

Code of Conduct

To all Traderoad's team members and stakeholders,

Traderoad's Code of Conduct communicates the fundamental principles that guide our business conduct, setting global standards for all our employees and selected third parties who engage with or represent Traderoad. It is a document that reflects our current corporate strategy, culture, and values and will be periodically updated. This Code signifies the steady commitment of our management board and everyone within our organization to embrace, uphold, and promote these principles and values.

Traderoad is committed to being a socially and environmentally responsible business, fully compliant with all applicable laws and regulations, and adhering to internationally recognized corporate standards in both its operations and beyond. We have a zero-tolerance approach when it comes to unethical business behavior and comply with The Ten Principles of the UN Compact and core ILO standards and conventions. We are striving to create, develop, and maintain effective compliance systems such as monitoring, record keeping, and enforcement procedures and be able to demonstrate a satisfactory record of compliance.

Our operations are built upon a bedrock of fairness and integrity. Operating within the oil and gas sector, we acknowledge our responsibility for the consequences of our decisions on society, the economy, and the environment. We are dedicated to prudently and comprehensively managing risks associated with our impacts on both people and the environment. We firmly believe that this approach enhances our resilience during times of crisis and ensures a sustainable progression of our Company.

At our core, we have a holistic approach to business, taking into account environmental, social, and governance (ESG) dimensions within and beyond our direct operations.

At Traderoad, we deliver quality and operate transparently and with integrity, fostering enduring, trust-based relationships with our global stakeholders. This commitment not only creates a competitive edge for our company but also establishes an inclusive workplace that welcomes all individuals.

The purpose of our Code is to serve as a compass, offering guidance and insight for ethical business conduct aligned with Traderoad's strategy and values as well as internationally recognized standards. We hold all Traderoad team members and other internal and external stakeholders to the same high ethical standards. If the Code demands a higher level of compliance than the law, we all should abide by it.

Our commitments

At Traderoad AG, our collective success hinges on our commitment to doing what is right. Regardless of our job titles, we all assume leadership roles in upholding the principles of ethics and integrity.

We all pledge to:

- Adhere to the guidelines outlined in the Code and the Traderoad Employee Manual,
- Cultivate a positive and inclusive work environment while promoting a culture of ethical business conduct,
- Contribute to the company's ESG commitments,
- Abide by all applicable laws, regulations, and certifications,
- Promptly report any suspected violations of the law or our Code,
- Refrain from engaging in workplace retaliation or other unethical behavior,
- Report any instances of known or suspected retaliation or other breaches of the law or the Code,
- Actively cooperate with investigations.

Together, we are the custodians of Traderoad's corporate culture of ethics and the architects of its sustainable success.

Traderoad relies on each of us

Subject to the Code are all employees, officers and directors, regardless of their role within the organization. Additionally, the Code and its expectations may be extended to non-employee third-parties, which include but are not limited to:

- Sales agents
- Representatives
- Consultants
- Contract workers
- Joint venture partners
- Distributors
- Converters
- Suppliers

- Outside counsel

In essence, Traderoad's code is directed to anyone whose actions and conduct have a bearing on the operations and reputation of Traderoad.

Exemplary Leadership with Unwavering Integrity

In our pursuit of an ethical culture at Traderoad, each one of us plays a vital part. However, if you hold a managerial, trading, or supervisory role, additional responsibilities are entrusted to you.

Being in a leadership position at Traderoad, you are expected to:

- Establish and maintain a high ethical standard and serve as an exemplar of ethical business conduct for all those you influence,
- Cultivate an environment that fosters open dialogue, encourage questions, and welcome expression of concerns,
- Ensure a workplace that is equitable and characterized by mutual respect,
- Attentively listen to and appropriately report any concerns, ensuring they are escalated when necessary, in accordance with the stipulated escalation procedures

People

People stand at the core of our achievements and prospects. We are committed to diligently complying with all applicable labour and human resources laws as well as creating an inclusive, safe, and uplifting workplace for all, employing relevant policies, procedures, and best practices. We encourage all team members to voice their concerns and actively contribute to the Company's development beyond the scope of their roles, for example, in the field of ethics, compliance, and individual well-being. We also expect all our team members to adhere to all applicable laws and regulations, as well as internal policies, standards, and procedures. We all pledge to treat each other and our external stakeholders fairly, ethically, respectfully, and with dignity as understood by the international community.

