

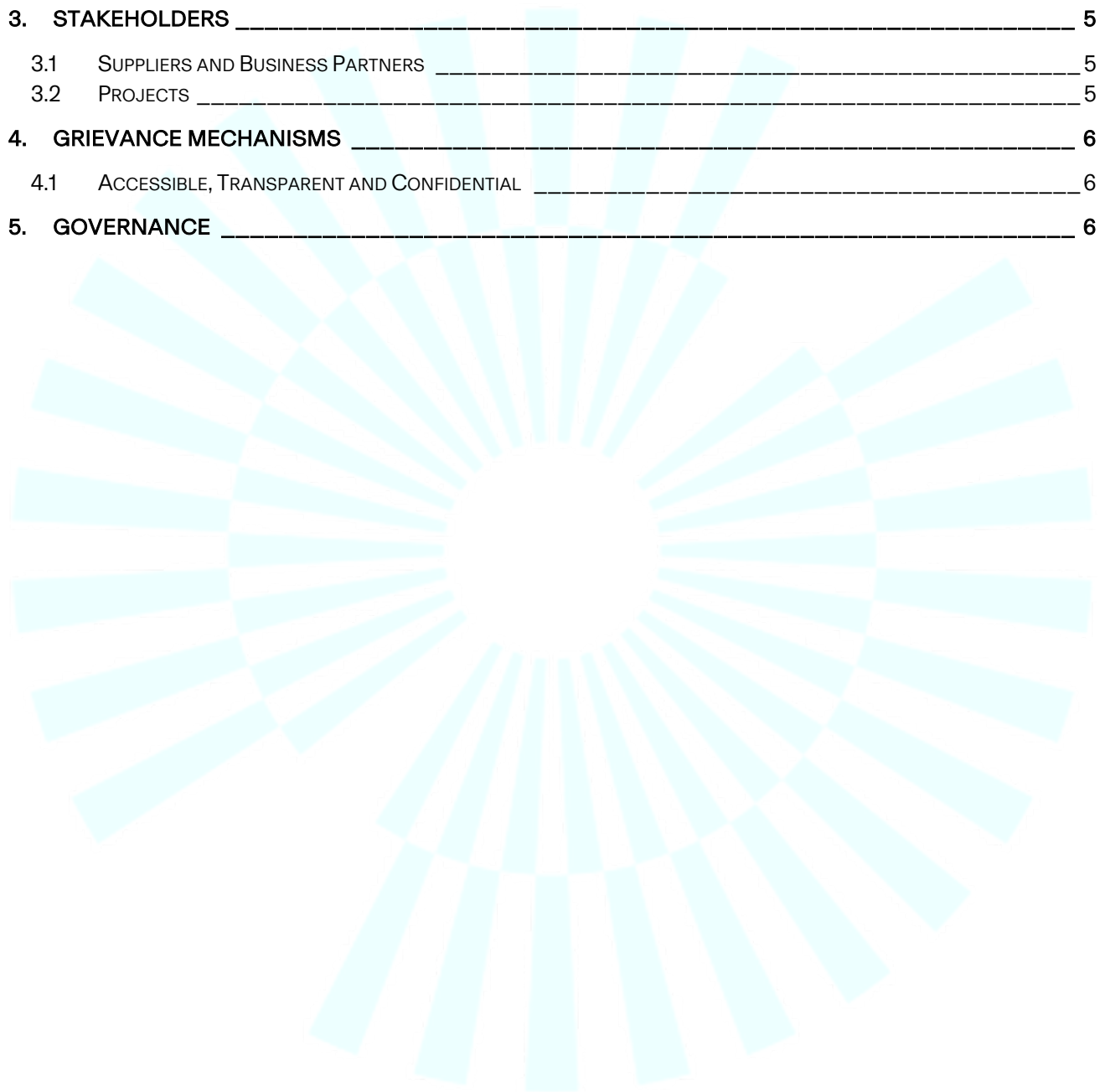


Human Rights Policy

ACT Commodities Group

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Sustainable Market Solutions Holding B.V., and Affiliated Companies¹ (hereafter 'ACT') is committed to upholding and respecting human rights in all aspects of its operations and activities. ACT recognizes its pivotal role in the overall energy landscape and acknowledges the impact its operations can have on the lives, well-being, and rights of individuals and communities.

We are committed to a comprehensive Human Rights Policy that safeguards human rights at every stage of our operations. This policy outlines the implications for our company, stakeholders, and the broader society.

