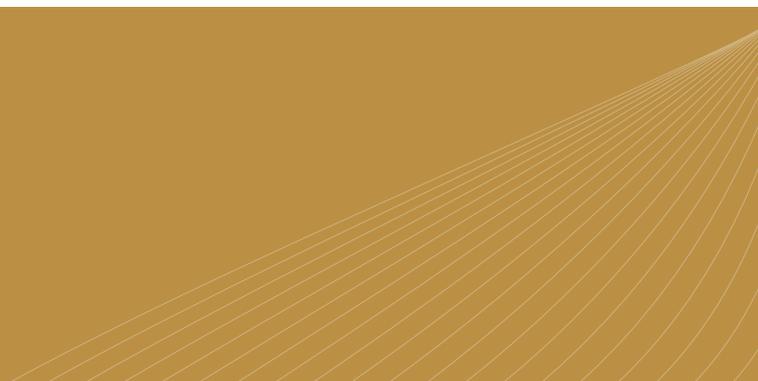


COUNT.



SUPPLIER CODE OF CONDUCT

COUNT Energy Trading B.V.

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Supplier code of conduct

Introduction

Advancing Sustainability in the Petrochemicals Market

COUNT Energy Trading conducts its business in a responsible and ethical fashion and expects its suppliers to do the same. COUNT is a knowledgeable and reliable group of traders with focus on the energy, petrochemical, and recycled plastics markets.

The company strives to be the enabler of the market's needs and the beacon for sustainable transition.

Purpose of the document

The purpose of this document is to ensure the business partners of COUNT:

- › Comply to all the applicable national and international laws;
- › Uphold commercial agreements;
- › Promote safe and respectful working conditions;
- › Respect human rights;

Promote the pursue of higher levels of environmental stewardship.

The Code of Conduct is a reference document for all employees of COUNT Energy Trading to be aware and make use of. It is the responsibility of managers to disseminate this code.

In this document COUNT Energy Trading's employees can find which values and guiding principles should be used to ensure that business is conducted with honesty, integrity and ethics. It guides individuals in the approach of problems, which ethical principles to adhere to, and which professional standards to hold to.

It also provides employees with a framework of existing rules at COUNT from a laws and regulations perspective and how to act in the grey areas of value-based ethics.

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Responsible supply chain

Bribes and kickbacks

Any form of directly or indirectly offering, paying, soliciting, or accepting bribes or kickbacks (including gifts in cash or cash equivalents as stocks) is unacceptable. COUNT expects the members of the supply chain to refrain from any form of bribery and kickbacks. Under some statutes these are criminal actions that can lead to prosecution.

Gifts, favours, and entertainment may be given to others at company expense only if they meet all the following criteria:

- › Consistent with customary business practices;
- › Not excessive in value and cannot be construed as a bribe or payoff;
- › Not in violation of applicable law or ethical standards.

Anti-money laundering

COUNT condemns any actions aimed at facilitating offences such as receiving, laundering, and using money, goods, or any other utility of unlawful origin, and implements all requested preventive and subsequent control measures necessary to ensure these offences do not occur.

Prohibited, of course, are theft, illegal entry, black market purchases, blackmail, electronic eavesdropping, threats, and other improper methods. Employees of competitors or suppliers should not be asked to reveal proprietary information. COUNT employees likewise never divulge proprietary information about their former employers, and will never be asked to do so.

Protection of confidential information

COUNT expects our supply chain members to protect any confidential information (including intellectual property, trade secrets, or private financial information) related to our and our partner's organization(s).

The suppliers must safeguard any property belonging to COUNT while it is under their control, and avoid any situations that may affect the companies' mutual interests and reputations.

Any acts of industrial espionage and sabotage against other companies must be prevented to protect everyone's' property, information, and resources.

Import and export control

All members of the supply chain must comply to the applicable national and international trade laws. Proper protection and use of company assets, including proprietary information, is a fundamental responsibility of employees in our supply chain.

Employers should take a proactive stance to ensure that everyone in an organization is informed about the relevant regulations and principles that affect the business operations.

Antitrust laws

All applicable antitrust and competition laws in place should be followed while conducting business operations. COUNT expects its suppliers to:

- › Know and follow the applicable laws;
- › Treat legal requirements as a minimum standard;
- › Alert COUNT to any material issues with the goods and services supplied regarding, and not exclusively, to health, safety, and environmental issues.

Antitrust laws also may apply in other circumstances, like benchmarking efforts, trade association meetings, or strategic alliances involving competitors. Unlawful agreements need not be written or even expressed.

Environmental policy

COUNT is committed to taking steps to diminish its environmental impact and to promote climate positive supply chain actions. COUNT is transparent about its decisions and activities that impact the environment. These will be disclosed in a clear, accurate, objective, and complete manner.

