



# **SUSTAINABILITY CODE OF CONDUCT**

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2023



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Kolmar Group AG ("**Kolmar**"), with global headquarters in Zug, Switzerland, is the corporate home of all Kolmar companies and all of Kolmar's affiliates worldwide. Kolmar is a virtually integrated petrochemicals, petroleum, gasoline, renewable fuels and chemical feedstocks company with involvement in manufacturing, sourcing, transporting, storing, tolling and marketing products on a global scale. The company also maintains dedicated storage capacity in various locations for its wide range of products throughout the key petroleum, petrochemical and renewable business hubs.

Kolmar has developed a global presence through its network of offices and agencies in more than 20 countries. Kolmar provides its expertise throughout the entire value chain and is organized to timely respond to dynamically evolving market conditions. Our goal is to develop the business to address increasing market demand for renewable and low carbon products around the globe which we are doing by establishing and investing in biofuel production facilities in the US as well as investments in European production. We are committed to integrating corporate sustainability (tackling poverty, inequality, environmental, social and governance issues) into our daily operations, while maintaining the trust and respect of our stakeholders and society. We are leading the energy transition to renewables, circular and low carbon technologies and products.

Kolmar has a client driven and non-speculative business philosophy with a core of clients who have supported us since inception.

## ABOUT THE SUSTAINABILITY CODE OF CONDUCT

Kolmar actively pursues long-term relationships based on responsible and sustainable business practices and expects its business partners to comply with the principles and requirements set out in this Sustainability Code of Conduct, which contains guidelines for all Kolmar's suppliers and customers, and applies to every aspect of its business. Our aim is to maintain a high degree of integrity and to grow as a socially responsible, environmentally sustainable and economically profitable market player. In order to achieve this, we expect our business partners to:

- Adhere to the rules, practices and procedures in the Sustainability Code of Conduct listed below
- Comply with all applicable laws and regulations, and internationally recognized environmental, social, and corporate governance standards including the Global Reporting Initiative (GRI) Standards, the Task Force on Climate-Related Financial Disclosures (TCFD), the SASB Standards and the Ten Principles of the UN Global Compact (the **ESG Standards**)
- Implement the principles, standards and provisions set out in the Sustainability Code of Conduct with their own suppliers, customers, service providers, subcontractors, and any other business partners

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### Labour Standards and Human Rights

- Conduct business activities with respect for human rights, including labour rights, and comply with all applicable international laws and regulations, including the ESG Standards, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the IFC Performance Standards 2 Labour and Working Conditions, the International

Labour Organization's eight fundamental Conventions, and the Ten Principles of the UN Global Compact

- Respect the protection of internationally proclaimed human rights
- Provide equal employment opportunities with no discrimination due to race, religion, sex or sexual orientation, age, social or ethnic origin, physical ability or political opinion
- Adhere to zero tolerance of forced and compulsory labour, and zero tolerance of child labour
- Recognize and uphold freedom of association and the right to collective bargaining in accordance with applicable laws
- Treat employees with respect and provide a safe and healthy workplace free of harassment or abuse of any kind, unlawful practices or discrimination, and ensure that appropriate health and safety information and equipment are provided for employees and contractors, including drinking water, clean toilets, adequate ventilation, emergency exits, proper lighting and access to first aid supplies or other provisions for emergency care
- Enable employees and other stakeholders to report concerns or potentially unlawful practices in the workplace
- Comply with minimum wages and working hours in accordance with local laws and ensure a living wage according to local living conditions
- Promote gender balance in the recruitment and promotion processes and provide equal opportunities and equal access to managerial positions
- Maintain employees' personal data in compliance with applicable privacy laws and regulations
- Minimise health and safety risks and develop and implement effective measures

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## Environment

- Comply with all applicable environmental legislation, regulations and/or local and international standards
- Work towards a more sustainable ecological footprint by reducing the impact of business operations and activities on the environment
- Commit to identifying and assessing environmental risks
- Pursue active environmental management and optimize the use of resources
- Encourage and implement good environmental practices throughout the supply chain
- Use appropriate management systems to ensure that product quality and safety meet applicable requirements
- Take action to implement measurable sustainability targets
- Use renewable energy, re-use and recycle materials, and reduce waste and emissions to air, water and soil
- Minimize any negative impact on biodiversity, climate change and water scarcity

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## Business Ethics

- Commit to conducting business with integrity and the highest ethical standards including the core principles of the OECD's Due Diligence Guidance for Responsible Supply Chains
- Prevent bribery, corruption, conflict of interest, insider trading, money laundering and breaches of confidentiality or privacy
- Ensure employees, subsidiaries, affiliates, suppliers, customers, service providers or other business partners do not accept or give payments, gifts or loans which could adversely impact the integrity of their or Kolmar's business
- Comply with all applicable national and international trade laws and regulations including competition (anti-trust) laws, data privacy and trade restrictions and sanctions imposed by the relevant authorities

- Respect the privacy and confidential information of employees and business partners, and protect data and intellectual property from misuse
- Prevent misconduct and reinforce a culture of integrity through implementation of internal training programs, appropriate compliance management policies, and procedures and controls which facilitate compliance with all applicable laws, regulations and standards
- Business partners may demonstrate their compliance with the principles in this Sustainability Code of Conduct with their own code of conduct or through appropriate and effective company policies that ensure compliance with Kolmar's standards.

## REPORTING

Our business partners should contact the Legal and Compliance Department at Kolmar if they have any questions and/or to report any concerns related to potential illegal or improper conduct at:

Email: [Legal@kolmargroup.com](mailto:Legal@kolmargroup.com)

Address: Kolmar Group AG (Attn: **General Counsel**)  
Baarerstrasse 18, 6300 Zug, Switzerland

Reports will be promptly investigated and appropriate corrective action will be taken.

This Sustainability Code of Conduct should be read in conjunction with Kolmar's ESG and Privacy policies and procedures, with which all Kolmar's employees, directors, representatives, subsidiaries, affiliates, contractors, subcontractors, agents and business partners are required to comply. The above-mentioned policies are available to view on [www.kolmargroup.com](http://www.kolmargroup.com) and may be amended from time to time.



