



BxT Trading

A Bapco Energies & TotalEnergies Joint Venture

Code of Conduct

Our Values in Practice

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About the Code of Conduct





Our Code of Conduct

- **Is informed by our seven values**, including our core value Responsibility that guide all our actions.
- **Describes the practices** to maintain with respect to safety, integrity, respect for human rights and other areas.
- **Lists the international standards** that BxT Trading applies.
- **Defines our commitments** to our internal and external stakeholders.
- **Describes** the steps to follow when reporting an issue that violates the Code of Conduct or to request guidance.
- **Enumerates reference** texts available to everyone as a further resource.

Intended Users



The Code of Conduct is a reference document intended for BxT Trading employees and employees assigned to BxT Trading. At all times, our actions and behaviour must reflect our values and demonstrate that the Code of Conduct is being observed and put into practice. Ignorance of the Code is no excuse

Managers are responsible for disseminating the Code and ensuring it is understood and applied effectively. To do that, they must:

- Refer regularly to the Code of Conduct with their team members and make sure they fully understand it.
- Promote discussion to encourage employees to speak up and share any concerns they may have.
- Review the reporting channels with employees.
- Ensure strict compliance with the Code of Conduct by the employees under their authority.
- Demonstrate exemplary conduct themselves.

Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings.

More broadly, this document is publicly communicated to all of our external stakeholders: host countries, local communities, customers, suppliers and contractors, business partners, and shareholders. It engages BxT Trading with regard to all of those stakeholders.



01

Our Code of Conduct & Reference Standards



The Most Stringent Standards

- We comply with all national and international laws and standards governing our activities.
- We abide by the OECD Guidelines for Multinational Enterprises as well as the principles of the United Nations Global Compact.
- In the event of a conflict between legal standards and our Code of Conduct, we apply the more stringent standard.
- BxT Trading maintains a dialogue with international, governmental and non-governmental organizations to address their concerns in fields related to our business.
- As provided by legislation governing our activities and our internal guidance, failure to comply with these reference standards can result in sanctions.

Our Code of Conduct, Rooted in our Values

In addition to those reference standards, we are united by seven values. These values are the principles that must guide everything we do. They are reflected in our organizations, procedures and guidelines to provide practical guidance for upholding the Code of Conduct in our day-to-day actions:

- Team spirit
- Performance
- Learning appetite
- Ambition
- Agility
- Respect
- Responsibility in Safety, Ethics, Compliance and Energy Transition

Safety and Respect for Each Other are at the core of our values

Safety



Safety is the core component of a company's responsibility; it is also the foundation of its long-term viability. A company that is not safe or reliable is not a sustainable company. That means that we are uncompromising when it comes to Safety. Cost does not enter into the equation, because Safety is a value that we respect above everything else.

Safety is a daily battle that is waged with humility and vigilance. We must never drop our guard. Accidents are not inevitable. Every accident, no matter how minor, can be avoided. All of us at BxT Trading, at every level of the organization, are mindful of our rules regarding safety and rigorously observe them at all times. Each of us has a personal responsibility and the personal authority to step in when we observe a breach of those rules or feel a situation is unsafe.

In choosing our business partners, we give preference to those who can apply policies equivalent to ours. Upholding our core value of Safety and putting it into practice at all times is essential.

Respect for Each Other

- Respect for Each Other is a cornerstone of our collective principles and our way of demonstrating exemplary conduct. Respect for Each Other means listening to each other.
- Respect for Each Other goes hand in hand with honesty, unwavering personal and business ethics & integrity and, as a result, the rejection of corruption and fraud in any form. It also means honoring the contracts and agreements we sign.
- Respect for Each Other is respect for human rights. We are uncompromising on this point in our operations worldwide
- Respect for Each Other includes respect for the environment and health, consistent with our strategy of responsible, sustainable development.
- Respect for Each Other means making people the core focus of our collective undertaking, valuing diversity and paying attention to the quality of employee dialogue.

Integrity: Fraud and Corruption



We maintain a policy of zero tolerance for fraud of any kind, particularly bribery and corruption, influence peddling and violations of antitrust law.

We do not tolerate any form of corruption or influence peddling, defined as follows:

- Promising or granting payments or benefits of any kind to a public official, private individual or company, either directly or indirectly (through a third party or intermediary), despite its illegality, in return for:
 1. Performing, failing to perform, facilitating, delaying or expediting an action related to official or professional duties, or
 2. Using undue influence to obtain a favorable decision or benefit of any kind from a public authority.
- Soliciting, accepting or receiving a payment or undue advantage of any kind in return for performing, failing to perform, facilitating, delaying or expediting an action related to official or professional duties.

Acts of corruption and influence peddling or violations of antitrust law shall render the culprits and the company alike liable to harsh disciplinary action, both civil and criminal, regardless of the country in which fraudulent behavior occurred, BxT Trading employees and assignees are invited to review our Anti-Corruption Compliance Program to ensure they are abiding by its principles at all times.



Examples of Unacceptable Behavior

Offering a payment or item of value (gifts, travel, hospitality, etc.) to a public official, a member of that official's staff or family, or any person claiming to have influence with that official in return for the issuance of a government permit that is needed to start a project.

- Receiving a gift or hospitality of value from a supplier participating in a call for tenders that could affect the impartiality of the selection process.
- Engaging a person to represent BxT Trading without first:
 - Evaluating the risks posed by that relationship.
 - Defining and delimiting that person's responsibilities.

This will help to ensure that, for example, the representative does not abuse his or her influence or promise or offer advantages of any kind to public officials to obtain an advantage in return.



Respect for Human Rights

All of us are required, collectively and individually, to uphold human rights.

