

Code of Conduct



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1. A Message from our Management



Dear colleagues and stakeholders,

Evos enhances a crucial part of the essential goods and resources supply chain by making sure that they are available at the right time and at top quality. In a world of never ending movement and change, we believe that opportunities are meant to be seized, and that our customers' businesses should always run smoothly.

It is enabling smooth business that empowers us. With our impressive heritage, backed up by our shareholder's vision of long-term value creation, we have always aspired to evolve our business by suiting it to the circumstances at any time in our history.

We are committed to conducting business with integrity and fairness, abiding by the law and by our own principles. Our commitment is outlined in this Evos Code of Conduct. Our Code of Conduct explains what we stand for and what we expect from each other – both individually and as a team wherever the location and whatever the culture. Our Code of Conduct sets out the principles that we believe will help protect our reputation and allow us to continue doing business by adhering to the highest standards.

Evos provides a fair and safe work environment, together with a healthy business relationship with our customers and other business partners. Our Code of Conduct provides guidelines for the kind of behaviour we expect from all our employees and stakeholders. Local policies, underlying policies and guidelines will be able to give further practical guidance on each topic. Each and all of us is responsible for understanding our Code of Conduct and its underlying policies. Every day, our colleagues provide services to our customers and are at the heart of our company. Our success begins with you. By staying true to our principles and to our Code of Conduct, we will pave the way our future success together.

We rely on your support and thank each of you for the important work you do every day.

Thank you for joining us in committing to uphold the Code of Conduct.

2. Introduction



2.1. Purpose

Our Code of Conduct sets out the corporate rules of conduct that we should all abide by in our everyday choices, decisions and behaviour. It applies to our interactions, transactions and relationships with employees, business partners and governmental authorities. We manage our business according to our principles (Chapter 3) and our rules of conduct (Chapters 4-7) as described in our Code of Conduct. Each of us must observe these principles and rules when acting for - or on behalf of - Evos.

Our Code of Conduct is set to play a vital role in helping us all work together by providing the framework and support we may need to sense critical situations, listen to our inner feelings, and be familiar about exactly where we can find the help we may need. It is our responsibility to follow our Code of Conduct by taking an active part in all the training sessions required of you, by keeping ourselves informed, asking questions or seeking expert advice when we are in doubt.

2.2. Scope

The basis for our business principles and activities are set out in this Code of Conduct, as well as in relevant local legislation, Evos policies and guidelines. Our Code of Conduct and its policies apply to individuals employed by any Evos company, regardless of their contract type or workplace. Our Code of Conduct and its policies also apply to individuals subcontracted to work for Evos via a third-party agreement.

The term "Employee" should be understood to include any Evos director, manager or Employee; any sales representative, any hired personnel; or any third party engaged by Evos, unless the context clearly proves otherwise.

The terms "Evos" and our "Company" refer to Evos B.V. and to any company that Evos B.V. has a majority stake in, or is controlled - directly or indirectly - by Evos B.V.

Evos endeavours to influence the policies and practices of companies where Evos has a non-operating stake, so that they reflect the values as described in our Code of Conduct.

Our Code of Conduct and its policies cannot possibly hope to cover every situation that may arise, nor should it do away with the application of common sense or



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professional judgment. We expect Employees to act as ambassadors for Evos at all times and be mindful of their own and our Company's reputation.

The term "Business Partner", should be understood to include any (potential) contractual partner, customer, supplier, joint venture, (sub-)contractor, financial institution or other third party of Evos, unless the context clearly proves otherwise.

3. Our Guiding Principles



As an international company, we are an organisation of people from different countries, backgrounds and cultures. Our organisation's diversity makes us stronger: this is something we can make use of as a stepping-stone for success in business. Evos is committed to sound business conduct and each and every one of us should abide by the guiding principles, that are set out below.

Our guiding principles are not merely a list of words on a document: we should involve them in our day-to-day regime to help inspire our company culture. Even more important is how all Evos employees carry out their work. Our principles symbolise the fertile ground where we can cultivate our knowledge and expertise.

3.1. Confidence

Reliable Delivery of Excellence

At Evos, we use expertise and experience to deliver consistently reliable results to our customers. Our Employees shall focus on responding to ever-changing needs both swiftly and proactively; and exceed customers' expectations by helping them seize opportunities: we are their back-up in this competitive business. We believe that flexibility, responsiveness and empathy help build trust to form a close, long-lasting relationship with each of our Business Partners.

3.2. Creativity

Solving Challenges by "Thinking outside the Box"

At Evos, we encourage the creation of new possibilities. Being creative provides an opportunity to try out new ideas, imaginative thinking and problem-solving. Creative activities help us acknowledge and celebrate our own uniqueness and diversity.

