

**Tree Trading DWC-LLC**  
**CODE OF CONDUCT**

TT.C001\_v02

08/2022

PAGE 1/5



**Contents**

**1. Our People..... 2**

**1.1 Equal opportunity ..... 2**

**1.2 Valuing diversity ..... 2**

**1.3 Respect ..... 2**

**1.4 Health and safety ..... 2**

**1.5 Personal information and communication ..... 2**

**2. How we work ..... 3**

**2.1 Operating responsibly ..... 3**

**2.2 Relationships with public officials ..... 3**

**2.3 Compliance with all applicable laws and regulations ..... 3**

**2.4 Anti-bribery and corruption ..... 3**

**2.5 Political activity ..... 3**

**2.6 Commitment to human rights and labour requirements ..... 4**

**2.7 Relationships with counterparties and partners ..... 5**

**3. Whistleblowing and enforcement ..... 5**

<b>Tree Trading DWC-LLC</b> <b>CODE OF CONDUCT</b>	TT.C001_v02
	08/2022
	PAGE 2/5

## *1. Our People*

It is on our people's expertise, innovation, drive and relationships that we depend for the development and growth of our business. Talent is precious to us and we create an environment in which individuals can reach their full potential, unfettered by hierarchy. At the same time, we expect people to behave responsibly and with commitment.

**Tree Trading** has a flat, meritocratic organisational structure. We believe this encourages an entrepreneurial and collaborative approach, with everyone primarily focused on delivering results, efficiently and safely.

### *1.1 Equal opportunity*

At **Tree Trading**, all individuals are judged solely on the basis of merit and contribution to the success of the company, and seek to create an environment which enables everyone to reach their potential.

### *1.2 Valuing diversity*

We operate in a complex global marketplace. We strongly believe that diversity among our workforce enables us to work better, identify innovative solutions and deliver the continuous questioning required to ensure the business operates effectively and captures the appropriate growth opportunities, recognising and valuing the benefits diversity brings.

### *1.3 Respect*

All our employees have the right to be treated with respect and no form of harassment will be tolerated. Employees should be respectful in their dealings with colleagues, customers, counterparties, partners, stakeholders and peers.

### *1.4 Health and safety*

Our employees have a right to work in a healthy and safe environment. **Tree Trading** conforms to HS standards, have the appropriate health and safety procedures and policies in place, and comply with relevant legislation. We expect our employees to be mindful and responsible in their approach to HSE, in all aspects of their work.

### *1.5 Personal information and communication*

We respect the right to privacy for individuals and have processes in place to safeguard any personal information **Tree Trading** may have.

All employees should be mindful of the impact their communications may have on **Tree Trading**, even if in a personal capacity, for example through social media, and should comply with the communications policy. Any queries relating to appropriateness of communications should be raised with Corporate Communications.

<b>Tree Trading DWC-LLC</b> <b>CODE OF CONDUCT</b>	TT.C001_v02
	08/2022
	PAGE 3/5

## *2. How we work*

### **Responsible and ethical conduct of business**

We expect all our employees to conduct themselves ethically, as well as in accordance with our code of conduct, and our policies and procedures.

All business conducted on **Tree Trading**'s behalf should be compliant with the applicable laws and regulations.

#### *2.1 Operating responsibly*

We take our responsibility towards health, safety and the environment seriously. **Tree Trading** has implemented the appropriate Health and Safety procedures and policies in place, and comply with relevant legislation.

#### *2.2 Relationships with public officials*

**Tree Trading** will always engage with the relevant authorities in any jurisdiction in which it operates and respect the confidentiality of these relationships.

All of our relationships with public officials will be in compliance with our anti-corruption policy. All employees must ensure they are familiar with and comply with **Tree Trading**'s anti-corruption policy.

#### *2.3 Compliance with all applicable laws and regulations*

All business conducted on **Tree Trading**'s behalf should be compliant with the applicable legislative and regulatory regime, including international sanctions. All employees must ensure they are familiar with and comply with relevant laws and regulations.

#### *2.4 Anti-bribery and corruption*

We do not tolerate bribery or corruption in our business. We have an anti-corruption policy in place, in accordance with all relevant legislation. All employees must ensure they are familiar with and comply with **Tree Trading**'s anti-corruption policy.

#### *2.5 Political activity*

As a company, **Tree Trading** is not affiliated with any political party. When appropriate, **Tree Trading** will engage with the relevant government officials on matters pertaining to its business. Nonetheless, we respect the right of our employees to participate in the political process. No **Tree Trading** funds should be used to support political parties. Employees must comply with the anti-corruption policy.

<b>Tree Trading DWC-LLC</b> <b>CODE OF CONDUCT</b>	TT.C001_v02
	08/2022
	PAGE 4/5

*2.6 Commitment to human rights and labour requirements*

**Tree Trading** seeks to conduct its business in accordance with the UN Global Compact's ten principles, including those on human rights. We believe that all people should be treated with respect and dignity. Employees should conduct themselves accordingly.

In regards to labour requirements, **Tree Trading** considers the rights and obligations established by national law, while at the same time fulfilling the following:

- Not use child labour

- *The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in the next point;*
- *In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours;*
- *No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations;*
- *The organization shall prohibit the worst forms of child labour.*

- Not use any form of forced and compulsory labour

- *Employment relationships are voluntary and based on mutual consent, without the threat of a penalty;*
- *There is no evidence of any practice's indicative of forced or compulsory labour, including, but not limited to, the following: physical and sexual violence, bonded labour, withholding of wages /including payment of employment fees and/or payment of deposit to commence employment, restriction of mobility/movement, retention of passport and identity documents, and threats of denunciation to the authorities.*

- Ensure that there is no discrimination in employment and occupation

- *Employment and occupation practices are non-discriminatory.*

- Respect freedom of association and the effective right to collective bargaining

- *Workers are able to establish or join worker organizations of their own choosing.*
- *The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.*
- *The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.*

<b>Tree Trading DWC-LLC</b> <b>CODE OF CONDUCT</b>	TT.C001_v02
	08/2022
	PAGE 5/5

- *The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.*
- *Collective bargaining agreements are implemented where they exist.*

### *2.7 Relationships with counterparties and partners*

Our business is built on relationships and we value the many partnerships we have built. Furthermore, we respect the confidentiality of all our commercial relationships. We expect our employees to appreciate the importance of counterparties and customers to our business. Notwithstanding, the appropriate on-boarding and monitoring procedures must be followed at all times and we expect all employees to comply with the applicable policies. Any employee with concerns or queries should raise them with Management. Customer confidentiality should be respected as permitted and required by law.

### *3. Whistleblowing and enforcement*

We are all responsible for ensuring the code of conduct and policies are applied throughout the organisation. Employees who become aware of a breach or potential breach of the code should contact management. **Tree Trading** will never retaliate against any employee for making such a disclosure. **Tree Trading** takes any breach of the code extremely seriously and will take action as it deems appropriate against any employee who commits a breach of the code.