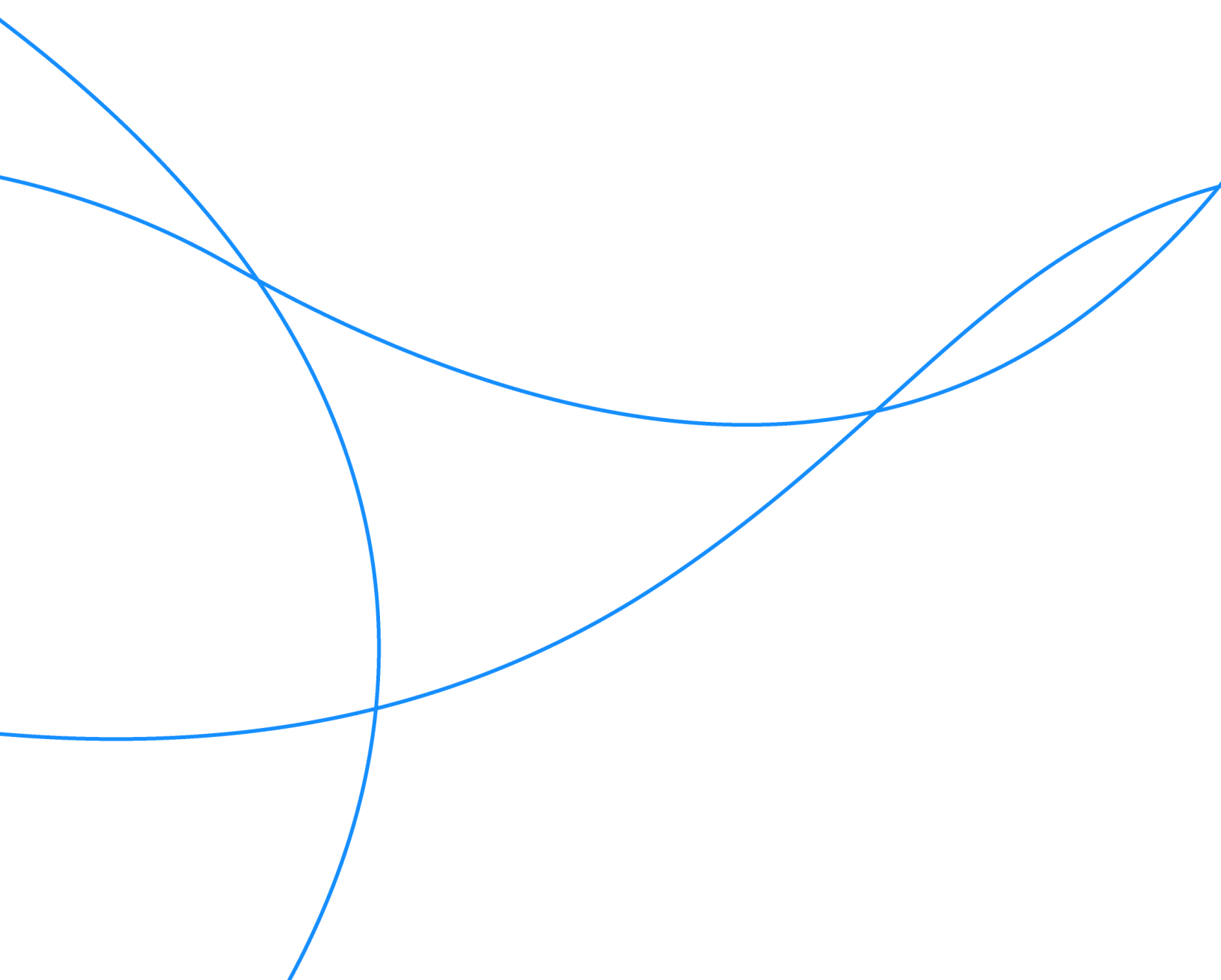


UK Anti-Fraud Policy





Introduction

This policy is being implemented by ConocoPhillips (U.K.) Holdings Limited ("CPUKHL") and ConocoPhillips (U.K.) Marketing and Trading Limited ("CPUKMTL") and their subsidiaries (together "ConocoPhillips UK").

ConocoPhillips UK requires all employees and persons acting for it or on its behalf in whatever capacity to act honestly and with integrity at all times in their role at or on behalf of ConocoPhillips UK.

