

TZERO LABS

Oil & Gas Testing | Inspection Coordination | Petroleum Product Verification

Supplier Code of Conduct

Global Compliance & Ethics Standards

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DOCUMENT TYPE	APPLICABILITY	EFFECTIVE DATE	REVIEW CYCLE
Compliance Policy	All Global Suppliers	January 1, 2025	Annual

Purpose

This Code sets the minimum ethical, social, and environmental standards that all Tzero Labs suppliers, sub-contractors, laboratory partners, inspection agencies, and business partners are required to meet.

"Our supply chain reflects our values. No exceptions."

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01 INTRODUCTION & PREAMBLE

Tzero Labs is a United States-based oil and gas testing, inspection coordination, and petroleum product verification company. We provide independent dip test coordination, tank access coordination, product sampling, cargo inspection support, petroleum product verification, and laboratory field services to buyers, sellers, petroleum traders, refineries, tank farms, terminal operators, and shipping companies across domestic and international markets.

From our origins in technical measurement, quality assurance, and process monitoring, Tzero Labs has grown into a comprehensive inspection coordination and petroleum verification company. The integrity of every service we deliver depends not only on our own standards but on the conduct of every supplier, laboratory partner, inspection agency, logistics provider, and sub-contractor who forms part of our operational supply chain.

This Supplier Code of Conduct ("the Code") sets out the minimum ethical, social, environmental, and governance standards that all suppliers, vendors, sub-contractors, agents, and business partners ("Suppliers") are required to meet as a condition of doing business with Tzero Labs.

This Code is grounded in internationally recognised frameworks including the UN Global Compact, the ILO Core Conventions, the UN Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises, and the ISO 14001 Environmental Management Standard.

Non-compliance with this Code may result in remediation requirements, suspension of business, or termination of the supplier relationship. Tzero Labs reserves the right to audit compliance at any time without prior notice.

02 PURPOSE AND SCOPE

Purpose: To establish clear, enforceable minimum standards for the ethical, social, environmental, and governance conduct of all entities within the Tzero Labs supply chain — including those providing laboratory testing, field inspection support, petroleum sampling, port-based coordination, and logistics services.

Scope: This Code applies without exception to:

- All direct suppliers of goods and services to Tzero Labs globally
- Sub-contractors and agents acting on behalf of direct suppliers
- Accredited laboratories, inspection agencies, and port-based testing facilities engaged by or through Tzero Labs, including those affiliated with internationally recognised bodies such as SGS, Intertek, Bureau Veritas, Cotecna, and Saybolt
- Joint venture partners and consortium members on Tzero Labs projects
- Suppliers at all tiers where Tzero Labs has material influence over procurement decisions

Supplier Onboarding & Code of Conduct Adoption Process:

Invite → Review → Accept → Vetting → Approval → Monitor

03 SUPPLIER EXPECTATIONS OVERVIEW

Suppliers engaged in Tzero Labs' inspection coordination, laboratory support, petroleum verification, and field services activities are expected to meet — and where possible exceed — the requirements of this Code. A Supplier Self-Assessment Questionnaire (Form COC-SAQ-001) must be completed by all new suppliers prior to onboarding and annually thereafter.

SUPPLIER COMPLIANCE SELF-ASSESSMENT CHECKLIST — OVERVIEW	COMPLIANT	N/A	NON-COMPLIANT
Reviewed and accepted the Tzero Labs Supplier Code of Conduct in full	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Can demonstrate legal compliance in all jurisdictions of operation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has documented policies covering labor rights, health & safety, and environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has not been subject to material legal violations in the preceding 3 years	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintains records of employee wages, hours, and contracts as required by local law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a named compliance officer or equivalent responsible for CoC adherence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is willing to participate in announced and unannounced audits by Tzero Labs or its agents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Will flow down equivalent standards to its own tier-2 and tier-3 sub-suppliers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

04 LABOR & HUMAN RIGHTS STANDARDS

Tzero Labs requires all Suppliers to uphold the fundamental human rights of their workers in full compliance with applicable local and international law, including ILO Core Conventions Nos. 87, 98, 29, 105, 138, 182, 100, and 111. This expectation extends to all personnel who support Tzero Labs' field inspection, dip test coordination, tank access, petroleum sampling, laboratory testing, and cargo verification activities.

