

PCEF-POL-002

Anti-Bribery & Corruption Policy

Premier Choice Energy Fund Ltd

Version	1.0	Effective Date	May 2026
Next Review	May 2027	Classification	Controlled Document
Owner	Compliance & Risk	Approved by	Board of Directors

1. Purpose & Legal Framework

Premier Choice Energy Fund Ltd has a zero-tolerance policy towards bribery and corruption in all its forms. This Policy is designed to ensure compliance with the Bribery Act 2010 and sets out the responsibilities of all persons associated with the Fund.

The Bribery Act 2010 creates four main offences: (i) bribing another person; (ii) being bribed; (iii) bribing a foreign public official; and (iv) failure of a commercial organisation to prevent bribery. PCEF is committed to preventing all such conduct.

2. Scope & Application

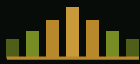
This Policy applies to all PCEF employees, directors, officers, contractors, consultants, agents, and any other persons acting on behalf of the Fund. It applies to all activities in the UK and overseas.

The Policy applies to all business relationships including: project developers, construction contractors, grid operators, legal and financial advisers, government and regulatory bodies, and any other counterparties.

3. Prohibited Conduct

The following conduct is strictly prohibited:

- Offering, promising, giving, requesting, or accepting any financial or other advantage intended to induce improper conduct
- Making payments to expedite or secure routine government actions (facilitation payments)
- Making or accepting political donations on behalf of the Fund
- Any conduct that constitutes bribery of a foreign public official
- Engaging third parties knowing they may use funds for bribery purposes



4. Gifts & Hospitality

Gifts and hospitality may only be offered or accepted where they are: proportionate and reasonable; not cash or cash equivalents; do not create a conflict of interest; and are disclosed in the Gifts & Hospitality Register.

Thresholds: Gifts received — declare all items above £50 in value. Hospitality offered — prior approval required above £100 per person. Hospitality received — declare all items above £75 per person.

5. Third-Party Due Diligence

All material counterparties and agents are subject to anti-bribery due diligence prior to engagement, including: identity verification; sanctions screening; adverse media checks; review of anti-bribery policies; and contractual anti-bribery warranties.

Enhanced due diligence is required for counterparties in higher-risk jurisdictions, transactions involving public officials, and engagements with agents acting in connection with public procurement.

6. Reporting & Non-Retaliation

Any employee who suspects bribery or corruption must report their concern immediately to the Chief Compliance Officer or via the confidential whistleblowing hotline. No employee will suffer any detriment as a result of making a report in good faith.

7. Training & Review

All employees complete mandatory anti-bribery training upon joining and annually thereafter. This Policy is reviewed annually and updated to reflect changes in the legal and regulatory environment.

AUTHORISATION

Role	Name	Signature	Date
Chief Executive Officer	_____	_____	May 2026
Chief Compliance Officer	_____	_____	May 2026
Board Chairman	_____	_____	May 2026

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