



CODE OF CONDUCT

The **Code of Conduct** ("the Code") outlines the ethical standards and expected behaviors for all personnel affiliated with Hallow Energy Corp. ("Hallow Energy"). All employees, directors, and officers are required to uphold these standards, and any breach of the Code will be considered a serious disciplinary matter.

While the Code serves as the foundation of Hallow Energy's compliance framework, it is complemented by several targeted Compliance Policies addressing key risk areas: **Trading Practices and Business Communications, Anti-Bribery and Corruption, Anti-Money Laundering, Global Competition Compliance, and Sanctions and High-Risk Jurisdictions**. These policies offer clear, actionable guidance for handling a range of business scenarios. Adherence to both the Code and related policies is mandatory for all personnel acting on behalf of Hallow Energy.

Compliance and Employment Obligations

Observance of the Code and associated Compliance Policies is a condition of employment at Hallow Energy. All employees must complete relevant training and demonstrate an understanding of the Code's provisions. Violations may lead to disciplinary measures, including termination.

Hallow Energy is committed to maintaining a fair and respectful workplace that encourages professional excellence and fosters strong working relationships. Employees are expected to contribute to this environment through their conduct and performance.

Responsibilities of Managers

Managers play a vital role in fostering a culture of compliance. They are expected to ensure that their teams are familiar with the Code and escalate any related concerns promptly. Managers must cultivate an environment where team members feel safe to voice concerns, confident that their reports will be taken seriously and addressed appropriately.

Compliance Officers

The Compliance Director at Hallow Energy has received specialized training to oversee compliance matters. Employees with questions or concerns may contact the Compliance Director at mpeters@hallowenergy.com.

Professional Responsibilities at Hallow Energy

1. Confidentiality and Proprietary Information

Employees are bound by strict confidentiality agreements as part of their employment contracts. Unauthorized use or disclosure of confidential or



proprietary information is prohibited, even after employment ends. These obligations do not override or replace any other confidentiality agreements in place.

2. **Conflicts of Interest and Business Communications**

Hallow Energy is committed to ethical market participation and expects all employees to comply with market regulations and standards. Any form of market manipulation or abuse is strictly forbidden.

The Trading Policy outlines expected behaviors in both professional and personal dealings, provides guidance on handling business communications, and defines processes for identifying and disclosing conflicts of interest.

While personal investing is permitted outside work hours, employees are restricted from trading in certain sensitive financial instruments.

3. **Anti-Money Laundering and Terrorist Financing**

Hallow Energy does not tolerate money laundering or the funding of terrorism.

Employees must consult the company's **Anti-Money Laundering and Terrorist Financing Policy** and access further resources via the internal **PULSE** platform.

All prospective business partners must undergo the Know Your Customer (KYC) due diligence process and be formally approved by Compliance prior to any financial transactions. Any failure to comply with this process will be reported and treated as a severe violation of the Code.

4. **Sanctions Compliance**

Employees must be aware of evolving international sanctions and trade restrictions.

Hallow Energy adheres strictly to all applicable sanctions laws and conducts transaction reviews involving high-risk jurisdictions in collaboration with the Compliance team.

All counterparties are screened for sanction risks as part of KYC. Under no circumstances may employees attempt to circumvent or disguise transactions to avoid sanctions compliance.

Special care must be taken by U.S.-based employees and U.S. citizens worldwide, as they are subject to U.S. sanctions regulations.

5. **Anti-Corruption and Relations with Public Officials**

In alignment with the U.S. Foreign Corrupt Practices Act (FCPA) and other international regulations, Hallow Energy strictly prohibits any form of bribery or corruption.

Gifts and entertainment may only be offered within reasonable limits, particularly with respect to public officials. Only modest corporate-branded gifts and consumables are acceptable in such cases.

Hallow Energy does not engage external agents for business acquisition or development unless specifically approved through senior management and



enhanced due diligence processes. The Compliance Department oversees these arrangements.

6. Political Contributions and Activities

Hallow Energy does not contribute to political parties or candidates. Employees are free to participate in political activities on a personal basis, provided such involvement does not reference their employment with Hallow Energy and is conducted on personal time and with personal funds.

7. Media Engagement

Public communication is managed exclusively by designated company representatives or the communications team. Employees must not respond directly to media inquiries. Any such inquiries should be referred to the press office at **mpeters@hallowenergy.com** or by phone at **+1 703-342-7933**.

8. Record Keeping

All business activities must be accurately documented and maintained. Employees must not falsify or alter records to mislead any party. The specific requirements regarding document retention and storage may vary and should be clarified with one's manager when in doubt.

9. Reporting Misconduct

Employees are expected to report suspected violations of the Code promptly. There are multiple reporting channels available, including direct supervisors, the Compliance Director, or the Compliance Committee.

Reports may be submitted in person, in writing, or electronically and will be handled confidentially. Seeking guidance when uncertainty is encouraged and supported.