Fraud is an ever-present threat to ConocoPhillips UK. It may occur internally or externally and may be perpetrated by employees or third parties performing services for or on behalf of ConocoPhillips UK, for example, consultants, suppliers, brokers, outsourced service providers or operational contractors ("External Associated Persons"), either individually or in collusion with others.

In the United Kingdom, a new corporate offence of failing to prevent fraud came into force on 1 September 2025¹. This new offence means that organisations of a certain size may be prosecuted if they fail to prevent fraud being committed by their employees, agents, subsidiaries and any External Associated Persons.

The purpose of this policy is to set out the responsibilities of employees and our External Associated Persons with regard to fraud prevention, what to do if fraud is suspected and what actions could be taken as a result.

This policy should be read in conjunction with the following policies:

- Code of Business Ethics and Conduct
- The Global Anti-Corruption Policy
- Supply Chain Standard
- Internal Control Standards Manual
- ConocoPhillips Information Security and Protection Policy
- UK Bribery Act Policy
- UK Anti-Facilitation of Tax Evasion Policy
- UK Travel Policy

¹ Section 199, Economic Crime and Corporate Transparency Act 2023



Application

This policy applies to all employees of CPUKHL, as well as any External Associated Persons. A copy of this policy will be provided to new hires as part of their compulsory training and it will be available on the UK Compliance & Legal section of the ConocoPhillips UK [intranet](#). Employees are required to comply with all applicable company policies under the terms of their employment with CPUKHL.

External Associated Persons will be provided with a copy of this policy prior to any formal contract being signed and will be required to agree to comply with it as part of their contractual requirements with ConocoPhillips UK.

What is fraud?

Fraud can be internal or external in effect:

- **Internal fraud** covers situations where employees, for example, defraud ConocoPhillips UK through claiming false or inflated expenses or misappropriating ConocoPhillips UK assets for personal use. In this case, ConocoPhillips UK is the victim of the fraud. While this is extremely serious wrongdoing which is not and never will be acceptable, it is dealt with through other relevant company policies (see in particular the Code of Business Ethics and Conduct and the UK Travel Policy).
- **External fraud** is where employees or other persons who are acting for or on behalf of ConocoPhillips UK (i.e. External Associated Persons) defraud third parties in order to benefit ConocoPhillips UK in some way or to benefit customers or clients of ConocoPhillips UK. In this case, the third party is the victim of the fraud and ConocoPhillips UK or its customers or clients might financially benefit as a result. This policy seeks to reduce the risk of external fraud.

In broad terms, fraud requires a person to act dishonestly with an intention to make a gain or cause a loss to another person. In particular, fraud can arise in the following circumstances, provided there is an intention to make a gain or cause a loss:

- When someone makes a false statement or representation to another when they know it to be untrue or misleading.
- When someone intentionally fails to disclose something they are legally required to disclose, for example, as a result of a contractual or regulatory obligation.
- When a person occupies a position in which they are expected to safeguard or not act against the financial interest of another but dishonestly abuses that position.



The loss or gain can be financial or non-financial. An unfair business advantage or a disadvantage to a business competitor could be covered if a person has acted dishonestly. It can arise in our dealings with:

- customers/clients, for example, if we intentionally tell them something that is untrue or misleading to convince them to buy our products or services or inflate the value of these;
- our investors or auditors, for example, if our books and records do not accurately reflect facts relevant to our financial position;
- regulators/government agencies, for example, if we provide them with information or calculations/data that are untrue or misleading whether in satisfaction of reporting requirements or in response to standalone enquiries.

A list of fraud red flags/indicators is in Schedule 1 to this policy.

What are the consequences of fraud?

Typically, fraudsters rationalise their behaviour by focussing on:

- the bigger mission (i.e. "I needed to do this to save the business");
- responsibility (i.e. "it was a group decision" or "everyone does it");
- the consequences of the act (i.e. "it is not material" or "I'm levelling the field"); or
- the victim (i.e. "fraud is a victimless crime" or "it's their duty to exercise proper due diligence").

None of these rationales are a valid excuse for fraudulent behaviour. Fraud is a crime and will not be tolerated by ConocoPhillips UK, even if it is common practice or was intended to help ConocoPhillips UK. ConocoPhillips UK will reject any profit based on, or assisted, by fraud.

On an individual level, anyone who commits a fraud offence could face imprisonment and/or an unlimited fine. Where the offence was committed for the benefit of ConocoPhillips UK, ConocoPhillips UK could also face criminal liability and an unlimited fine, irrespective of whether or not its directors or management was aware of or involved in the offending.

