



# Icon Commodities Code of Business Conduct

2800 Post Oak Boulevard  
Suite 4100  
Houston Texas 77056  
United State



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# Introduction

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Since the Company's founding, integrity, honesty, fair dealing and full compliance with all applicable laws have guided Icon Commodities' business practices. Since then, the employees of Icon Commodities worldwide have upheld and fulfilled this commitment in their daily responsibilities, while the reputation of Icon Commodities continues to be one of the Company's most important assets today.

The Icon Commodities Corporate Business Principles set forth certain values and principles that Icon Commodities has undertaken to adhere to globally. This Code of Business Conduct specifies the Corporate Business Principles and helps to implement them on an ongoing basis through the establishment of certain minimum standards of non-negotiable behavior applicable to key areas.

The nature of this Code is not intended to cover all possible situations that may occur. Its purpose is to provide a frame of reference against which to measure any activity. Employees, contractors and associates should seek advice if they have any doubts about the action plan in a given situation, since the absolute responsibility of each employee, contractor and associate is

“do the right thing”, a responsibility that cannot be delegated.

Employees should always be guided by the following basic principles: – avoid any conduct that could harm or endanger Icon Commodities or its reputation; – act lawfully and honestly; – prioritize the interests of the Company over personal or other interests. For purposes of this Code, references to the term "employees" include employees, associates, contractors, officers and directors of Icon Commodities and its subsidiaries.

## Compliance with Laws, Rules and Regulations

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### **We respect the law at all times**

Icon Commodities and its employees are governed by the law. Compliance with all applicable laws and regulations must never be compromised. In addition, employees must adhere to internal rules and regulations as they may be applicable in a given situation. Such internal regulations are specific to the Company and may go beyond the requirements of the law.

## Conflicts of Interest

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### **We always act in the best interests of Icon Commodities**

A Conflict of Interest occurs when the personal interests of an employee or the interests of a third party compete with the interests of Icon Commodities. In this situation, it may be difficult for the employee to act fully in the best interests of Icon Commodities. Whenever possible, employees should avoid Conflicts of Interest. If a Conflict of Interest has occurred or if an employee is faced with a situation that may involve or give rise to a Conflict of Interest, the employee must notify their immediate superior and/or the person in charge of the Human Resources or legal area. in order to resolve the situation in a fair and transparent manner.

## External management and other activities external

We are proud of the reputation of Icon Commodities and also have the best interests of Icon Commodities in mind in our outside work and activities.

Activities outside of Icon Commodities should not be conducted if they interfere with employees' responsibilities to Icon Commodities, or if they pose a risk to Icon Commodities' reputation or are otherwise conflict with the interests of Icon Commodities. In case of any doubt about whether an activity is permitted, employees should consult the person in charge of the Human Resources or Legal area. The following positions and activities will be considered acceptable only in case of having the previous authorization of a member of the Executive Council (Executive Board) of Icon

Commodities: director, employee officer, partner, consultant.

Authorization may be denied if the position or activity conflicts with the interests of Icon Commodities or with the responsibilities of the employees. The positions of director of publicly traded companies require the prior approval of the CEO (Chief Executive Officer) of Icon Commodities and, in the case of members of the Executive Board (Executive Board) of Icon Commodities S.A., of the President (Chairman) of Icon Commodities S.A. Unless requested by the Company to take on a particular role or activity, employees will perform outside activities and duties at their own risk and expense, and only on their own time.

## Families and Relatives

**Our hiring and staff development decisions will be fair and objective**

These fair hiring principles will apply to all aspects of the employment relationship, including remuneration, promotions and transfers, as well as in the event that the relationship develops after the moment in which the respective employee has attached to the Company. Children of Icon Commodities employees may have priority for internships, training periods, vacation employment, and short-term assignments of a similar nature, provided they meet the same qualifications as other applicants.

Immediate family members and partners of employees may be hired as employees or consultants only if their appointment is based on their qualifications, performance, skills and experience, and provided there are no restrictions. relationship of direct or indirect labor dependency between the employee and his family member or partner.

## Corporate Opportunities

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**We are committed to fomenting the deals on Icon Commodities**

Even if the Company decides not to pursue the opportunity, the employee may do so for their own benefit only if it is clear that

If employees wish to pursue business opportunities that may be of interest to the Company, they must notify their immediate superior (Line Manager) who will obtain a management decision as to whether or not the Company wishes to pursue the opportunity. .

this will not generate direct or indirect competition with the Company's operations.

Employees will not compete with the Company or take personal advantage of business opportunities presented to them during the course of their employment relationship, unless the Company has expressly abandoned its interest in pursuing such opportunity.

## Management of Privileged Information

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**We respect and follow the Rules for the Handling of Inside Information in relation to the purchase or sale of securities of Icon Commodities**

Icon Commodities prohibits the trading of Icon Commodities shares or securities based on potentially material share price information that is not yet publicly available. Failure to comply with this rule may not only result in the application of disciplinary sanctions but also result in the filing of criminal charges. In case of having doubts about the interpretation or application of the Icon Commodities Privileged Information Handling Rules, employees should consult with the person in charge of the Legal area.

## Defense of Competition and Commercial legality

**We believe in the importance of free competition.**

Icon Commodities is poised to compete successfully in today's business world and will always do so in full compliance with all applicable competition, antitrust and fair dealing laws.

Therefore, employees must adhere to the following standards at all times: Commercial policy and prices will be established independently and will never be agreed, formally or informally, with competitors or other unrelated parties, either directly or indirectly; The customers, territory or product markets will never be distributed between Icon Commodities and its competitors but will always be the result of the com-

fair demand;

Customers and suppliers will be treated fairly. –All employees, but particularly those engaged in marketing, sales and purchasing activities, or those who are in frequent contact with competitors, must ensure that they are familiar with applicable competition laws. In case of doubt, the person in charge of the Legal area should be contacted in order to receive advice and training on said laws.

