

QUALITY, COMPLIANCE & POLICY STATEMENT

The following statement describes the overall quality objectives, code of business conduct and policies of the “*Stichting Chemical Distribution Institute*” (CDI) as set by the Board of CDI. All participants, employees and accredited inspectors are required to adhere to these at all times in the execution of their work for CDI. The combined statement is prominently displayed within the CDI offices and made known to all participants, employees and accredited inspectors.

CDI's VISION:

Driven by the expertise of the world's leading chemical manufacturers CDI sets out to be the world leader in the source for digitised, cost-effective data, for effective identification and management of a chemical company participant's risk; specific attention is paid to the environmentally sustainable and safe marine transportation, storage and handling of hazardous chemicals and liquefied gases, whether that be in bulk or packaged form.

QUALITY OBJECTIVES

- To meet customers' requirements for providing high quality independent data, and information and advice on industry best practice and international legislation for marine transportation and storage of chemicals and liquefied gases.
- To continually improve the way, we operate and communicate.
- To measure CDI's performance and provide meaningful statistical evidence of its progress.

QUALITY POLICIES

- To meet our customer's quality demands consistently.
- To manage CDI in order to comply with the current ISO 9001:2015 Standard.
- To implement and maintain awareness of, and participation in meeting the quality objectives.
- To keep proper records to demonstrate effectiveness of the quality system
- To promote best practices and comply with changing legislation related to marine transportation and storage of chemicals and liquefied gases

THE BUSINESS OBJECTIVES

To continually improve the safety, security and quality performance of marine transportation and storage for the chemical and gas industry.

To provide the chemical industry with an independent organisation for: training, qualification and accreditation of inspectors. development and maintenance of databases on which inspection and risk management information can be promulgated by;

- Driving the development of industry best practice
- Providing information and advice on industry best practice and international legislation

- Providing experience and knowledge to the legislators
- Providing cost effective systems for risk management, thus assisting chemical company participant's commitment to Responsible Care ®
- Providing a single set of reliable and consistent inspection data which chemical company participants can use with confidence in management of the risks associated with the transport and storage of chemicals and liquefied gases.

THE BUSINESS POLICIES

- Through user feedback, learnings and monitoring of legislation CDI will promulgate information and best practice to continually improve secure, safe and sustainable marine transportation and storage.
- CDI will represent the industry, by providing expertise and knowledge to legislators.
- CDI will ensure that reliable and accurate inspection schemes are maintained and that inspection protocols are regularly updated in line with legislation, recognised industry standards, best practices and technology.
- CDI will continually improve the interactive databases for input, extraction and interpolation of data and information.
- CDI will comply with the procedures for accreditation, and provide global coverage of inspectors for ship, terminal and supply chain inspection.
- CDI will operate within the budgetary limits set by the Board and ensure surplus capital to support the continual improvement of CDI's operating systems.
- Extend the services of CDI beyond the chemical industry wherever assistance and advice may be requested.

SAFETY, SECURITY, SUSTAINABLE, HEALTH AND ENVIRONMENT OBJECTIVES

- CDI's employees and inspectors conduct its activities safely, securely sustainably, healthily and environmentally friendly.

SAFETY, SECURITY, SUSTAINABLE, HEALTH AND ENVIRONMENT POLICIES

Through inspection protocols, guidelines, training of personnel and industry presentations CDI will:

- Actively promote Safety, Secure, Sustainable, Healthy and a pollution free Environment.
- Comply with all applicable legislation and recognised industry standards
- Provide all inspectors with identification documents and maintain accurate records to provide verification of the inspector's identity.
- Comply with ships, terminals, and offices Safety, Security, Sustainable, Health and Environmental Policies for visitors when on site.
- CDI will monitor safety performance by recording and reviewing all incidents, accidents and near misses involving employees and inspectors as well as industry learnings.
- CDI will maintain a Safe, Secure, Stable and a Healthy working environment for employees.
- CDI will provide information and instructions to ensure all employees and inspectors avoid hazards likely to be encountered in their daily activities.

PERSONNEL OBJECTIVE

- Properly trained and qualified personnel are the key elements to the success and quality of the CDI.

PERSONNEL POLICIES

CDI will:

- Ensure that the right people are employed in the right positions with the right work instructions.
- Provide appropriate training to all employees to ensure they stay up-to date with changing procedures, legislation, and modern working practice.
- Maintain appropriate safety equipment, fire protection, first aid and welfare facilities within the administration office.

CDI CODE OF BUSINESS CONDUCT

Purpose and scope of the Code

The purpose of this Code is to set out CDI's fundamental principles and establish the standard of business conduct expected of all those involved in CDI activities to include employees, directors, contractors, consultants, agents, representatives, inspectors, auditors, chemical company participants and any other individual or organisation working on CDI's behalf. It applies in respect of our business conduct towards each other, and third parties involved in CDI activities such as ship/terminal operators and chemical company participants.

Complying with the Code

- CDI will apply a strict adherence policy to this code at all times.

Fundamental Principles of the Code

This Code encompasses three fundamental principles: integrity, professionalism and transparency. These are defined as follows:

- **Integrity** is the state of moral soundness, honesty and freedom from corrupting influences or motives.
- **Professionalism** is applying accepted professional standards of conduct and technical knowledge.
- **Transparency** implies openness and accountability.

