

ESG AND SUSTAINABILITY POLICY

HORSAN BROKERS COMPANY SL

Registered Office: Calle Campoamor, 28 - Piso 1, Castellón de la Plana, Spain

Version 1.0 | Effective Date: 20 April 2026 | Approved by: Board of Directors

1. Our Commitment

HORSAN BROKERS COMPANY SL is committed to conducting its business in a responsible and sustainable manner, recognising that long-term value creation depends on managing environmental, social and governance (ESG) issues in addition to financial performance. This Policy sets out the principles, commitments and framework that guide the Company's approach to sustainability.

The Company aligns its approach with internationally recognised frameworks, including:

- The ten principles of the United Nations Global Compact (UNGC).
- The United Nations Sustainable Development Goals (SDGs).
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).
- The Core Conventions of the International Labour Organization (ILO).
- The OECD Guidelines for Multinational Enterprises.

While the Company is not currently a signatory or member of these organisations, it commits to conducting its operations in alignment with their principles and, over time, to evaluating formal adherence to industry-leading sustainability initiatives.

2. Scope

This Policy applies to all activities, operations and business relationships of the Company, including employees, directors, officers, agents, suppliers and business partners.

3. Environmental Responsibility

The Company is committed to:

- Complying with all applicable environmental laws and regulations.
- Minimising its direct and indirect environmental impact, including greenhouse gas emissions, energy consumption, waste generation and the use of natural resources.
- Applying the precautionary principle to environmental risk.
- Promoting energy efficiency and, where feasible, the use of lower-carbon alternatives.
- Preventing pollution and responding promptly and effectively to any environmental incident.
- Encouraging suppliers and counterparties to adopt responsible environmental practices.

- Progressively developing environmental performance indicators for the Company's operations.

4. Social Responsibility

4.1 Human Rights

The Company respects all internationally recognised human rights, including those set out in the Universal Declaration of Human Rights, and is committed to:

- Avoiding complicity in human rights abuses.
- Rejecting child labour, forced labour and human trafficking in its operations and supply chain.
- Conducting human rights due diligence proportionate to its activities.

4.2 Labour and Working Conditions

- Providing equal opportunities and a non-discriminatory workplace.
- Offering fair compensation and benefits in line with applicable law.
- Promoting health, safety and wellbeing at work.
- Respecting freedom of association and collective bargaining.
- Investing in the professional development of its people.

4.3 Communities

- Respecting the rights and cultural heritage of local communities.
- Engaging constructively with stakeholders.
- Promoting transparency in the Company's community-related activities.

5. Governance

- The Board of Directors has ultimate oversight of ESG matters.
- ESG topics are discussed at senior-management level on a regular basis.
- The Company maintains policies on anti-corruption, code of conduct, whistleblowing, third-party due diligence, KYC, responsible sourcing and high-risk jurisdictions that together form its governance framework.
- The Company considers, as it matures, linking part of senior compensation to sustainability performance.
- The Company is committed to transparent and accurate reporting to its stakeholders.

6. Business Ethics

- Zero tolerance for bribery, corruption, fraud, money laundering and sanctions breaches.
- Commitment to fair competition and ethical marketing.
- Honest and accurate communications with all stakeholders.
- Respect for privacy and data protection.

7. Sustainability Capacity

The Company currently integrates sustainability oversight within the responsibilities of the Compliance function, under the supervision of the Board of Directors. As the Company grows, it is committed to:

- Reviewing the appropriateness of a dedicated sustainability officer or team.
- Increasing the frequency and depth of sustainability discussions at senior level.
- Developing internal capacity for sustainability management and reporting.

8. Certifications and Standards

The Company does not currently hold formal sustainability certifications (e.g. ISO 14001 environmental management, ISO 45001 occupational health and safety). The Company is committed to:

- Applying management practices consistent with the principles of such standards.
- Assessing, within a reasonable timeframe, the feasibility and appropriateness of pursuing formal certification.
- Engaging with suppliers that are independently certified, where available and proportionate.

9. Reporting and Performance Monitoring

The Company is committed to:

- Progressively developing internal tracking of relevant ESG key performance indicators (including workplace incidents, environmental incidents, and compliance matters).
- Documenting material ESG matters in internal management reporting.
- Publishing, over time, public-facing sustainability information as the Company's programme matures.
- Aligning future reporting with recognised frameworks such as the Global Reporting Initiative (GRI) and, where relevant, sector-specific standards (e.g. IPIECA for the oil and gas industry).

10. High-Risk Jurisdictions

Operating or sourcing from jurisdictions considered high risk from a sustainability perspective requires enhanced due diligence and senior-management approval, as set out in the High-Risk Jurisdictions Policy.

11. Stakeholder Engagement

The Company values open dialogue with its employees, counterparties, suppliers, regulators, communities and other stakeholders, and welcomes feedback on its sustainability performance.

12. Reporting Concerns

Any person may report concerns regarding the Company's ESG practices through the Whistleblowing channel described in the Whistleblowing Policy. The Company does not tolerate retaliation against anyone who reports a concern in good faith.

13. Responsibilities

- **Board of Directors:** ultimate oversight of ESG strategy, commitments and performance.
- **Compliance Officer:** coordination of ESG-related policies, risk assessments and external reporting.
- **All employees:** application of this Policy in their day-to-day activities and reporting of concerns.

14. Review

This Policy is reviewed at least every two years and updated to reflect the evolution of the Company, regulatory developments and stakeholder expectations.

Approval and Sign-Off

This Policy has been reviewed, approved and adopted by the Board of Directors of HORSAN BROKERS COMPANY SL and is effective as of 20 April 2026.

Javier Sánchez

Chief Executive Officer / Administrador Único
HORSAN BROKERS COMPANY SL

Date: 20 April 2026

