



TRANS-OIL

Group of Companies

CODE OF CONDUCT

**Approved by Board of Directors:
25 May 2026**

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Terms and Definitions

Code: this Code of Conduct.

Group: Trans-Oil Group and its companies from time to time, as applicable.

Covered Persons: all persons to whom this Code applies, including employees, directors, officers, members of governing bodies, secondees, consultants, contractors, agents, intermediaries, suppliers, and other relevant third parties acting on behalf of, or contributing to the activities of, the Group, to the extent applicable.

AML: Anti-Money Laundering

ILO: International Labour Organization

OECD: The Organisation for Economic Co-operation and Development

1. Introductory message

Trans-Oil Group is an agro-industrial conglomerate with a wide range of activities, including oilseed crushing, grain handling and storage, international commodities trading, vegetable oil in bulk, bottled oil, and flour production. Trans-Oil Group is engaged primarily in sunflower oil production, as well as in origination and logistics, all of which are entirely owned and operated by the group. The business segments of the Group are:

- **Crushing and Refining** - processing of oilseeds to get vegetable oil for the food industry and meal for animal feed. The Group owns and operates a network of oilseed crushing facilities strategically located in the Republic of Moldova, Romania, and Serbia. The Group's sunflower oil brands are the leaders in the local markets and are increasingly expanding internationally in Europe, Asia, Africa and the Middle East.

- **Grains and Trading** - Trans-Oil Group is the leader in export of grains and oilseeds in the Central and Eastern Europe. The Group operates an extensive network of storage facilities across the Republic of Moldova, Romania and Serbia, ensuring fully integrated and managed operations.

- **Export Terminals** - Trans-Oil Group provides grain, oil handling and transshipment services, through terminals located in Reni (Ukraine), Giurgiulesti (Republic of Moldova), Pancevo & Backa Palanka (both Serbia). These facilities ensure efficient operations and integrated logistics across the region.

Trans-Oil Group conducts its activities based on the principles of integrity, legality, responsibility, and respect. The Group's reputation is built not only through commercial and operational performance, but also through the way we behave in our relationships with colleagues, partners, authorities, communities, and other stakeholders. This

Code sets out the minimum standards of professional and ethical behavior applicable within the Group and constitutes a fundamental corporate governance document that must be observed by all Covered Persons. No commercial, operational, or financial pressure justifies a departure from the law, this Code, or the Group's internal policies.

2. Purpose of the Code

The purpose of this Code is to define the standards of conduct applicable throughout the Group, to strengthen an organizational culture based on integrity, responsibility, and respect, to support compliance with relevant laws, regulations, and internal and external standards, and to guide decision-making when ethical, operational, sustainability, or compliance risks arise. Through this document, the Group also seeks to protect its reputation, its assets, the environment, its people, and its legitimate long-term interests.

3. Scope of application

This Code applies to all employees of Trans-Oil Group, regardless of position, seniority, or jurisdiction, as well as to administrators, directors, members of governing bodies, secondees, and persons temporarily working within the Group. Furthermore, to the extent provided by the relevant contractual relationship and applicable internal rules, the principles of this Code also extend to consultants, agents, intermediaries, contractors, suppliers, and other third parties acting on behalf of the Group or contributing to its activities and supply chain. Every Covered Person is required to be familiar with, understand, and comply with this Code.

4. Our values

The fundamental values of Trans-Oil Group are integrity, respect, responsibility, and compliance. Integrity means that we act properly, honestly, and transparently in all our activities. Respect governs the way we treat people and institutions, based on dignity, professionalism, and fairness. Responsibility means assuming the consequences of our actions and protecting the interests of the Group, communities, and the environment. Compliance reflects our commitment to observing the law, applicable regulations, international sanctions, internationally recognized standards, and internal rules in all jurisdictions in which we operate.

5. Compliance with the law and the Group's policies

Trans-Oil Group conducts its activities in compliance with all laws and regulations applicable in the jurisdictions in which it operates. All persons covered by this Code are required to comply with relevant legislation, sanctions and export control regimes, anti-corruption, anti-fraud, and anti-money laundering rules, fair competition rules,

health and safety, and environmental protection requirements, as well as the Group's internal policies, procedures, and controls.

The Group complies with applicable tax laws and regulations in the jurisdictions in which it operates and seeks to ensure that its tax obligations are properly recorded, declared, and paid in full and in a timely manner.

