biodiversity – as well as landscape functions such as watershed management and control of soil erosion. We respect areas that are legally designated as protected and adhere to associated regulations, factoring in the cultural heritage of indigenous people, who often have a unique connection with the land where they live.

Water management

We recognise access to safe and clean water and sanitation as a human right. Water is a shared and finite resource. We preserve water sources, protect the waterways we use and support access to high-quality water. Through good water management, we minimise our impact on water resources – for the benefit of local water users and ourselves. By improving our water efficiency, we reduce our impact on local water supplies, especially in areas where supply is under stress.

Through effective risk management, we help maintain the quantity and quality of the water bodies we use and preserve waterways we use for transporting commodities. Our water-related risk management ensures an adequate identification and mitigation of potential risks.

Air emissions

We work to minimise our air emissions and impact on the environment and on the local communities. By working to manage and reduce emissions, we can minimise their impact on local communities and the environment.

Waste management

We work to minimise the impact of the waste our activities produce – and focus on the need to store waste safely. By managing this waste responsibly, we can mitigate risk and reduce impacts on the environment and people.

2.4. GSEG ANTI-CORRUPTION POLICY

Introduction

GSEG is committed to conducting business in compliance with all applicable laws and regulations and in accordance with the highest ethical standards. In recognition of the foregoing commitment, GSEG has adopted a zero tolerance for bribery and corruption in both the public and private sectors.

Coverage of the policy

This Anti-Corruption Policy (“Policy”) applies to all GSEG operations as well as all joint ventures in which GSEG or any of GSEG’s affiliated companies have a majority interest or control. This Policy also applies to all GSEG directors, officers, employees, contract employees, and agents (“associates”). Every associate is personally responsible for understanding and complying with the laws prohibiting Corruption to which GSEG and its associates are subject as well as this Policy and the GSEG Anti-Corruption Procedures that will implement this Policy.

Prohibitions

Associates must not – directly or indirectly – offer, promise or give anything of value to anyone in the public or private sector with the intention to: i) influence someone to obtain or retain business or an advantage in violation of applicable law; or ii) cause or reward improper performance of official, business, or professional obligations. Further, associates must not – directly or indirectly – request, agree to receive or accept anything of value as an incentive or reward for acting improperly, in violation of their duty of loyalty to GSEG.

Facilitation Payments

Facilitation payments to expedite or speed up government actions (such as issuing licenses and permits, clearing items through customs or obtaining a visa) to which we or an associate are legally entitled must not be offered, promised, paid or authorised by anyone on behalf of GSEG. Requests for a facilitation payment must be notified to the Legal Department as immediately.

That will enable GSEG to take appropriate action to prevent facilitation payment requests.

Business Courtesies

While business courtesies (which include gifts, meals, entertainment, transportation, lodging or per diems) that promote cordial relations or demonstrate products or services can be legitimate, some business courtesies can constitute bribes in certain circumstances. Therefore, before offering or accepting any business courtesy, you must consider carefully whether the business courtesy is appropriate and follow the requirements below:

- The business courtesy must be communicated to the Legal department and the value should be limited to USD100;
- The business courtesy must be permissible under all applicable laws or regulations, including any internal rules or policies of the recipient’s organisation or agency (that is, we must be allowed to provide and the recipient must be allowed to accept what is being offered);
- The business courtesy must be offered, given or received for a legitimate business purpose;
- The business courtesy must not be too frequent when combined with all other business courtesies provided to a particular recipient or accepted by you over the course of twelve months;
- The business courtesy must be given or received openly (i.e., not hidden from the superiors of the recipient or from others);
- The business courtesy must not be lavish or extravagant;
- Cash or cash equivalent gifts are never permissible; and
- Certain proposed business courtesies must be approved in writing before they are offered or accepted as specified in the Anti-Corruption Procedures.

Business Partners

Business partners include joint venture partners, agents, brokers, representatives, consultants, contractors, distributors, lobbyists and other service providers that interact with others on behalf of GSEG. We need to ensure that business partners adhere through a contract to the same ethical and legal standards as Associates whenever they are acting on our behalf. Accordingly, the following requirements must be satisfied:

- In accordance with the Anti-Corruption Procedures appropriate due diligence must be carried out before (i) any new business partner is engaged and (ii) before any services are performed and (iii) before any payments are made.
- The activities of business partners must be monitored in an appropriate manner, taking into account the services or activities that the business partner is providing and the Corruption risk profile of the pertinent country or countries.
- Business partners must be engaged for legitimate business purposes and on commercially reasonable terms

The legal department must approve all business partners and a written contract containing anti-corruption provisions approved by the Legal Department must be signed.

