



ZUVA PETROLEUM (PVT) LIMITED

SUPPLIER CODE OF CONDUCT

CONTROLLED DOCUMENT

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER (CEO)

Dear business partner,

We strive to be a globally recognized energy logistics group offering best-in-class services, delivering financial performance and operational excellence while staying true to our Values and this Code.

We believe this will position Zuva Petroleum to face all challenges and opportunities without compromising our Values or commitment to manage our business in a safe, reliable, responsible, and sustainable manner.

Responsible sourcing reflects our commitment to consider social and environmental factors as part of our supplier relationships. We expect our suppliers to follow this Code in their own operations and supply chains.

Your commitment to incorporate these requirements as part of your own operations is part of developing a long-term trusted partner relationship with our stakeholders and the communities in locations where we operate.

Together this will ensure a more sustainable future not only for our businesses but also for those participating towards and impacted by our operations. Your continued support towards this Code is much appreciated.

(Bethwell)Gumbo

Bethwell Gumbo

Zuva Petroleum C.E.O

REVISION TABLE:

Revision Date	Pages Revised	By Who	Remarks

1.0 OUR VALUES**1.1. Leadership**

Everyday, we will shape the future in all facets of our business ensuring service excellence and provision of quality products.

1.2. Integrity

Everyday, we are loyal to the absent and are transparent, fair and ethical in all our engagements.

1.3. Safety

Everyday, we will go beyond the compliance requirements to ensure our activities protect property, the environment and life.

1.4. Curiosity

Everyday, we will seek to know what delights our customers and how we can improve continuously to serve them and all stakeholders.

1.5. Empowerment

Everyday, we will nurture human capital as the most important asset of our business.

1.6. Value

Everyday, we will be committed to giving value to all our stakeholders.

1.7. Respect

Everyday, we will treat our customers, colleagues and all stakeholders with respect that is evident in our professionalism.

2.0. OUR SUPPLIERS**2.1 HOW WE WORK WITH OUR SUPPLIERS**

- 2.1.1 We expect our suppliers to share our commitment to ethical, safe and responsible business practices and support our Values as set out herein and in our Ethics Code of Conduct.

DOCUMENT NUMBER: ZP IMS COMP POL 01	ZUVA PETROLEUM (PVT) LIMITED SUPPLIER CODE OF CONDUCT		
EFFECTIVE DATE: 1 MARCH 2025	ISSUED BY: Signed	HEAD OF CORPORATE SERVICES 	Revision No.0
DOCUMENT TYPE POLICY	APPROVED BY: Signed	CHIEF EXECUTIVE OFFICER 	Page 4 of 13

- 2.1.2 We value our relationships with our suppliers. This means that we're careful to ensure we only work with suppliers that share our commitment to ethical business practices and conduct. We treat our suppliers with respect. We work with our suppliers to help them understand our expectations. We are fair, open and transparent (while still protecting the nature of commercially sensitive information) in our dealings with them. We never ask our suppliers to operate in a manner that puts them, or their workforce, at risk. We never ask our suppliers to act in a way that breaches the law, our Values or our Ethics Code of Conduct. We take action if our suppliers break the law.

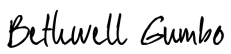
2.2 HOW TO USE THIS SUPPLIER CODE OF CONDUCT

- 2.2.1 For the purposes of this Supplier Code of Conduct, a supplier is any individual or organisation that provides, sells, or leases materials, products or services directly to Zuva Petroleum companies.
- 2.2.2 We require our suppliers, when working with Zuva Petroleum, to act in a manner consistent with this Supplier Code of Conduct. Additionally, we encourage our suppliers to set expectations for their own suppliers that align with this Supplier Code of Conduct.
- 2.2.3 If a supplier identifies a breach of this Code, or facts or circumstances that indicate or could lead to a breach of this Code, they must report it to the relevant Zuva Petroleum business representative within a reasonable timeframe and they must cooperate with any subsequent investigation.
- 2.2.4 We strive to make a contribution to communities wherever we operate by providing employment opportunities and supporting local businesses. Our assets' procurement policies and procedures are developed locally to reflect the diverse environments in which we operate. We work with local suppliers in the context of these procurement strategies to communicate our expectations and build understanding of our requirements.