3.3. Honesty

Inspiring Trust through Straightforward and Transparent Communication

At Evos we inspire trust through no-nonsense, transparent communication. We can gain more credibility by standing by a commitment, showing integrity, thus reaching our goals solely through honourable conduct. Everything we do will be proof of this.

3.4. Responsibility

Caring for each other, our partners and communities

Our aim at Evos is to avoid any harm to individuals, to the environment or to organizations. In cases where a conflict of interest may arise, we always try to find a solution for all the parties involved. As a responsible international company, we are committed to reducing our activities' environmental impact and to striving for equal rights and opportunities for all.

4. Respect for People and our Planet



At Evos we strive to provide a seamless supply chain, combined with reliable and responsible storage, production, and handling, together with a complete range of logistics- related services for essential energy and chemical products. We recognize our responsibility we have towards any of the potential personal or environmental consequences of our activities. We provide sustainable services with total respect for the environment. We are similarly committed to minimizing any potential negative effects our activities may cause, especially those we can directly influence, whether to individuals or the environment.

We support the United Nations' Sustainable Development Goals specifically those where we can make a significant material difference, such as good health and well-being; affordable and clean energy; industry, innovation and infrastructure; and reduced inequalities.

4.1. Health and Safety

People are our greatest assets. We provide a safe and healthy working environment and are committed to complying with any legal, health or safety requirement. It is our aim to preserve and promote the health of everyone present at our terminals at any time. Everyone is responsible and anyone is called upon to contribute towards improving the health and safety of our colleagues, Business Partners or any other third party involved.

At Evos, we are committed eliminating hazards, and reducing and managing potential risks. We have a structured risk-based procedure in place to identify, classify, prioritize and control hazards and risks. We consistently consult and seek our Employees' and their representative bodies' advice on ensuring a safe working environment. Should it be deemed advisable, we shall even exceed existing rules and regulations and - as a responsible partner - encourage others to follow our example. We strive to continually upgrade procedural and occupational safety at our terminals. We have a comprehensive set of procedures and policies in place. We expect our Employees and Business Partners to attend all the required safety training, courses that are mandatory for our sector and locations. Always follow safety fundamentals and report any incident, unsafe situation or near miss in the appropriate reporting systems.

We uphold high work and ethical standards to maintain a safe work environment for everyone. We do not tolerate Employees and/or other third parties using, possessing and/or being intoxicated by alcohol, drugs or non-prescribed medicines;

carrying weapons; or taking part in gambling (or any other game of chance) during business hours or when present at our premises.

4.2. The Environment

The products that we produce, store and service for our customers are crucial for society at large, but at the same time may be harmful to the environment when leaked, spilled or emitted. We shall abide by any safety regulation, policy or procedure to prevent any such product spills to the surrounding soil, and ground- or surface water, and minimize atmospheric emissions at all our sites. We operate in compliance with all applicable regulations that seek to protect the environment from the direct impact of our business activities. We continuously seek to minimize the potential negative effects of such activities on the environment.

4.3. Our Society

We care dearly for the good health and well-being of all the people who work for our Company and those around us. We acknowledge the boroughs and communities we are involved in as important stakeholders. It is only by engaging and co-operating closely with local port and social organisations that we can hope to progress towards everyone's common goals. We are aware of this responsibility: not only to the communities we operate in, but also to our society as a whole. We aim to contribute to a more sustainable economy by introducing sustainable technologies and processes, and by facilitating the transition to cleaner and more renewable resources as a response to changing needs and expectations.

4.4. Human Rights

We carry out our business activities with respect for people's fundamental dignity and human rights. This is anchored in our principles, our policies and standards. We respect all regulations regards forced labour, child labour, (modern) slavery, non-discrimination, freedom of association and collective bargaining. We will not engage in any of the following: child labour, slavery or forced labour, dishonest remuneration, non-compliant environmental pollution or other breaches of basic human rights.

We are an organization that promotes unceasing honesty, responsibility, confidence and creativity. Therefore, we strive to establish and promote the best practices for a respectful and ethical treatment of our workers, and promote sustainable conditions whereby workers earn fair recompense for their efforts at a safe, healthy workplace. We expect our Employees to ensure that they and all our Business Partners comply with our Company's commitments to human rights. We encourage all our Employees, Business Partners and any third parties affected by our activities, to speak up if they suspect or observe any potential breach of human rights.