Donations and Community Investments

GSEG recognises that making donations (which include education benefits such as scholarships) and investing in the communities in which we operate are an important part of our corporate responsibility. Such donations and investments also help us create and maintain links with local communities, which benefits GSEG as well as the communities themselves. Accordingly, GSEG is committed to making donations and investing in worthwhile community projects. At the same time, GSEG must ensure that all of its donations and community investments are appropriate. Therefore, the following is required:

- Donations and community investments must be approved in advance, in writing, by the Legal

Department in accordance with the Anti-Corruption Procedures and supported by a contract.

- Donations and community investments must never be made in cash.
- Donations and community investments should be made only to organisations that can be relied upon to use the donation or community investment in the manner intended by GSEG.
- Donations and political contributions to public officials – including political parties, political party officials and candidates for public office – are prohibited.
- A donation or community investment should not be made if a public official is likely to benefit disproportionately from the donation or community investment.
- Appropriate documentation evidencing the donation or community investment is required.
- Donations and community investments must be described accurately and in reasonable detail in the books and records of the GSEG entity making the donation or community investment.

Recruitment

No public official, close relative of a public official or business associate of a public official may be hired or retained without the advance approval, in writing, of the legal department.

For the purposes of this Policy, public officials include anyone employed by or acting on behalf of, whether on a full or part time basis, a national, regional or local government; government owned or controlled company or other entity; employees or agents of public international organisations (such as the United Nations, European Union, World Bank and other international development organisations); political parties, political party officials and candidates for public office; and anyone else acting in an official capacity for or on behalf of a government agency or entity, including persons holding a legislative, administrative or judicial post and members of the military and police.

Corporate Transactions

Proposed corporate transactions, including joint ventures, investments and asset acquisitions, must be referred to and reviewed for anti-corruption purposes by the legal department before the transaction is completed.

Books and Records

All payments by and transactions involving GSEG must be recorded accurately and in reasonable detail in the GSEG books and records. Adequate financial controls also must be implemented to ensure that no disposition of GSEG funds or other assets can be made except in accordance with management instructions.

Records Retention

To document compliance with the applicable anti-corruption laws and this Policy, appropriate Corruption-related compliance records must be made and retained.

Reporting Violations and Disciplinary Action

Failing to comply with the laws prohibiting public and private sector Corruption, this Policy and related policies and procedures may result in disciplinary action that can include termination of employment by GSEG. All reports of possible non-compliance will be taken seriously and appropriate remedial action will be taken as needed.

Any associate who learns of possible Corruption involving GSEG must report his or her concerns immediately, preferably in writing, to his or her immediate supervisor, the legal department or through the “Ethics Line” that GSEG has established. Failure to make a timely report may itself be grounds for disciplinary action, up to and including termination of employment by GSEG.

No retaliation will be permitted against any associate who reports in good faith a possible Corruption problem involving GSEG.

Training

Training on the applicable anti-corruption laws, this Policy and the related policies and procedures will be provided. Appropriate anti-corruption training may also be provided to certain business partners where applicable.

Monitoring and Audit

The Legal and Finance departments should monitor implementation of the anti-corruption requirements imposed by applicable laws, this Policy and the related policies and procedures. Anti-Corruption risk assessments will be undertaken periodically when risk levels may change such as with new country entry, completed corporate transactions, or new exploration programs.

2.5. GSEG FOOD AND FEED QUALITY & SAFETY POLICY

The quality and safety of our Food and Feed products are essential to our customers. We work to provide safe and quality-assured Food and Feed that meet regulatory requirements and industry standards, across the whole supply chain.

GSEG want the products we supply to customers to be of the right quality, and safe for people and for the environment – in line with evolving rules and standards. Our approach to product stewardship helps to achieve this.

GSEG are committed to provide safe food for people and feed for animals, not only based on complying with applicable local laws and regulations but also on standards to which the organization subscribes. We encourage the use of technologies and production processes that favour food and feed safety within our supply chain.

GSEG uphold the highest quality and safety standards for our products in full compliance with all applicable standards for consumer health and safety.