6. Individual and managerial responsibilities

Each employee is required to act in good faith and with professionalism, to comply with this Code and internal rules, to avoid conduct that may harm the Group, to seek guidance when in doubt, and to promptly report any reasonable suspicion of a violation. Managers have an additional responsibility to serve as role models of ethical conduct, to create a culture of responsibility and openness, to encourage the reporting of integrity concerns, to treat reports seriously, impartially, and confidentially, to not tolerate retaliation, and to ensure the effective, not merely formal, implementation of the Group's rules.

7. Conflicts of interest

Persons covered by this Code must avoid any situation in which personal interests may influence, or appear to influence, decisions made in the interest of the Group. Conflicts of interest may arise, for example, in the case of business relationships with relatives or close persons, holding significant financial interests in suppliers, customers, competitors, or partners, using one's position or information for personal purposes, or carrying out external activities that affect the Group's independence, performance, or reputation. Any actual, potential, or apparent conflict must be promptly disclosed and managed in accordance with internal rules.

8. Anti-bribery, anti-corruption, and anti-fraud

Trans-Oil Group applies zero tolerance toward corruption, bribery, fraud, embezzlement, and any other unlawful or unethical practices. It is strictly prohibited to offer, promise, request, or accept any undue advantage, make facilitation payments, use third parties to circumvent applicable prohibitions, conceal the nature of a payment or transaction, or present false, inaccurate, or misleading information. Particular attention must be paid to interactions with public officials, port authorities, supervisory bodies, business partners, and intermediaries.

9. Gifts, hospitality, and other benefits

Gifts, invitations, hospitality, sponsorships, donations, and other benefits may be offered or accepted only when they are lawful, reasonable, transparent, properly documented where required, justified by a legitimate business purpose, and compliant with the Group's internal policies. It is prohibited to offer or accept any benefit that may

improperly influence a decision, reward improper conduct, or create the appearance of an undue advantage.

10. International sanctions, export controls, and responsible trade

Given the international nature of the Group's operations, compliance with economic and financial sanctions, trade restrictions, and export control rules is mandatory. The Group will not initiate, facilitate, or continue activities that violate applicable sanctions regimes or other restrictions. Employees involved in trading, shipping, logistics, port operations, procurement, finance, and contracting must exercise heightened caution when dealing with insufficiently known counterparties, high-risk jurisdictions, non-transparent ownership structures, and vessels, operators, intermediaries, or transactions that raise compliance concerns.

11. Prevention of money laundering and knowing our partners

Trans-Oil Group is committed to preventing the use of its business for money laundering, terrorist financing, or other unlawful activities. For this purpose, the Group applies measures relating to the identification and verification of partners, identification of beneficial owners, assessment of the purpose and nature of the business relationship, and monitoring of business relationships.

We cannot enter into transactions involving funds generated through criminal activities such as fraud, terrorism, or drug trafficking. If we were to do so, we could violate anti-money laundering and counter-terrorism laws.

Trans-Oil Group takes seriously red flags relating to requests for cash payments, payments to third parties not involved in the contract, or other unusual payment arrangements.

12. Fair competition and fair business practices

Trans-Oil Group competes lawfully and fairly. Anti-competitive agreements or arrangements, unauthorized exchange of commercially sensitive information with competitors, market, customer, or supplier allocation practices, and any other conduct that violates competition laws are not permitted. All business relationships must be based on professionalism, merit, quality, price, transparency, and compliance with the law.

13. Political neutrality and contributions

The Group maintains political neutrality in the conduct of its business and does not make political contributions, whether in cash or in kind, to political parties, political organizations, candidates for public office, or any related persons or entities. Group funds, assets, facilities, services, or other resources must not be used to support political activities, campaigns, or interests. Any exception may be made only where

expressly permitted by applicable law and specifically approved in advance by the Board of Directors.

14. Accurate records and reporting

All documents, registers, accounting records, commercial information, operational reports, and data used within the Group must be complete, accurate, and prepared in a timely manner. It is prohibited to make false or misleading entries, intentionally omit relevant information, conceal the nature of an operation, or destroy documents in violation of applicable rules. Documentary integrity is essential for the Group's credibility in its relationships with banks, investors, auditors, authorities, and business partners.

15. Respect in the workplace

Trans-Oil Group promotes a work environment based on dignity, respect, fairness, and professionalism. Discrimination, harassment, intimidation, violence, verbal or physical abuse, degrading or humiliating conduct, and retaliation against persons who report legitimate concerns in good faith are not tolerated. Open communication, cooperation, and mutual respect must characterize relationships among colleagues, managers, contractors, suppliers, and other persons interacting in the course of the Group's activities. Decisions regarding recruitment, promotion, evaluation, and remuneration must be based on objective criteria, merit, and performance.