4.5. Equality and Fairness

We treat people fairly and as equals, based on the principle of non-discrimination. We aim to create a working environment where all individuals are able to make the best use of their skills, free from discrimination, harassment or victimization and where any decision is based on merit. We employ, reward and promote people based on their competence and on the principle of equal opportunity. We will not accept anyone be treated differently due to their gender, race, skin colour, national or social origin, age, disability, sexual orientation, beliefs, or political convictions under any circumstances. We strive to create a work environment where each and every Employee has an equal opportunity to join in, grow and succeed. We respect all and any cultural or individual diversity, and promote inclusiveness.

A key aspect of safeguarding the personal dignity and equality of each employee is to ensure that harassment, in whatever form, never occurs. We treat our colleagues with respect and fairness, and avoid any situation that may be deemed inappropriate. We do not tolerate behaviour that leads to an intimidating or offensive work environment. This include, but not be limited to; physical, verbal, sexual or psychological harassment, bullying, discrimination, violence, abuse or threats. If Employees were to observe - or even suspect - such behaviour in the workplace, we encourage them to speak up.

More guidance can be found in
the Evos Human Rights Policy

5. Business Integrity



5.1. Anti-Bribery and Anti-Corruption

We do not tolerate any form of bribery or corruption. We comply with all and every applicable anti-bribery and anti-corruption laws in the jurisdiction where we operate, and train all of our relevant staff extensively in such matters. We expect every Employee to comply with the law. Our anti-bribery and anti-corruption policies apply both to the public and private sectors.

Evos prohibits the following: receiving, offering, promising, giving or authorising or any item of value in order to influence the behaviour of government or business personnel – whether directly or indirectly – to try to gain (or retain) a commercial advantage; or to induce or reward the recipient for acting unlawfully; or under any such circumstances that would be deemed inappropriate for the recipient to accept such a reward.

We expect Employees to be on their guard and follow applicable laws and policies when providing anything of value (such as gifts, entertainment, hospitality or charitable donations) at all times. If Employees were to observe – or even suspect – that such exaction is taking place, we encourage them to speak up.

More guidance can be found in the Evos Policy on Anti-Bribery and Anti-Corruption

5.2. Export Controls and Sanctions

The fact that we provide a range of services to international customers and have terminals in several European countries means that we are required to abide by export controls and sanctions in jurisdictions both home and abroad (as well as any European Union, United Kingdom, Australian or United States export controls or sanctions). The term “Export Controls” should be understood to be regulations that are designed to support domestic and international security measures. The term “Sanctions” should be understood to be political and financial rulings that apply to nations, bodies or individuals who bring international peace or security into disrepute in any way. Breach of these international rulings may lead to sanctions against our Company or Employees. Therefore, we thoroughly screen and research the parties we do business with.

More guidance can be found in the Evos Policy on Export Controls and Sanctions

5.3. Antitrust and Competition

We fully support free enterprise and honest competition. We only engage in fair and ethical dealings and conduct ourselves and act in compliance with applicable laws. Any illegal pricing, market allocation, cartel arrangements and abuse of the economic power must be avoided. We ban any unlawful agreement with Business Partners and/or competitors and ensure that our actions cannot be deemed breaches of competition laws.

More guidance can be found in the Evos Policy on Antitrust and Competition

5.4. Anti-Money Laundering and Financing of Terrorism

At Evos, we do our utmost to avoid illegal or criminally obtained money or funds becoming part of the legal economy (money-laundering); or that funds from the legal economy be used for crime or terrorism. Employees are expected to know who they do business with and should not deal with any person or body that may be suspected to engage in criminal intent or activity. We shall help our Employees ensure that everyone at Evos complies with local laws and reporting requirements. We encourage all our Employees, Business Partners and third parties affected by our activities to speak up if they have any concerns about money-laundering or terrorism financing activities.

More guidance can be found in the Evos Policy on Anti-Money Laundering

5.5. Business Partners, Agents and Other Intermediaries

We seek to do business with partners who share our principles, and values and our commitment to responsible business conduct. After all, Business Partners may have a direct impact on our reputation due to their behaviour. We expect our Business Partners to act with integrity and fairness, adhere to applicable laws, and behave in a manner that is consistent with our standards and principles. We use reasonable demands to ensure that they comply with our Code of Conduct and Supplier Code.

We shall detail products and services fairly and accurately in our marketing practices and in our interaction with customers. Suppliers are expected to comply with the Evos Supplier Code. We encourage all our Employees to speak up if there is any suspicion or doubt about a Business Partner's misconduct. We also encourage any of our Business Partners to speak up if they have any concerns regarding possible breaches of the law or of this Code of Conduct.

