

Moffett Oil Company Ethics and Compliance Statement

Effective Date: April 3, 2026

At Moffett Oil Company, we commit to doing business lawfully, ethically, and safely in every location where we operate. We know that our long-term success relies on the trust we build with our customers, partners, and communities. This statement outlines our unwavering dedication to integrity and sets the standard for how we work.

Our Core Principles

We hold all directors, officers, employees, and business partners to the highest ethical standards. We expect everyone acting on our behalf to follow these core principles:

- **Act with Integrity:** We act honestly, fairly, and in good faith at all times. We avoid conduct that creates even the appearance of wrongdoing.
- **Follow the Law:** We comply strictly with all applicable laws, regulations, and company policies.
- **Ensure Transparency:** We accurately and completely record all business transactions. We never falsify documents, hide funds, or alter operational data.
- **Take Accountability:** Every person is responsible for understanding our rules and applying them in their daily work.

Key Areas of Focus

To protect our reputation and prevent misconduct, we maintain strict rules across several critical areas:

Anti-Bribery and Anti-Corruption

We have a zero-tolerance policy for bribery and corruption. We do not offer, promise, give, or accept bribes, kickbacks, or secret commissions. We strictly prohibit facilitation payments to expedite routine government actions. We apply careful scrutiny to all interactions with government officials and conduct thorough background checks on all third-party intermediaries.

Fair Markets and Fraud Prevention

We believe in fair competition. We strictly prohibit insider trading, market manipulation, and the sharing of sensitive competitive information. We also maintain strong internal controls to prevent, detect, and stop all forms of fraud, theft, and money laundering.

Sanctions and Trade Compliance

We follow all economic sanctions and trade laws. We carefully screen our transactions, partners, and shipping routes to ensure we never do business with restricted or sanctioned parties.

Conflicts of Interest

We make decisions based on what is best for Moffett Oil Company. We require all team members to avoid situations where their personal interests might conflict with their professional duties. We expect complete disclosure of any potential conflicts.

Speaking Up

We rely on our team to help us maintain a culture of compliance. We encourage everyone to speak up immediately if they suspect misconduct, fraud, or a violation of our policies.

We listen to all concerns and investigate them fully. Most importantly, we strictly prohibit retaliation. We protect anyone who makes a good-faith report or participates in an investigation.

By upholding these standards, we ensure that Moffett Oil Company remains a trusted and responsible leader in the energy sector. We power progress while protecting people, the environment, and our shared values.