1. Core Priorities

1.1 Guiding Principles

1.1.1 Commitment

We uphold the principles of internationally acknowledged human rights, as outlined in the United Nation's Global Impact on Human Rights², International Bill of Human Rights³, the fundamental labour standards detailed in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work⁴, and the human rights guidelines detailed in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct⁵.

1.1.2 Delivery

We will meet our responsibility to respect human rights by incorporating these principles into our internal policies, processes and guidance. This includes training and development; conducting human rights due diligence through our risk and impact management processes, and grievance management. We aim to equip our businesses to identify potential impacts on the rights of individuals across local communities and workers affected by our operations.

2. Employees

2.1 Diversity, Equity and Inclusion (DEI)

2.1.1 Commitment

We are committed to fostering a diverse, equitable, and inclusive workplace that values and respects every individual.

We recognize the value of diverse perspectives and backgrounds. We are dedicated to building a culture that ensures people from all walks of life are welcomed, heard, and celebrated.

We are committed to providing equal opportunities for all employees, irrespective of their background, identity, disability, or experiences.

We are committed to create an environment where all employees feel valued and empowered to contribute their unique insights.

We are dedicated to continuously educating ourselves and our workforce about the importance of DEI.

¹ For the purpose of this policy "Affiliated Company" shall mean, any entity that, directly or indirectly, controls, or is controlled by, or is under common control with, the ACT Commodities Group B.V. that is established in The Netherlands

² <https://unglobalcompact.org/what-is-gc/mission/principles/principle-1>

³ <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

⁴ <https://www.ilo.org/declaration/lang--en/index.htm>

⁵ <https://www.oecd-ilibrary.org/docserver/81f92357-en.pdf?expires=1693568217&id=id&accname=quest&checksum=95585D524B2F6A72E6EEDC880432CA8C>

2.1.2 Delivery

Our leadership is fully committed to DEI initiatives and is actively involved in supporting, championing, and ensuring the implementation the policy across all facets of our organization. We provide equal opportunities at all stages of employment, from promotion to compensation to professional development, with all employment decisions grounded in merit.

Our assessments consider qualifications, skills, performance, and accomplishments, and we maintain a zero-tolerance stance against any form of discrimination towards employees or job applicants. We do not discriminate based on personal attributes unrelated to work, such as race, colour, religious beliefs, pregnancy, gender, sexual orientation, gender identity or expression, transgender status, national origin, ethnicity, social background, marital or familial status, age, physical or mental disability, medical condition, genetic information, veteran status, military service, union membership, or union involvement.

We are dedicated to establishing a transparent and inclusive process for nominating and selecting individuals to serve on our governance bodies. We actively seek out candidates from diverse backgrounds and experiences, ensuring that a broad range of voices contributes to decision-making.

We conduct regular internal workshops, training programs, and awareness campaigns to challenge biases, broaden perspectives, and foster empathy.

2.2 Working Conditions (Corporate Offices)

2.2.1 Commitment

We are dedicated to maintaining safe, healthy, and supportive working conditions that prioritize the physical and mental well-being, and productivity of our employees. For more information, please refer to our Employee Code of Conduct.

2.2.2 Delivery

We prioritize health and safety through adherence to regulations, offer ergonomic setups, and encourage work-life balance with flexible arrangements. Our commitment to zero tolerance for harassment ensures a safe, respectful, and inclusive work environment for all employees. We encourage employees to pursue continuous learning and professional growth through relevant certifications and participation in global events and conferences.

2.3 Working Conditions (Factories)

2.3.1 Commitment

We commit to treat everyone with equity, dignity, and respect, and provide decent working conditions. We are against all forms of harassment, child labor, forced or compulsory labor, modern slavery, and discrimination across our own operations, supply chain, and with business partners.

We uphold the rights of our employees in factories to freely associate, organize, and collectively bargain through trade unions, as essential components of their fundamental human rights. For more information, please refer to our Sustainability and Quality Management System (Fuels) which covers safety requirements for production, processing, and transport of products, including external service providers and/or partner organizations.

2.3.2 Delivery

We engage in thorough due diligence, conducting regular audits and assessments to verify compliance and rectify any potential violations to gauge the risk for modern slavery, child labor, and human trafficking across our internal operations within factories.

We champion fair wages, safe environments, and opportunities for growth, fostering a workplace culture where human rights are valued.

We engage in constructive dialogue and collaboration with staff to address workplace concerns to promote employee well-being, and uphold the principles of fairness, equity, and dignity.

3. Stakeholders

3.1 Suppliers and Business Partners

3.1.1 Commitment

We commit to develop our supply and value chain as a reflection of our overall values, marked by transparency, accountability, and social responsibility. We commit to ensure that our suppliers and business partners respect the highest ethical standards and embrace principles that reject any form of discrimination, forced labor, child labor, or unsafe working conditions.

