



## **SUSTAINABILITY POLICY**

## 1. PURPOSE AND SCOPE

As PENTHOL Group of Companies (“PENTHOL”), we are committed to reducing the economic, environmental and social impacts and risks arising from our operational activities, creating added value for our business partners and leaving a sustainable world to future generations by placing sustainability at the heart of our business model. This Sustainability Policy (“POLICY”) includes the key principles guiding our sustainability efforts in line with transition to a low-carbon economy and green development.

**PENTHOL's Sustainability Vision:** To ensure sustainable trading and distribution of oil products and petrochemicals by considering our economic, environmental and social impacts and creating long-term value for all our stakeholders

## 2. GENERAL PRINCIPLES

The general principles set out in the PENTHOL Sustainability Policy are presented below:

1. We have integrated our management approach, operating activities and future goals with the UN Sustainable Development Goals, relating sub-targets and benefits of the European Green Deal, and work in line with international corporate sustainability principles and sustainability taxonomies, ensuring compliance with global sustainability standards and ESG criteria.
2. We shall determine and monitor all our sustainability activities in an effective, transparent and participatory manner by means of decision-making mechanisms within our Sustainability Committee which has direct representation and voting rights under our Top Management, as well as through actions focused on sustainable development with relevant sub-working groups.
3. In order to extend our reporting activities, set out in International Standards as a consequence of the global trading and financial markets at our value chain, to harmonize with ESG criteria and to maximize our corporate sustainability performance, we are going to focus on conducting Sustainability Reporting Activities and making them available to stakeholders via active communication channels.
4. We strive to improve our sustainability performance in line with our Vision, Mission and Corporate Values.
5. We maintain the accurate and robust financial operations in order to ensure the transition to the resilient sector approach by developing preventive activities with risk and crisis management.
6. Through our sustainable investments, we both strive to adopt a green transition-oriented growth and reduce our economic, environmental and social impacts and risks arising from our business operations, and aim to conduct responsible trading that takes into account the environment and society.
7. While ensuring the quality of products and services with international standards, we aim to create long-term value for all our stakeholders and to be ready for green transition through innovative technologies and methods. We also aim to source and

distribute sustainable products and services compatible with the low carbon economy target.

- 8.** With the employment and international trade volume we create, we are contributing to the sustainable development of the oil and gas sector.
- 9.** Stakeholder engagement and customer needs and expectations are duly taken into account, in order to keep customers' satisfaction at the highest level.
- 10.** We are committed to a responsible supply chain, focusing on training, assessment and development. We shall adopt a fair, honest, transparent and equitable selection process for our suppliers in accordance with the principles of responsible purchasing that respect Human Rights.
- 11.** We have integrated sustainability and green transition concepts into our corporate culture, while working to extend them across our entire value chain.
- 12.** With our approach of respect for human rights, inclusion, diversity, participation, fairness and equal opportunity, we are aiming at raising the awareness of our employees, suppliers, customers and all our stakeholders on sustainability.
- 13.** We analyze all of the various forms of counter-party/credit risk, market risk, liquidity and funding risk, reputational risk, legal and regulatory risk and outsourcing risk in a comprehensive manner through integrated risk management into our business operations.
- 14.** We calculate the corporate GHG emissions inventory of our operations in order to take into account the impacts of climate change on economic, environmental and social welfare, and the associated risks and opportunities. We contribute to the global struggle in the transition to a low carbon economy.
- 15.** We intend to strengthen our investments towards water/energy efficiency, renewable energy, biodiversity, recycling and recovery on the basis of green development and circular economy principles.
- 16.** We strive to eliminate the potential of spills and pollution throughout our business processes by taking the necessary precautions in our third-party contracts.
- 17.** We are intolerant of any kind of anti-human rights and anti-competitive behavior, bribery and corruption as well as money laundering throughout our business and the value chain. We shall act within the framework of our policies in relevant cases.
- 18.** Taking into account the satisfaction of our employees, we offer an inclusive, participatory, diverse, fair and equitable working environment that respects human rights, and we strictly reject all kinds of discrimination in accordance with our ethical principles. We're aiming at providing our employees with an appropriate remuneration and performance system that will contribute to their success. We will continue to invest in our staff's talent and development, with a view to long-term business relationships.
- 19.** We adopt international and sector specific regulations in the field of Health and Safety, so as to ensure a healthy, safe, secure and decent workplace for our employees, implement regular training and information activities, and take the necessary precautions. We strive to maintain high quality and high standards in the transportation and storage safety.
- 20.** We seek to generate added value for the society by developing social responsibility projects supporting sustainable development.
- 21.** We're constantly improving the way we work and keeping an eye on innovation and developments in information security. We attach great importance to ensuring

information confidentiality and protecting private data of our employees, customers, suppliers and other third parties in our activities and business relations.

- 22.** We are paying close attention to the work of sustainability initiatives internationally and take a keen interest on being involved in such cooperation platforms. We are sharing experience with our stakeholders, in particular industry representatives, universities, state bodies and NGOs.
- 23.** Through our corporate website, we make publicly available the sustainability performance of our company to all interested parties and take into account all comments and suggestions.

### **3. IMPLEMENTATION, REVIEW AND ENFORCEMENT**

Our Sustainability Policy was published on 30.11.2022 with the approval of our President. Our Sustainability Committee shall examine this policy on a regular basis (at least once a year), taking into account the current requirements and changes to our operating conditions. After approval of our President on the basis of a recommendation by our Sustainability Committee, amendments considered to be necessary shall take effect.

PENTHOL Sustainability Policy shall be made available to all our stakeholders, including employees, through our company website and intranet.