## Confidential Information

**We value and protect our confidential information and respect the confidential information of others**

Confidential information is information that is not or is not yet public knowledge. It includes trade secrets, business plans, marketing and services, consumer views, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any other information. any other unpublished financial or other information.

The continued success of Quantum Commodities depends on the use of your confidential information and its non-disclosure to third parties. Unless required by law or authorized by Company Management, employees will not disclose confidential information or allow its disclosure. This obligation subsists once the employment relationship has ended. In addition, employees must use their

best efforts to prevent unintentional disclosure of information by taking special care when storing or transmitting confidential information.

Quantum Commodities respects the fact that third parties have a similar interest in protecting your confidential information. In the event that third parties such as joint venture partners, suppliers, or customers share confidential information with Quantum Commodities, such information will receive the same care as Quantum Commodities' confidential information. In this same sense, the employees will protect the confidential information that they have obtained during their previous jobs.

## Fraud, Protection of Company assets, Accounting

### We emphasize honesty and respect Company assets and property

Employees should never be involved in fraudulent or other dishonest conduct involving the property or assets or the financial records and accounting of Icon Commodities or a third party. This may not only lead to the application of disciplinary sanctions but also result in the filing of criminal charges.

The financial records of Icon Commodities constitute the basis for managing the Company's business and for complying with its obligations towards the different interested parties (stakeholders). Therefore, all financial records must be accurate and in accordance with Icon Commodities' accounting principles.

Employees must protect Icon Commodities assets and use them only properly and efficiently. All employees will attempt to protect Icon Commodities assets against loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or privileged information and computer systems.

To the extent permitted by applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including the right to inspect all email, data and files maintained on the Company's network. company computers

## Bribery and Corruption

### We repudiate all forms of bribery and corruption

Employees, directly or through intermediaries, must never offer or promise an improper personal or financial favor or other favor in order to obtain or procure business or other advantage from a third party, whether public or private. private.

Employees must also not accept such an advantage in exchange for preferential treatment from a third party. Likewise, employees must refrain from engaging in any activity or conduct that could give rise to the occurrence or suspicion of such conduct or an attempt thereof. Employees should be aware that offering or giving improper benefits in order to influence the decision of the recipient, even if the recipient is not a government official, can not only lead to the application of disciplinary sanctions but also result in the formulation of criminal charges.

Improper benefits can include anything of value to the recipient, including employment or consulting contracts for closely related parties.

Employees should be aware that electoral laws in many jurisdictions generally prohibit contributions by corporations to political parties or candidates. Icon Commodities has adopted the policy of not making such contributions except in the case of the Headquarters (Icon Commodities) in its country of origin. Any contribution or deviation from said policy must be authorized by the CEO (Chief Executive Officer) and the Director of Icon Commodities.

## Presents, Meals, Entertainment

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**We believe in the importance of free competition.**

Employees may not be influenced by receiving favors or attempt to improperly influence third parties by giving favors.

Employees may only offer or accept reasonable meals and token gifts that are appropriate under the circumstances, and will not accept or offer gifts, meals, or entertainment if such behavior could create the appearance of improper influence regarding the corresponding business relationship.

When evaluating the situation in accordance with the above, employees should refer to the applicable policy in their Market

If such a policy is not available, they will apply the most restrictive local practice in order to avoid even the appearance of improper dealings. In the event of any doubt, the employee must request the advice of their immediate superior (Line Manager) or the person in charge of the Legal or Compliance area. No employee shall offer to third parties, nor accept from them, gifts included in the following list, whatever their value:

- money
- loans
- bribes
- similar monetary benefits

## Discrimination and Harassment

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**We encourage diversity and respect the personal dignity of our employees**

Icon Commodities respects the personal dignity, privacy and personal rights of each employee and is committed to maintaining a workplace that is free from discrimination or harassment. Therefore, employees must not discriminate with respect to origin, nationality, religion, race, gender, age or sexual orientation, nor must they engage in any type of verbal or physical harassing behavior based on the aforementioned or for any other reason.

Employees who feel that their work environment does not comply with the principles mentioned above can raise their concerns with the head of Human Resources.



## Breach

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The financial records of Icon Commodities constitute the basis for managing the Company's business and for complying with its obligations towards the different interested parties (stakeholders). Therefore, all financial records must be accurate and in accordance with Icon Commodities' accounting principles.

Employees must protect Icon Commodities assets and use them only properly and efficiently. All employees will attempt to protect Icon Commodities assets against loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or privileged information and computer systems.

To the extent permitted by applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including the right to inspect all email, data and files maintained on the Company's network company computers

## Communication of Illegal or Violative conduct

### We take responsibility for ensuring that we all act with integrity in all situations

Employees will notify their immediate superiors (Line Managers) or the person in charge of the Human Resources or Legal area, of any practice or action that they believe to be inappropriate, or even illegal, under this Code. Where appropriate, taking into account the nature of the reported event, reports of violations may be made directly to higher levels, including the Group CEO and/or Group Director.

If applicable, claims may be made confidentially or through the Icon Commodities employee service lines.

All complaints must be properly investigated. Icon Commodities

prohibits retaliation against any employee with respect to those claims presented in good faith, and in turn protects the rights of the incriminated person

**Board of directors**

(Board of Directors)  
**Executive Council**  
 (Executive Board) of **Icon Commodities Pty Ltd**