

Date: 15/Sep/2014

**Announcement No. 2014/61**

# Anti-Bribery Policy

(v4.0.0 - 14/Aug/2014)

Glow Energy PLC and its affiliated companies (hereinafter collectively referred to as "GLOW Group") does not tolerate bribery or any other form of corrupt business behaviour.

- (1) This policy applies to all GLOW Group activities and operations with the public and private sectors.
- (2) Bribery is against the laws of many countries, and it is the very opposite of everything GLOW Group stands for. GLOW Group requires compliance with the highest ethical standards and all laws/regulations that apply to our business. GLOW Group values integrity and transparency, and prohibits corrupt activities of any kind, whether committed by GLOW Group employees or by third parties acting for or on behalf of GLOW Group.
- (3) This anti-bribery policy fully reflects the values and ethical principles set out on the GDF SUEZ Ethics Charter and GLOW Group Code of Conduct.
- (4) Violations of this anti-bribery policy have serious, including criminal, consequences for individuals, as well as for GLOW Group. Hence, GLOW Group employees and third parties acting for, or on behalf of, GLOW Group will be held accountable, if they do not comply with this anti-bribery policy.
- (5) GLOW Group Board of Directors closely oversees GLOW Group's bribery prevention policies, procedures and processes. It is the firm intention of GLOW Group Executive Management team to ensure that anti-bribery policies, procedures and processes are embedded in the GLOW Group organization, and the conduct of our business, under the responsibility of the GLOW Group line managers and business process owners. To support this policy, a dedicated ethics and compliance responsibility is included in the mission of the GLOW Group Ethics Officer.
- (6) GLOW Group is committed to conducting business in full compliance with anti-bribery laws/regulations and GDF SUEZ Ethics Charter. GLOW Group regards compliance with anti-bribery laws/regulations crucially important, and everyone who acts for GLOW Group is expected to apply the highest standards of integrity to all their activities, and to comply fully with the GLOW Group ethical principles, policies, procedures and processes. This will ensure that GLOW Group's activities and operations are aligned with ethical responsibilities, and maximize the long term sustainability of our business and of the communities in which we operate.
- (7) Noone acting for GLOW Group is allowed to offer or to give any form of advantage, whether monetary or otherwise, to any individual or company, in order to influence their behaviour contrary to honesty or integrity, or with the aim of gaining a commercial advantage. Further, noone is allowed to request, to agree to receive, or to accept such an advantage.

This Anti-Bribery Policy shall be treated as a part of GLOW Group's rules and regulations, and all Directors and employees shall strictly comply with it accordingly.



Chamaiporn Soonthorntasanapong  
(Ethics Officer)



Esa Heiskanen  
(Director & CEO)