In order to assure that the above-mentioned guiding principles are fulfilled we commit to undertake the following:

- Maintain transparency throughout the supply chain. Traceability from the Farm to the Market Shelf helps to guarantee the integrity of our products and provide reassurance to our customers.
- Use of third party certification schemes that provide assurance on food and feed safety and quality.
- Ensure that we only use production, storage and transportation facilities that do not compromise the quality and safety of our products.
- Screen and select suppliers that have the capability to meet our standards for safe raw materials and ingredients.
- Our management systems continuously identify, assess and manage our food and feed quality and safety processes to identify hazards and risks, improve our performance, optimize production and efficiency and contribute to global food security.
- Our management systems incorporates food safety control points and compliance criteria covering traceability; food safety; environment; and occupational health & safety.
- Our management system sets competency and training standards to ensure our employees and suppliers are able to supply food and feed products that meet all applicable quality and safety standards.
- Our management system increases integrity by defining and enforcing a common level of auditor competence, verification status, reporting, and harmonizing interpretation of compliance criteria.
- Encourage the use of environmentally sound technologies for safer, cleaner and more sustainable production.
- Establish measurable targets and conduct periodic audits to monitor measure and improve our performance.

2.6. GSEG HEALTH AND SAFETY POLICY

GSEG is committed to maintaining a fair and effective culture in Health and Safety for everyone affected by our activities. This policy applies to all operational and project activities under GSEG control.

In line with the above, we will:

- Set Health and Safety as a core value for all our business activities;
- Implement safe working and fitness to work programmes to pursue the goals of no harm to the health of, or injury to, people;
- Comply with relevant legislation, regulations and other requirements to which GSEG subscribes;
- Assess and manage Health and Safety risks across the lifecycle for each business activity;
- Play a leading role in promoting best Health and Safety practice in the agricultural sector internationally;
- Maintain a documented Health and Safety management system which includes full and honest reporting and review of performance;
- Set objectives and targets, implemented through appropriate programmes, which will provide continual improvement in overall Health and Safety performance; and
- Include Health and Safety performance in appraisal of staff and contractors.

2.7. GSEG WHISTLEBLOWING POLICY

Whistleblowing

Anyone who has a concern or evidence of corruption or other unethical or illegal conduct relating to GSEG activities (as further detailed below) may report the matter in confidence to the following address:

Ethics-line@GSEG.com

Scope of Policy

This policy is designed to enable anyone to raise concerns at a high level and to disclose information which the individual believes shows malpractice or impropriety relating to GSEG activities. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Criminal activity (including bribery and corruption)
- Improper conduct or unethical behaviour
- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the Environment
- Attempts to conceal any of these

Safeguards

Protection - this policy is designed to offer protection to those who disclose such concerns provided the disclosure is made: i) in good faith; and ii) in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety.

Confidentiality - GSEG will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations - this policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously may be considered at the discretion of GSEG based on: the seriousness of the issues raised; the credibility of the concern; and the likelihood of confirming the allegation from attributable sources.

Untrue Allegations - If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

2.8. GSEG STAKEHOLDER ENGAGEMENT POLICY

GSEG commitment is to conduct its business with Integrity, Diversity and Inclusiveness, Innovation and Sustainability to create the world we want for our communities, families and children. Good business for good society, today and tomorrow.

To achieve this commitment is key to identify all groups of people or organizations that can either affect or be affected by the conduct of our business, our stakeholders.

Maintaining positive relationships with all stakeholder will enable GSEG to grow and respond efficiently to their needs, bringing mutual benefits and long-term sustainable values. We recognize that stakeholder's engagement is a mutually beneficial process.

Aligned with international Standards, and to achieve stakeholder engagement, GSEG is committed to the following:

- Act careful thought issues that are important to the business and stakeholders;
- Proactive approach towards every stakeholder group in sustainability strategy development;
- Openness to sustainability expectations including stakeholder communication.

2.9. GSEG PRIVACY POLICY

Advertising

Advertising allows us to provide, support and improve some of our services. GSEG does not use what you say in email, chat, video calls or voicemail, or your documents, photos or other personal files to do this. We use other data, detailed below, for advertising our services. For example:

- GSEG may use data we collect to select and deliver some of the information you see on the GSEG website.

Personal data

GSEG may collect data from you, through our interactions with you for a variety of purposes described below, including to operate effectively. You provide this data directly, such as when joining the company as an employee or consultant or when we contract with you as a business partner.

We rely on a variety of legal reasons and permissions to process data, including with your consent, necessity to enter into contracts and compliance with legal obligations, for a variety of purposes described below.