3.0 COMPLIANCE WITH LAWS

Suppliers must comply with all applicable laws, including but not limited to laws concerning labour rights, workplace health and safety, environmental protection, product safety, bribery and corruption, sanctions and trade controls, money laundering, competition, data protection and privacy and the facilitation of criminal tax evasion.

3.1 MODERN SLAVERY AND CHILD LABOUR

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DOCUMENT TYPE POLICY	APPROVED BY: Signed	CHIEF EXECUTIVE OFFICER 	Page 5 of 13

Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour in their operations and supply chains. Our suppliers must not provide employment to anyone under the national minimum legal age for employment and must take steps to ensure that such persons are not employed in their supply chains. Our suppliers must actively work to eliminate modern slavery and all forms of child labour from their supply chains, including by incorporating the requirements in this section into all contract with subcontractors and suppliers involved in the provision of materials, products, or services to us.

3.2 FAIRNESS AND RESPECT

We expect our suppliers to respect all relevant Labour Standards and to treat their workers fairly and with respect. We expect our suppliers to not unfairly or illegally discriminate based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, or trade union membership. We expect our suppliers to respect workforce rights to lawful freedom of association and collective bargaining. We expect our suppliers to offer fair and transparent terms and conditions of employment including fair remuneration, working hours, and working conditions.

3.3 HEALTH AND SAFETY

Our suppliers must provide a safe working environment for their workers. Suppliers must assess the health and safety hazards and risks in their operations and implement appropriate health and safety controls to protect their workers, including setting the health and safety requirements for the supplier's operations, including providing appropriate personal protective equipment, training their workers, and applying safe work practices. Our suppliers must use and transport hazardous materials safely and responsibly. Our suppliers' products must meet all applicable product safety specifications.

3.4 ENVIRONMENT

We expect our suppliers to commit to identifying and addressing the impacts of their business on the environment by applying the mitigation hierarchy (avoid, minimise, restore/mitigate, offset), and to commit to addressing the impacts of their business on biodiversity with the ambition of achieving no net loss.

3.5 CLIMATE

We have publicly stated our climate change targets and total emissions net zero ambition, recognising the contribution that our suppliers can make to achieving this ambition. Our suppliers must provide on request the carbon footprint data for their products delivered to Zuva Petroleum. We expect our suppliers to develop decarbonisation roadmaps for the reduction of the carbon footprint of their products and associated handling and transportation, in line with the goals of the Paris Agreement.

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DOCUMENT TYPE POLICY	APPROVED BY: Signed	CHIEF EXECUTIVE OFFICER 	Page 6 of 13

3.6 COMMUNITIES

We expect our suppliers to respect the communities where they operate and the human rights of community members, including where they may operate in Zuva Petroleum's host communities. This includes maintaining respectful relationships and communicating openly and honestly with local stakeholders. In connection with the provision of materials, products or services to Zuva Petroleum, we expect our suppliers to identify actual and potential impacts of their activities on their host communities, both positive and negative, to take action to avoid or mitigate negative impacts and to promote positive opportunities.

3.7 HUMAN RIGHTS

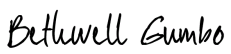
We expect our suppliers to respect their workforce's internationally recognised human rights as set out in the Constitution of Zimbabwe and in a manner consistent with the UN Guiding Principles on Business and Human Rights. We expect our suppliers to understand and address human rights risks that may arise from their business activities and supply chain. If suppliers cause or contribute to an adverse impact on human rights in their business activities and supply chain, we expect that they provide for, or cooperate in, processes to enable an appropriate remedy.

3.8 ACTING WITH INTEGRITY

Suppliers must not tolerate bribery of any kind, whether to a public official or a private individual. They must never offer, provide, or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual. They must never request or accept bribes of any kind, either directly or indirectly. Suppliers must avoid conflict of interests with their obligations to Zuva Petroleum and take steps to declare and manage any conflicts, including in respect of their workers. In line with our commitment to beneficial ownership transparency, we expect our suppliers to consider publicly disclosing their beneficial owners.