16. Human rights and labor standards

The Group respects human rights and fundamental labor standards within its own operations and seeks the same standards in its relationships with its partners and throughout the supply chain. The Group's activities must be compatible with internationally recognized principles regarding human dignity, freedom, and the fair treatment of individuals, including the principles reflected in the Universal Declaration of Human Rights, the International Labour Organization Conventions, the OECD Guidelines for Multinational Enterprises, and, where relevant, applicable modern slavery and human rights legislation. Forced labor, child labor, human trafficking, exploitation, degrading treatment, and serious violations of dignity and fundamental freedoms are not tolerated. Employment relationships must be lawful, freely chosen, fair, and transparent, and working time, rest periods, and remuneration must comply with applicable legal requirements. The Group also respects freedom of association and the right to collective bargaining, in accordance with ILO Conventions and applicable law, and seeks constructive dialogue with employee representatives and trade unions where such structures exist.

17. Diversity, inclusion, and equal opportunity

Trans-Oil Group is committed to maintaining a diverse, inclusive, and fair work environment in which all employees, contractors, and collaborators are treated with dignity, respect, and fairness. Differences in experience, perspective, background, and abilities are considered a valuable resource for the Group's sustainable development, innovation, and operational performance. The Group does not tolerate discrimination based on sex, age, nationality, ethnicity, race, religion, disability, marital status, sexual orientation, political opinion, or any other criterion protected by law. Employment and professional development policies and practices must be based on merit, qualifications, performance, and fair treatment, including the principle of fair pay for equal work.

Trans-Oil Group promotes inclusive practices that allow persons from diverse backgrounds to contribute fully and develop professionally. Open communication is encouraged, and mechanisms for raising concerns or reporting potential violations are made available without fear of retaliation.

18. Health and safety, and environmental protection

Trans-Oil Group considers the protection of people's health and safety, as well as environmental protection, to be essential priorities and central elements of its responsible conduct. The Group seeks to prevent occupational accidents, work-related illnesses, industrial incidents, and adverse environmental impacts by identifying hazards, assessing risks, and implementing appropriate control measures.

Each employee has the responsibility to remain vigilant in identifying hazards, to actively contribute to risk prevention, and to maintain a safe working environment for all those involved.

In fact, all persons working within or on behalf of the Group must comply with health and safety rules and standards, use the required protective equipment and measures, report incidents, near misses, and unsafe conditions, participate in training, and stop work when they reasonably believe that there is a serious risk to health, safety, or the environment.

Any accident, near miss, unsafe condition, or relevant health issue must be reported immediately so that the necessary measures can be adopted without delay. Full cooperation is also required during safety inspections, audits, and incident investigations, as these are essential elements in preventing similar events in the future.

All covered persons must be prepared to respond appropriately in emergency situations and to follow the procedures established for such cases. When an activity

presents a serious risk to health or safety, there is not only the right, but also the responsibility, to stop work and immediately report the situation.

The Group also encourages a proactive attitude from everyone, so that each person contributes to the continuous improvement of workplace health and safety practices and conditions.

At the same time, the Group seeks to prevent pollution, use energy, water, and other natural resources responsibly, manage waste efficiently, reduce emissions, and adopt practices and technologies that improve resource efficiency and climate resilience. In processing, transportation, handling, storage, and port operations, priority is given to preventing fires, explosions, leaks, contamination, and other events that may affect people, communities, the supply chain, and the environment.

19. Relationship with partners, the supply chain, and responsible supplier conduct

Trans-Oil Group seeks to work with partners, suppliers, consultants, agents, and other third parties who adhere to appropriate standards of legality, integrity, and responsible conduct. In selecting and maintaining relationships with third parties, the Group may take into account their compliance reputation and track record, transparency of ownership structure, sanctions, corruption, fraud, and AML risks, as well as relevant health, safety, labor, and environmental standards. The Group promotes responsible sourcing and expects its business partners to adopt practices consistent with this Code and, where applicable, with the Group's Supplier Code of Conduct, including with regard to environmental protection, respect for human rights, working conditions, prevention of deforestation, protection of biodiversity, and reporting of relevant incidents or concerns. The Group may request documents, information, and compliance commitments from its partners and may take measures where their conduct is incompatible with the Group's standards.