We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time and include:

- Suppliers of products and services to GSEG;
- Communication services, including email providers and social networks like LinkedIn, when you give us permission to access your data on such third-party services or networks.
- Developers who create new GSEG software and databases.

When you are asked to provide personal data, you can decline. Where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the data, we will not be able to enter into the contract.

The data we collect can include the following:

Name and contact data. Your first and surname, email address, postal address, phone number and other similar contact data.

Credentials. Passwords, password hints and similar security information used for authentication and account access to GSEG systems.

How we use personal data

GSEG uses data to:

- Provide our business services.
- Improve and develop our services.
- Recruit appropriately qualified and experienced personnel.
- Advertise and market positions within the Group.
- To use data to operate our business, which includes analysing our performance, meeting our legal obligations, developing our workforce and doing research.

Our processing of personal data for these purposes includes both automated and manual (human) methods of processing. When we process personal data about you, we do so with your consent and/or as required to provide services to you (for example, when recruiting we check previous work history or experience on social networking sites), or to operate our business, meet our contractual and legal obligations, protect the security of our systems and our clients or fulfil other legitimate interests of GSEG as described in this section and in the Reasons we share personal data section of this privacy statement. When we transfer personal data from the European Economic Area, we do so based on a variety of legal mechanisms, as described in the Where we store and process personal data section of this privacy statement.

Purposes of processing:

- Recruitment. We use personal information including: – name, DOB, photograph, qualifications, previous work experience, historic visa and work permits, references and expert skills and knowledge.
- HR. In addition to information used during recruitment above, we use employee personal information including bank details.
- Product development. We use data to develop new services.

- Staff support. We use data to troubleshoot and diagnose IT problems, repair devices and provide IT support services.
- Help secure and troubleshoot. We use data to help secure and troubleshoot our software.
- Promotional communications. We use data we collect to deliver internal promotional communications and news updates.
- Protecting rights and property. We use data to detect and prevent fraud, resolve disputes, enforce agreements and protect our security. We may use automated processes to detect and prevent activities that violate our rights and the rights of others, such as fraud.
- Research. With appropriate technical and organisational measures to safeguard individuals' rights and freedoms, we use data to conduct market research.

Sharing of personal data

We share your personal data with your consent or as required by law to complete any transaction you have requested or authorised. For example, we share bank details to enable payments to be made to you with our global bankers.

In addition, we share personal data among GSEG-controlled affiliates and subsidiaries. We also share personal data with vendors or agents working on our behalf for the purposes described in this statement. For example, companies we've hired to provide IT support or assist in protecting and securing our systems and services may need access to personal data to provide those functions. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. We may also disclose personal data as part of a corporate transaction such as a merger or sale of assets.

Finally, we will retain, access, transfer, disclose and preserve personal data, including your content (such as the content of your emails in Outlook.com, or files in private folders), when we have a good faith belief that doing so is necessary to do any of the following:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.

- Protect our clients, for example, to prevent spam.
- Operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks.
- Protect the rights or property of GSEG, including enforcing the terms governing the use of the services – however, if we receive information indicating that someone is using our services to traffic in stolen intellectual or physical property of GSEG, we will not inspect a client's private content ourselves, but we may refer the matter to law enforcement.

How to access and control your personal data

You can access and control your personal data that GSEG has obtained with tools GSEG provides to you, which are described below, or by contacting GSEG. For instance:

- If GSEG obtained your consent to use your personal data, you can withdraw that consent at any time.
- You can request access to, erasure of and updates to your personal data.

You can also object to or restrict the use of your personal data by GSEG. For example, you can object at any time to our use of your personal data:

- For direct marketing purposes.
- Where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party.

You may have these rights under applicable laws, including the EU General Data Protection Regulation (GDPR), but we offer them regardless of your location. In some cases, your ability to access or control your personal data will be limited, as required or permitted by applicable law.

Security of personal data

GSEG is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. When we transmit confidential data (such as a

bank account information) over the Internet, we protect it through the use of encryption or directly to the bank via secure interface. GSEG complies with applicable data protection laws, including applicable security breach notification laws.

Where we store and process personal data

Personal data collected by GSEG may be stored and processed in your region and in any other country where GSEG or its subsidiaries operate. The storage location(s) are chosen in order to operate efficiently. We take steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located.

We transfer personal data from the European Economic Area, and the United Kingdom to other countries, some of which have not yet been determined by the European Commission to have an adequate level of data protection. For example, their laws may not guarantee you the same rights, or there may not be a privacy supervisory authority there that is capable of addressing your complaints. When we engage in such transfers, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data.