4.0 REQUIREMENTS AND EXPECTATIONS

- 4.1 We use the terms 'must' and 'expect' in our Supplier Code of Conduct. Where we use the term 'must', this means that this is a requirement for all Zuva Petroleum suppliers and a failure to meet that requirement will constitute a breach of contract.
- 4.2 Where we use the term 'expect', this means that we consider this constitutes responsible business practice and we encourage suppliers to adopt this practice. In a supplier audit, we expect to see that our suppliers make reasonable efforts to meet these expectations or provide us with a reasonable

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DOCUMENT TYPE POLICY	APPROVED BY: Signed	CHIEF EXECUTIVE OFFICER 	Page 7 of 13

explanation as to why they are unable to do so. If a Zuva Petroleum supplier fails to make reasonable efforts to meet these expectations and is unable to provide a reasonable explanation, this may affect Zuva Petroleum's willingness to continue doing business with that supplier.

5.0 DUE DILIGENCE

- 5.1 We have a comprehensive framework and action plan for identifying and managing the key risks associated with our suppliers, from supplier due diligence, selection, onboarding and monitoring, through to disengagement.
- 5.2 We assess suppliers based on their risk, and direct them to the most appropriate due diligence and management process for their risk level. Our suppliers are required to provide Zuva Petroleum access to relevant information on reasonable request. Our due diligence processes take into account the differing complexity, maturity and circumstances of our diverse supplier base. Our due diligence processes address supplier risks associated with compliance with laws, respect for human rights such as equality, non-discrimination and diversity, respect for workers' rights of freedom of association, modern slavery, child labour, health and safety, and environmental impacts.
- 5.3 We use a variety of tools to assist us in our due diligence processes, which may include: on-site inspections, third party verification, obtaining information from third party sources including authorities, international organisations and civil society, and consulting experts and technical literature. We take a risk-based approach to requiring suppliers to provide evidence of their compliance to the requirements of our Supplier Code of Conduct.

6.0 INVESTIGATIONS AND CORRECTIVE ACTIONS

- 6.1 Where we find instances of noncompliance by our suppliers with the requirements of our Supplier Code of Conduct, we would seek to investigate these incidents to understand causes and contributing factors, and we take appropriate action accordingly. Our suppliers are required to cooperate in the investigation and assessment of potential or actual adverse impacts and provide Zuva Petroleum access to relevant information on reasonable request.
- 6.2 We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified potential or actual adverse impacts as appropriate. However, where we find that a supplier cannot or will not take actions to demonstrate compliance within an agreed timeframe, we may review our continuing relationship with that supplier up to and including termination of

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DOCUMENT TYPE POLICY	APPROVED BY: Signed	CHIEF EXECUTIVE OFFICER 	Page 8 of 13

engagement. If we become aware of facts or circumstances that, in our reasonable determination, indicate that a supplier has breached, or may breach, this Code of Conduct, either (i) intentionally, (ii) repeatedly, (iii) in a manner that we reasonably consider to be serious and unlikely to be capable of remediation, or (iv) in circumstances where we reasonably consider that the supplier cannot or will not take actions to demonstrate compliance within an agreed timeframe, we shall be entitled to terminate our agreement(s) with that supplier by written notice, without prejudice to any other remedy we may have.

7.0 RAISING CONCERNS

7.1 We expect our suppliers to provide their stakeholders, including their workforce and associated communities, access to grievance mechanisms for the confidential raising of concerns without fear of retaliation. A grievance mechanism is a way for stakeholders to safely and anonymously raise a concern about possible negative impacts on them involving a supplier and seek remedy.

7.2 If you become aware of, or suspect that, a breach of this Code has occurred, you must report your concerns to the details provided under:

Report to: The Compliance Coordinator

Zuva Petroleum Private Limited

52 Birmingham Road

Southerton

Harare

Compliance Coordinator: +263 787 107 610

Email: compliance@zuvapetroleum.co.zw

7.3 If a concern remains unresolved or a reporter feels uncomfortable using these local channels, the AQE Raising Concerns Program offers anonymous reporting channels for all of Zuva Petroleum's employees, contractors, suppliers, business partners and other stakeholders, including our indirect suppliers. The Raising Concerns Programme is managed by AQE's head office in London and is available to report concerns in various languages in a secure manner. Concerns may also be reported anonymously through our SafeCall Raising Concerns Platform which can be found at www.aquariusenergy.com/raising-concerns/.