



Supplier Code of Conduct

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1. Introduction

About Us: Bulk Trading Group (BTG) is an independent, competitive group of companies that specialises in the trading and transportation of energy commodities around the world. The majority of our work today is focused on solid fuel trading, but we are also working on expanding our services to incorporate new forms of energy as well as working on various projects related to the sale of natural gas and biomass.

We employ a specialist team of professionals to provide an increasingly efficient service and to ensure we remain up-to-date on the latest market trends, while constantly expanding our trading opportunities across the world through an effective network of agents.

At Bulk Trading, we are committed to upholding the highest ethical standards in all aspects of our business operations. Our Code of Business Conduct ensures that we "conduct our business in a manner that respects the rights and dignity of all people." This principle is fundamental to our Human Right Commitment Statement (HRCS), which explicitly commits us to respect international labor rights, including child labor prohibitions.

Our HRCS mandates adherence to globally recognized human rights standards across our value chain. It specifies that "our human rights commitments are global and apply throughout our value chain. Policies and procedures, including those relevant to human rights, are binding on all Bulk Trading employees."

BTG maintains a compliance team in Lugano, Switzerland, (the "Compliance Department").

2. Supplier Code of Conduct

Building on the Bulk Trading "Code of Business Conduct," our Supplier Code of Conduct aligns with internationally recognized standards and principles relating to human rights, labor rights, anti-corruption, and environmental responsibility. This Code is a cornerstone of our contractual relationships with suppliers, and we expect all suppliers to adopt practices consistent with it.

We require all our suppliers to sign and adhere to this Code, ensuring it also applies throughout their supply chains. Our business activities are subject to national laws and regulations on environmental protection, product safety, and social welfare. Beyond this, it is our policy to formally request that all our suppliers respect the principles of our Supplier Code of Conduct. Group policies/regulations and all applicable laws and regulations. Commercial transactions can only be entered into with approved counterparties.

3. Expectations from Suppliers

Bulk Trading expects its suppliers to adhere to the principles of the following internationally recognized standards:

- The eight core conventions of the International Labour Organization (ILO)
- The Ten Principles of the United Nations Global Compact
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights

More specifically, Bulk Trading expects its suppliers to comply with the following obligations:

Working Conditions / Labor

- a. **Child Labor:** Suppliers must not use child labor at any stage of manufacturing or delivery. Suppliers should follow the ILO conventions' recommendations on the minimum age for employment. Bulk Trading reserves the right to investigate when there are reasonable grounds to suspect that child labor may be occurring in the suppliers' operations or their value chains.

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- b. Compensation and Benefits:** Suppliers must comply with principles related to minimum wages, working hours, overtime, and legally mandated benefits, ensuring equal pay for equal work regardless of gender, as stipulated in ILO Convention 100.
- c. Forced Labor:** Any form of forced or compulsory labor is strictly prohibited. Employees must be free to leave employment after reasonable notice.
- d. Freedom of Association:** Suppliers must respect employees' rights to freedom of association and collective bargaining, where permitted by law.
- e. Safe Working Conditions:** Suppliers must ensure safe and healthy working conditions that comply with applicable occupational health and safety standards.

Environmental Standards

- a. Compliance:** Suppliers must comply with all applicable environmental laws and regulations and manage their environmental impacts systematically.
- b. Product Safety:** All products and services must meet the environmental, quality, and safety criteria specified in relevant contract elements and be safe for their intended use.

Business Ethics

- a. Integrity:** Business must be conducted with integrity, and no undue advantages should be given or received.
- b. Conflict of Interest:** Suppliers must maintain impartial relationships and handle conflicts of interest appropriately.
- c. Financial Transactions:** All financial transactions must comply with applicable laws, and suppliers must avoid complicity in money laundering or terrorism financing.
- d. Sanctions and Export Control:** Suppliers must comply with all applicable sanctions and export control legislation.
- e. Fair Competition:** Suppliers must promote fair and free competition and avoid anti-competitive practices.
- f. Human Rights:** Suppliers must respect human rights and avoid complicity in human rights violations, ensuring non-discrimination and equal opportunity as per ILO standards.
- g. Reporting Channels:** Suppliers must have internal reporting channels to identify and address compliance risks and potential misconduct promptly.

4. Consequences of Violation

In the event of a violation of this Supplier Code of Conduct, the following actions may be taken:

- **Investigation:** Bulk Trading reserves the right to investigate any suspected violations, including reasonable grounds to suspect that child labor or other human rights abuses may be occurring within a supplier's operations or their supply chains.
- **Corrective Actions:** Suppliers will be required to take corrective actions to address any violations found. This may include creating and implementing a Corrective and Preventive Action (CAPA) plan.
- **Termination of Agreement:** If a supplier fails to fulfill the requirements of this Supplier Code of Conduct or adequately remedy any non-compliance issues, Bulk Trading has the right to terminate any agreement with the supplier without further notice and with immediate effect.
- **Legal Action:** Bulk Trading may also take legal action if necessary to protect its interests and ensure compliance with the Supplier Code of Conduct.
- **Audit Rights:** Bulk Trading retains the right to audit suppliers to ensure compliance with the standards in this Code. This includes the right to engage third-party auditors if necessary.

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5. Ensuring Compliance

To ensure compliance with this Supplier Code of Conduct, all suppliers are expected to:

- Conduct regular internal audits and assessments.
- Provide training to employees and supply chain partners on the principles outlined in this Code.
- Maintain open communication with Bulk Trading regarding any compliance concerns or violations.

By working together, we aim to maintain high ethical standards and foster a responsible, sustainable, and respectful business environment throughout our supply chain.

Supplier Agreement

I/we, the undersigned, acknowledge receipt of the Bulk Trading Supplier Code of Conduct and Agreement. I/we have read, understood, and agree to comply with the standards and practices outlined in this document. As a trader with a related supply chain, I/we commit to ensuring that my supply chain partners are aware of and adhere to these standards. I/we will take reasonable measures to enforce compliance and will work with Bulk Trading to address any issues that may arise.

Signature:

Name: _____

Role: _____

Company Name: _____

Signature: _____

Date: _____

Bulk Trading Contact Information

For any questions or to report any concerns regarding the Supplier Code of Conduct, please contact:

Bulk Trading Compliance Department

Email: compliance@bulktrading.ch

Instructions for Suppliers

Please review the Bulk Trading Supplier Code of Conduct and Agreement carefully. By signing this document, you are confirming your commitment to comply with the standards outlined herein and to ensure that your supply chain partners are aware of and adhere to these standards. This agreement is a prerequisite for entering into a contractual relationship with Bulk Trading.