



United Independent Petroleum Marketing Company Limited

# SUPPLIER CODE OF CONDUCT AND ETHICS

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## 1.0 OVERVIEW

United Independent Petroleum Marketing Company Limited (UNIPET) is committed to maintaining the highest standards of integrity and social responsibility. In alignment with these values, UNIPET expects all its suppliers engaged in providing products and services to UNIPET (Suppliers) to demonstrate a similar commitment.

The UNIPET Supplier Code of Conduct and Ethics ("the Code") outlines the expectations for how Suppliers should conduct their business interactions with UNIPET. Suppliers are expected to adhere to the principles set forth in the Code and, at a minimum, must comply with all applicable laws and regulations in the jurisdictions where they operate. Additionally, Suppliers must cooperate openly with regulatory authorities responsible for enforcing such laws.

In cases where the expectations outlined in the Code differ from applicable local laws, Suppliers are required to follow the Code's expectations to the extent permitted by local law.

## 2.0 PURPOSE

UNIPET is committed to conducting business in an ethical, responsible, and sustainable manner. As part of this commitment, we expect our Suppliers and business partners to adhere to the highest standards of integrity, transparency, and ethical behaviour. This Supplier Code of Conduct and Ethics sets forth the principles and expectations that all Suppliers must adhere to when conducting business with UNIPET.

## 3.0 SCOPE

The Code applies to all Suppliers, contractors, and subcontractors providing goods and services to UNIPET. Compliance with the Code is mandatory, and adherence to its principles is a fundamental condition for maintaining business relationships with UNIPET.

## 4.0 TERMS AND DEFINITIONS

TERM	DEFINITION
Ethical Behaviour	Conduct that adheres to accepted principles of right or good conduct, particularly in the context of business activities.
Supplier	A third-party individual, entity or vendor that provides goods and/or services to UNIPET in exchange for payment for any aspect of the company's operations. This definition excludes transactions involving land purchases, leases, government agencies, utilities, and financial institutions.
Sustainability	The practice of meeting present needs without compromising the ability of future generations to meet their own, balancing environmental, social, and economic considerations.



## 5.0 SUPPLIER CODE OF CONDUCT & ETHICS

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### 5.1 Ethics and Integrity

UNIPET is committed to upholding the highest ethical standards and ensuring compliance with all applicable laws, rules, and regulations. As part of this commitment, UNIPET requires its Suppliers to adhere to the following standards:

Compliance with Laws: Suppliers must comply with all applicable laws and regulations, in the jurisdictions where they operate, including but not limited to the following key pieces of legislation in the Republic of Trinidad and Tobago:

<b>Consumer Protection Act Chap. 82:34</b>	Regulates business practices to protect consumers and ensures that products and services meet safety and quality standards.
<b>Standards Act Chap. 82:03</b>	Requires products and services to conform to established safety and quality standards.
<b>Customs Act Chap. 78:01</b>	Governs the importation and exportation of goods, including customs duties and procedures.
<b>Anti-Dumping and Countervailing Duties Act Chap. 78:05</b>	Protects domestic industries from the adverse effects of dumped imports.
<b>Anti-Bribery and Anti-Corruption</b>	Suppliers must fully comply with all applicable anti-bribery and anti-corruption laws and regulations.
<b>Gifts and Entertainment</b>	Suppliers must not offer or accept any gifts or inducements intended to secure improper advantages or influence decisions related to the Supplier, UNIPET (including UNIPET's employees, their family members, or associates), or any third party. Gifts may include benefits, fees, commissions, dividends, cash, gratuities, services, or other forms of inducement. It should be noted that while improper gifts or inducements are prohibited, reasonable gifts of nominal value and/or promotional items may be permissible provided they do not influence business decisions or create conflicts of interest.
<b>Non-Retaliation for Reports of Concern</b>	UNIPET expects Suppliers to establish a transparent and easily understandable policy and process for reporting workplace concerns. This policy should protect individuals who report concerns or participate in investigations from retaliation, ensuring a fair and open environment for addressing issues.

### 5.2 Data Privacy and Security

UNIPET requires its Suppliers to ensure the protection of individuals' privacy and the security of confidential assets and information.



