



XBM and XLNT Biofuel Human Rights Policy COMMITMENT

At XBM and XLNT Biofuel, we commit to respecting human rights as defined in the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the International Labour Conference (ILO) Declaration on Fundamental Principles and the Rights at Work.

This policy applies to XBM and XLNT Biofuel and our business partners, vendors, and suppliers. We believe that freedom of movement, - adequate wages, - protection from physical or sexual violence, protection from any form of discrimination, protection from any kind of threats or intimidation, freedom from fraudulent debt from which they cannot escape, no work or service of prisoners and no child labor are fundamental human rights, and we are taking steps to improve our approach across our business.

We believe that our business can help to promote human rights through our trade of renewable, circular-economy feedstocks and biodiesel, but also acknowledge that without proper oversight, it can present risks to human rights as well.

APPROACH AND KEY IMPACT AREAS

Our approach to human rights begins with understanding how our activities, including our products and services, as well as the activities of our business partners, may impact, either positively or negatively, our rightsholders. These include suppliers, employees, business partners, customers, and the broader community.

We strive to ensure that the rights of these rightsholders are respected and promoted through our activities and those of our business partners. We work to meet this commitment through the activities outlined below, but not limited to them:

Fair and Safe Work: We believe workers should be treated with dignity, respect, and fairness, and should not be subject to harassment, discrimination, child labour, forced labour, or inhumane treatment. We are working continuously to providing a safe, inclusive work environment for our employees and contractors in line with international labour standards wherever we do business. To promote these values across our supply chain, we will implement more robust oversight mechanisms and expectations for our business partners to meet these same standards in their own operations. We only do business with ISCC or INS-certified suppliers that respect human rights.

Empowering Women: We believe in the equality of opportunity and treatment for all women and men. We are committed to enhancing gender balance in our workforce.

Caring for the environment: We believe in doing business that prevent climate change, reduce waste and pollution in Europe and also in regions such as Malaysia, Indonesia, China, India, were we source our products. We foster local economies by trading sustainable products that support circular economy initiatives. For this reason, we focus solely in sourcing and trading vegetable waste-based materials, that would otherwise pollute the Earth. Our business helps care for the environment and create sustainable jobs for locals in developing countries.



Partnerships: We believe in doing business with partners that share our values and commitments to respect human rights. We strive to work only with partners that share our human rights commitments. To mitigate risks of human rights violations further down our supply chain, we will strengthen our ongoing partnership due diligence and review process, including a review of potential human rights considerations as part of that due diligence, and use our leverage when partner-related risks are identified.

Ethics: The Company expects all employees, contractors and suppliers to share its commitment to high moral, ethical and legal standards and creates conditions where all can work with dignity.

Freedom of Association and Collective Bargaining: The company respects the employees' right to join, form or not to join a labour union. It is committed to establishing constructive dialogue with organised labour and the freely chosen representatives of employees and to bargain in good faith within the appropriate national legal frameworks.

Working Hours, Pay and Benefits: The Company complies with applicable labour and employment legislation and strives to remunerate employees competitively relative to comparable industry and market norms.

Diversity and Inclusion: The Company promotes diversity and inclusion and strives to maintain workplaces that are free from unfair discrimination or harassment based on race, sex, colour, nationality, religion, age, sexual orientation, gender, marital status, family status, HIV/AIDS status, disability or any other arbitrary grounds.

GOVERNANCE AND REMEDIATION

Human rights at XBM and XLNT Biofuel are part of our wider strategy and are implemented through our Code of Conduct, employee training, partner research, KYC and Human Rights Policy. We display publicly our commitment to Human Rights through our website: www.xbm.dk and inform suppliers, business partners and clients in our meetings.

Ultimate oversight of human rights at XBM and XLNT Biofuels falls with our Founder, CEO and CCO. Operational oversight of human rights is managed by our COO and Operations department at our headquarters in Denmark.

As part of our ongoing commitment to implementing the Guiding Principles, XBM and XLNT Biofuel conduct yearly in-company human rights training for all employees.

In line with the expectations articulated in the UN Guiding Principles on Business and Human Rights (Guiding Principles), XBM and XLNT Biofuel provide several grievance channels for employees and other stakeholders to report concerns about human rights and receive remedy, including through mail sl@xbm.dk and by phone +45 25474999 to the company's headquarters in Denmark.