

## Supplier Code of Conduct

Aramco Fuels Poland sp. z o.o.

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## Supplier Code of Conduct

Supplier Code of Conduct presents AFP's standards and expectations applicable to Suppliers.

The Code of Conduct does not replace or modify contracts with suppliers or any other obligations, instead, it contains principles and values relevant to suppliers.

Neither AFP nor its suppliers, personnel or representatives are authorized to suggest or approve conduct that violates the provisions of the Supplier Code of Conduct.

## Contact

Do you have questions about the Code of Conduct?

Write to:

ARAMCO FUELS POLAND SPÓŁKA Z  
OGRA NICZONĄ ODPOWIEDZIALNOŚCIĄ  
Jana z Kolna 11, 80-864 Gdańsk, Polska

## Application

This Code of Conduct is addressed to all current and potential Suppliers of Aramco Fuels Poland Sp. z o.o. (hereinafter: “AFP”). By Suppliers we mean all those who supply or intend to supply us with: goods, energy and utilities, intellectual rights, services (including consultancy and advisory services) or human resources, regardless of whether or not we have a contract with them, as well as all subcontractors, helpers and other entities with whom we have a business relationship of any kind.

## Purpose

At AFP, we comply with the law, act ethically and safely and are responsible for the environment and society. We have created the Supplier Code of Conduct in order to ensure that the conditions are in place to fulfil the commitments we have made to ourselves and to all those with whom we engage. We also want our Suppliers to be aware that doing business with us involves commitment to certain values and ethical standards. The Supplier Code sets out a general framework of business standards that we expect all our business partners to respect.

We use the following terms: By “AFP”, “its”, “our”, “we” or “us” we mean ourselves, that is Aramco Fuels Poland sp. z o. o. By “you” we mean our current or potential Supplier and their personnel and all the individuals who represent the Supplier, as defines above.

## Values

The Supplier Code of Conduct is founded on our corporate values. We believe that the Code expresses and elaborates on those values.



### Integrity

We respect ethical standards in our business.



### Excellence

We strive to achieve the best results and actively pursue new challenges.



### Safety

We promote the safety and wellbeing of our employees.



### Responsibility

We take responsibility for our actions and pursuit of corporate goals.



### Citizenship

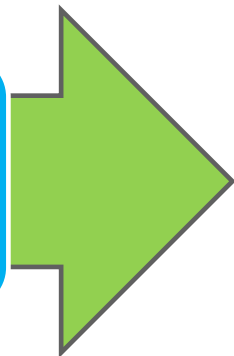
We make a positive impact on our communities.

If you are not certain what to do, check the ethical decision-making model.

Is it compliant with the law that applies to us?

Is it consistent with the obligation to which you committed yourself?

Is it consistent with the values mentioned above?



## Law

We want our Suppliers to comply with the applicable laws. By law we mean not only statutory law, which applies to us all, but also binding contractual rights.

We expect to be duly informed of any actual or potential breach of law. We assure you that we will always find the right solution to ensure legal compliance.

By engaging with us, you undertake to duly comply with the law.

## Ethics

We want AFP and our Suppliers to do business in accordance with the highest standards of ethical conduct. In particular, any violations of ethical standards relating to: conflict of interest, bribery and corruption, abuse of trust, gift and entertainment guidelines, fraud and other similar misconduct or whistleblowing and whistleblower protection to be unacceptable.

Suppliers should promote ethical behavior and counteract any conduct contrary to accepted ethical principles. In particular, the Supplier's personnel should be aware that any unethical behavior is contrary to the Supplier's business practice and will not be accepted by the Supplier.

AFP's business ethics require all transactions to be conducted honestly and reliably and in accordance with the highest ethical standards. Any breach or violation of business ethics will be regarded as lack of integrity.

## Health, safety and environment

We understand that our business is not without impact on the outer world. We want our Suppliers to take into account and mitigate the impact of their activities on the climate, water, soil, air and biodiversity and to take accountability and care for the environment, among other things, by respecting international standards, conventions and declarations.

Suppliers should:

