



OQ TRADING – Supply Chain Policy

May 2025

OQ TRADING – SUPPLY CHAIN POLICY

1. Version Control

Date	Author	Version	Change Reference
May 2025	Mark Craig	1.1	

2. Document Custodian

Name	Position
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3. 1st Approver(s)

Name	Position	Date of Approval
Tahira Hassan	Compliance Manager	5 May 2025
Sam Naylor	Chief Financial Officer	5 May 2025

4. Final Approval

Name	Position	Date of Approval
Wail Al Jamali	Chief Executive Officer	20 May 2025

5. Distribution

Copy	Names	Location
1	OQT (All Employees)	All Offices

1. PURPOSE

- 1.1 The purpose of this Policy is to ensure that OQ Trading Limited and its subsidiary companies (together, the “**OQT Group**”) conduct our business responsibly and in compliance with our social, ethical and environmental obligations.

2. SCOPE OF APPLICATION

- 2.1 This Policy applies to:
- (a) the OQT Group and its directors (acting in their capacity as such), officers, employees and secondees; with regards to
 - (b) our relationship with and engagement of any person or entity that provides, sells or leases materials, products or services directly to the OQT Group (“**Suppliers**”).
- 2.2 Our Suppliers, when working with the OQT Group, are also expected to act in a manner consistent with this Policy.
- 2.3 Supply chain activity must be for legitimate business requirements and authorised in accordance with the OQT Group’s policies and procedures (including the Delegation of Authority and Code of Conduct).
- 2.4 If there is any uncertainty as to whether or not this Policy applies, or in its interpretation/application, you must seek guidance from the Legal department.
- 2.5 Note this Policy does not override the requirement to comply with applicable law. In the event of any inconsistency between this Policy and applicable law, the higher standard will apply.

PRINCIPLES

1. COMPLIANCE WITH APPLICABLE LAW

- 1.1 It is fundamental to the operations of the OQT Group that we comply with applicable law in all jurisdictions in which we operate. This includes, but is not limited to, the matters set out below in this Policy.
- 1.2 We also require that our Suppliers comply with applicable law in their dealings with the OQT Group.
- 1.3 The foregoing standard is the minimum requirement. We recognise that applicable laws may vary across the jurisdictions in which we and our Suppliers operate but we should always seek to honour any higher principles and standards of this Policy to the fullest extent (provided it would not put any entity or individual in violation of applicable law).

2. HUMAN RIGHTS

- 2.1 We are committed to the universal protection of fundamental human rights, as set out in the UN Universal Declaration of Human Rights, in a manner consistent with the UN Guiding Principles on Business and Human Rights. This includes inalienable rights and freedoms addressing issues such as modern slavery, discrimination and child labour.

- 2.2 We expect our Suppliers to adopt a similar commitment to the protection of human rights, including to prevent, mitigate and where appropriate remedy human rights abuses that they cause or contribute to.

3. ENVIRONMENT

- 3.1 We acknowledge the importance of minimising the environmental impact of our activities and are focused on improving our environmental performance, consistent with the aspirations stated in the OQ SAOC Sustainability Policy.
- 3.2 We expect our Suppliers to commit to identifying and addressing the impacts of their business on the environment, including reducing their carbon footprint in line with the goals of the Paris Agreement.

4. HEALTH AND SAFETY

- 4.1 We are committed to providing a safe working environment for our employees and require the same of our Suppliers.
- 4.2 Providing a safe working environment includes:
- (a) assessing health and safety hazards and risks;
 - (b) implementing health and safety controls;
 - (c) provision of appropriate protective equipment and training; and
 - (d) enshrining a culture of safety as a management priority.

5. TRADE RESTRICTIONS/SANCTIONS

- 5.1 We operate in an industry which is the subject of trade restrictions imposed by numerous authorities (including the UN, the US, the EU and the UK) and strict compliance with all applicable trade restrictions is mandatory in all activities the OQT Group undertakes.
- 5.2 Further, we have additional contractual obligations relating to trade restrictions with our counterparties (such as banks, insurers and third party trading entities) which often go beyond the legal obligations. Compliance with such obligations is also mandatory (provided always such obligations would not put us in breach of applicable law).
- 5.3 We also require that our Suppliers comply with applicable trade restrictions and any associated contractual obligations in their dealings with the OQT Group.
- 5.4 We operate on the basis of transparency and cooperation and expect the same from our Suppliers.

6. ANTI-BRIBERY AND CORRUPTION (“ABC”)

- 6.1 We acknowledge the absolute requirement to comply with ABC laws and we implement policies, procedures and oversight to ensure strict compliance (as further enshrined in our Code of Conduct and ABC Policy).
- 6.2 Our Suppliers must have a similar commitment to ABC compliance and must never offer, request,

provide, receive or authorise bribes of any kind. Enhanced due diligence will be undertaken on any Supplier acting as an agent or broker on behalf of the OQT Group to evaluate risks associated with ABC (including potential conflicts of interest).

7. ANTI-MONEY LAUNDERING (“AML”)

- 7.1 Similarly, the OQT Group has an absolute obligation to comply with AML laws and maintains policies and procedures designed to ensure strict compliance, as further detailed in our Code of Conduct, our Counterparty Due Diligence Handbook and our Intermediary Due Diligence Process.
- 7.2 We hold our Suppliers to the same standard and expect full cooperation during our onboarding process (in particular, the identification of the ultimate beneficial owner) and the assessment of any subsequent AML risks.
- 7.3 Suppliers and transactions are monitored on a continuous basis to ensure compliance with our AML obligations and any suspicious activity must be immediately reported to the Legal department.

8. COMPLIANCE WITH THIS POLICY

- 8.1 In order to ensure compliance with this Policy, we will:
 - (a) conduct appropriate risk-based due diligence on our Suppliers, including to identify any issues of past non-compliance with the matters addressed by this Policy;
 - (b) train our employees with respect to the implementation of this Policy, both in regards to the obligations of the OQT Group but also in the management of our Suppliers;
 - (c) implement assurance processes to monitor compliance with this Policy;
 - (d) maintain whistle-blowing channels in accordance with our Code of Conduct so that concerns can be anonymously raised by employees and third parties; and
 - (e) regularly review this Policy to ensure it remains responsive to our legal, contractual and ethical obligations.
- 8.2 Where we identify a breach or potential breach of this Policy, we will:
 - (a) promptly investigate the matter to understand the causes or contributing factors;
 - (b) work collaboratively with our Suppliers to address any deficiencies identified and mitigate adverse actual or potential impacts;
 - (c) if appropriate, review our relationship with a Supplier and potentially terminate existing/future engagements;
 - (d) review internal policies and processes, and take appropriate remedial action (including training), to reduce the risk of future breaches; and
 - (e) if the breach relates to the acts or omissions of an OQT Group employee, take appropriate disciplinary action (which may range from a warning through to termination for severe breaches).