

# ESG

REPORT  
2024

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## A word from management

Dear valued stakeholders,

As we reflect on our journey through 2023-2024, I am proud to share the progress 2Rivers has made in our ESG initiatives. Our primary focus has been on governance, emphasizing our unwavering commitment to transparency and full compliance with international laws and regulations. Since our rebranding, we have significantly strengthened our compliance programs and internal controls, demonstrating a proactive approach to align our business practices with the highest international standards.

We believe in leading by example in the global energy market. Our adherence to international sanctions and regulations is steadfast, and following our recent Management Buy Out, we have established a clear and transparent ownership and management structure. This clarity is essential in strengthening trust and confidence among our stakeholders.

Our comprehensive compliance framework includes regular audits, third-party verifications, and a zero-tolerance policy for any activities that fall short of our ethical standards. We take pride in our robust governance and the transparent structure of our operations, which underpin our commitment to responsible business practices.

In addition to our governance initiatives, I am pleased to report our achievements in environmental and social commitments. We have made significant progress in reducing carbon emissions through innovative practices and have implemented measures to improve the workplace environment. Our employee health, safety, and well-being initiatives have also expanded, ensuring a supportive and safe workplace for all our team members.

As we continue to engage with international regulatory bodies, external auditors, and compliance experts, our focus remains on building a sustainable and responsible energy future in alignment with global regulations and sanctions regimes.

Thank you for your continued support as we strive to lead with integrity and responsibility.

Sincerely,

2Rivers Group  
Executive Committee

## 2Rivers. Company Profile

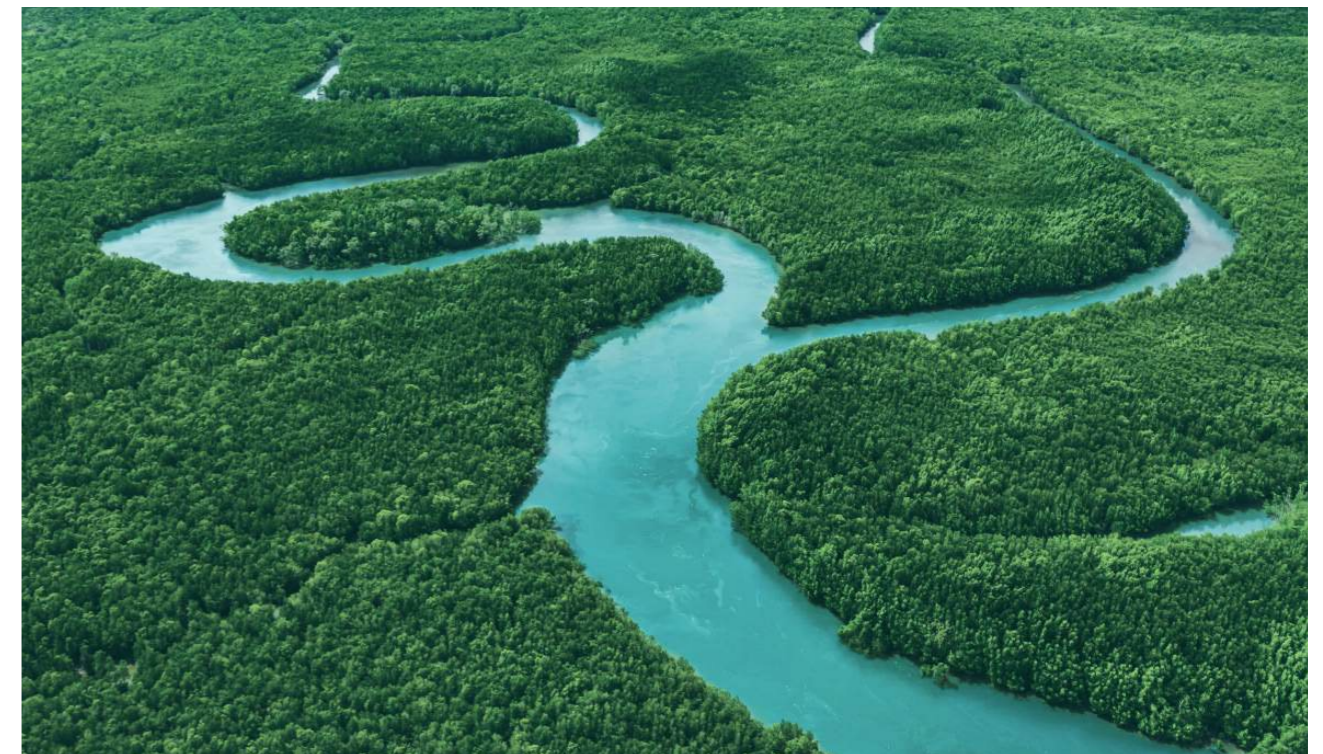
2Rivers Group is a dynamic leader in the global energy market, specializing in the trading and distribution of liquid hydrocarbons, petrochemicals, dry bulk commodities, and biofuels. We serve a broad portfolio of clients across multiple continents, guided by a deep commitment to operational excellence at every stage of our business.

Our mission is to deliver reliable energy solutions with focus on Integrity, sustainability and innovation. Our experienced professionals make sure our clients can count on us for efficient, dependable service that meets their needs in an ever-evolving industry.

We responsibly source products essential for global industries and economies, from a diversity of suppliers across MENA, meeting required quality standards and specific needs of our clients worldwide.

With main offices in key hubs, Dubai and Singapore, 2Rivers maintains a strong international presence, participating in global trading across our strategic regions and in major industry forums worldwide.

We continually seek opportunities for further geographic expansion to meet the growing demand from our expanding client base.



## Strategy and Vision

Driven by our ambition to be centric to our suppliers and clients, combined with our reliability, financial strength and deep industry insights, we aim to transform global trade and stay ahead of the curve.

Under the renewed leadership of the senior management team, 2Rivers is committed to sustainable growth. All our operations are guided by high ethical standards and the core values of compliance, sustainability, and transparency.

2Rivers focuses mainly on the EMEA and Asian regions. Going forward, we plan to further expand activities to Europe, strengthening global presence and operational capabilities.

The strategic interests of 2Rivers reflect the forward-looking nature of our company - driving growth and innovation while focusing on the company's core competencies.



## Our business philosophy and key to success

We believe our strength comes from the expertise and dedication of our people. At the core of our success is a strong yet healthy commercial drive, a commitment to best practices, and efficient decision-making.

Central to our operations is a rigorous, integrated compliance system that prioritizes ethical business conduct and transparency in every aspect. We maintain the highest standards through robust procedures, ensuring full adherence to legal and regulatory requirements. In addition, our frameworks for managing teams, risks, and financial resources are designed to uphold accountability and trust, which are essential to sustaining our competitive advantage.

We place great importance on managing both operational and legal risks, fully recognizing that our numerous counterparties operate across a wide range of jurisdictions.

One of our priorities is the active development of local talent, taking into account the specific needs and peculiarities of our target markets.

Strong relationships with leading banks are a cornerstone of our success. Effective risk management, prudent financial oversight, and an impeccable banking track record are the foundational elements of our business, enabling us to earn the trust of financial institutions and maintain our reputation as a reliable partner in the banking sector.

## Core Values

### Integrity and Reputation

At 2Rivers, integrity is the cornerstone of our operations. We uphold the highest ethical standards in all our dealings, ensuring that our actions consistently reflect our words. Given the critical importance of our reputation, we ensure that our trading operations always comply with international regulations on compliance and sanctions.

### Transparency

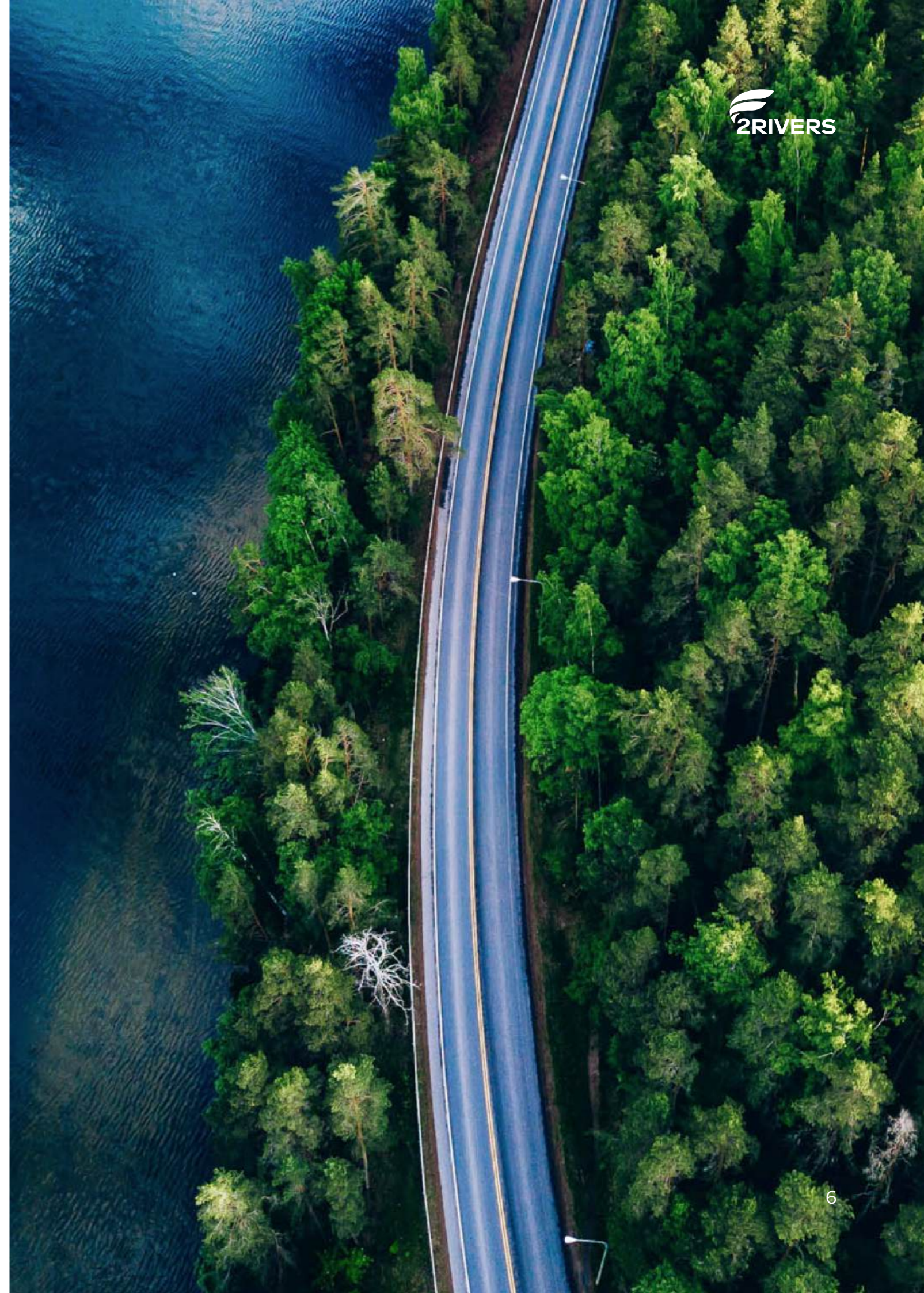
Transparency is vital to our operations. We believe in open and honest communication with all our stakeholders, ensuring that our actions are visible and understandable. We maintain detailed records of our compliance efforts and are prepared to cooperate fully with relevant authorities in the event of any compliance-related inquiries.

### Sustainability and Compliance

We are dedicated to shaping a greener future by promoting and supporting the transition from fossil fuels to renewable energy sources in alignment with the energy demand of the world of tomorrow, with a strong commitment to environmental, social, and governance (ESG) principles, and by prioritizing regulatory compliance.

### Sound Judgement

Our decision-making processes are grounded in sound judgement, balancing innovative strategies with prudent risk management to ensure sustainable growth.



# Strengths and Value Proposition

## Strong and Enduring Partnerships

We prioritize building deep, lasting relationships with our suppliers and buyers based on trust and transparency.

## Reliable Supply Network

We develop and maintain an efficient network of terminals, freight forwarders, vessel owners, and freight operators to ensure the seamless transportation of hydrocarbons and other essential commodities to meet our clients' demands precisely when and where they arise.

## Top Tier Special Services Infrastructure

We continually nurture and expand our top-tier special services support infrastructure including a diverse array of experts, such as surveyors and derivatives brokers, who help us comply with stringent quantity and quality standards, effectively manage risks, and facilitate performance.

## Strategic Collaboration with Financial Institutions

We engage in strategic cooperation with leading international and regional trade finance banks, leveraging our effective financial management practices. Our impeccable reputation as a reliable partner within the banking community is built on our consistent delivery of results, adherence to high ethical standards and compliance with all applicable regulations and sanctions.

## Multifaceted Capabilities

End-use refined oil products must meet our customer expectations and comply with stringent and varying quality standards across different countries. 2Rivers is well positioned to support the extracting and refining companies managing technical and commercial evaluation, purchase, accumulation, storage, blending, and transportation to ensure these standards are met. This enables these companies to focus on their core business – extracting and processing oil.

## Innovative Market Strategies with Prudent Risk Management

We implement forward-thinking – and, sometimes, disruptive – market strategies to stay ahead of industry trends. These innovative approaches are carefully balanced with conservative risk management practices, ensuring that we capitalize on opportunities while safeguarding our stakeholders' interests.

## Comprehensive Legal and Compliance Framework

We possess a highly competent legal team and a rigorous regulatory compliance framework that ensure all our operations adhere to local and international laws, including sanctions regulations. Our meticulous risk-based approach to compliance, including comprehensive screening procedures and ongoing monitoring, reflects our commitment to ethical business conduct. Our ESG-centric philosophy integrates environmental, social, and governance considerations into our business strategies and decision-making processes.

## Advanced IT Infrastructure

Our state-of-the-art IT infrastructure is meticulously designed to meet the complex contractual and delivery requirements of our industry. The CTRM system supports every aspect of our operations, from real-time data analysis to secure transaction processing, ensuring that we can deliver on our promises with precision and efficiency.

## Top Talent Development

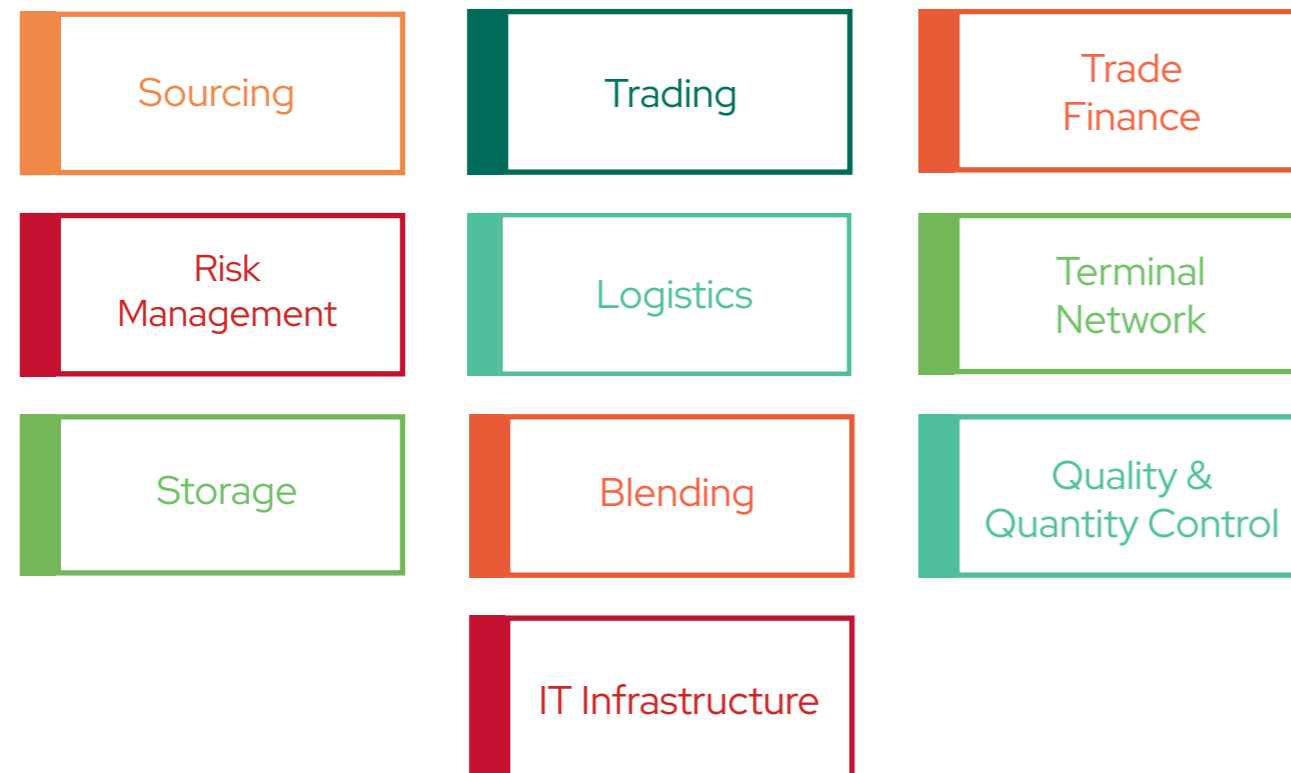
Our strategy involves not only recruiting the best talent but also creating an environment that retains and develops these professionals. By building efficient teams and specialized desks, we enhance our origination, trading, and operational capabilities.

## Core Competencies

In today's complex and fast-paced world, where geopolitical dynamics, economic environment, and regulatory requirements are constantly evolving, the process of delivering the right commodity to the right place at the right time has become increasingly challenging and intricate.

2Rivers brings together the experience of professionals who are recognized leaders in energy commodities trading sector. Our collective expertise and industry insight drive the company's success, enabling us to navigate complex markets and deliver tailored solutions to our global clientele.

Our forward-thinking approach and comprehensive capabilities encompass a wide range of critical areas:



## Mastering the Complexity of Hydrocarbon Supply Chain

The supply of hydrocarbons is one of the most complex supply chains in the commodity trading industry. With over

200 grades of oil produced globally, the spectrum ranges from light condensates—so light that their density and properties are similar to gasoline— to heavy, bituminous grades, which resemble road asphalt.

This vast diversity of crude oil must be transported and refined into standardized petroleum and petrochemical products that fuel industries and economies. Often, these crude types are extracted far from the refineries where they will be processed. Traders play a critical role in this process: analyzing the quality and commercial potential of the feedstock, transporting it to terminals, loading it onto tankers, and delivering it to refineries that require specific physical and chemical characteristics.

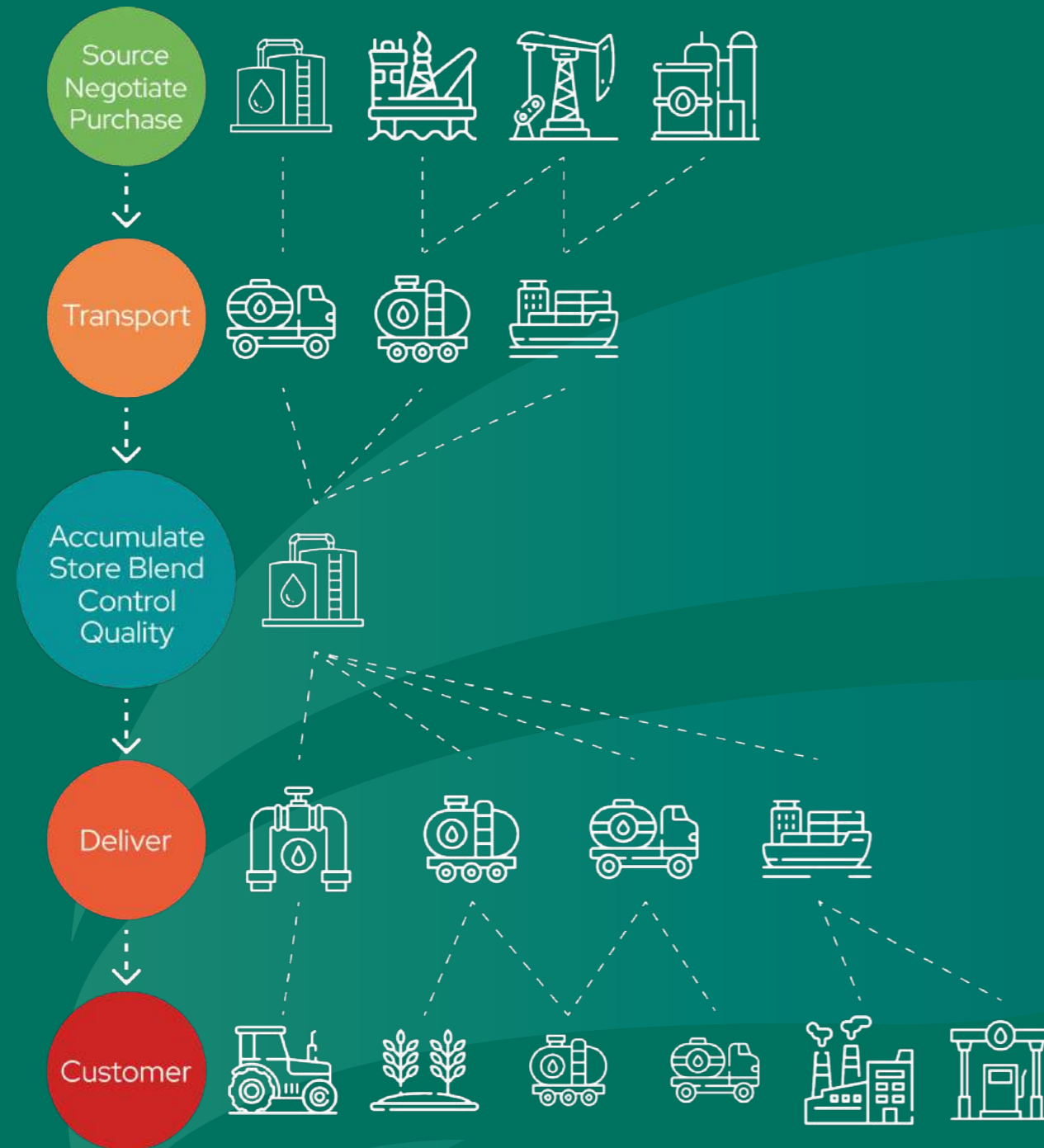
The same applies to middle distillates such as fuel oil and vacuum gas oil, which are further processed into end-use products. Traders must locate, evaluate, purchase, and accumulate these products in transportable volumes, blending and storing them when necessary, before delivering them to refineries.