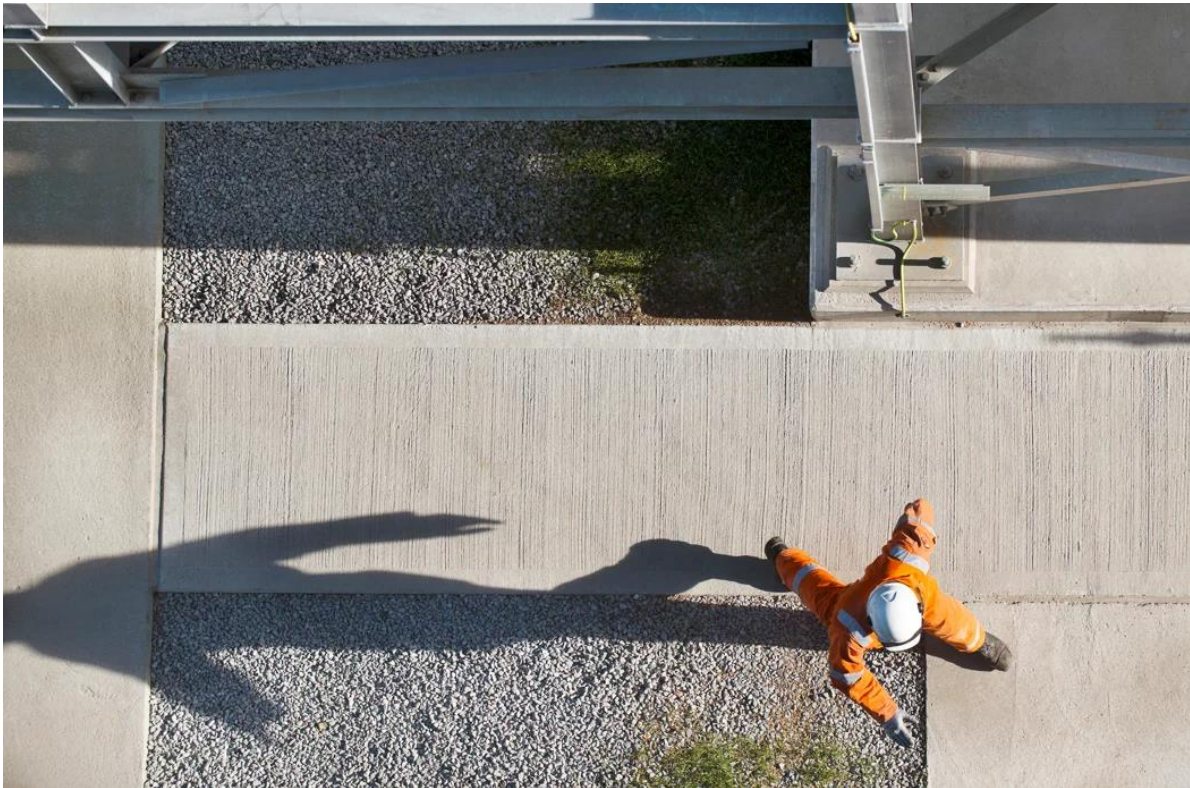
- Have valid permits required by law for the use of or impact on the environment and comply with the guidelines and requirements set out in those permits.
- Handle with due care any materials that may adversely affect the environment and, in particular, ensure appropriate and responsible waste management.
- Comply with applicable occupational health and safety principles, in particular with regard to the provision of appropriate protective equipment.



- Promote employee attitudes and behaviors in line with health and safety standards and have a relevant training policy.
- Have appropriate insurance to deal with any environmental damage.

## ESG

We declare, in compliance with the law and our internal policies, that we do business in accordance with the ESG (environmental, social responsibility and corporate governance) standards. This concerns in particular the non-financial reporting obligations. The Supplier should conduct business in a sustainable manner and have relevant internal policies in place.



## Antitrust and competition regulations

AFP complies with antitrust and competition laws and regulations. We do not accept engaging in practices, including arrangements that violate the law.

We put special emphasis on complying with the prohibition against entering into agreements or arrangements with others that restrict or eliminate competition, including activities that

could be seen as price fixing or anticompetitive agreements on other terms of commercial transactions. We expect the same from all Suppliers who do business with us.

## Respecting the sanctions regimes

We expect our Suppliers to comply with any restrictive measures, in particular sanctions imposed by the authorities of the European Union, the Republic of Poland, the United States and the United Kingdom of Great Britain and Northern Ireland and as defined in the acts of the United Nations. We expect Suppliers to comply with the obligations imposed on them and to not engage in any activities that have the purpose or effect of circumventing the application or reducing the effectiveness of restrictive measures.

We want our Suppliers to have in place a policy that allows them to respect the restrictions and to inform us promptly and clearly of any engagements with sanctioned entities or of any engagements that could be perceived as breach of sanctions regimes.

We have the right to request our Suppliers to provide us with details of their policies against sanctions violations.

We also reserve the right to decide against engaging with a Supplier if such engagement involves the risk of violating any restrictive measures.

## Ethical sourcing

Suppliers should source goods or services from third parties that meet at least the standards of the country of origin in terms of health and safety, working hours, wages, employment conditions and environmental protection.

## Human rights

We want our Suppliers to respect fundamental human rights, which are universally accepted by the international community, including but not limited to: forced labor laws, working hours, working conditions, minimum employment age, minimum wages, post-employment benefits and social security. We also expect efforts to create a friendly workplace based on treatment with dignity and mutual respect.

## Relations and communication

We believe that commitment to ethical principles and values is also manifested through interpersonal communication. We expect Suppliers to avoid, both in public communication and in contacts with AFP, any form of expression or communication that might be considered compromising or inappropriate. In particular, we expect ethical principles and standards to be respected with due earnestness.

Suppliers should not even joke about violating the law or ethical standards. Communication between us and Suppliers should be up to professional communication standards, businesslike and respectful. Any content that is insulting or offensive to dignity, or expresses extreme political or religious beliefs is unacceptable.

Please note that as our Supplier, you are not entitled to speak or communicate publicly on behalf of AFP or to give the impression that you are presenting the position of AFP, unless you have been explicitly authorized to do so by relevant AFP bodies. Any public communication presented in the name or on behalf of AFP must be preapproved by AFP. This also applies to contacts with investors or media. Moreover, Suppliers must not communicate their engagement with AFP to the public or use any identifying marks belonging to or associated with AFP.

## Bribery, corruption and fraud

We do not tolerate bribery or corruption in any form. We expect our Suppliers and their personnel and vendors to not accept, permit or engage in any form of bribery, corruption or extortion. This applies both to government officials and private businesses.

- It is forbidden to offer bribes, illegal fees or other payments intended to influence the conduct of AFP or its employees.
- It is forbidden to offer bribes or anything of value to any person with the intention of obtaining an illicit advantage for oneself or AFP.
- It is forbidden to offer through a third person bribes or anything of value to any person with the intention of obtaining an illicit advantage for oneself or AFP.
- Any practices that may appear to be unethical should be avoided in actual or potential business dealings with AFP.

At AFP, we take our commitments with due earnestness and will not tolerate any deviations in this regard.





## Conflict of interest, gifts, meals and entertainment

We are obliged to avoid any conflict between the personal interests of the personnel and the interests of the Company, as well as situations that may give the impression of such a conflict. A conflict of interest may arise if our personnel or a family member of our personnel are involved in situations that may affect their ability to make objective decisions on behalf of the Company. We expect Suppliers to refrain from any practices that may be considered contrary to our conflict of interest policies.

We understand the desire to show courtesy, but we must remain particularly vigilant in this regard. We expect Suppliers and their personnel to not offer us or our personnel any gifts, meals or entertainment unless they are of symbolic value and in accordance with usual business practices.

- By symbolic gifts we mean such gifts that do not create a sense of obligation to reciprocate in the recipient. We expect such gifts to not be excessive and to not raise reasonable suspicions about the impartiality of the recipient.
- It is common business practice to accept entertainment and to accept a meal that is appropriate to the professional nature of a meeting for a legitimate business purpose.

Gifts, meals and entertainment offered to personnel that exceed symbolic value or value justified by particular circumstances need to be reported in accordance with our internal policies and regulations. Suppliers should make sure that the gifts, meals and entertainment they want to offer are not contrary to our policies.

As part of our internal regulations, we have introduced specific stricter guidelines for personnel who decide on pricing or Supplier selection. On our part, such personnel may only accept merchandise of low material value, which is not taxable under Polish law. Such personnel are also obliged to refuse offers of entertainment and business meals.

To avoid any doubts, AFP pays the expenses of its personnel, including business travel expenses. Suppliers are not obliged, nor will they be asked to pay for or reimburse business expenses of our employees, unless we have expressly arranged with the Supplier to pay the costs of our personnel.

## Non-disclosure

Suppliers or potential Suppliers may have access to confidential materials or information that cannot be made public. We expect Suppliers to keep such materials and information confidential. Even if we have not signed a non-disclosure agreement with the Supplier, we expect information that relates to AFP and its interests to remain confidential and to be disclosed on a need-to-know basis solely to individuals engaged in negotiating and executing contracts with AFP.

Suppliers will have in place an adequate policy on the processing of all information relating to AFP. Note that Suppliers must always provide information on the individuals who process data and ensure identification of the personnel who have access to confidential information relating to AFP.

Suppliers acknowledge that we reserve the right to take any measures or decisions that may be required to secure our information, including the decision to terminate or limit engagement with Suppliers who breach our non-disclosure policies.

## Cybersecurity

We expect our Suppliers to have in place adequate protective mechanisms to guarantee the safety of ICT systems in terms of the security of data that relates to us, may relate to us or is in any way related to AFP. We are ready to provide you with cybersecurity guidelines.

Note that we can assess compliance with security standards and make your access to data and systems conditional on the results of such assessment. If a Supplier fails to comply with

cybersecurity standards, we may decide to terminate our engagement or not to engage with such Supplier.

## Monitoring and compliance

We believe that it is our mutual responsibility to comply with this Code of Conduct. We expect Suppliers to make sure their personnel are aware of the provisions of this Code of Conduct, to monitor compliance with those provisions and to disclose any incidents where a conflict of interest may be expected as well as any cases of unethical or dishonest behavior of any party, including the Supplier's employees or AFP's employees, related to orders and commercial contracts.

We have implemented an internal whistleblowing and whistleblower protection procedure. This procedure enables reporting any information about actual or potential breaches of law or AFP's internal regulations. Current or potential Suppliers and their personnel may also use our whistleblowing mechanism. We expect the Supplier to inform their personnel of this possibility. We will review all such reports with due diligence. Violations may be reported to AFP by email at:

- [integrity@aramcofuels.com](mailto:integrity@aramcofuels.com)

AFP reserves the right to decide to terminate engagement with a Supplier who is found to be in breach of the Supplier Code of Conduct. Also, based on analysis of available information, we can decide to not engage with any potential Supplier.