

Document type Instruction	Approved EMT/CEO	Policy structure <ul style="list-style-type: none"> — Sustainability Policy — Environmental Policy — Health and Safety Policy — Local Engagement Instruction — Policy Against Corruption
Document owner Chief Communications and Sustainability Officer	Date of last approval 2026-24-228	Rev. Index 3



Local Engagement Instruction



Local Engagement Policy

Purpose of policy and scope

This Local Engagement Policy outlines the guidelines and procedures governing OX2's local activities. The purpose of this policy is to ensure that all local engagement activities align with our mission, values, business ethics and sustainability approach while maintaining transparency and consistency in our local engagement activities.

Local engagement refers to any situation where OX2, or anyone acting on its behalf, provides contributions, through the provision of goods or services, to a third party at no cost or a discounted cost, or where OX2 makes charitable donations to third parties.

The policy applies to all individuals who act on behalf of OX2 in this respect, including employees, consultants, and directors. The policy covers all local engagement issues, irrespective of the amount or activity involved. For the sake of simplicity, the term "employee" as used in this document refers to employees, consultants, and directors.

Objectives of OX2's Local engagement

OX2 engages in local activities that are aligned with OX2's Information Policy, communications strategy and sustainability commitment which benefit local society where OX2 plan to conduct business. Activities should primarily target the project area or vicinity, and we aspire to be supportive and responsible community members.

As gifts and benefits may be sensitive from a corruption perspective, it's particularly important that the Requirements (see below) are applied before initiating a Local engagement activity.

Requirements

- **Alignment with Mission and Values:** Local engagement opportunities should align with the mission, values, and goals of OX2. We only consider local engagement activities that are consistent with our core values and objectives.
- **Transparency:** All Local engagement agreements, including terms, benefits, obligations, and financial details, are documented clearly and transparently in a written agreement. All funds paid or received must be transparently accounted for in OX2's accountings.
- **Beneficiaries:** The Local engagements must benefit an undefined group of people. Furthermore, the activity may not contribute to any political party or religious organization, members of a political party, associations, or company that is majority owned by, or otherwise acting on behalf of, a governmental body, official or political organization or events with links to a political party.
- **Ethical Considerations:** OX2 will not engage in local activities related to entities engaged in activities that are illegal, harmful, or unethical, or that contradict our values and mission.
- **Non-Interference:** Local engagements may not be used with the objective to influence the decision-making processes of an authority, governmental body, entity or organization, in relation to OX2's projects. It may also not influence OX2's objectives, or content in a way that compromises our independence or integrity.
- **Due diligence:** An investigation about the involved parties stated above (Beneficiaries, Ethical Considerations and Non-Interference) shall be conducted, and documented in writing ("DD-report"), to ensure that the recipient is a legitimate organization conducting its affairs lawfully and that it does not have links to governmental or political bodies, please see OX2 Counterparty Check Instruction.
- **Documentation:** Copies of the DD-report, agreements, documentation demonstrating the performance of obligations under those agreements and any approvals secured under this policy, shall be maintained in a readily accessible file.

Local Engagement Approval Process

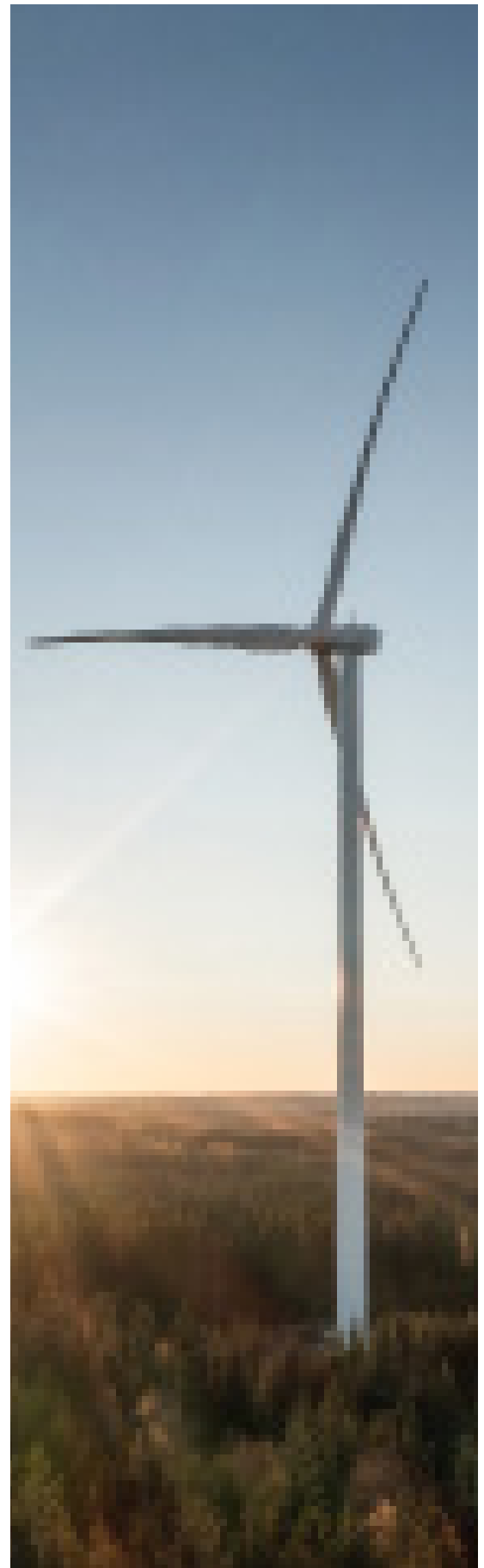
1. **Identification of Opportunities:** OX2's employees are responsible for identifying and evaluating Local engagement opportunities.
2. **Assessment:** Each Local engagement opportunity will be assessed against the requirements of this policy.
3. **Approval:** Prior to starting an engagement or promising a contribution from OX2, the Local engagement must be approved by the Country Manager, based on verification that the Requirements are fulfilled. Also, the agreement concerning the Local engagement must be signed by the Country Manager.
4. **Documentation:** A written agreement describing the Local engagement will be prepared and signed by both parties, outlining the terms, expectations, and deliverables.

Compliance and Reporting

All agreements concerning local engagement activities must comply with the OX2 Code of Conduct, relevant laws, and regulations. Any issues or concerns related to agreements concerning local activities should be reported to the General Counsel.

Review and Amendments

This Local Engagement Policy will be reviewed yearly and may be amended as needed. Amendments will be communicated to all relevant parties. This Policy reflects our commitment to ethical and transparent local activities while ensuring that they align with our mission and values.



Revision history

Revision index	Description	Date	Issued by	Approved by
0	First issue	2023-11-10	Head of Sustainability	CEO
1	Yearly approval	2024-04-16	Chief Communications and Sustainability Officer	CEO
2	Yearly approval	2025-10-21	Chief Communications and Sustainability Officer	CEO
3	Yearly approval	2026-04-28	Chief Communications and Sustainability Officer	CEO

Related policies

[Code of Conduct](#)

[Policy Against Corruption](#)

[Gift and Entertainment Policy](#)

[Counterparty Check Instruction](#)