End-use products, like motor fuels and petrochemicals, must be transported from production hubs to consumers while meeting both customer expectations and stringent country-specific quality standards. This requires a thorough process of technical and commercial evaluation, acquisition, accumulation, blending, storage, and transport. It is our responsibility at 2Rivers to carry out all these functions seamlessly.

A trader, therefore, is part chemist, part logistician, part marketer, and a key financial enabler, supporting both upstream and downstream companies in focusing on their core activities—producing and refining oil.

At 2Rivers, we also emphasize the importance of digital technologies in optimizing trading operations. A dedicated working group is tasked with enhancing efficiencies, underscoring our commitment to innovation and operational excellence.

## Commodity Trading Process



## Our ESG Vision

At 2Rivers, environmental responsibility, social responsibility, and proper corporate governance are at the forefront of all our operations. We align our sustainable development strategy with our core values, promoting environmental stewardship, regulatory compliance, and best practices to minimize our ecological footprint while ensuring the well-being of our employees and creating positive impact for all stakeholders.

## Our Key Stakeholders



Adhering to environmental, social, and governance principles is integral to our corporate commitment to sustainable and compliant operations, and continuous improvement in environmental performance.



## Our ESG Commitments

### Environmental Commitments

We focus on reducing our carbon footprint, managing waste efficiently, and implementing biosecurity measures to protect ecosystems. Our efforts extend across all areas of business, from trading activities to office operations, as well as the logistics involved in delivering energy products globally.

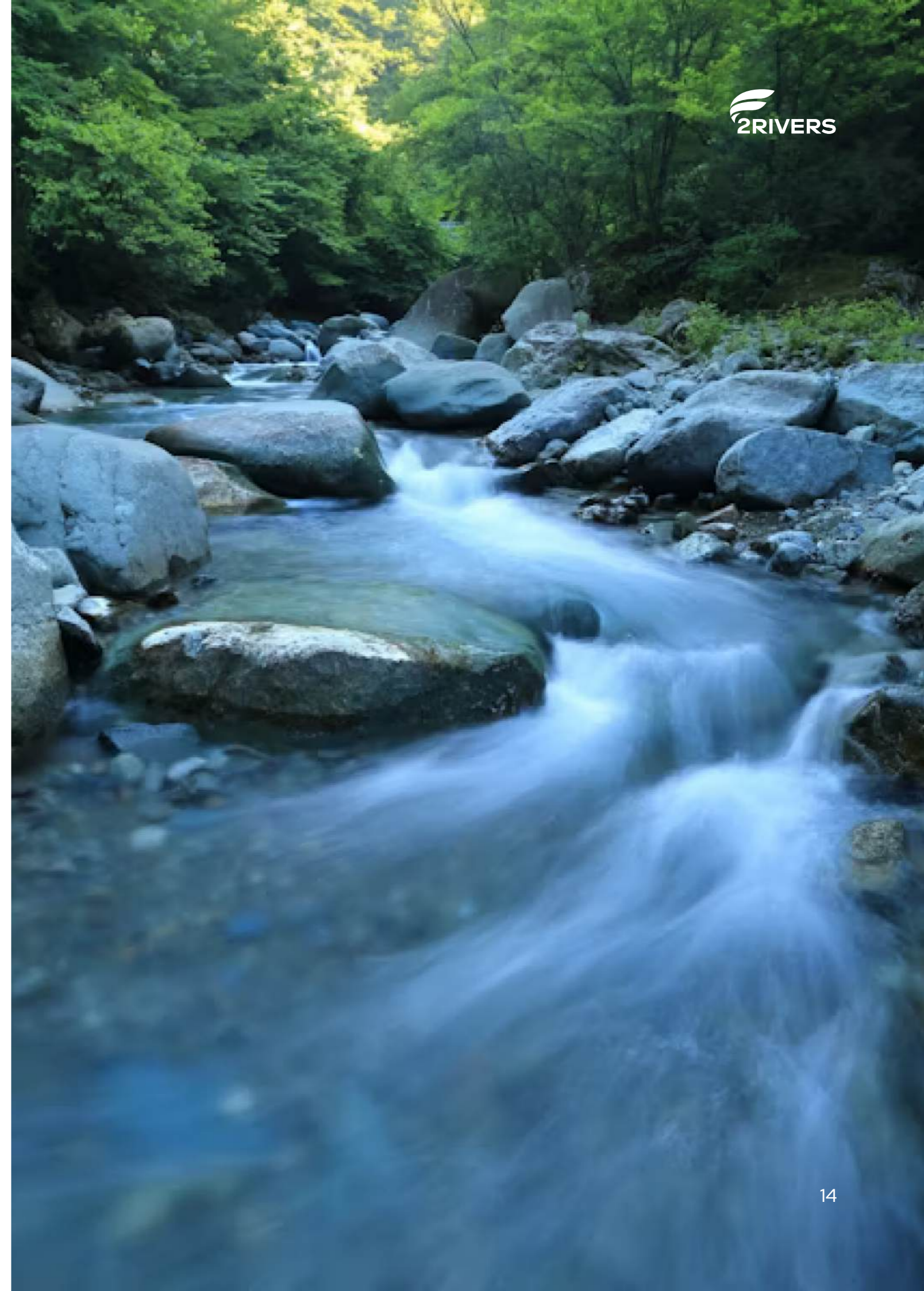
### Employment and Social Commitments

We emphasize building strong relationships with stakeholders, ensuring health, safety and well-being of our employees, and promoting diversity, equal opportunities and professional development within our organization.

### Regulatory Compliance and Governance Commitments

We uphold the highest ethical standards and ensure transparent business practices in all our operations. We implement robust internal policies and procedures to guarantee full adherence to legal and regulatory obligations, while also ensuring compliance with international and regional sanctions. Our commitment to compliance is reflected in our efforts to cultivate a culture of compliance across the organization. Additionally, we prioritize risk management by actively identifying and mitigating potential political, operational, and financial risks, ensuring the stability and integrity of our business.

By integrating these ESG principles, we are committed to continuous improvement and sustainable growth across all our operations.



# Environmental Responsibility

At 2Rivers, environmental responsibility and safety are central to everything we do. Our approach to sustainable development is rooted in our core values, emphasizing environmental stewardship, regulatory compliance, and the implementation of best practices to reduce our ecological footprint. Adhering to ESG principles is fundamental to our commitment to sustainable operations and ongoing improvement in environmental performance.

Our Environmental Policy focuses on key areas such as carbon footprint reduction, waste management, biosecurity, and crisis management. At 2Rivers, we believe in collaborating closely with our stakeholders and maintaining transparency in our reporting, ensuring continuous progress in our environmental initiatives.

## Environmental Policy Components

### Enhanced Actions and Procedures for Reducing Environmental Footprint

As an energy commodities trader committed to a robust ESG program, we recognize the importance of actively reducing our environmental footprint.

Below are the actions and procedures that align with our ESG goals.



ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<p>Responsible Sourcing and Sales</p>	<p><b>Supplier Evaluation and Certification</b></p> <ul style="list-style-type: none"> <li>Established rigorous supplier evaluation process that includes third-party certifications for sustainability, such as ISO 14001 (Environmental Management) or equivalent. This ensures that our suppliers not only comply with local legislation but also embrace international best practices in environmental management.</li> </ul> <p><b>Sustainable Sourcing Policies</b></p> <ul style="list-style-type: none"> <li>Developed and implemented a sustainable sourcing policy that prioritizes suppliers engaged in renewable energy projects, sustainable business initiatives, or eco-friendly methods.</li> <li>Actively seeking partnerships with suppliers who have demonstrated a commitment to reducing their carbon footprint.</li> </ul> <p><b>Counterparty Risk Assessment</b></p> <ul style="list-style-type: none"> <li>Implemented a comprehensive counterparty risk assessment framework that includes an analysis of environmental performance and adherence to sustainability practices. This helps us identify and avoid engaging with entities that have a history of environmental violations.</li> </ul> <p><b>Transparency and Reporting</b></p> <ul style="list-style-type: none"> <li>Requiring counterparties to provide transparent reporting on their environmental impact, including emissions data and sustainability initiatives. This fosters accountability and encourages continuous improvement in environmental practices across our network.</li> </ul>

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<p>Vehicle/Vessel/ Terminal Vetting and Compliance Check</p>	<p><b>Enhanced Vetting Procedures</b></p> <ul style="list-style-type: none"> <li>• Prioritize use of SIRE inspected fleet; ensure HSE compliance of the chartered fleet through availability of SIRE (Safety Management) reports or comparable inspection programs.</li> <li>• Strengthened our vetting process for vessels and vehicles by incorporating a thorough review of each entity’s environmental track record, including past incidents and sustainability certifications.</li> </ul> <p><b>Regular Audits and Performance Monitoring</b></p> <ul style="list-style-type: none"> <li>• For terminals, mandatory visual inspections and HSE document audit by 2Rivers representatives, where required with a dedicated surveyor follow-up.</li> <li>• For rail, ensure full compliance of the rolling stock with the local and regional (depending on the area – EU/CIS-SMGS) rules. Mandatory rolling stock inspection at loading by independent surveyor.</li> </ul>
<p>Product Standards</p>	<p><b>Training and Awareness Programs</b></p> <ul style="list-style-type: none"> <li>• Conducting regular training sessions for traders and operators focused on product standards, safe handling, and environmental implications. This empowers employees with the knowledge needed to make informed decisions regarding product management and sustainability.</li> </ul> <p><b>Enhanced Access to Documentation</b></p> <ul style="list-style-type: none"> <li>• Ensuring that Material Safety Data Sheets (MSDS) are readily accessible in multiple languages and provide additional resources on best practices for environmental safety and compliance.</li> </ul>