**Confidential Assets and Information**

Suppliers are responsible for safeguarding the confidential assets and information of UNIPET and its clients. Suppliers must establish and maintain processes designed to provide adequate protection for this information.

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**Personal Information and Privacy**

Suppliers must protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of UNIPET shall be treated as strictly confidential and must only be used, accessed, or disclosed as permitted under the terms of the Supplier agreement.

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**5.3 Inclusion and diversity**

UNIPET fosters an inclusive culture where diversity is celebrated, and discrimination of any kind is not tolerated.

**Non-Discrimination and Workplace Diversity**

Suppliers are required to comply with all applicable laws regarding discrimination in hiring, employment practices, harassment and retaliation. UNIPET expects its Suppliers to operate workplaces free from discrimination, harassment, victimization, or abuse on any grounds, including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, or union affiliation.

**Supplier Diversity**

As part of UNIPET's commitment to promoting diversity and inclusion, we actively seek to build relationships with diverse and underrepresented businesses in our strategic sourcing and procurement process.

UNIPET values Suppliers that reflect a similar commitment to diversity within their own supply chains and that support UNIPET's supplier diversity goal.

UNIPET expects its Suppliers to:

- (i) utilize search and assessment processes for its procurement that are unbiased and transparent;
  - (ii) ensure that procurement teams provide fair access to bids for diverse business; and
  - (iii) where practicable, actively seek out and provide opportunities for diverse Suppliers to participate in business opportunities.
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**5.4 Employment and Working Conditions**

As a participant in the United Nations Global Compact (UNGC), UNIPET supports the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. UNIPET strives to adhere to these standards and expects its Suppliers to do the same.



**Modern Slavery/  
Human Trafficking**

UNIPET maintains a zero-tolerance policy towards slavery, forced labour, and human trafficking in any form. Suppliers are required to fully comply with the applicable legal requirements regarding slavery, forced labour, and human trafficking. Additionally, Suppliers are expected to implement practices that ensure compliance with such laws.

**Child Labour**

UNIPET strictly prohibits child labour. Suppliers must comply with all laws regulating the minimum working age, including laws related to the employment, apprenticeships, and internships of youths and students.

**Human Rights**

UNIPET does not tolerate human rights violations in any form. Suppliers are expected to implement practices that promote a respectful and safe workplace. Suppliers must ensure that physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behaviour, bullying or harassment of any kind are not tolerated.

**Employment Laws**

Suppliers must adhere to all applicable local wage and labour laws. UNIPET expects Suppliers to provide employees with a timely and clear wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labour must comply with local legal requirements.

**5.5 Wellbeing, Health, and Safety**

UNIPET expects its Suppliers to implement robust health and safety practices across all business operations.

**Health and Safety**

Suppliers must comply with all applicable health and safety laws and regulations. UNIPET expects Suppliers to adopt proactive measures to minimize health and safety risks, support accident prevention, and ensure a safe and secure working environment for all employees.

**5.6 Environment**

UNIPET is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to achieve the same.

**Environmental  
footprint**

Suppliers must comply with all applicable environmental laws and regulations. UNIPET expects Suppliers to address, manage, and mitigate their environmental risks and impacts. This includes measuring and addressing energy consumption and greenhouse gas (GHG) emissions. Where applicable, Suppliers are also expected to measure, manage and reduce water and waste usage in their operations.



## 6.0 COMPLIANCE WITH THE CODE

### 6.1 Violations

Suppliers are required to promptly report to UNIPET any legal violations, breaches of the Code, or violations of other UNIPET policies. Suppliers must also promptly forward any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning UNIPET, provided they are permitted to do so by law..

To report a violation or other information, please email [procurement@unipet.co](mailto:procurement@unipet.co). This email address is monitored daily, 5 days a week. UNIPET will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

### 6.2 UNIPET’s Rights

UNIPET reserves the following rights to ensure and enforce Suppliers’ compliance with the Code:

**Supplier Selection** UNIPET will evaluate Suppliers’ compliance with the Code during the Supplier evaluation and selection process, or at UNIPET’s request.

