

Modern Slavery and Human Trafficking Statement

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

INTRODUCTION

This statement is made on behalf of Tricon Energy Ltd and its subsidiaries, including but not limited to Tricon Energy UK Ltd., pursuant to Section 54 (a) of the UK Modern Slavery Act of 2015, and other applicable laws and regulations related to slavery and human trafficking.

OUR BUSINESS

Tricon business is the global trade and, for some products, local and regional distribution, of chemicals, dry bulk, fuels, plastic intermediates, and fertilizers. We provide logistics, risk management and financing services. Products are marketed globally, meeting specific location, quality, timing, and volume requirements. We also provide a versatile range of price risk management, financing and contracting alternatives to our clients.

OUR SUPPLY CHAINS

TRADE

We purchase approximately 172 different products from dozens of suppliers and sell to our customers in approximately 63 different countries. In some cases, we use the support of law firms to assist in the negotiation of commercial agreements.

LOGISTICS

Our logistics involves contracting entities that provide the following modes of transport: railcars, trucks, barges, and both dry bulk and liquids vessels. We also store product in tanks located in different parts of the world. We buy and sell directly but also do business with the support of agents, freight forwarders and customs brokers.

RISK MANAGEMENT

With the support of top consulting firms, we manage various risks in our operations, including price risk, credit, liquidity and operational risks.

FINANCING

We provide various forms of financing to our customers and suppliers. We participate in prepayment arrangements, secured financing structures, and provide open account terms. In some cases, we use the support of financial consultants.



OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

While we run our business with the clear goal of ensuring complete customer and supplier satisfaction by addressing the needs of the physical commodity industry and adding material value to the overall supply chain, we are also keenly aware that corporate responsibility is key to managing risks and maximizing on the opportunities available to all of us in a changing world. We at Tricon are committed to improving our practices to combat slavery and human trafficking. This Statement forms part of Tricon's governance framework and adherence to it and related operating procedures is the responsibility of every Tricon Manager, Director, Officer and Employee. The compliance team is led by Bryan Elwood elwoodb@triconenergy.com

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Tricon has implemented a Corporate Social Responsibility Policy, which forms part of Tricon's governance framework and adherence to it and related operating procedures.

- Tricon will apply fair labor practices and provide equal opportunity in all aspects of employment. We will not engage in unlawful workplace conduct, including discrimination, intimidation, or harassment.
- Tricon will work with its suppliers to help them treat their workers and employees fairly and with dignity and respect, maintain safe working conditions, and conduct manufacturing activities in an environmentally safe and responsible manner.
- Tricon will not tolerate human rights abuses, human trafficking and/or slavery, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

• SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

Tricon has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values Tricon has implemented a Third-Party Onboarding Policy and Procedures where we screen the Third Parties we transact with. We also work with our third parties and contractors to recertify periodically that they have firm policies and practices that fully reject and avoid slavery and/or human trafficking practices, and that they are systematically alert and ensuring that these practices cannot occur in the provision of their services.

• RISK ASSESSMENT AND MANAGEMENT

We will periodically conduct reviews of the implementation of this policy, to bring insights on ways we can tackle slavery and human trafficking. Additionally, we will conduct risk assessments in response to any material changes in our slavery and human trafficking risk profile.

• MEASURING PROGRAM EFFECTIVENESS

KPIs will be used to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

• TRAINING

We will periodically train our staff to ensure they have a high-level understanding of the risks of modern slavery and human trafficking in our supply chains and our business. We will also reach out to our business partners and request that they provide relevant training to their staffs.