LABOR & HUMAN RIGHTS COMPLIANCE REQUIREMENTS	COMPLIANT	N/A	NON-COMPLIANT
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Pay all employees at or above the statutory minimum wage — and preferably a living wage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comply with all applicable maximum working hour limits; overtime shall be voluntary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide written employment contracts to all workers in their primary language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Allow workers to freely associate and collectively bargain without interference or penalty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not use unauthorised deductions from wages or make wage payments in non-monetary form	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure all workers retain their own identity documents at all times	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide adequate rest breaks, leave entitlements, and social security as required by law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treat all workers with dignity; prohibit physical, verbal, or psychological abuse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

05 ANTI-DISCRIMINATION REQUIREMENTS

Suppliers shall maintain a workplace free from discrimination, harassment, and victimisation. Employment decisions — including hiring, promotion, compensation, and termination — shall be based solely on merit, qualifications, and business requirements.

No discrimination on the basis of:

- Race, colour, or ethnic origin
- Religion or belief
- Gender or gender identity

- Sexual orientation
- Age
- Disability or chronic illness
- Pregnancy or maternity/paternity
- National origin or immigration status
- Political affiliation (where protected by law)
- Marital or family status

06 CHILD LABOR PROHIBITION

Tzero Labs maintains a zero-tolerance position on child labor in any form. Suppliers shall not employ any individual below the legal minimum working age in the relevant jurisdiction. Given the hazardous environments inherent in petroleum inspection, tank access, and laboratory work, particular care must be taken to ensure no person under 18 is engaged in any activity involving petroleum products, confined spaces, or industrial terminals.

Requirement	Standard	Obligation
Minimum Age	15 years (or local legal minimum, whichever is higher)	MANDATORY — Zero tolerance
Hazardous Work	Strictly prohibited for anyone under 18 years	MANDATORY — Zero tolerance
Age Verification	Documented verification required for all workers	Retain records 5 years minimum
Young Workers (15–17)	Special protections: hours, nature of work, schooling access	MANDATORY where applicable
Remediation	Remove child; provide education support; report to TZL immediately	MANDATORY on discovery

07 FORCED LABOR PROHIBITION

Suppliers shall not use, procure, or benefit from any form of forced, compulsory, bonded, trafficked, or prison labor. All work must be freely chosen and workers must be free to leave employment upon reasonable notice without penalty.

- Workers shall retain possession of their own identity and travel documents at all times
- Recruitment fees charged to workers are prohibited; costs must be borne by the employer
- Contracts must be clear, understood by the worker, and not substituted after recruitment
- Suppliers must conduct human trafficking risk assessments in high-risk supply chain segments, including port environments and cross-border logistics operations
- Any evidence of forced labor must be reported to Tzero Labs immediately under Article 16

08 WORKPLACE HEALTH & SAFETY

Tzero Labs' supply chain includes field inspection personnel, laboratory technicians, sampling operatives, dip test coordinators, and port representatives who regularly work in environments involving petroleum products, pressurised storage systems, confined tanks, marine vessels, and industrial terminal facilities.

Suppliers shall provide a safe, healthy, and hygienic working environment for all workers in full compliance with applicable occupational health and safety standards. Safety management systems must meet or exceed ISO 45001 or equivalent national standards.

WORKPLACE HEALTH & SAFETY COMPLIANCE CHECKLIST	COMPLIANT	N/A	NON-COMPLIANT
Valid OHS management system in place (ISO 45001 or equivalent national standard)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Written risk assessments conducted for all significant hazards including tank access, petroleum sampling, confined space entry, and laboratory chemical handling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appropriate personal protective equipment (PPE) provided at no cost to workers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency response plans, spill response procedures, and evacuation drills conducted regularly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incidents and near-misses reported to Tzero Labs within 24 hours of occurrence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sufficient clean drinking water, sanitation facilities, and rest areas provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
All gauging instruments, sampling equipment, and laboratory devices maintained in safe working condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workers trained on health & safety relevant to their role — including	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

petroleum product hazards — before commencing work			
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09 ENVIRONMENTAL RESPONSIBILITIES

Tzero Labs recognises that suppliers operating in the petroleum testing, inspection coordination, and laboratory services sector handle products and materials that carry inherent environmental risk. Petroleum samples, chemical reagents, cleaning solvents, and calibration materials must all be managed responsibly. Suppliers shall operate in full compliance with all applicable environmental laws and take a proactive approach to minimising the environmental impact of their operations.

