



MIR Trade AG

Alte Haslenstrasse 5 | 9053 Teufen | Switzerland

Tel. +41 71 353 77 88 | Fax +41 71 353 77 80

office@mirtrade.ch

UID-No. CHE-100,725,724

SUSTAINABILITY

ESG – Environmental, Social, Governance

At MIR Trade AG, as a commodity trader, we are committed to fulfil the high ESG standards and are set out to comply with the environmental, social and governance goals. By observing the principles of sustainability, we create value for our shareholders and investors, give our employees a good working environment, are a reliable partner for our suppliers and customers and prove respect to the community and state where our company is based.

We also expect our suppliers and business partners to comply with below standards while conducting business with and/or on behalf of MIR Trade AG. We do our best to select only suppliers that comply with the ESG regulations.

Principles	Targets
<p><u>Legal Compliance.</u></p>	<p><i>We are committed to complying with all regulations and best practice guidelines applicable to our operations and products in the jurisdictions in which we operate and through continuous monitoring of legislative requirements and engagement with government and regulators to ensure full compliance.</i></p> <p><i>Since the end of 2020 we have been implementing a KYC procedure with all our business partners which enables us to undertake an obligation to guarantee the following:</i></p> <p><i>(a) neither Counterparties nor any of its subsidiaries or directors, senior executives or officers, or to the knowledge of the Company, any person on whose behalf the Counterparties are acting, is an individual or entity that is, or is 50% or more owned or controlled by, a Person (or Persons) that is the subject of any economic or financial sanctions or trade embargoes administered or enforced by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) the U.S. Departments of State or Commerce, the United Nations Security Council (“UNSC”), the European Union (“EU”), Switzerland or any other applicable sanctions authority (collectively, “Sanctions”) or based, organized or resident in a country or territory that is the subject of comprehensive (i.e., country-wide or territory-wide) Sanctions (including, as of the date of signature of this</i></p>



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	<p><i>Contract, Crimea, Cuba, Donetsk People's Republic, Iran, Luhansk People's Republic, North Korea and Syria) (a "Sanctioned Country") (collectively, a "Sanctioned Person");</i></p> <p><i>(b) no Sanctioned Person has any beneficial or other property interest in the Counterparties, will have any participation in or derive any other financial or economic benefit from the cooperation with MIR Trade AG;</i></p> <p><i>(c) MIR Trade AG will not use, or make available, the Material or funds (as applicable) provided by the other Party to fund or facilitate any activities or business of, with or related to any Sanctioned Country or Sanctioned Person, or in any manner that would result in a violation of Sanctions, or for any activities or business that could result in the designation as a Sanctioned Person.</i></p>
<p><u>Anti-Corruption and Anti-Money-Laundering</u></p>	<p><i>We prohibit and prevent all forms of corruption, including bribery, bribe solicitation, facilitation payments and extortion as well as money laundering by employees, contractors and business partners.</i></p> <p><i>To prevent fraud and other financial crimes, we maintain high standard in business transparency and ethics, refrain from soliciting or offering of benefits, such as cash, gifts, hospitality, travel or entertainment, in order to obtain or maintain business.</i></p> <p><i>We avoid insider trading or procure others to trade while in possession of material non-public or price sensitive information.</i></p> <p><i>We respectively comply with and act in a manner consistent with all applicable laws, rules, regulations, decrees and/or official government orders of the governments of the United Kingdom, European Union, United States of America, Switzerland or other applicable jurisdiction applicable relating to anti-bribery and anti-money laundering.</i></p> <p><i>We are committed to elaborate and implement the grievance mechanism and applicable procedures available for all Counterparties</i></p>



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	<p><i>through MIR Trade AG official website and special contact e-mail.</i></p>
<p><u>Environment and sustainability</u></p>	<p><i>We give our best to meet the requirements of all applicable environmental laws and regulations in terms of energy consumption, water use, and waste management.</i></p> <p><i>We seek to reduce the environmental impacts of our business operations.</i></p> <p><i>Environmental protection, management and use of hazardous substances and explosives, the responsible use of natural resources as well as renaturation are important goals that our business partners have to pursue.</i></p> <p><i>We are committed to ask all our Counterparties to comply with environmental laws and regulations and implement the procedures to reduce environmental impacts.</i></p>
<p><u>Health and Safety</u></p>	<p><i>We promote a safe and healthy working environment in accordance with all applicable laws and regulations.</i></p> <p><i>We make available to our own personnel protective equipment relevant to the job and the risks associated with the job and ensure proper maintenance of such to employees.</i></p> <p><i>For this we provide adequate mitigation measures and regular trainings to mitigate workplace hazards.</i></p> <p><i>We implement relevant policies and procedures to support the recording and reporting of occupational injuries and illness and other relevant incidents to us.</i></p> <p><i>Strict compliance with health and safety rules is our top priority.</i></p>
<p><u>Social policy</u></p>	<p><i>We expect our business partners to meet the requirements of ILO such as labor protection and industrial safety, labor remuneration, protection of labor rights, observing anti-discrimination policies and ensure dignified and respectful working conditions.</i></p> <p><i>Our aim is to work with business partners who advocate human rights, among others the rights of indigenous people, affected by the extraction operations and take appropriate action to</i></p>

assess, prevent and remedy potential adverse impacts on human rights.

<p><u>Information Security and Data Privacy</u></p>	<p><i>MIR Trade AG complies with all relevant data protection laws and regulations.</i></p> <p><i>We protect the confidential, proprietary and personal information being handled and processed and entrusted by us from our counterparties.</i></p> <p><i>We put in place IT-policies, processes and infrastructure for information security protection to protect against all forms of cyber-attacks or other intrusions into electronic systems as a result of which data of MIR Trade AG or its customers may be lost, stolen or corrupted.</i></p> <p><i>We establish reporting mechanisms and procedures to ensure that information security incidents with potential impact on MIR Trade AG can be reported, monitored, evaluated and responded to in a timely manner.</i></p>
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Teufen, 14 March 2022

MIR Trade AG


Vladimir Rybak


Sandra Graf


MIR Trade AG
9053 Teufen