Compliance with Laws

CDI aims that at all times it will strictly observe and follow all local laws, rules, and regulations applicable to its activities in each jurisdiction in which CDI operates in, including but not limited to:

- Data protection and privacy;
- Antitrust and competition;
- Anti-bribery and corruption;
- International trade;
- Business secrets;
- Environmental laws and regulations;
- Health and Safety laws and regulations;
- Harassment and Discrimination laws.

Compliance with Statutes, Policies and Procedures

- CDI will be familiar with and comply with the statutes on which CDI is established and CDI's policies and procedures as set out in its Manuals.

Respect for each other

- CDI will be honest, straight forward and impartial, upholding the utmost integrity.

- CDI will ensure that it is respectful, and does not discriminate, bully or harass, nor allow bullying or harassment of CDI staff or inspectors.
- CDI will ensure its oral and written communications are professional, courteous and considerate.
- CDI will respect different cultures, traditions and customs and in so doing maintain the highest integrity in its dealings and activities.
- During working hours, CDI staff and inspectors will be free from the influence of alcohol, drugs or any other substances that could impact the health and safety and welfare of others and comply with CDI's Drugs and Alcohol Policy.

Conflicts of interest

- CDI will use its judgment to act in the best interests of CDI. As such, it will seek to avoid actual or apparent conflicts of interest. For the avoidance of doubt, a general conflict of interest will occur when personal interests interfere with the best interests of CDI.
- If any staff member, CDI inspector, Director or committee member of CDI becomes aware of a potential or known conflict of interest, this is to be declared immediately to CDI.

Bribery and Corruption

- CDI will conduct all business in an honest and ethical manner. CDI takes a zero-tolerance approach to bribery and corruption and will act professionally, fairly and with integrity in all business dealings and relationships.
- Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage and corruption is the abuse of entrusted power or position for private gain.
- CDI will not:
 - give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - give or accept a gift or hospitality during any commercial negotiations, tender process or inspection if this could be perceived as intended or likely to influence the outcome;
 - accept a payment, gift or hospitality from a third party that is offered with the expectation that it will provide a business advantage for anyone in return;
 - accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
 - offer or accept a gift to or from government officials or representatives, or politicians or political parties; or
 - threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this section of the Code.

Competition

- In carrying out CDI's duties and activities, CDI staff and inspectors will rigidly comply with all anti-trust/competition laws which are applicable to CDI's activities.
- Consistent with this principle, the CDI Board shall emphasise the importance of competition law compliance and shall establish a competition law compliance program. This includes guidance to conduct business according to a set of rules and "do's & don'ts" in competition law and ensure awareness of these rules via communication and, where necessary, training. Thus CDI requires that an anti-

trust/competition law compliance statement be circulated prior to commencement of all Board, Executive Board, Committee and Work Group meetings.

- CDI inspectors shall not discuss or disclose their inspection fees with other CDI inspectors and shall, under no circumstances, collude on inspection fees.
- CDI participants, such as inspectors & staff ship/terminal operators and chemical company participants are annually made aware of CDI's competition law compliance policy and its contents. Although the scope and content of competition laws may vary from country to country the following principles always apply to the CDI activities:
 - (i) the prohibition of anticompetitive agreements or practices and
 - (ii) the prohibition of abuse of a dominant position.
- If at any time or occasion, any doubts arise as to the proper interpretation in conjunction with applicable laws in each country, CDI will ensure the case is referred to CDI's legal counsel for an opinion and guidance.

Confidential Information / Data Privacy

- CDI will only collect confidential information and privacy information in compliance with CDI's Data Protection Policy and the applicable laws and regulations, and use such information strictly for the sole purposes for which it has been collected.
- Confidential information shall include but not be limited to the content, findings or observations in any CDI inspection report, inspection fees, data privacy, third party information which is witnessed as a result of conducting a CDI inspection and/or audit, or any privileged or confidential document.

Conduct when performing an inspection/audit

The inspector/auditor shall:

- Maintain the highest standards of ethical behaviour
- Be an observer only and should not interfere or become involved in the operation of the ship, terminal or plant or be a party in any discussion between the ship, terminal, plant and port or authorities etc.
- Not operate any equipment or give advice on any operational or constructional matters or give any advice on how a particular non-compliance or observation may be corrected.
- Behave in a courteous and considerate manner in all dealings with all staff being inspected or audited whether it is senior management or their delegates or any other representative.
- Take care to ensure that his/her actions do not in any way delay or interfere with the normal operation of the ship, terminal or plant been audited or inspected.
- Set a good example in all respects, including safety, during the period of the audit or inspection.
- Produce proper identification when requested and wear CDI insignia as provided by CDI.
- Wear Personal Protective Equipment as specified in CDI operating manuals or more stringent for the location or hazards anticipated.
- Not enter restricted areas without operator's permission been obtained and any relevant permits / checklists have been completed correctly.

Signed.....CDI Chairman of the Board

Name:..... JAN ARONSSON

Date: 23 MARCH 2023