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<p>Environmental Footprint Reduction</p>	<p><b>CO2 Emission Monitoring Program</b></p> <ul style="list-style-type: none"> <li>• Expanding our CO2 emission monitoring program to include not only storage and logistics but also all aspects of our operations.</li> <li>• Using advanced analytics and reporting tools to track emissions and identify areas for reduction (including carbon management software, emission tracking platforms, IoT sensors and monitoring devices, carbon footprint calculators).</li> </ul> <p><b>Sustainable Office Practices</b></p> <ul style="list-style-type: none"> <li>• Relocated to environmentally friendly office premises with smart-working facilities -- breakout rooms, quiet spaces, collaboration spaces.</li> <li>• Implemented a comprehensive green office program including initiatives like minimizing single-use items, utilizing renewable power sources and smart environmental energy efficiency control.</li> <li>• Promoting the use of digital documents and cloud storage to minimize paper waste.</li> <li>• Encouraging employees to use reusable containers, mugs and utensils to reduce single-use plastics and other disposables in the office.</li> <li>• Conducting periodic sustainability assessments of office practices.</li> </ul> <p><b>Energy Efficiency Initiatives</b></p> <ul style="list-style-type: none"> <li>• Adopted energy efficiency measures such as automated systems for lighting and HVAC that adjust based on occupancy and time of day.</li> <li>• Considering integrating renewable energy options like solar panels or purchasing renewable energy credits (RECs) to offset office energy use.</li> </ul>

Environmental Responsibility

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<p>Environmental Footprint Reduction</p>	<p><b>Waste Reduction and Recycling Initiatives</b></p> <ul style="list-style-type: none"> <li>Enhanced our waste reduction efforts by implementing a zero-waste policy, including composting organic waste and providing employees with tools to minimize their waste production.</li> </ul> <p><b>Responsible Travel Policy</b></p> <ul style="list-style-type: none"> <li>Promoting responsible travel approach with priority given to online meetings where appropriate.</li> </ul> <p><b>Sustainable IT Practices</b></p> <ul style="list-style-type: none"> <li>Expanded our IT sustainability efforts by adopting cloud-based solutions to reduce energy consumption associated with on-premises servers.</li> <li>Regularly reviewing and updating our e-waste recycling program to ensure compliance with local regulations and promote responsible disposal practices.</li> </ul> <p><b>Employee Engagement and Community Involvement</b></p> <ul style="list-style-type: none"> <li>Encouraging employee involvement in environmental initiatives, such as local clean-up events, tree planting, and sustainability challenges.</li> </ul>
<p>Investment in renewables</p>	<ul style="list-style-type: none"> <li>Ongoing investment in renewable energy projects.</li> <li>Assessment of potential investment opportunities worldwide with a support from a dedicated inhouse M&amp;A team.</li> </ul>
<p>Participating in industry discussions on energy transition</p>	<ul style="list-style-type: none"> <li>Hydrogen as motor fuel</li> <li>The role of energy storage in facilitating the transition to renewables.</li> <li>Sustainable supply chains for energy commodities.</li> <li>Decarbonization strategies.</li> </ul>





## Social Responsibility

We prioritize building strong relationships with our stakeholders while ensuring the health, safety, and well-being of our employees. We are committed to promoting diversity, equal opportunities, and professional development within our organization. This year marks a significant milestone in our growth journey as we have relocated to newly expanded offices in Dubai. This move reflects our dedication to integrating advanced technology with our ESG principles, including smart environmental energy efficiency controls, reduction of water and plastic consumption, and effective recycling practices. Our new office is designed to foster innovation, enhance collaboration among our functional teams, prioritize employee well-being, and provide a comprehensive suite of world-class services and trade support to our valued clients and partners.

### Social, Employment and Employee Well-Being Policy Components

Enhanced Actions and Procedures for Promoting Social Responsibility and Employee Well-Being

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<b>EMPLOYMENT AND SOCIAL</b>	
<b>Diversity and Equal Opportunities</b>	<ul style="list-style-type: none"> <li>• 2Rivers employs individuals from all races and ethnicities and of various religious beliefs.</li> <li>• Committed to a zero discrimination policy that promotes diversity, equity, and inclusion.</li> <li>• All employees, job applicants, contractors, and external parties are treated with respect, dignity, and fairness, regardless of race, ethnicity, sex, or religion.</li> </ul>
<b>Professional Development</b>	<ul style="list-style-type: none"> <li>• We provide a supportive and enriching work environment with development opportunities for all employees eager to grow professionally.</li> <li>• Offering career development planning support and access to training programs and industry conferences.</li> <li>• Encouraging job rotations and cross-functional projects, along with mentorship and coaching from experienced staff members.</li> </ul>

Social Responsibility

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
Human Rights	<ul style="list-style-type: none"> <li>Comprehensive employment protection measures implemented in accordance with local labor laws.</li> <li>A global grievance procedure incorporated providing employees with accessible channels to address complaints or concerns related to discrimination, unfair treatment, and human rights violations.</li> </ul>
Privacy and Data Security	<ul style="list-style-type: none"> <li>Robust policies and procedures implemented outlining specific data protection measures.</li> <li>Protocols established for responding to data breaches and cybersecurity incidents, minimizing potential damages and ensuring uninterrupted operations.</li> <li>Regular mandatory cybersecurity and data protection trainings for all employees conducted as per established schedule.</li> </ul>
Community Engagement and Charity	<ul style="list-style-type: none"> <li>Developing an organization-wide community engagement program, initially focusing on key locations, with plans to scale it up to all locations in the future.</li> <li>Planning to implement an internship program for local students and young professionals, providing them with hands-on experience in the energy commodities industry.</li> <li>Considering sponsorship of local cultural events, festivals, and sports activities that bring the community together and celebrate diversity.</li> </ul>

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
HEALTH, SAFETY AND WELL-BEING	
Comprehensive Health and Safety Policy Development	<ul style="list-style-type: none"> <li>Development and implementation of H&amp;S policies organisation-wide and for all locations.</li> <li>Implemented and enforced organization-wide health and safety (H&amp;S) policies across all functional divisions and operational locations.</li> </ul>
Regulatory Compliance Assurance	Achieved full compliance with local health and safety legislation, ensuring that all practices meet or exceed legal requirements in every location.
Safety Awareness Promotion	Launched initiatives to enhance safety awareness throughout the organization, providing all employees with easy access to H&S policies, procedures, and internal regulations.
High Safety Standards Monitoring	Established rigorous monitoring systems to identify and mitigate health and safety hazards in the workplace, aiming to maintain the highest safety standards in operational environments.
Employee Induction and Training Programs	Conducted comprehensive H&S induction and ongoing training sessions for all employees, including regular fire and evacuation drills to ensure preparedness.

Social Responsibility

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
Accident Reporting and Analysis	Implemented a systematic approach to accurately record, report, and investigate work-related accidents, incidents, illnesses, and near misses. This includes a structured process for identifying «lessons learned» to drive continuous improvement in H&S performance.
First Aid Facilities Deployment	Equipped all office locations with first aid facilities and trained personnel to respond effectively to medical emergencies.
Zero-Injury Commitment	Committed to achieving zero workplace injury incidents and fatalities by fostering a culture of safety and proactive risk management across the organization.
Proactive Healthy Living Program	Implemented a comprehensive healthy living awareness program designed to educate employees on nutrition, exercise, and overall well-being.
Enhanced Workplace Environment	<ul style="list-style-type: none"> <li>Maintaining comfortable room temperatures and high-standard ventilation systems to optimize air quality.</li> <li>Providing access to potable water, modern kitchen facilities, and inviting breakout areas to encourage relaxation and social interaction.</li> <li>Supplying fresh fruit and other health-focused snacks to support employees' nutritional needs.</li> </ul>
HSE Compliance Monitoring	Established a robust monitoring program for cleaning and facilities contractors to ensure adherence to health, safety, and environmental standards, guaranteeing a clean and safe workplace

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
Comprehensive Medical Benefits	<ul style="list-style-type: none"> <li>Upgraded employee medical insurance plans to provide extensive coverage and support for both physical and mental health needs.</li> <li>Considering offering corporate fitness options, such as gym memberships or fitness classes, to encourage active lifestyles.</li> </ul>
Flexible Work Arrangements	Providing employees an opportunity to work from home when required to accommodate employees' personal needs and promote a better work-life balance, thereby enhancing overall job satisfaction and productivity.
Mental Health Support	Provided access to mental health resources and wellness workshops, to address the psychological well-being of employees.
Employee Engagement Activities	Facilitated team-building activities and wellness challenges to foster a sense of community and support among employees, enhancing their overall well-being and workplace satisfaction.
Feedback Mechanisms	Established channels for employees to provide feedback on workplace health and wellness issues, ensuring that appropriate support is available when needed.

## Corporate Governance, Transparency and Compliance

2Rivers is committed to the highest standards of corporate governance, transparency, and compliance. We have consistently demonstrated our commitment to ethical business practices. Following the company's exit from all new Russian-originated business in 2022, it has focused on building a sustainable and responsible energy future. Through continuous engagement with international regulatory bodies and external auditors, 2Rivers remains dedicated to promoting compliance and accountability across the global energy industry.

Our compliance framework includes regular audits, third-party verifications, and regular employee training. These measures ensure that 2Rivers maintains its strong governance practices and transparent operational structure, fostering trust among stakeholders and counterparties.

## Organizational Structure

At 2Rivers, our strength lies in the expertise and dedication of our people, supported by a network of trusted external advisors. 2Rivers' organizational structure is designed to foster efficient decision-making while maximizing the value of each team member's input. With a clear, streamlined hierarchy led by experienced professionals, our structure encourages collaborative problem-solving and ensures that insights from all levels of the organization contribute to our strategic direction.