**Sustainability Screening Checklist** During the selection process, Suppliers will be required to complete a Sustainability Screening Checklist on their compliance with the Code. Suppliers may be periodically asked to re-affirm their compliance. Upon request and where applicable, Suppliers maybe required to provide written information regarding their policies and practices related to Code compliance. UNIPET is committed to working with Suppliers to improve performance on topics covered by this Code and expects Suppliers to collaborate with UNIPET in addressing relevant and applicable topics.

**Supplier Declaration Form Requirement** All Suppliers conducting business with UNIPET are required to complete and submit the Supplier Declaration Form as part of their commitment to complying with the UNIPET Supplier Code of Conduct & Ethics. This form must be submitted during the Supplier evaluation and selection process or at UNIPET’s request. By completing the form, Suppliers affirm their compliance with all applicable laws, regulations, and the ethical standards outlined in this Code, including ensuring that any subcontractors also adhere to these standards.

Failure to submit the form or comply with the standards outlined in this policy may result in the suspension or termination of the business relationship with UNIPET.

**Violations and Termination** Supplier must ensure that their subcontractors, if any, comply with the Code, and acknowledge responsibility for any violations by their subcontractors. In the event of non-compliance, or violation of the Code, UNIPET may allow the Supplier a reasonable opportunity to propose and carry out corrective actions within a reasonable time as determined by UNIPET, unless the violation is severe, incurable, or constitutes a breach of law or the Code. UNIPET reserves the right to suspend or terminate its relationship with the Supplier for non-compliance with or violation of the Code if not remedied within a reasonable



amount of time and for any violations of law. UNIPET reserves the right to report the matter to the appropriate authorities if a violation of law occurs.

**Order of Precedence  
and Changes to the  
Code**

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This Code does not supersede any applicable law, or the terms of any agreement between UNIPET and a Supplier. In the event of a conflict between this Code and any applicable law or contractual provision, the law or contract will take precedence. UNIPET reserves the right to update or modify the Code as necessary and as the company deems fit.

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# SUPPLIER DECLARATION FORM

## A. SUPPLIER INFORMATION

Company Name:

Company Address:

Type of Products/Service Provided:

City/State/Zip Code:

Country:

Contact Person:

Position/Title:

Email Address:

Phone Number:

## B. DECLARATION OF COMPLIANCE

Please indicate your company's compliance with the following standards by selecting **Yes**, **No**, or **N/A** (**Not Applicable**).

1. We confirm that our company complies with all applicable laws and regulations related to our business operations.  Yes  No  NA

2. We ensure fair labour practices, including the prohibition of forced labour, child labour, and any form of exploitation.  Yes  No  NA

3. We provide a safe and healthy working environment for our employees and have measures in place to manage health and safety risks.  Yes  No  NA

4. We comply with all applicable environmental laws and regulations and implement sustainable practices to minimize our environmental impact.  Yes  No  NA

5. We have policies and procedures for managing waste and emissions responsibly.  Yes  No  NA

6. We protect confidential information and comply with data protection and privacy laws.  Yes  No  NA

7. We ensure that our products and services meet applicable quality and safety standards.  Yes  No  NA

8. We do not tolerate modern slavery, forced labour, or human trafficking in any form and comply with all relevant laws in this regard.  Yes  No  NA

9. We respect human rights and provide a workplace free from discrimination, harassment, and abuse.  Yes  No  NA

10. We comply with UNIPET's Supplier Code of Conduct & Ethics and ensure that our subcontractors also comply with the same standards.  Yes  No  NA

## C. COMMITMENT TO ETHICAL STANDARDS



## SUPPLIER DECLARATION FORM

By signing below, I confirm that the information provided in this form is accurate and complete to the best of my knowledge. I acknowledge and agree to comply with UNIPET's Supplier Code of Conduct & Ethics and all applicable laws and regulations. Furthermore, I agree to ensure that all subcontractors engaged by our company also comply with these standards.

Declarant's Name (in block letters):

Declarant's Signature:

Position/Title:

Date:

*Please return the completed form to UNIPET's Procurement Department at [procurement@unipet.co](mailto:procurement@unipet.co)*