Environment and Health

Our proactive efforts to protect human health and the environment are consistent with our strategy of responsible, sustainable development.

As a responsible energy player, we are committed to promoting efficient and wise use of our energy sources and products. We are attentive to changing consumer needs and expectations. Likewise, it is up to each of us to be careful and vigilant in everything we do, to protect everyone's health. We provide training and conduct employee awareness campaigns





02

The Code of Conduct & Our Employees



The Code of Conduct defines collective and individual values for BxT Trading employees and assignees who must ensure compliance with the Code of Conduct in their daily activities.

1. Personal health and safety

We strive to protect personal health and safety and to assist employees and assignees in protecting their colleagues through training and awareness initiatives.

2. Freedom of association and collective bargaining

We are careful to create working conditions that show respect for people and that allow for freedom of association and collective bargaining. Harassment in any form is not tolerated.

3. Political engagement

We respect the privacy of our employees. With regards to political engagement, employees and assignees have the right to participate in political activities on their own right, if they specify clearly that they do not represent BxT Trading and they notify their line management of any action with the potential to create a conflict of interest.





4. Conflict of interest reporting

All employees and assignees must report any existing or potential conflict of interest. Conflicts of interest can be avoided by following some simple rules; for example, employees and assignees should not acquire an interest in the business of a competitor, supplier or customer, nor should they engage in any occupation outside BxT Trading, with-out their line management's prior written approval.

5. Insider trading prevention

We are especially concerned to prevent insider trading, and we prohibit the use of privileged and confidential information to buy or sell shares or other securities in a publicly traded company.

6. Respect for confidentiality

We respect the privacy of our employees' and assignees' personal data. Every assignee undertakes to uphold the confidentiality of all information and protect our intangible assets. To that end, any disclosure of trade secrets or patented or patentable processes is prohibited.

7. Respect for employees

We promote behavior that instills in every employee and assignee a sense of feeling welcomed as an integral part of our organizations, since diversity is a shared concern.



8. Diversity promotion

We develop our employees' and assignees' professional skills and careers without any discrimination, whether based on origin, gender, age, disability, sexual orientation, gender identity or affiliation with a political or union organization or minority group. Our employees and assignees are hired on the basis of need and each candidate's specific capabilities. We respect the diversity of religious beliefs and the freedom of every assignee to follow articles of religious faith.

9. Communication and dialogue

We give employees and assignees a stake in our future growth by encouraging the dissemination of relevant information, promoting collaboration, fostering an open and honest communication and maintaining an ongoing dialogue.



03

BxT Trading & Its Stakeholders





The Code of Conduct defines BxT Trading' commitments and expectations with regard to its stakeholders.

Host Countries

The Guiding Principles on Business and Human Rights, adopted by the United Nations Human Rights Council in 2011, set out the obligations incumbent on member states to respect, protect and fulfill human rights.

We respect the environment and culture of our host countries.

We respect the sovereignty of host countries and refrain from inter-vening in or funding the political process. We reserve the right, as appropriate, to let governments know our positions on topics related to our operations, employees and shareholders, as well as our belief in the importance of upholding human rights.

Local Communities

We respect the rights of local communities by identifying, preventing and mitigating any impact on their environment and way of life and remedying any situation as needed. We systematically establish dialogue as early as possible to foster lasting relationships with those communities, and we are mindful of opportunities for community development.

We design and implement grievance procedures and corrective mea-sures, particularly on behalf of vulnerable groups, including indigenous peoples.



Customers

We provide customers with quality products and services, and strive at all times to deliver optimal performance at a competitive price.

Attentive to our customers' needs, we continuously monitor, assess and improve our products, services, technology and processes. Our goal is to deliver quality, safety, energy efficiency and innovation at every step of the development, production and distribution processes.

We take steps to ensure the confidentiality of the data our customers entrust to us, in accordance with regulations governing privacy.

Suppliers

With regard to suppliers and contractors, we act with integrity, transparency and respect and operate under clear, fairly negotiated contract terms that reflect the legitimate interests of all parties. This relationship is based on three cornerstones: dialogue, professionalism and meeting commitments. We choose suppliers that can conduct their business responsibly.



04

The Code of Conduct in Daily Practice

Speaking Up



All of us must take responsibility for applying the Code of Conduct. We encourage a culture of openness that allows everyone to express their concerns about the Code of Conduct.

To request advice or report a situation of which you are aware that may be a violation of our Code of Conduct, you have several options available and can choose the one you feel is most appropriate:

- Talk to your line manager;
- Contact the human resources manager for your unit;
- Contact your Compliance Officer
- Present your concern to the Ethics Committee of TotalEnergies SE by writing to this address: ethics@totalenergies.com or to the Speak Up Platform of Bapco Energies: [Speak Up | Bapco Energies](#)



Do not hesitate to take action. The person you contact can direct you to the appropriate unit or department based on the nature of the issue you raise (safety, business integrity, human rights or any other ethics-related matter).

The information you provide will be treated with the utmost confidentiality. We do not tolerate reprisals of any kind against employees who voice concerns in good faith regarding compliance with the Code of Conduct.

“How do I know when a situation poses an ethical problem?”

If you are unsure whether an action complies with our Code of Conduct, ask yourself the following questions:

- Is the action or decision legal?
- Is it free of any conflict of interest?
- What would happen if it were reported in the media?
- How would it be seen five years from now? Does it have a negative impact on stakeholders?

You can also read our related guides and documents (see “Helpful Resources”).



Helpful Resources

Internal Resources: BxT Trading Policies and Rules

- Business Integrity Guide
- Anti-corruption Compliance Program
- Market Compliance Program

External Resources

- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact