



CODE OF ETHICS

At Hallow Energy, we promote and expect ethical conduct in all interactions—whether with the public, clients, colleagues, or prospective partners. Our team is encouraged to always uphold the following core values:

- **Integrity**
- **Competence**
- **Respect**
- **Diligence**

Our ethical commitment lies in fostering and maintaining a healthy organizational culture—one that supports compliance with legal requirements and ethical standards applicable in all jurisdictions where Hallow Energy operates.

We encourage all team members to exercise sound judgment and ethical awareness when making decisions. Determining the right course of action is not always straightforward. To assist in ethical decision-making, we recommend the following five-step approach:

1. **Pause and consider** – Take a moment before acting.
2. **Reflect carefully** – Evaluate the situation thoroughly.
3. **Clarify the facts** – Identify and, where possible, document the facts you are dealing with.
4. **Evaluate your options** – Consider: Is this action necessary? Is it lawful? Would I feel confident explaining and justifying my decision? Does it clearly serve both the company's and society's best interests?
5. **Seek guidance** – If uncertain, consult with a supervisor or an appropriate internal resource before proceeding.