Aside from the criminal penalties, ConocoPhillips UK could face reputational damage and lose the trust of its employees, customers, business partners and stakeholders. It takes many good deeds to build a good reputation and only one bad one to lose it. We therefore want our employees and External Associated Persons to make the right and ethical decision every time.



Company Responsibilities

In order to combat external fraud, ConocoPhillips UK will:

- identify its external fraud risks and review these risks periodically and/or as the business evolves;
- ensure it has suitable policies and procedures in place to prevent its employees and persons providing services for or on its behalf from committing fraud;
- conduct due diligence on External Associated Persons prior to engagement to ensure they are reputable;
- encourage its employees to report any suspicions of fraudulent behaviour without fear of retribution or retaliation; and
- train its employees on their obligations under this policy.

Employee Responsibilities

All employees must:

- read this policy and, if unclear on any requirements, raise them with your supervisor or the UK Compliance Manager or Legal;
- comply with this policy at all times and not act fraudulently in connection with ConocoPhillips UK's business;
- remain vigilant for red flags (see Schedule 1); and
- raise any concerns or suspicions of fraudulent behaviour with their supervisor or a member of the local leadership team or Compliance or Legal as soon as possible. You can also contact the ConocoPhillips [Ethics Helpline](#), or by phone: 0800 890011 (at the prompt, dial 877-327-2272) or in writing to:

ConocoPhillips Global Compliance & Ethics
P.O.Box 2197, Houston, TX 77252

Employees and External Associated Persons may raise such concerns or suspicions in confidence and without fear of retaliation. If you report through the anonymous channel set out under the [Code of Business Ethics and Conduct](#), your anonymity will be protected. ConocoPhillips does not permit retaliation of any kind for good faith reports of ethical violations.

Key risk area: Corruption in tendering

All employees involved in submitting and winning tenders for ConocoPhillips UK must do so lawfully. No employee should seek to improperly influence the tender process, for example:



- by misrepresenting ConocoPhillips UK's ability to provide the goods/services in question; or
- through use of improper relationships with:
 - o the prospective client/customer or its representatives (e.g. seeking confidential competitor information or offering personal benefits to those awarding the contract);
 - o agents or consultants engaged to advise (e.g. where the agent carries out misleading or improper behaviour in connection with ConocoPhillips UK's business; or
 - o other bidders (e.g. through bid-rigging).

While the above practices overlap with other areas of unethical behaviour (bribery, competition offences), they may also involve elements of fraud. All such behaviours are prohibited under ConocoPhillips's policies.

The procurement of all goods and services within Supply Chain scope should comply with the "Supply Chain Standard" and other relevant ConocoPhillips policies.

Key risk area: Financial statement fraud

Accuracy of financial information, including in all of ConocoPhillips UK's books and records, is integral to our business. Employees are required to keep accurate records of any transactions entered into by ConocoPhillips UK and no documents should be falsified or created to hide the true nature of any given transaction or payment.

ConocoPhillips UK's finance department has additional rules and controls, such as the Internal Control Standards Manual and controls under the Sarbanes-Oxley Act (SOX), that are designed to ensure financial accuracy, which supplement this policy. All information provided to the finance department, for whatever purpose, should be accurate. Where information sought is unknown or not clear, this should be made known to the requestor.

ConocoPhillips UK's books and records are reviewed annually by external auditors. Those involved in the external audit process must act transparently in their dealings with external auditors. No information or documentation to which the external auditors have a right should be withheld, hidden or falsified in any way. Any fraud concerns identified through internal or external audits will be escalated to senior management and acted upon.

Directors of ConocoPhillips UK will only sign off on accounts and financial statements where they are satisfied that they accurately reflect ConocoPhillips UK's financial position.



Key risk area: non-financial information reporting

Accuracy of non-financial information, including data required to be provided to government bodies, for example greenhouse gas (GHG) data, wholesale energy market reporting (REMIT) and customs declarations, is as integral to our business as financial information. Employees are required to keep accurate records of all non-financial information and data. No documents should be falsified or created to disguise or mislead the reader as to the true nature of the underlying information or data. Similarly, devices/equipment which capture such non-financial information or data should not be modified or interfered with in order to produce inaccurate or misleading information or data.

Key risk area: Interactions with customers/clients

When interacting with customers/clients, all employees must at all times act truthfully and with integrity. ConocoPhillips UK will not tolerate any dishonest sales practices (which, for the avoidance of doubt can include omitting important information from clients/customers, as well as making false or misleading statements as to our products or services).