More guidance can be found in the Evos Supplier Code, the Evos Policy on Anti-Bribery and Anti-Corruption, the Evos Policy on Anti-Money Laundering, the Evos Policy on Human Rights, and the Evos Policy on Export Controls and Sanctions

5.6. Conflict of Interest

Evos related decisions must not be influenced by personal or private considerations. Employees have to avoid any activity that may conflict with their responsibilities at Evos or which may be deemed an abuse of their position. It is important to avoid situations where conflict may arise between Evos and personal interests: even the mere idea of such a conflict of interest should be avoided. If a conflict of interest does exist or appears to exist, please be transparent and discuss it with a colleague, a manager and/or the Evos Group Compliance Manager.

6. Safeguarding Assets and Information



6.1. Safeguarding Assets

Our terminals are located on the borders of the European Union and are considered critical supply chain infrastructure. We store valuable goods, both for our customers for society at large. Security plans are implemented and maintained, and the boundaries of our terminals are monitored and safeguarded to protect our infrastructure, the goods we store, and all the people working at our sites.

For us to carry out our work, we need to deploy company assets such as equipment, material, company funds, intellectual property and business information. Evos protects its corporate assets just as our Employees are expected to do and use them prudently to avoid loss or waste. The same principle applies to any of our Business Partners' assets used by Employees, whether at our locations or not. Use these assets as if they were your own and look after them in a responsible fashion. Theft or wilful destruction are strictly forbidden.

6.2. Fraud

The term "Fraud" should be understood to be wilful deception for personal or third-party gain by means of financial or reputational harm to Evos. Examples of fraud include document forgery, the misappropriation of company assets or resources (including theft) and, - in some cases - intentionally bending or breaking internal rules. Evos will not tolerate fraud of any kind: it is unethical, illegal and could mislead or deceive both internal and external stakeholders. In order to protect the interests of all stakeholders, it is essential that we be alert to and prevent fraudulent behaviour. We expect Employees to be alert to fraud and encourage them to speak up if they suspect fraudulent practice is going on.

6.3. Accurate Reporting

We abide by generally accepted reporting principles. We emphasize the importance of reporting both financial and non-financial (security, and personal and environmental safety) data accurately and in a non-misleading way. Any

information that Employees record or report on behalf of Evos must be done honestly. All of our records (including accounts and financial statements) must be detailed to a reasonable and appropriate standard, must be updated in timely fashion, and reflect all transactions and our financial position correctly.

6.4. Responsible Communication

Preserving and improving the reputation of Evos is of key importance. Therefore, any external communication must only be performed by authorized personnel. Employees are not permitted to comment on or reply to external media inquiries, and are obliged to refer such inquiries to expressly authorized personnel at their location immediately. Remember that any online communication - including social media - that refers to Evos may affect our reputation. When Employees use social media, whether at work or at home, they should do so responsibly by applying common sense and professional judgement.

More guidance can be found in local guidelines responsible communications

6.5. Privacy and Data Protection

Data privacy and protection laws regulate the safeguarding individuals' and businesses' information. We understand the importance of data privacy, data protection and cybersecurity. Protecting the privacy and security of our Employees and Business Partners is a top priority, and compliance is central to this goal.

Employees may not use, modify, share or distribute any private or business sensitive information concerning an Employee, Business Partner, or Evos' business activity, which has no proper business argument or underlying agreement, without appropriate authorisation.

Digital systems - and any information processed or saved thereon - used and stored pursuant to relevant data protection and security rules and standards.

More detailed information can be found in the Evos Privacy Policy, local (IT) security policies and in our other applicable local policies and guidelines

6.6. Confidential Information

6.6.1. Intellectual Property

We develop our business and promote the principle of creativity within our organisation in a continuous fashion. Ideas, innovation and top level services are understood as integral components of our Company identity that enable us to conduct better business. Patents, trademarks and other intellectual property rights are considered strategic tools for us to reach our business goals and cannot be shared with a third party.

6.6.2. Confidential and Proprietary Information

During our daily work we come across all kinds of business sensitive and confidential information. Examples include budget and audit reports, business plans, strategies, innovations, agreements and financial statements. It is essential that we respect and protect our Company's confidential and proprietary information and only share or use it to the extent expressly authorised. This also applies to confidential information belonging to third parties.

More guidance can be found in the Evos Policy on Confidential and Proprietary Information

6.6.3. Insider Information

We do not engage in any form of market abuse. In our day-to-day business we may come across insider information, such as news about possible acquisitions or financial results. No-one involved with our Company is allowed to use such insider information and should keep such information confidential. Keep Evos in-house information inside Evos and only share it on a need-to-know basis and only then with Business Partners who have signed a confidentiality agreement.