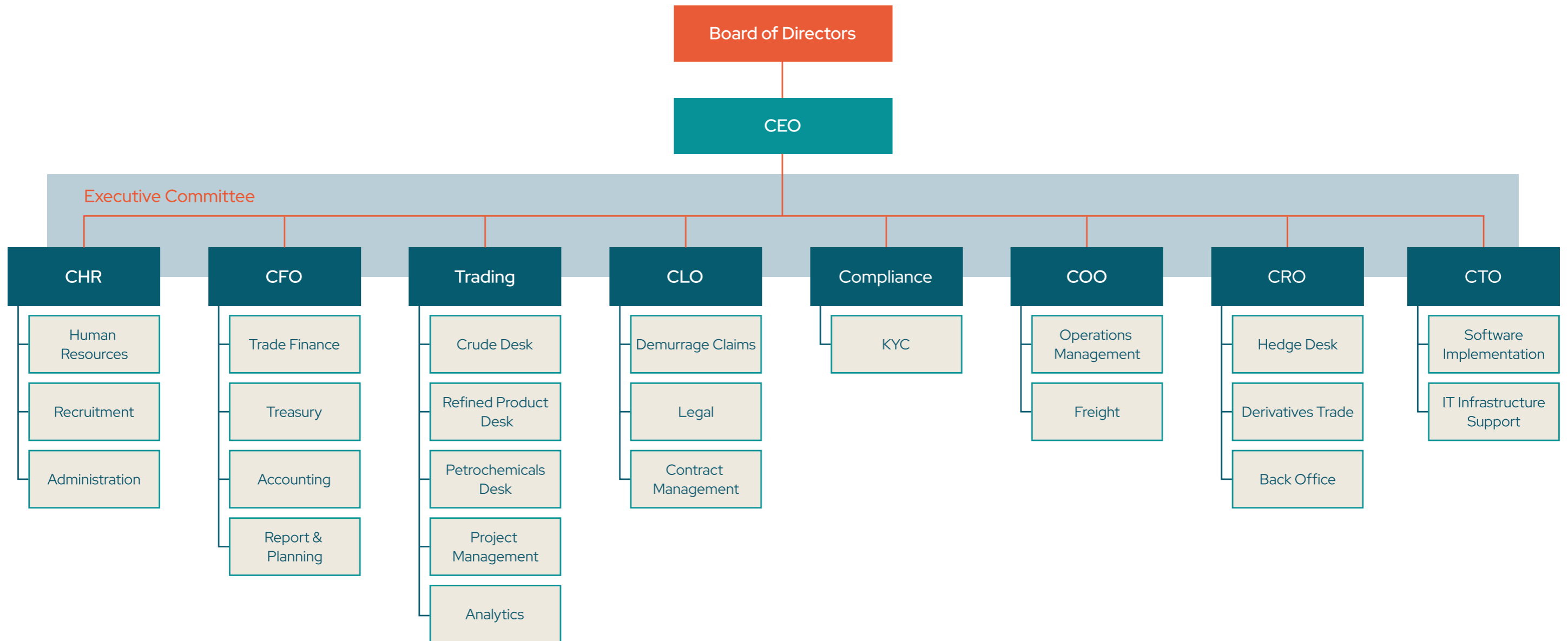
Committed to the highest standards of governance, we partner with top-tier firms to enhance our internal practices. Our financial audits are rigorously conducted by KPMG, ensuring transparent reporting, while EY, Deloitte, and PwC provide additional financial and advisory support to strengthen our strategic initiatives. Our legal affairs are managed in collaboration with leading firms, including HFW, Clyde & Co, Wilborg Rein LLP, and Baker McKenzie.

Our leadership thrives on a culture of collaboration and shared expertise, where every team member's input is valued. We foster innovative thinking and diverse perspectives, integrating them into our strategic vision and decision-making processes. From the CEO to the desk managers, every role is interconnected, allowing for agile responses to market dynamics and ensuring that our decisions are grounded in comprehensive analysis and collective expertise.





# Organizational Chart



## Decision-making procedures

At 2Rivers, our decision-making procedures are guided by a robust corporate governance framework designed to ensure transparency, accountability, and efficiency. This framework is detailed in our Corporate Governance Policy, which serves as the overarching policy governing our operations and strategic initiatives.

### Board Regulations

We have specific regulations and procedures in place for our board’s operations. These regulations establish the foundational principles and guidelines for board governance, ensuring that all decisions align with our core values and strategic objectives.

### Executive Committee (ExCo)

The Executive Committee (ExCo) plays a pivotal role in our decision-making process. ExCo members convene regularly, at least once a month, or more frequently as necessary to address urgent matters. The ExCo primarily operates by circulation, enabling prompt and effective decision-making.

All decisions made by the ExCo are meticulously documented, with minutes recorded to maintain a transparent and accountable decision-making process.

### Unit Heads and Reporting Structure

Each Unit Head is responsible for the management and performance of their respective units. They report directly to the ExCo, providing regular updates and insights into their unit’s operations. This reporting structure ensures that the ExCo remains well-informed and able to make decisions based on comprehensive and up-to-date information.



## Multi-Layered Decision-Making

To enhance the effectiveness of our governance, 2Rivers has established multiple layers of decision-making authority. This structure ensures that decisions are made at the appropriate level, balancing efficiency with thorough oversight. Key components include:

- Operational Decisions: Handled at the unit level, enabling swift and responsive management of day-to-day activities.
- Strategic Decisions: Evaluated and approved by the ExCo, ensuring alignment with 2Rivers’s long-term goals and strategic direction.
- Board-Level Decisions: For matters of significant impact, the board of directors provides final oversight and approval, guided by the MOA and our corporate governance principles.

This multi-layered approach fosters a culture of accountability and empowers leaders at all levels of the organization to contribute to our strategic objectives.



## Commitment to Best Practices

Our governance processes and decision-making procedures are continuously reviewed and refined to reflect best practices and evolving regulatory requirements. We have regular overviews of our governance and processes conducted by leading experts in the commodity trading space. This commitment ensures that we remain a trusted and reliable partner to our stakeholders, upholding our reputation for integrity and excellence in the energy commodities trading sector.

## Conflict of Interest & Ethical conduct

At 2Rivers, we uphold the highest standards of ethical conduct and integrity in every aspect of our operations. Our commitment to managing conflicts of interest and promoting ethical behaviour is embedded within our Human Resources policies and Code of Conduct. These guidelines ensure transparency and provide a clear framework for identifying, disclosing, and mitigating potential conflicts, ensuring that all business decisions serve the best interests of our company, our people, and our stakeholders.

We maintain a zero-tolerance approach to breaches of conflict of interest regulations or any unethical behaviour. To support this, we mandate comprehensive training for all employees on our conflict of interest policies and ethical standards. This training empowers our team to understand their responsibilities, the value of ethical behavior, and the procedures for reporting and managing potential conflicts.

## Compliance Program

### Our Comprehensive Compliance Program

Our Comprehensive Compliance Program reflects our commitment to excellence in all aspects of our operations and ESG-centric development. It encompasses a number of key elements, including strong leadership engagement, proactive risk management, effective internal safeguards, ongoing evaluation and improvement, continuous education for our team, sanctions compliance training for employees, and active involvement of senior management in our compliance efforts.

Additionally, the program includes critical components such as Sanctions Risk Management, Know Your Customer (KYC) Standards and Compliance Procedures, Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Policies, and Supplier and Customer Due Diligence. Through these initiatives, we ensure a robust compliance framework that supports our organizational values and regulatory obligations.

### Sanctions Risk Management Approach

Our Sanctions Risk Management Approach is fully integrated into our overall compliance framework. We conduct regular risk assessments to identify and mitigate potential sanctions risks within our operations, supply chains, and customer base.

Our internal controls include thorough screening of all parties involved in our transactions against relevant sanctions lists. We implement transaction monitoring, clear escalation procedures, and comprehensive recordkeeping practices to ensure compliance.

Additionally, we have established «Know Your Customer» (KYC) and «Know Your Customer's Customer» (KYCC) procedures to enhance our risk management efforts. Our sanctions screening and compliance initiatives are further supported by advanced technology, enabling us to maintain a robust and effective sanctions risk management program.

### KYC Standards and Compliance Procedures

The recent management buy-out (MBO) has significantly improved 2Rivers' compliance framework and KYC processes. This strategic transformation has fuelled ongoing improvements in our KYC standards, reinforcing our commitment to rigorous scrutiny and due diligence. The key changes implemented include:

#### Risk-Based Approach

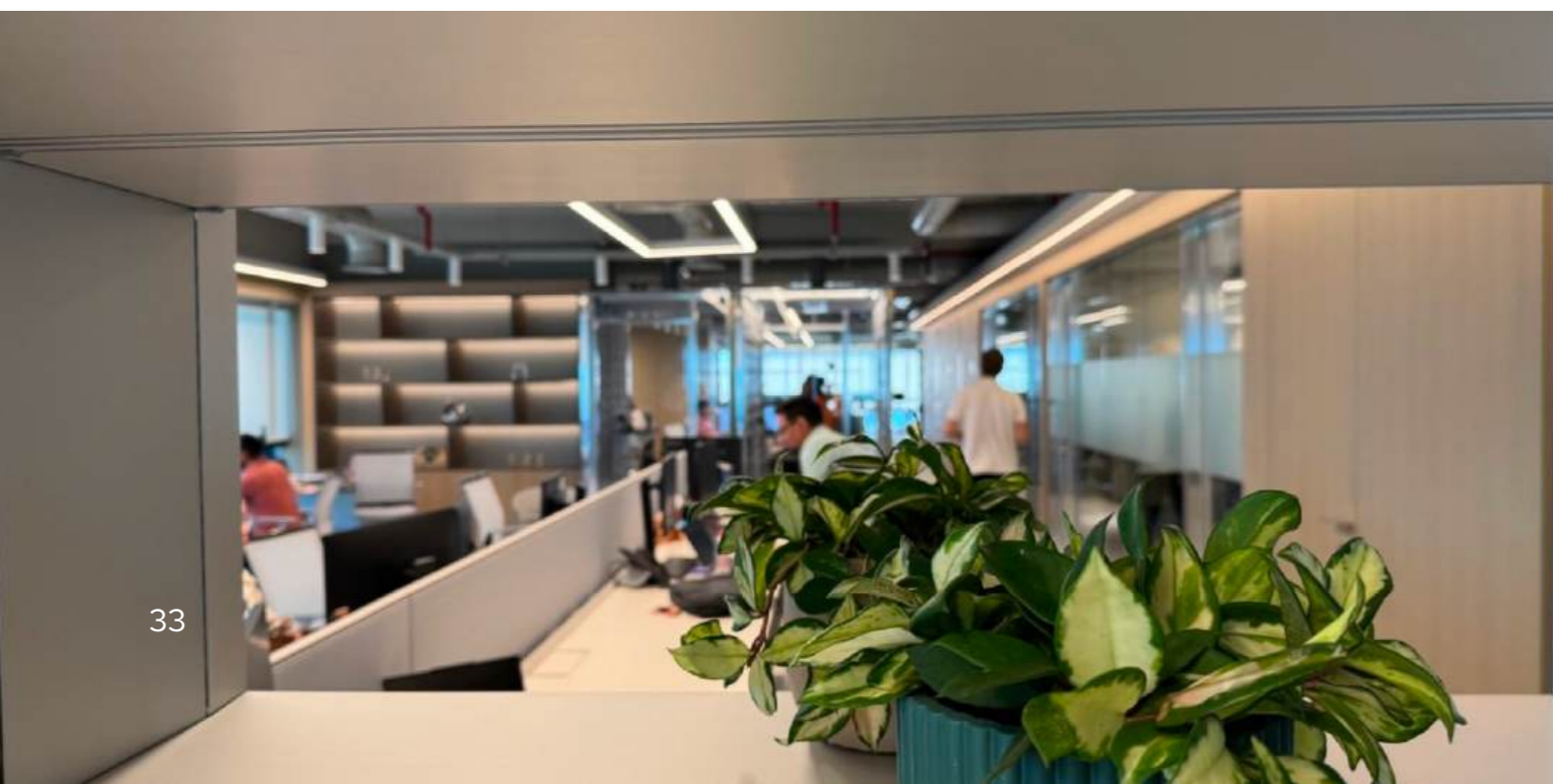
**Categorized Risk Profiles:** By adopting a risk-based approach to KYC, we categorize customers based on their risk profiles. Enhanced due diligence is applied to high-risk customers, ensuring that heightened scrutiny is focused where it is most needed.