Area	Requirement	Level
Permits & Legal Compliance	Hold all required environmental permits; disclose violations within 30 days	MANDATORY
GHG Reporting	Report Scope 1 & 2 emissions annually upon request from Tzero Labs	Major suppliers
Waste Management	Properly segregate, store, and dispose of all waste — including petroleum samples, laboratory chemicals, and contaminated materials; zero illegal dumping	MANDATORY
Hazardous Materials	SDS/MSDS maintained for all petroleum products and chemical reagents; proper labelling, storage, and licensed disposal required	MANDATORY
Spill Prevention	Spill containment measures maintained at all sampling, storage, and laboratory facilities; documented spill response plans in place	MANDATORY
Water Protection	Comply with discharge consents; prevent hydrocarbon or chemical contamination of water sources	MANDATORY
ISO 14001 / 50001	Encouraged for suppliers with significant environmental or energy footprint	BEST PRACTICE
Carbon Reduction	Encouraged to set and publish science-based carbon reduction targets	BEST PRACTICE

10 ETHICAL BUSINESS CONDUCT

The oil and gas testing and inspection coordination sector depends entirely on the independence, objectivity, and integrity of all parties involved. Suppliers are expected to conduct their business with honesty and full transparency in compliance with all applicable laws. The following obligations apply to all business conduct involving Tzero Labs or performed on its behalf:

- Accurate and honest record-keeping; no falsification of inspection records, laboratory results, test certificates, dip test measurements, quantity reports, or sampling documentation
- Fair competition; compliance with all applicable competition and anti-trust laws
- Protection of Tzero Labs intellectual property, proprietary information, client cargo data, and trade secrets
- No manipulation, alteration, or misrepresentation of inspection findings, product test results, certificate of quality data, or cargo verification documentation
- No engagement in tax evasion; full compliance with applicable tax laws in all jurisdictions
- Transparent disclosure of ownership structures, beneficial owners, and political connections

11 ANTI-BRIBERY & ANTI-CORRUPTION

Tzero Labs operates a zero-tolerance policy on bribery and corruption in any form. Petroleum inspection and cargo verification services operate within environments where corruption risk is widely recognised as elevated — including port environments, customs processing, and terminal operations. Suppliers must comply with the US Foreign Corrupt Practices Act (FCPA) and all applicable local anti-corruption laws.

Prohibition	Description	Consequence
Bribery of Officials	Offering, giving, or promising anything of value to a public official, port authority, terminal operator, or customs officer to obtain advantage	Immediate termination
Commercial Bribery	Inducing private sector employees — including inspectors, laboratory personnel, or terminal representatives — to act improperly; kickbacks or undisclosed commissions	Immediate termination
Facilitation Payments	Unofficial payments to expedite port clearance, laboratory turnaround, tank access, or inspection attendance	Prohibited — refuse & report
Gifts & Hospitality	Gifts exceeding USD 100 in value; hospitality that could influence inspection or verification decisions	Pre-approval required
Fraudulent Certification	Issuing, procuring, or altering false petroleum test certificates,	Immediate termination & legal

	inspection reports, or cargo verification documentation	referral
Political Donations	Any political contribution made in connection with Tzero Labs business	Strictly prohibited
Money Laundering	Engaging in or facilitating movement of proceeds of crime	Termination & legal referral

12 CONFLICT OF INTEREST POLICY

Independence is fundamental to the credibility and value of petroleum inspection and verification services. Suppliers must disclose any actual, potential, or perceived conflict of interest that could influence their dealings with Tzero Labs or compromise the integrity of any inspection, sampling, testing, or verification activity. Disclosure must be made in writing to the Tzero Labs Procurement Director within 10 business days of the conflict arising.

Examples requiring disclosure include: financial interests in petroleum products or cargoes currently being inspected or verified; commercial relationships with counterparties on transactions where Tzero Labs is coordinating independent verification; personal or family relationships with Tzero Labs employees involved in procurement or assignment decisions; ownership stakes in competing inspection, laboratory, or verification businesses; simultaneous engagement with Tzero Labs' clients on related commercial transactions.