3.1.2 Delivery

Our Ethical Guidelines for Suppliers and Business Partners establishes our expectations concerning human rights across our supply chain and business operations. By championing respect for human dignity, we strive to create a supply chain and business operations ecosystem that not only sustains our business but also uplifts the lives and rights of all those who contribute to our success.

For more information, please refer to ACT Ethical Guidelines for our Suppliers and Business Partners and Business Supplier Code of Conduct policy within the Sustainability and Quality Management System, which incorporates these principles as part of ISCC Certification policy⁶. Both certification and quality management requirements cover requirements regarding our modern slavery policy.

3.2 Projects

3.2.1 Commitment

We recognize the rights of indigenous peoples and local communities to participate in decisions affecting their lands, territories, and resources in our self-developed projects. We honor the rights of special groups or individuals who may be more susceptible to adverse impacts, encompassing but not limited to women; national or ethnic, religious and linguistic minorities; people with disabilities; LGBT+ people, and migrant workers and their families.

3.2.2 Delivery

Across our self-developed projects involving affected communities, we promote comprehensive stakeholder consultations to understand the needs, concerns, and expectations of the concerned stakeholders. Through active dialogue, we aim to incorporate their feedback and ensure our projects align with local priorities and aspirations.

We promote voluntary engagement, transparent dialogue, and equitable sharing of information, in line with the "Free" and "Informed" aspects of Free, Prior, and Informed Consent (FPIC). Our commitment to "Prior" consultation guarantees that these conversations occur well before any project actions, allowing ample time for meaningful deliberation. We honor the principle of "Consent," wherein decisions are respected, and projects proceed only when stakeholders grant their unequivocal agreement.

Our delivery extends to diligent monitoring and reporting of project-related incidents and complaints. Any person from the affected communities including indigenous and local communities that wants to report any complaint

⁶ [ISCC System Documents - ISCC System \(iscc-system.org\)](https://www.iscc-system.org/)

(deviation from our human rights policy) or incidents (deaths, injuries etc.) can reach out to the project implementor or our grievance management portal at <https://actgrievances.speakup.report/external>.

To ensure the integrity of our efforts, we reserve the right to third-party audits of our projects. Independent audits provide an objective evaluation of our compliance with environmental, social, and governance standards.

4. Grievance mechanisms

4.1 Accessible, Transparent and Confidential

4.1.1 Commitment

We are committed to fostering a fair, transparent, and supportive workplace for all our employees and stakeholders. Central to this commitment is a robust grievance mechanism that empowers both the internal and external individuals to voice their concerns, ensuring that every voice is heard, and every issue is addressed promptly and equitably.

We are dedicated to ensuring that our grievance mechanism is accessible to everyone regardless of their position, background, or role within the organization.

4.1.2 Delivery

We understand the sensitivity of grievances and the importance of maintaining confidentiality. Our commitment to impartiality underscores that all grievances will be treated with fairness, free from bias or favoritism. We do not tolerate any form of retaliation against our employees for speaking up and raising concerns in good faith about suspected misconduct.

Anyone who is working for or on behalf of ACT, our suppliers and business partners can raise their concern through our speak up policy. ACT has engaged a third party, that is fully independent and separate from ACT, that acts as an alternative reporting line outside the internal reporting lines. Via this service, our suppliers and business partners can report on an anonymous or confidential basis via a website, an application, or via a voice memo. The Speak Up Service is available 24/7, 365 days a year. Concerns or report is routed to pre-designated representatives within ACT for review, to the Speak Up Committee as required, and to take appropriate action. For more information, please refer to our Speak-Up policy⁷.

We conduct training sessions to educate employees about the grievance mechanism policy to explain the process, the importance of raising grievances, and the steps involved.

5. Governance

The duty and obligation for handling human rights matters extend throughout ACT. This encompasses the human rights committee, which exercises supervision over human rights affairs, encompassing the assessment of our effectiveness in addressing risks related to modern slavery.

The committee comprising of senior staff members from ESG, Compliance, Fuels, and Primary Departments of the organization examines existing and emerging human rights risks that could have significant implications for the company. Ultimately, business segments and regional operations bear the responsibility of executing measures to fulfil the undertakings outlined in this policy and all pertinent group mandates.

We provide annual updates to stakeholders regarding the execution of this policy through several relevant disclosures, which encompass our sustainability and the annual report.

⁷ [Link of Speakup Policy](#)