#### Enhanced Customer Due Diligence (CDD)

**Strengthened Procedures:** We have bolstered our CDD procedures to encompass more comprehensive background checks and continuous monitoring of customer activities. This enhancement ensures that all customer interactions are subject to rigorous scrutiny, mitigating potential risks effectively.

#### Use of Advance Technology and Data Analytics Tools

**Integration of Advanced Tools:** We have integrated advanced technology and data analytics tools into our KYC processes. These tools enhance the accuracy and efficiency of our procedures, enabling real-time monitoring and risk assessment. This technological upgrade ensures that our KYC processes are both robust and responsive to emerging risks.



## Compliance Procedures

Following the management buy-out, 2Rivers has reinforced its compliance procedures to ensure strict adherence to all regulatory requirements and industry best practices. The key improvements in our compliance framework include:

### Strengthened Governance

**Dedicated Compliance Committee:** We have established a dedicated Compliance Committee responsible for overseeing all compliance-related activities. This committee ensures robust governance and continuous improvement in our compliance standards.

### Compliance and KYC Policies and Functions

2Rivers has implemented a comprehensive set of policies at both the group and legal entity levels to support our enhanced compliance and KYC functions. These policies provide a structured framework for our compliance and KYC activities, ensuring consistency and thoroughness across all levels of the organization.

These policies are:

- Group Compliance Policy
- KYC Check Audit Procedures
- KYC Check Procedures

### Counterparty Screening and Onboarding

2Rivers sources and sells to established counterparts, all of whom undergo comprehensive compliance screening against major sanctions lists, including those from the US, EU, UK, and UN. As part of our onboarding process, we require counterparties to provide specific written representations related to sanctions compliance. Standard representations are attached for reference.

### Regular Audits and Reviews

**Increased Audit Frequency:** The frequency of internal audits and compliance reviews has been increased to identify and address any potential gaps in our compliance framework promptly. These regular assessments ensure that we maintain the highest standards of regulatory compliance and operational integrity.

### Sanctions Compliance Policy and Procedures

2Rivers has implemented a comprehensive set of policies at both the group and legal entity levels to support our enhanced compliance and KYC functions. These policies provide a structured framework for our compliance and KYC activities, ensuring consistency and thoroughness across all levels of the organization.

### Commercial Agreements Monitoring

All commercial agreements incorporate specific sanctions clauses to prevent any breaches. Where appropriate, contracts mandate the presentation of a Certificate of Origin to ensure compliance with sanctions regulations. Our chartering and compliance teams continuously monitor transactions to detect and prevent any potential breaches. We also implement compliance programs to monitor counterparties, trading activities, and vessels involved in transactions. In cases where potential risks are identified, we request detailed attestations following G7 recommendations and guidance, particularly regarding oil price caps. We do not engage with vessels that have entered Russian ports or those that have been red-flagged.

## Vessel screening process

To ensure that we do not source oil transported by sanctioned vessels, 2Rivers employs a comprehensive vessel screening process incorporating both automated and manual checks. This process is supported by advanced technology, including Windward AI, to enhance accuracy and efficiency.



### Initial Identification and Preliminary Checks

Our chartering team actively monitors the market to identify potential vessels. This initial identification process involves our experienced brokers, who stay abreast of the latest developments and regulations within the maritime industry. Brokers conduct preliminary checks to filter out vessels that may pose compliance risks due to sanctions or other issues.

### Detailed Screening

Once a vessel passes the preliminary checks, it undergoes a detailed screening process. This includes automated checks using Windward AI to assess the vessel's history, ownership, and compliance status. Manual reviews are conducted to verify the findings and address any flagged issues.

### Ongoing Monitoring

Even after a vessel has been approved for use, ongoing monitoring is conducted to ensure continued compliance. This includes real-time tracking of vessel movements and continuous updates from our compliance systems. Any changes in the vessel's status or new compliance risks are immediately addressed to maintain adherence to sanctions regulations.

## Automated Screening Tools

To ensure robust and continuous compliance screening of counterparties, 2Rivers employs advanced automated tools that provide real-time data on vessel movements, ownership, and sanctions status. These tools enhance our ability to maintain adherence to international regulatory standards and mitigate risks effectively.

### Key Automated Tools

#### OFAC List Monitoring

Our systems continuously monitor the US Department of the Treasury's Office of Foreign Assets Control (OFAC) list to ensure that no vessels or associated entities under US sanctions are engaged in our operations.

#### UK Sanctions List Monitoring

We regularly check the UK government's sanctions list to prevent any interactions with restricted vessels or entities, ensuring compliance with UK regulations.

#### World-Check Software

This comprehensive software checks entities and individuals against all major global sanctions lists, including those from the EU, UK, UN, US, New Zealand, Canada, Australia, and Switzerland. World-Check provides daily updates and monitors any hits related to sanctions or negative news, directly informing our compliance department as the second line of defence.

#### UANI (United Against Nuclear Iran) List

Our systems continuously monitor the US Department of the Treasury's Office of Foreign Assets Control (OFAC) list to ensure that no vessels or associated entities under US sanctions are engaged in our operations.



#### Windward AI Platform

To further enhance our vessel screening and compliance vetting processes, we have onboarded the Windward AI platform. Widely used by industry peers such as Peninsula and Gunvor, Windward employs artificial intelligence to reduce false positives and improve the accuracy of our screening efforts.

### Ongoing Monitoring and Data Reliability

These automated tools run frequent checks, often on a daily basis, to ensure that our compliance data remains current and reliable. The integration of advanced technologies like Windward AI allows us to swiftly identify and address any potential compliance issues, thereby maintaining the highest standards of corporate governance, transparency, and regulatory adherence. By leveraging these automated systems, 2Rivers ensures that our compliance screening processes are thorough, efficient, and continuously updated to reflect the latest regulatory developments and risks.

## Compliance Department Screening

Following the preliminary and automated screenings, our compliance department undertakes a thorough review to ensure comprehensive due diligence. Equipped with advanced screening software and extensive databases, the compliance department meticulously examines vessel ownership, historical activities, and potential red flags.

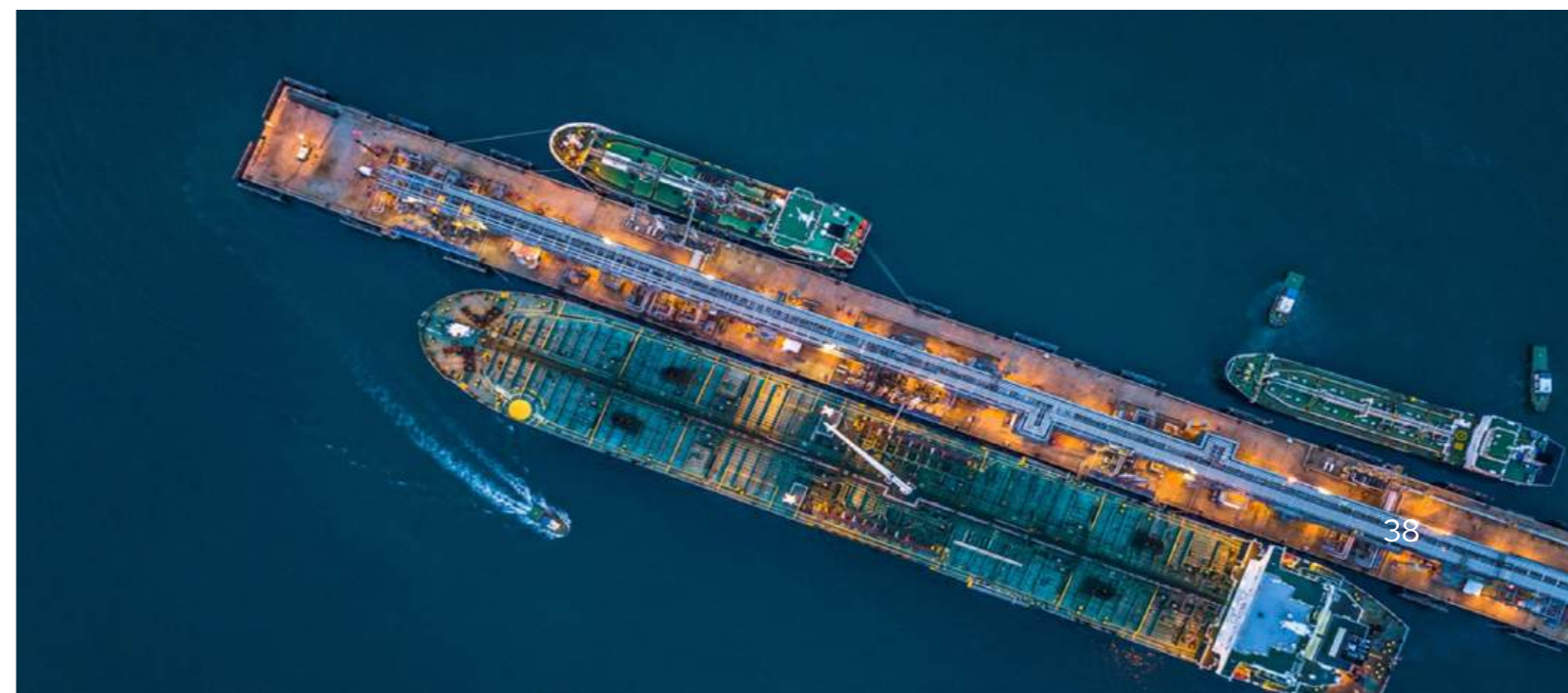
This rigorous review process involves entity screening and vessel screening. Entity screening ensures that all parties involved in the shipping process are vetted against international sanctions lists and other regulatory databases. Vessel screening verifies that the vessels themselves have no history of involvement in sanctioned activities or ownership by blacklisted entities. Our tools also monitor potential deceptive practice, behavioral patterns such as spoofing, flag hopping, etc. This multi-layered screening approach guarantees that all potential risks are identified and mitigated before any contractual agreements are finalized.

### Frequency of Screening

Compliance screening at 2Rivers is an ongoing process rather than a one-time check. Initially, a comprehensive screening is conducted before any engagement with a vessel or its owners. Throughout the duration of the charter, we continuously monitor the vessel's status to ensure ongoing compliance. This involves regular updates to our screening tools and lists, which are refreshed daily to capture any new sanctions or changes in vessel status. This continuous monitoring ensures that our compliance measures remain robust and up-to-date, safeguarding our operations against potential risks.