Retention of personal data

GSEG retains personal data for as long as necessary to provide the services and fulfil the transactions you have requested, or for other legitimate purposes such as complying with our legal obligations, resolving disputes and enforcing

our agreements. Because these needs can vary for different data types, the context of our interactions with you or your use of services, actual retention periods can vary significantly.

Changes to this privacy statement

We will update this privacy statement when necessary to provide greater transparency or in response to:

- Feedback from business partners, regulators, industry or other stakeholder.
- Changes in our services and operations.
- Changes in our data processing activities or policies.

If there are material changes to the statement, such as a change to the purposes of processing of personal data that is not consistent with the purpose for which it was originally collected, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this privacy statement to learn how GSEG is protecting your information.

How to contact us

If you have a privacy concern, complaint or question for Data Protection to GSEG please contact us by using our web form. We will respond to questions or concerns within 30 days. You can also raise a concern or lodge a complaint with a data protection authority or other official with jurisdiction.

2.10. GSEG WEBPAGE TERMS OF USE

Web Site Disclaimer

GSEG operate this site for the purpose of promoting our activities and selling services supplied by us. By using this site, you signify your acceptance of these conditions in return for which GSEG will provide you with access. From time to time GSEG may modify the conditions so please continue to review the conditions of use whenever accessing or using this site. If at any time you do not wish to accept these conditions then you may not use this site.

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No warranty

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Validity of provisions and remedies

If any provision of these conditions is or becomes invalid or contravenes applicable regulations then the remaining provisions will not be affected.

Waiver

No waiver by us of any breach of these conditions shall constitute a waiver of any other breach. No failure by us to exercise any remedy shall constitute a waiver of the right subsequently to exercise that or any other remedy.

Links to the site

Websites or pages to which this site is linked (other than other websites operated by us) are for information only and have not been reviewed by us. GSEG have no responsibility for the content of such websites or pages and accept no liability for any losses whatsoever that may be incurred as a result of any linking to the same.

Governing law and jurisdiction

These conditions are governed by the laws of England and the English courts shall have the non-exclusive jurisdiction to resolve any disputes arising out of or under it.

3. Ethics Line Procedure

Procedures for Making a Disclosure

The Board of Directors have appointed an Ethics Committee to ensure Whistleblowing and other complaints relating to corporate ethics are investigated and resolved.

If there is evidence of criminal activity, then the Ethics Committee will inform the appropriate authorities. GSEG will ensure that any internal investigation does not hinder a formal police investigation.

For other matters the Ethics Committee will arrange for an internal investigation to be conducted.

In cases where the Ethics Committee consider that a conflict of interest may exist then the complaint may be referred to an independent third party. The general procedure for handling investigations is outlined below.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the Ethics Committee as follows:

- Complaints of malpractice will be investigated by an investigating officer appointed by the Ethics Committee unless the complaint is against or is in any way related to the actions of the Ethics Committee.
- In the case of a complaint, which is any way connected with the actions of the Ethics Committee, the Board of Directors will nominate an independent third party to act as the alternative investigating officer.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for such investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on

the action that is proposed. All responses to the complainant should be in writing and sent to their private e-mail address or to their home address marked "confidential".

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should consider the involvement of the Police at this stage, the Ethics Committee should be consulted for instruct the appropriate procedure.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies, prior approval by the Ethics Committee.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Ethics Committee for action.
- The Ethics Committee will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Ethics Committee.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, GSEG recognises the lawful rights of the complainant to make disclosures to the applicable authorities.

4. Code of Ethics

GSEG Code of Ethics guides all officers and employees' decisions and actions.

The Code of Ethics stems from the GSEG Corporate Social Responsibility Statement (CSR) and approved policies that includes the following:

GSEG Corporate Social Responsibility Statement (CSR)

GSEG Human Rights Policy

GSEG Labour & Modern Slavery Policy

GSEG Environmental Policy

GSEG Anti-Corruption Policy

GSEG Food and Feed Quality & Safety

GSEG Health and Safety Policy

GSEG Whistleblowing Policy

GSEG Stakeholder Engagement Policy

The Code of Ethics is an integral part of the terms of appointment of GSEG officers and employees.

Breach of the Code of Ethics will be subject to disciplinary action in accordance with GSEG procedures and the terms and conditions of engagement of the officers and employees staff contracts.