20. Relationship with affected communities and social responsibility

Trans-Oil Group recognizes that its activities may have social, economic, and environmental effects on neighboring communities and other stakeholders. For this reason, the Group seeks to act responsibly, respect the rights and interests of affected communities, and contribute, in a reasonable and sustainable manner, to their health, safety, and well-being.

The Group encourages open and transparent dialogue with communities and other stakeholders, seeks to understand their legitimate concerns, and endeavors to reduce the negative impacts of its operations by protecting the local environment, shared resources, and relevant social and cultural heritage. Complaints and concerns

raised by communities must be treated seriously, documented, and addressed appropriately, and retaliation against persons who raise such issues in good faith is strictly prohibited.

21. Protection of the Group's assets and resources

The Group's assets, including tangible property, financial resources, equipment, IT systems, data, and commercial information, must be protected and used exclusively for legitimate business purposes. Unauthorized, abusive, fraudulent, or wasteful use of the Group's resources is prohibited.

22. Confidentiality and information protection

Persons covered by this Code are required to protect the confidential information of the Group and its partners. Such information includes, without limitation, commercial, financial, contractual, operational, technical, strategic, and other non-public information. Confidential information may be disclosed only on the basis of a legitimate business need, proper authorization, or a legal obligation. Unauthorized disclosure, misuse, or careless handling of confidential or non-public information may harm the Group or third parties and may result in disciplinary, contractual, civil, administrative, or criminal consequences, as applicable. This obligation continues even after the end of the employment or collaboration relationship.

23. Privacy and Personal Data Protection

Trans-Oil Group respects the right to privacy and is committed to protecting the personal data of employees, candidates, contractors, business partners, customers, their representatives, and other individuals with whom it interacts in the course of its activities. Personal data must be processed lawfully, fairly, transparently, and only for specific, explicit, and legitimate purposes.

Personal data may be collected, used, accessed, stored, transferred, and disclosed only to the extent necessary for a legitimate business purpose, for compliance with a legal or contractual obligation, or on another valid legal basis. The Group seeks to ensure that personal data is adequate, relevant, and limited to what is necessary for the purpose for which it is processed, and that it is retained only for as long as necessary in accordance with applicable legal requirements and internal rules.

Any transfer of personal data to third parties or to other jurisdictions must take place only where permitted by law and in accordance with the Group's internal procedures and controls. Where the Group engages suppliers, consultants, or other partners to process personal data on its behalf, such parties must provide adequate assurances regarding confidentiality, security, and compliance with applicable data protection laws.

24. Reporting concerns and protection against retaliation

Any person covered by this Code is required to report, in good faith, actual or potential violations of the law, the Code, or the Group's policies. Reports may concern, without limitation, corruption or fraud, sanctions or AML breaches, undeclared conflicts of interest, falsification of documents, health, safety, and environment violations, environmental issues, harassment, discrimination, or other serious misconduct.

Reports may be raised through the reporting channels made available by the Group, including a line manager, designated whistleblowing channels, and any dedicated reporting e-mail address, hotline or web-based reporting mechanism. Reports may also be made anonymously, to the extent permitted by applicable law and the Group's internal reporting mechanisms.

The Group prohibits any form of retaliation against persons who raise a legitimate concern in good faith or who participate in an internal investigation.

25. Investigations and cooperation

All persons covered by this Code must cooperate fully, honestly, and promptly in internal investigations carried out by the divisions responsible for internal control. It is prohibited to obstruct an investigation, provide false or incomplete information, conceal or destroy relevant documents, or exert pressure on persons involved in the investigative process.

26. Violations and consequences

Violation of this Code may result, as appropriate, in disciplinary, contractual, or legal measures. Depending on the seriousness of the conduct and the specific circumstances, consequences may include warnings, disciplinary measures, termination of employment or collaboration, termination of contractual relationships with third parties, and referral to the competent authorities.

27. Implementation and review

This Code is supported through policies, procedures, training, and internal controls. The Board of Directors, supported by senior management and the relevant control and support functions, is responsible for oversight of adherence to this Code and for promoting its effective implementation throughout the Group. Trans-Oil Group shall ensure communication of the Code to relevant persons, periodic staff training, and periodic review of its content.

Unless an earlier revision is required due to legislative, operational, risk, governance, or sustainability developments, the Code should be reviewed at least annually and updated as appropriate. To the extent necessary, the Group may implement integrated management systems, internal and external audits, and other

monitoring mechanisms to support transparency, accountability, and continuous improvement. Compliance with this Code constitutes a fundamental professional obligation within the Group.