### Manual Screening Process

While our automated systems handle the bulk of the screening, manual checks are an essential component of our due diligence process. Compliance officers conduct detailed reviews of reports generated by automated systems, cross-checking information and investigating any discrepancies or potential issues. Our brokers, leveraging their market knowledge and industry contacts, provide additional insights and updates. Furthermore, all relevant documentation, including ownership records, vessel registration, and charter party agreements, are manually verified to ensure accuracy and compliance. This meticulous manual screening process complements our automated systems, providing a comprehensive and reliable compliance framework.



## Supplier and Customer Due Diligence

### Onboarding Procedure

At 2Rivers, our onboarding procedure is designed to ensure thorough risk assessment and compliance with all regulatory standards. We require a comprehensive set of documents for every counterparty to evaluate potential compliance risks effectively. Our compliance team utilizes independent databases, such as WorldCheck for counterparties, and WorldCheck, Kepler, Marine databases, and Windward for all vessels involved.

Every trade recap must include a sanctions clause, and all required documentation must be submitted and approved before any transaction is finalized. Ships must be cleared prior to loading, and transaction trade recaps are reviewed by compliance for approval before being shared with counterparties. If there is any indication that a transaction may involve Russian products, including third-country origins that could pose a risk of Russian origin cargo, a separate price cap check is conducted, requiring itemized pricing for all cargo components.

To maintain up-to-date compliance, counterparty information is renewed every two years or sooner if a red flag arises. Additionally, we perform annual random checks on ten entries from the previous year to ensure ongoing vigilance and integrity in our operations.

### Ongoing Monitoring and Compliance

2Rivers continuously monitors existing customers and counterparties to ensure ongoing compliance with AML/ CFT regulations and applicable trade sanctions, following our Existing Customer/Counterparty Monitoring Procedure. This process helps us identify any changes that may pose new compliance risks, including:

- The addition of a customer or counterparty to any sanctions list under applicable trade sanctions.
- Regulatory or law enforcement actions involving a customer or counterparty.
- New adverse media reports concerning a customer or counterparty.

If any such changes are detected during the monitoring process, the Legal Department will review the customer's or counterparty's KYC file to determine if further investigation, termination of the relationship, or other actions are warranted, as outlined in our Existing Customer/Counterparty Monitoring Procedure. Our standard template contract with counterparties also includes specific sanctions clauses to ensure no breaches of sanctions occur.



# Governance and Compliance Policy Components.

## Enhanced Actions and Procedures for Robust Governance Practices and Compliance

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
Corporate Governance Policy	<ul style="list-style-type: none"> <li>Robust corporate governance policy enhanced, strengthened and implemented.</li> <li>Specific regulations and procedures for Board's and Executive Committee operations and decision making process outlined.</li> </ul>
Code of Conduct	Comprehensive Code of Conduct developed and implemented.
Compliance Processes and Procedures	<ul style="list-style-type: none"> <li>Comprehensive Compliance Policy in place.</li> <li>KYC and KYCC Check Procedures and Audit Procedures in place.</li> <li>Robust counterparty screening, onboarding and ongoing monitoring and compliance procedures established with the use of WorldCheck, Kepler, Marine, and Windward automated tools.</li> <li>Commercial agreements monitoring procedure in place.</li> <li>Vessel screening process in place.</li> <li>Automated screening tools employed.                             <ul style="list-style-type: none"> <li>OFAC List Monitoring</li> <li>UK Sanctions List Monitoring</li> <li>UANI (United Against Nuclear Iran) List</li> <li>World-Check Software checks</li> <li>Windward AI Platform integrated</li> </ul> </li> <li>Manual screening Process by our Compliance Department enhanced.</li> </ul>

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
Sanctions Compliance	<ul style="list-style-type: none"> <li>Comprehensive set of Sanctions Compliance Policy and Procedures implemented.</li> <li>Competent outsourced independent sanctions legal advisors in key jurisdictions retained.</li> <li>Sanctions clauses regularly updated in contractual documentation.</li> <li>Counterparty sanctions exposure check procedures in place.</li> </ul>
Anti-Corruption, AML	<ul style="list-style-type: none"> <li>Strict Anti-Bribery / Anti-Corruption Policy in place.</li> <li>Strict AML Policy in place.</li> </ul>
Internal Audits and Third Party Verifications	<ul style="list-style-type: none"> <li>Quarterly internal audits and compliance reviews conducted by Internal Audit.</li> <li>Department staffed by CIAs, CPAs and compliance and risk management experts, to identify and address any potential compliance issues promptly.</li> <li>Ad hoc audits on as needed basis.</li> <li>External third party audit conducted by PWC CH internal audit conducted in November 2024. Risk assessment review conducted by E&amp;Y CH in 2022</li> </ul>
Compliance Committee	Dedicated Compliance Committee established to oversee all compliance-related activities.

Governance

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
<b>MARKET RISK MANAGEMENT</b>	
Price Risk Hedge Policy	Robust policy established for hedging price risks associated with our trading activities in place.
Manual Monitoring Procedure for Market Positions and Effectiveness	Market Positions and Effectiveness Regular Manual Monitoring Procedures in place, including evaluating market trends, price fluctuations, and the performance of hedging strategies.
Automated Physical Position Hedge Cover Controls	Automated Physical Position Hedge Cover Controls that monitor our physical positions in real time in place. These controls facilitate prompt adjustments to hedge coverage as market conditions evolve, ensuring that we remain protected against adverse price movements.
Trader Limit Compliance	Trader Limit Strict Compliance reinforced to mitigate risk exposure.
Transaction Authorization Procedures	Transaction Authorization Procedures implemented including manual and automated processes to review and approve trades.

ESG Policy Component	Implemented, Ongoing, and Planned Actions and Procedures
ESG Training	<p>A comprehensive range of highly customized mandatory internal trainings developed and conducted to share the company's ESG objectives with all the employees and to ensure understanding, compliance, cooperation and contribution:</p> <ul style="list-style-type: none"> <li>• Conflict of Interest Policies and Ethical Standards Training.</li> <li>• Regular staff training actively promoting anti-corruption/AML culture.</li> <li>• Data security training.</li> </ul>
Compliance Training Program	<p>Extensive new Compliance Training Program deployed in 2024, and dlanched with a comprehensive series of training sessions conducted by a leading third-party compliance expert. The series cover:</p> <ul style="list-style-type: none"> <li>• Sanctions compliance.</li> <li>• Risk of non-compliance.</li> <li>• Specific sanctions programs with a deep dive in deceptive shipping practices.</li> <li>• Price cap policies.</li> <li>• Secondary sanctions.</li> </ul>





## Internal Audit and Risk Management Strategies

### Onboarding Procedure

At 2Rivers, our internal audit function is designed to provide independent and objective assurance on the effectiveness of our risk management, control, and governance practices. We take a comprehensive approach that includes financial, operational, compliance, and information technology audits, ensuring rigorous oversight and alignment with best practices in corporate governance.

### Frequency of Audits

Internal audits are conducted on a quarterly basis to maintain a regular and systematic review of our processes. Additionally, ad-hoc audits may be initiated in response to specific risk events or at the request of senior management or the Board of Directors, ensuring agility and responsiveness to emerging risks and concerns.

### Conducting Audits

Our internal audits are performed by a dedicated Internal Audit Department, staffed by certified internal auditors (CIAs), certified public accountants (CPAs), and professionals with specialized expertise in compliance and risk management. In certain instances, we may engage external audit firms to provide additional specialized expertise or assurance, enhancing the depth and breadth of our audit capabilities.

## Audit Process

### Planning

The internal audit team develops an annual audit plan based on a comprehensive risk assessment process. This plan is reviewed and approved by the Audit Committee to ensure alignment with the organization's strategic priorities and risk profile.

### Execution

During the audit, the team conducts detailed testing and evaluation of controls, processes, and transactions. This includes interviews with key personnel, thorough document reviews, and extensive data analysis to verify compliance and operational efficiency.

### Reporting

Audit findings are documented in a comprehensive report, which includes observations, risk assessments, and recommendations for improvement. This report is presented to the Audit Committee and senior management, providing clear and actionable insights to enhance the organization's governance and control environment.

### Follow-Up

The internal audit team conducts follow-up reviews to ensure that corrective actions have been implemented and that identified issues have been resolved. This follow-up process is critical for verifying the effectiveness of remediation efforts and sustaining improvements over time.

## Addressing Findings

Audit findings are categorized based on their severity and potential impact on the organization. Senior management is tasked with developing and implementing action plans to address these findings promptly. The internal audit team monitors the progress of these action plans, providing regular updates to the Audit Committee to ensure accountability and continuous improvement.

By maintaining a rigorous and transparent internal audit process, 2Rivers reinforces its commitment to high standards of corporate governance, accountability, and compliance. This approach ensures that our risk management and control processes are robust and effective, supporting the long-term sustainability and success of our organization.



## Risk Management Framework

2Rivers has established a comprehensive risk management framework that encompasses the identification, assessment, monitoring, and mitigation of risks across the organization. This framework is meticulously aligned with industry best practices and regulatory requirements, ensuring robust and effective risk management throughout the company.

### Addressing Findings

The risk assessment process at 2Rivers involves several critical steps:

#### Identification

Risks are identified through multiple channels, including internal audits, formal risk assessments, market analysis, and employee feedback. This multi-faceted approach ensures that potential risks are captured from all areas of the organization.

#### Assessment

Each identified risk undergoes a thorough assessment based on its likelihood and potential impact. This process involves both quantitative and qualitative analyses to provide a comprehensive understanding of the risk landscape.

#### Prioritization

After assessment, risks are prioritized according to their severity. Resources are then allocated to address the most critical risks, ensuring that our risk management efforts are focused where they are needed most.



### Risk Mitigation Strategies

2Rivers employs a range of strategies to mitigate identified risks effectively:

#### Hedging and Diversification

To manage market and price risks, we utilize hedging strategies and diversify our energy portfolio. This approach reduces our exposure to any single commodity or market, thereby stabilizing our overall risk profile.

#### Operational Controls

We have implemented robust internal controls and standard operating procedures (SOPs) to mitigate operational risks. This includes comprehensive employee training and regular reviews of procedures to ensure effectiveness and adherence.

### Regulatory Compliance

Ensuring compliance with all relevant laws and regulations is a priority. We achieve this through continuous monitoring, regular updates to our compliance policies, and comprehensive training programs for our staff.

### Prohibited Engagements

2Rivers and its employees are prohibited from engaging in business with individuals, entities, or jurisdictions that are sanctioned by the United Nations. Specifically, our organization does not engage in transactions or activities involving:

- Jurisdictions under comprehensive US, UK, or EU trade sanctions, such as Iran, Cuba, Syria, North Korea, or Crimea, unless authorized by relevant licenses.
- Individuals or entities subject to targeted sanctions by the US, UK, or EU, or entities where such individuals or entities hold a 50% or greater interest, unless authorized by relevant licenses.
- Activities involving Venezuela or Russia that are prohibited by US, UK, or EU sanctions.
- Any other activities prohibited by US, UK, or EU sanctions.