Do not hesitate to embrace the role of a positive catalyst for change! It is essential for our collective success!

Human rights

At Traderoad, we support and respect the protection of internationally proclaimed human rights and proactively make sure that we are not complicit in human rights abuses to any internal or external stakeholder.

Labour

At Traderoad, we strictly comply with all applicable international or local labour and human resources laws.

1. We uphold the freedom of association and the effective recognition of the right to collective bargaining
2. We do not tolerate or use any forms of forced, compulsory, or child labour or human trafficking
3. We do not tolerate or practice discrimination in respect of employment and occupation
4. We comply with local and international regulations and/or collective agreements regarding working hours, compensation, wage, etc.
5. Our employees are protected from all forms of sexual, physical, and psychological abuse in the workplace.

The aforementioned applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Health and Safety

At Traderoad, we make sure that our workplace is healthy and safe for all team members in all our business activities. We comply with all applicable health and safety laws, regulations, and standards. In addition, we are striving to take appropriate action, such as dedicating sufficient resources and implementing policies, procedures, governance, and educational measures, to provide a safe and healthy workplace to all your employees.

Personal Data Protection

The protection of privacy and personal data is a priority for Traderoad in all its business relations. We respect the confidentiality of personal data and always act according to the provisions of data protection law and other applicable regulations. We collect only the necessary information required to perform our duties. When collecting and processing personal data, we shall ensure compliance with applicable laws and regulations. Do not hesitate to turn to our Employee Manual in case of uncertainty or consult with your supervisor.

External Stakeholders

At Traderoad, we are striving to be a socially and environmentally responsible business beyond our direct operations. Therefore, we promote the ESG standards to our suppliers and those directly or indirectly involved in our business operations. Our expectations and requirements are elaborated in the Traderoad's Supplier Code of Conduct.

Environment

At Traderoad, we conduct our operations in compliance with all applicable environmental laws and regulations and strive to promote and ensure compliance along the whole value chain. We follow a precautionary approach, undertake initiatives that promote greater environmental responsibility, and encourage the development of environmentally friendly technologies and best practices. As of 2024, we commit to the Net Zero ambition communicated in the Swiss Innovation and Climate Act and

EU Green Deal. Thus, we aim to reduce the negative impacts of our products and activities on people and the environment, adopt relevant best practices and frameworks, and implement sustainability in our strategy and risk management. Our commitments are elaborated in our Sustainability Statement and Employee Manual.

Governance

At Traderoad, we promote integrity and ethics in all our business activities and comply with all applicable laws and regulations regarding corruption, bribery, prohibited business practices, extortion, etc. We are continuously developing clear and effective guidelines, controls, and enforcement mechanisms that will allow us to conduct business ethically and in compliance with internationally recognized standards defining responsible business practices:

- We adhere to anti-trust and other competition laws,
- We protect confidential information within Traderoad and provided by our respective business partners,
- We respect the intellectual property of others, and
- We adhere to local and international trade regulations

Detailed guidelines that cover gift exchange, entertainment, conflicts of interest, disclosure of information, privacy, and other relevant topics can be found in our Employee Manual.

Material Compliance

At Traderoad, we are determined to comply with all regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and “conflict minerals.” Therefore, we are striving to ensure that the goods provided to Traderoad comply with the requirements covered by all applicable regulations on local and international levels. This includes maintaining and developing relevant policies and due diligence processes.

Together, let's grow and succeed while caring for people and the Planet!