More guidance can be found in the Evos Policy on Confidential and Proprietary Information

7. Our Responsibilities



7.1. Our Responsibilities

We expect Employees to act in accordance with the law, and with our Code of Conduct and its underlying policies at all times. Wherever laws, regulations or self-regulatory agreements are more restrictive, they prevail. We expect everyone to promote a culture of openness, where we all feel comfortable about raising questions, dilemmas and concerns regarding the interpretation of - or observance of - this Code of Conduct.

We must take full responsibility for acting with integrity, even when this may mean making a difficult choice. Meeting our responsibilities is what enables us to succeed and grow, both today and in the future. Management Employees are in a position to have a specific role to play in sustaining our reputation and licence to operate. Managers are expected to implement this Code of Conduct and our Principles actively. They are similarly expected to exemplify the highest standards of ethical business conduct and create an open, transparent environment where concerns or suspicions can be raised without fear of retaliation.

Evos operates internationally, which means that we are subject to the laws and regulations of different countries. We are all responsible for upholding the laws and regulations applicable to ourselves - as individuals, and to our work- as an organisation. Where differences exist as a result of local customs, norms, laws or regulations, Employees must apply either the Code of Conduct or the local requirements - whichever demands the highest standard of behaviour.

This Code of Conduct is not intended to be a comprehensive rulebook and cannot possibly address every situation that a person may face. We are expected to read the Code of Conduct carefully and then simply lead by example.

If confronted with a difficult business decision that is not addressed in this Code of Conduct, we encourage you to discuss it with your colleagues or manager.

7.2. Seek Advice & Speak Up

When in doubt, be open, seek advice, and discuss possible dilemmas. Evos provides resources to help Employees who find themselves needing to discuss ethics and compliance issues that may be difficult to resolve alone.

A direct manager or supervisor is an Employee's first resource, since this person should be familiar with the employee's environment. If a manager or supervisor is not available, or even if the Employee in question is not comfortable discussing the matter with his or her direct manager or supervisor - the following resources are also available:

- The HR Manager at the Terminal;
- The Manager's Manager or the Managing Director at the Terminal;
- The designated Terminal Compliance contact (internal or external);
- The Evos Group Compliance Manager.

Employees and/or Business Partners may also report their concerns online via the Evos Integrity Line (<https://evos.integrityline.com/>). All reports may be made confidentially and may even be made anonymously, providing that this is feasible and permitted by law.

You can find more guidance in the Evos Speak Up Policy

7.3. Reporting Concerns and Breaches

We treat all reports of ethical concerns confidentially. Evos will only share such information expressly with specific individuals who have been specifically requested to address the question or concern at hand. In some cases, said individuals may be required to share the information with the appropriate legal authorities. The person making the report may also request to remain anonymous (see Chapter 7.2). Making a deliberately false accusation of unethical behaviour shall be considered a breach of this Code of Conduct and – as a result – may lead to disciplinary measures being taken.

7.4. Investigation

Employees are expected to cooperate with investigations proactively by providing the necessary information on request. Any investigation shall be initiated by the Evos Group Compliance Manager, in cooperation with the HR department as appropriate.

Should Employees be involved in an investigation process of any nature or scope, those involved shall be expected to:

- keep, safeguard and furnish any pertinent information or data;
- provide true, accurate, complete statements about the events and people involved in the investigation;
- avoid sharing or releasing any detail or information related to an investigation process;
- avoid initiating an investigation on their own without direct supervision or without the HR manager in charge.

7.5. Non-Retaliation

We are all responsible for maintaining a culture where concerns and potential problems can be shared. No-one is going to suffer if we decline a business transaction in order to observe to our Code of Conduct or its underlying policies. Be assured that no-one will be penalised for raising concerns about a suspicion of misconduct in good faith via one of the Speak Up channels.

Any form of retaliation against an individual speaking up shall not be tolerated. Retaliation against individuals who have made a report shall be treated as a breach of this Code of Conduct and – as a result – may lead to disciplinary measures being taken.

7.6. Disciplinary Measures

Non-adherence to our Code of Conduct, may lead to serious consequences, both for Evos and the individuals involved. On an organisational level, Evos may be held liable and fined, and its reputation may be severely damaged. In addition, on an individual level, the person involved may also be held liable and fined.

Depending on the circumstances of the breach, the response from Evos may include: re-training, a verbal or written warning, demotion; other employment consequences, such as disciplinary measures that may even lead to termination of employment. More guidance can be found in the local policies on disciplinary measures.

The English Version of the Evos Code of Conduct shall always prevail in case of a discrepancy or inconsistency between the English Version and any translation into other languages