### Technology and Cybersecurity

Advanced technology solutions are deployed to safeguard against cyber threats and ensure data security. We conduct regular cybersecurity assessments and updates to address and mitigate emerging threats.

### AML and CTF Policies

2Rivers is fully committed to preventing money laundering, terrorism financing, and any activities that could compromise our integrity or facilitate criminal behavior. We adhere strictly to all Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) regulations, expecting all employees to uphold these standards to maintain the trust and reliability of our products and services.

### Compliance with KYC Procedures

Advanced technology solutions are deployed to safeguard against cyber threats and ensure data security. We conduct regular cybersecurity assessments and updates to address and mitigate emerging threats.

### Reporting and Escalation

Any actual or potential breaches of applicable regulations, or any suspicious activities, must be promptly reported to the Executive Director or their designated delegate. 2Rivers maintains a zero-tolerance policy for any violations of sanctions regulations or the requirements outlined in this policy. All reports will be investigated thoroughly, and appropriate actions will be taken to address any breaches.



## Investment Strategy

At 2Rivers, our investment decisions are guided by a disciplined, fact-based approach that aligns with our strategic goals and commitment to the highest standards of governance, transparency, and compliance. We focus on enhancing our presence across the energy supply chain while maintaining an asset-light model, strategically investing in opportunities that strengthen our trading capabilities and market position.

Our investment strategy is designed to enhance our trading capabilities and expand our market presence. We remain opportunistic in acquiring fixed assets that align with our trading strategy, such as terminals and vessels, while being mindful of the ESG considerations of our lenders. Our core focus remains on trading energy commodities and maintaining an asset-light model.

### Onboarding Procedure

We evaluate potential acquisitions using the following criteria:

- **Market Access:** The acquisition should provide us with access to new markets.
- **Market Position:** Strengthen our existing market position through increased flows.
- **Cost Efficiencies:** Drive cost efficiencies and synergies with our existing trading business.
- **Cashflow Stability:** Streamline the cashflow profile by mitigating the volatility of trading business cashflows.
- **Value Generation:** Generate value-accretive returns as standalone investments.

### Investment Process

Our disciplined investment process ensures thorough evaluation and strategic alignment:

- **Opportunity Identification:** Investment opportunities are identified internally through strategic analysis or externally via market intelligence and networking.
- **Concept Paper Development:** A detailed concept paper is prepared, outlining the opportunity characteristics, investment thesis, and strategic rationale. This document is presented to the investment committee for preliminary approval.
- **Due Diligence:** We conduct comprehensive due diligence, including financial, legal, compliance/sanction risk, technical, and operational analysis, to determine the intrinsic value of the asset.
- **Negotiation & Execution:** Upon consensus on valuation, we negotiate the terms and conditions of the transaction, including drafting legal documents and structuring the deal.

### Commitment to Compliance and Ethical Standards

As we expand our portfolio and strengthen our market presence, we are steadfast in our commitment to ethical conduct and regulatory compliance. We ensure that we do not engage in any business activities with sanctioned entities, countries, or individuals, maintaining our reputation as a trustworthy and responsible market player.

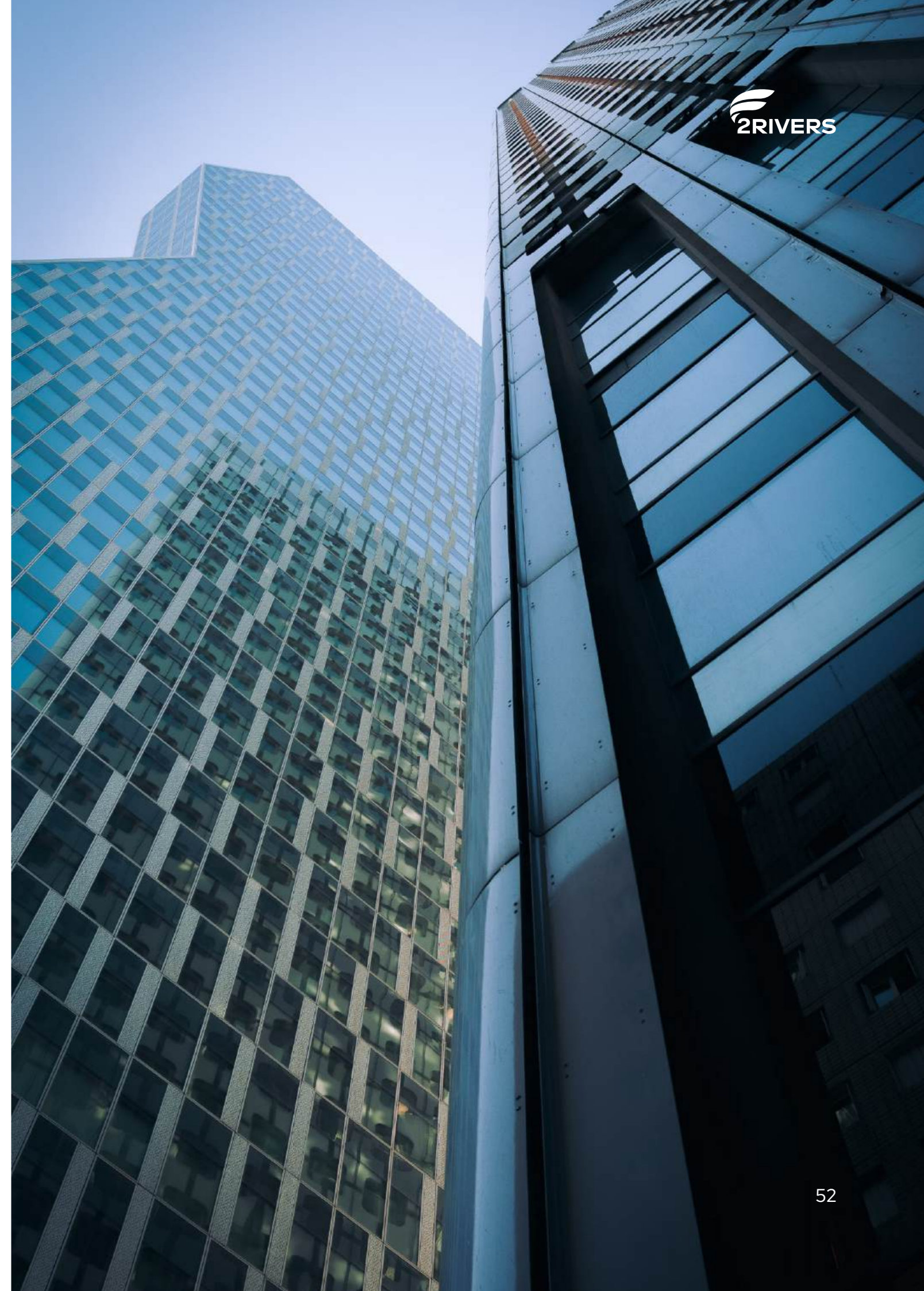
## Our Key Performance Indicators Under Review

Our company is fully committed to conducting a thorough and comprehensive review of our ESG program. This review will include exploring the possibility of undertaking a full legal scoping and materiality assessment to ensure that our ESG initiatives are aligned with both our sustainability goals and industry best practices.

As part of this process, the leadership at 2Rivers has requested a careful re-evaluation of our current Key Performance Indicators (KPIs). The objective of this review is not to undermine the value and meaningfulness of our existing KPIs, but rather to ensure they are realistic, achievable, and truly reflective of the strategic changes needed to move our ESG ambitions forward.

In this context, it is vital that our KPIs are more than just metrics – they must actively encourage management to steer the company toward tangible and measurable progress in our ESG goals. By refining our KPIs, we aim to create a clear roadmap that drives real impact across our sustainability initiatives, while fostering an environment where both leadership and teams are motivated by goals that reflect our core values and long-term vision.

This review is essential to ensuring that our ESG framework remains robust, forward-thinking, and responsive to emerging challenges, enabling us to lead by example in sustainability while keeping our commitments to stakeholders both transparent and effective.



## Looking Forward: ESG Deployment Mechanisms

As we look ahead in this ESG report, it is crucial to focus on the mechanisms that will enable the continuous successful implementation of our ESG initiatives at 2Rivers. Our commitment to sustainability and responsible business practices is not just a present goal but a strategic vision that will guide our future endeavors.

### Governance Framework

Our ESG deployment is anchored in a robust governance structure that promotes accountability and transparency. We will continue to define clear roles and responsibilities for all stakeholders, ensuring that everyone from senior management to operational teams understands their part in upholding our ESG commitments. Regular training sessions will empower our employees to actively contribute to our sustainability goals, while our board of directors will provide ongoing oversight and strategic direction to keep us aligned with best practices.

In particular, we will enhance our sanctions compliance framework to ensure that we strictly adhere to all relevant regulations and standards. This includes comprehensive training on sanctions-related issues for all employees involved in transactions, ensuring they understand the implications of non-compliance and the importance of rigorous due diligence.

### Data-Driven Decision Making

Moving forward, we will leverage advanced data analytics to inform our ESG strategies and monitor our performance against established KPIs. By employing real-time data collection and analysis, we will be able to swiftly identify areas for improvement, assess the effectiveness of our initiatives, and make informed decisions that align with our sustainability objectives. This data-driven approach will enhance our operational efficiency and ensure we remain agile in a rapidly changing energy commodities market.

### Stakeholder Engagement

Engaging with our stakeholders will remain integral to our ESG deployment. We will actively seek feedback from employees, clients, suppliers, and community members to understand their perspectives and expectations. This engagement will foster a culture of collaboration and inclusivity, ensuring that our ESG initiatives are relevant and impactful. Regular stakeholder consultations and surveys will allow us to refine our strategies and address emerging concerns effectively.

### Continuous Improvement

At 2Rivers, we view ESG as a journey of continuous improvement. We will regularly evaluate our initiatives, assessing their impact and identifying opportunities for enhancement. Our commitment to learning from both successes and challenges will drive our ongoing efforts to innovate and adapt our practices. Through internal audits, third-party assessments, and industry benchmarking, we will strive for excellence in our ESG performance.

### Reporting and Accountability

Transparency will continue to be a cornerstone of our ESG deployment. We are committed to openly reporting our progress, providing stakeholders with insights into our achievements and challenges. This report serves as a testament to our dedication to accountability and ongoing dialogue with our stakeholders. We welcome feedback and suggestions that can further refine our ESG strategies.

### Looking Ahead

As we forge ahead, our focus will remain on embedding ESG principles into our core business strategies. We recognize that the landscape of sustainability is continually evolving, and we are committed to being at the forefront of these changes. By fostering a culture of innovation, collaboration, and accountability, we aim to drive positive change within the energy commodities sector and contribute to a more sustainable future.

In closing, we extend our gratitude to all our stakeholders for their support and engagement. Together, we can build a resilient organization that not only meets the challenges of today but also paves the way for a sustainable tomorrow. Thank you for being part of our journey.



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