Therefore, COUNT incentivizes and has preference for supply chain partners that can provide information about the environmental consequences of their activities. As part of COUNT's business mission and vision, the aim is to:

- › Continually seek to improve corporate environmental performance;
- › Assess and address the environmental impact in decision making;

- › Training of employees on the importance of environmental protection;
- › Establish measurable objectives and targets for improved environmental performance, progress monitorization, and audits of facilities.

As a responsible supply chain member, COUNT expects its partners to also commit to the environmental policies. COUNT condemns fraudulent illegal activities detrimental to the environment committed by any player in the supply chain. In addition, COUNT encourages and expects the suppliers to take further actions to reduce their environmental impacts and to implement concrete, measurable sustainability targets within their organisations.

Labour practice and standards

Employee rights

COUNT finds it salient that suppliers have respect and dignity for everyone affected by their business activities. COUNT is committed to internationally recognized principles in the areas of human rights and labour conditions, and expects the suppliers to adhere to the following policy statements:

- › A supplier must not discriminate and should condemn any type of discrimination on grounds of race, nationality, religion, sex, gender identity and/or expression, political opinion, disability, social origin, sexual orientation, marital status, union membership, or age.
- › The supplier must respect the right of employees to freely and voluntarily establish and join organisations of their own choice and be represented by them. These organisations may engage in collective bargaining according to the applicable legal regulations.
- › The supplier must not permit abuse of any type (whether it is sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment).

- › A supplier must provide their employees with fair and competitive compensation and reward, and recognise their efforts and achievements. Compensation paid to employees must comply with applicable national wage laws and ensure an adequate standard of living.

Modern Slavery

Modern slavery is the severe exploitation of other people for personal or commercial gain. COUNT condemns any form of modern slavery practices and expects its partners to do so too. Those unlawful practices can include any form of:

- › Forced labour
- › Child labour
- › Human or sex trafficking
- › Debt bondage or bonded labour
- › Blackmailing

At COUNT we are committed to protecting and respecting human rights, and expect our contractors and suppliers to do the same. This extends to workers in our supply chain, customers, and the communities in which we operate.

Ethics

COUNT stakeholders

COUNT stakeholders are the groups and individuals who, directly or indirectly, influence or are influenced by the attainment of the company's objectives. They include, but are not limited to, employees, shareholders, lenders, customers, suppliers, the public sector, civil society, and the environment.

COUNT uptakes the upmost integrity and respect of its commitments to stakeholders, both externally and internally, and expect the same commitment from the suppliers and customers.

Transparency

As a company that values long-term relationships with stakeholders, COUNT values transparency and dialogue that is built and acted upon on the basis of trust.

COUNT supply chain policy statements

As responsible business partners of COUNT the suppliers must comply to the policy statements of the company:

- › To have a strong commitment to the protection and advancement of human rights;
- › To comply with all applicable laws and regulations of the countries in which we operate and respect international norms of behaviour;
- › To seek an open and honest dialogue with key stakeholders and respect and consider their interests;
- › To refrain from participation in any form of anti-competitive agreements.
- › To conduct all commercial activities in a fair and ethical manner;
- › To support free trade;
- › To uphold the highest quality and safety standards of our products and assure they meet all legally required standards for consumer health and safety;
- › To provide transparent and effective procedures to address consumer complaints;
- › To, as much as possible, be involved in and informed about the Round Table initiatives and sustainable production.

Review of documentation policy

COUNT is committed to fulfilling all the requirements of the Supplier Code of conduct and expects its suppliers to comply to all principles stated in this document.

Shall any questions or concerns arise about the ethics or integrity of any aspect of COUNT, the supplier should address the issue as soon as possible.

The supplier can raise questions, comments, and concerns by contacting the management of COUNT.

COUNT management is responsible for auditing and updating the COUNT Supplier Code of Conduct. The management has free access to the data and corporate information it needs to exercise its activities.

COUNT must have the ability to access and audit any of the suppliers' facilities to ensure compliance to the Supplier Code of Conduct. Furthermore, COUNT must be allowed to, if necessary, involve an external auditing organization to verify the activities of a supplier.

Reporting of breaches in compliance

Should any of the codes of conduct be violated by a supplier, it is a responsibility of the supplier to inform COUNT of the breaches as soon as possible and to resolve the issue(s).

COUNT management shall be contacted in case a breach in compliance to the Supplier Code of Conduct has occurred.

If a supplier is found to have violated any of the principles stated in the Supplier Code of Conduct, without warning COUNT and without an attempt to solve the issue(s), COUNT shall terminate any further cooperation with the supplier.



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