ConocoPhillips UK will only invoice clients/customers for goods/services actually provided. Invoices should never be falsified or inflated and should always be an accurate reflection of what has been provided by ConocoPhillips UK to a client/customer.

The Internal Control Standards Manual and Sarbanes-Oxley Act (SOX) controls are in place to ensure the reliability and integrity of ConocoPhillips UK's financial processes and statements. The Commercial business of ConocoPhillips UK also relies on its trade monitoring and market abuse procedures to ensure our activity in both the financial and wholesale markets does not give a false or misleading impression or intentionally manipulates the market.

Key risk area: Employees

In accordance with ConocoPhillips UK's HR processes, background checks are conducted on all new hires, including criminal and reference checks to ensure our staff are reputable and have high ethical standards.

Employees will also be required to sign terms that require them to comply with ConocoPhillips UK's policies and procedures, including this one.

Key risk area: External Associated Persons

External Associated Persons are defined to include agents, consultants, business partners or other suppliers. Such External Associated Persons can create criminal liability for ConocoPhillips UK if



they are performing services for or on ConocoPhillips UK's behalf and in doing so, they commit fraud intending to benefit ConocoPhillips UK (even if tangentially). ConocoPhillips UK is not absolved by ignorance of the fraud at the time it took place. It is therefore important that we ensure that we only engage third parties who will maintain the same ethical standards that we do. Employees responsible for engaging External Associated Persons must:

- Consider the rationale and business need for the third party, documenting it for review and approval in accordance with the Supply Chain Standard.
- Ensure Supply Chain and/or Commercial Client Screening (as appropriate) are involved early so they can conduct appropriate due diligence using third-party risk management tools, on the third party prior to appointment to ensure they are reputable.
- Ensure there is a written contract clearly setting out the services to be provided. Contracts should be initiated or reviewed by Supply Chain and/or Legal to ensure they contain appropriate contractual wording to cover fraud risks.
- Provide the third party with a copy of this policy, ensure that the third party agrees to abide by it and address any questions that the third party might have about its obligations thereunder.

Key risk area: Senior Managers

Senior managers are those who play a significant role in either making decisions about how the whole or a substantial part of the business of ConocoPhillips UK is managed/organised or play a significant role in the actual managing or organising of the whole or a substantial part of those activities.

Because frauds and economic crimes committed by senior managers can be attributed to ConocoPhillips UK, we require senior managers to attend additional fraud and financial crime compliance training on an annual basis.

Compliance and consequences for non-compliance

Compliance with this policy will be monitored through, amongst other things, ConocoPhillips UK's management structure, Finance, HR, Legal and Compliance functions.

In the case of suspected or proven fraud, ConocoPhillips UK reserves the right to refer the matter to the police or other law enforcement agency.

In any event, any suspected or actual fraud will be treated extremely seriously by ConocoPhillips UK and any culpable employees will be subject to disciplinary action, up to and including termination.

Any External Associated Person to whom this policy applies may have their contract terminated with immediate effect in the event of suspected or actual fraud.



Review and update

This policy will be reviewed periodically and updated as necessary. The boards of CPUKHL and CPUKMTL will be responsible for approving any material updates. If updates are required, they will be communicated to all employees and others to whom the policy applies.

Implementation

This policy was introduced on 3rd September 2025, following approval of the board of directors of CPUKHL and CPUKMTL.

Oversight for implementation of the policy is the responsibility of Compliance and questions about the policy should be directed to the Compliance Manager or your manager in the first instance.



Schedule 1: Fraud red flags

The following is a list of fraud perpetrator red flags, which may not in and of themselves mean the person is committing fraud but are merely possible warning signs. Where identified, these should be raised in accordance with ConocoPhillips UK's reporting procedures so further investigation can be undertaken, as necessary:

- An unusually close association or relationship with a supplier or customer.
- Excessive control issues or an unwillingness to delegate or share duties.
- Refusal to take annual leave or displaying a general lack of transparency.
- Unnecessary secretiveness.
- Lack of candour.
- Deceptiveness.
- Reluctance to provide documentation when reasonably requested.
- Reluctance or failure to maintain required written records.
- Reluctance to provide access to documentation/information when reasonably requested.
- High spend activity on off-price book items.



Appendix A – Revision History

Revision No	Revision Detail	Responsible Person	Dated
1	New Procedure	Kamla Rhodes	28/08/2025
2			
3			
4			
5			
6			
7			
8			