

Conflict Minerals Statement

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”).

Noven Energy supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. We are committed to complying with any requirements applicable to our Company under the Conflict Minerals Rule.

Noven Energy does not directly purchase any Conflict Minerals from any source and does not knowingly procure any product containing Conflict Minerals from the Conflict Region. Noven Energy is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. Noven Energy is committed to work with our supply chain to increase transparency regarding the origin and traceability of minerals contained in products. We also require all suppliers to comply with applicable legal standards and requirements.

Noven Energy requires all of our suppliers to provide us with completed conflict minerals declarations using the EICC/GeSI Conflict Minerals Reporting Template. We may reconsider our willingness to partner with suppliers that fail to comply with this Policy.

Serkan YILDIZ

Ankara, 13.06.2024