



Neda General Trading Importer of
Petroleum Products Ltd.

Code of Ethics Handbook



Foreword

NGT's Code of Ethics outlines the company's core values, guiding principles, and expected behaviours for all employees and collaborators. Its aim is to foster ethical conduct in all interactions with stakeholders, including customers, shareholders, partners, suppliers, and public authorities.

The Code emphasises key values such as compliance with the law, responsibility, and respect. It establishes clear standards of conduct in areas like integrity, fair competition, and environmental sustainability.

1. Purpose

- 1.1 This Handbook establishes core values and ethical principles, guiding employee behaviour and ensuring alignment with the company's mission, values, and culture.
- 1.2 Establishing clear expectations for ethical behaviour, this Handbook serves to proactively deter misconduct such as bribery, corruption, discrimination, and harassment. This commitment to integrity and transparency cultivates trust among stakeholders.
- 1.3 When faced with ethical dilemmas, employees can consult the code for guidance, ensuring decisions align with the company's values and minimise potential harms.
- 1.4 At NGT, your voice matters. We encourage employees to ask questions, raise concerns, and propose improvements to our business practices. To ensure ethical conduct, we urge you to promptly report suspected violations of laws, company policies, or internal controls to your manager. This allows us to swiftly investigate and take appropriate corrective action.

Terms used in this policy:

- a) "we", "our" and "us" refer to NGT
- b) "third party" includes but is not limited to: any individual or organization we come into contact with during the course of our work; actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

It is imperative that all our employees read, understand and act in accordance with this Handbook, in conjunction with the relevant Employee Handbook or local employee policies.



2. Laws and Regulations

- 2.1 The cornerstone of NGT's operating principles is unwavering adherence to the laws and regulations of every country in which it operates. Under no circumstances will NGT tolerate any conduct that breaches these laws.
- 2.2 This commitment extends to all parties NGT interacts with, regardless of their purpose. We expect our employees, partners, suppliers, and collaborators to uphold the same values of legality and ethical conduct in their dealings with us. We view adherence to environmental, health & safety, and employment rights standards as core values.
- 2.3 If you face conflicting legislation or are unsure about the right course of action, don't hesitate to consult our Legal Department.

3. Honesty, Integrity and Fair Competition

- 3.1 Honesty is the bedrock of everything we do. It's not just a value, it's woven into the fabric of our organisation and how we manage it. In all our interactions with all stakeholders, we expect our employees to strive for responsible conduct, open collaboration, fairness, and genuine respect.
- 3.2 NGT is firmly committed to fair competition and operating with integrity in all markets we serve. Our employees are expected to rigorously adhere to all applicable anti-trust laws and regulations, ensuring fairness and equal opportunity for competitors, customers, and suppliers alike. Competition laws, sometimes referred to as anti-trust laws, aim to prevent anti-competitive conduct and practices that restrict free trade and fair competition. By upholding these laws, we contribute to a healthy and vibrant marketplace for all stakeholders.

4. Anti-Bribery and Anti-Corruption

- 4.1 NGT operates with unwavering commitment to honesty and ethical conduct. We expect our employees to comply with all applicable anti-bribery laws and anti-corruption laws.
- 4.2 We have zero tolerance for bribery and corruption. Integrity, fairness, and professionalism guide all our business dealings, wherever we operate. NGT strictly prohibits any form of bribery or corruption by employees, contractors, or industry partners.
- 4.3 For further details, please refer to the company's Anti-Bribery and Anti-Corruption Policy Document.

5. Protecting Privacy and Confidentiality

- 5.1 NGT takes your privacy and the confidentiality of your personal information seriously. We only collect and store data essential for our operations and legal compliance. Access to employee information is strictly limited to authorised personnel with a legitimate business need. As NGT employee, supplier, and stakeholder, you are responsible for safeguarding confidential information from unauthorised access and use.
- 5.2 Our employees must follow proper procedures when collecting, using and sharing personal data.
- 5.3 Confidential information may be disclosed only if required by law or authorised for business



reasons. Employees must always protect personnel and business files which contain personal data.

6. Health, Safety and Environment

- 6.1 We are committed to achieving the highest Health and Safety standards in all our activities, across all regions, markets, and countries in which we operate.
- 6.2 We all have a part to play in minimising environmental, health, and safety risks throughout our business, particularly within our areas of expertise and influence.
- 6.3 Driven by sustainability values, NGT implements eco-friendly practices throughout its operations. We address the rising commodities demand by developing solutions that benefit the economy, protect the environment, and empower communities.
- 6.4 For further details, please refer to Health and Safety Handbook and Environmental Policy Document.

7. Fairness, Respect and Workplace Code of Conduct

- 7.1 At NGT, employees across all levels are united by a shared commitment to core values, including diligence, integrity, and equal opportunity. We foster a collaborative environment that prioritises the well-being of our people and strives to provide a safe and respectful space for everyone.
- 7.2 We have zero tolerance for any form of abuse, violence, bullying, or harassment – towards employees, partners, or anyone else.
- 7.3 We believe a diverse range of perspectives strengthens our team. We encourage open communication and provide anonymous reporting mechanisms for individuals to address any concerns. Together, we can create a positive and productive work environment where everyone thrives.
- 7.4 This summary outlines key principles that contribute to a positive and productive workplace experience for all employees:
 - a) **Respect and Dignity:**
 - i. Treat everyone with fairness and respect, regardless of position, background, or personal characteristics.
 - ii. Discrimination, harassment, and bullying are strictly prohibited.
 - iii. Collaboration and teamwork are encouraged to foster a positive and inclusive atmosphere.
 - b) **Professional Growth and Development:**
 - i. We offer opportunities for career growth and skill development through training and mentoring programs.



- ii. Managers are responsible for supporting the professional development of their team members.
 - iii. Continuous improvement of working conditions is a priority.
- c) Equality and Opportunity:
 - i. We provide equal opportunities for all employees based on merit and qualifications.
 - ii. We uphold diversity and inclusion as core values, celebrating the unique contributions of everyone.
 - iii. We comply with applicable laws and regulations concerning fairness and non-discrimination.
- d) Communication and Transparency:
 - i. Open and honest communication is essential at all levels of the organisation.
 - ii. Concerns or issues can be raised without fear of retaliation through various channels.
 - iii. We strive to ensure clear and transparent communication across the company.

8. Failure to Follow Code of Ethics

- 8.1 Compliance with the rules of the Code of Ethics and corporate regulatory instruments is an essential part of our contractual obligations.
- 8.2 Employee's violation of principles and contents of the Code of Ethics is a disciplinary offense and constitutes a breach of the primary obligations as an employee.
 - a) Disciplinary Action: This could range from verbal warnings to written reprimands, suspension, or even termination of employment, depending on the severity of the breach.

9. Code of Ethics Review

This Handbook will be reviewed on a biennial basis, with the next review date in January 2026.