13 CONFIDENTIALITY REQUIREMENTS

In the course of supporting Tzero Labs' inspection coordination, petroleum product verification, and laboratory testing activities, suppliers may receive access to highly sensitive commercial and operational information — including product test results, cargo quantities, certificate of quality data, client identities on active transactions, transaction values, dip test records, sampling findings, and proprietary blending or refining specifications. Suppliers shall protect all Confidential Information received from Tzero Labs with no less than reasonable care.

- Confidential Information shall only be disclosed to employees with a strict need to know
- Suppliers shall not use Tzero Labs Confidential Information — including inspection data, laboratory results, and client transaction details — for any purpose other than fulfilling their contractual obligations
- Inspection reports, certificates of quality, cargo measurement data, dip test records, and sampling documentation are strictly confidential and must not be shared with any unauthorised party
- All Confidential Information must be returned or securely destroyed upon relationship termination
- Suppliers processing personal data on behalf of Tzero Labs must comply with applicable data protection law (GDPR, US state privacy laws, and equivalent applicable frameworks)
- Data breaches involving Tzero Labs data must be notified within 72 hours of discovery

14 COMPLIANCE MONITORING

Tzero Labs employs a risk-based compliance monitoring programme to assess supplier adherence to this Code on an ongoing basis. The programme includes documented self-assessments, desktop reviews, and on-site audits. Suppliers engaged in high-risk activities — including petroleum sampling at port terminals, confined space tank access, laboratory chemical handling, and cargo verification for high-value transactions — are subject to enhanced monitoring frequency.

COMPLIANCE CATEGORY	WEIGHT	SCORE	THRESHOLD	STATUS
Labor & Human Rights	20%	94%	>=85%	COMPLIANT
Health & Safety	20%	100%	>=90%	COMPLIANT
Environmental Management	15%	78%	>=75%	COMPLIANT
Anti-Corruption & Ethics	20%	100%	>=95%	COMPLIANT
Confidentiality & Data	10%	88%	>=85%	COMPLIANT
Sub-Supplier Management	10%	72%	>=70%	COMPLIANT
Reporting & Transparency	5%	65%	>=80%	CONDITIONAL

Figure: Supplier Compliance Scorecard — Assessment Framework

15 AUDIT REQUIREMENTS

Tzero Labs reserves the right to conduct — or commission third parties to conduct — compliance audits of any Supplier at any time. Suppliers must cooperate fully with all audit activities. Audits may include review of laboratory accreditation records, sampling procedure compliance, inspection documentation practices, personnel safety certifications, environmental permit status, and anti-corruption training records.

Audit Type	Notice	Frequency	Scope
Self-Assessment (SAQ)	N/A	Annual — all suppliers	Full Code (Form COC-SAQ-001)
Desktop Review	14 days	Annual — high-risk suppliers	Documents, accreditations, certifications, corrective actions
Announced On-Site	21 days	Every 2 years (standard); annual (high-risk)	Full facility, records, personnel interviews
Unannounced	None	Risk trigger or complaint	Full or targeted — TZL or 3rd party
Follow-Up / Closure	14 days	Post-CAR (within 90 days)	Verification of corrective action completion

16 REPORTING VIOLATIONS

Tzero Labs operates a confidential, independently managed ethics reporting channel for suspected violations of this Code. Reports may include concerns about falsified inspection records, corrupt practices at ports or terminals, improper handling of petroleum samples, manipulation of laboratory results, or unauthorised disclosure of client transaction data. Reports may be made anonymously. Retaliation against anyone who reports a concern in good faith is strictly prohibited.

Reporting Channel	Contact	Availability	Anonymous?
Ethics Hotline	ethics@tzero-labs.com	24/7	Yes
Compliance Officer	compliance@tzero-labs.com	Business hours	Yes
Procurement Director	procurement@tzero-labs.com	Business hours	Yes
Whistleblower Portal	tzero-labs.com/speak-up	24/7	Yes
Postal (Sealed)	[TZL Registered Office — FAO Compliance]	As received	Yes

17 CORRECTIVE ACTION PROCESS

Where a compliance gap or violation is identified, Tzero Labs will issue a Corrective Action Request (CAR). Suppliers must respond within the timeframes set out below based on severity classification.

Severity	Definition	Response	Closure	Consequence
CRITICAL (Zero Tolerance)	Child/forced labor; bribery; falsification of inspection records or laboratory results; immediate safety risk to life	24 hours	30 days	Immediate suspension & possible termination
MAJOR	Systemic non-compliance; repeated violations; audit obstruction; persistent documentation or certification failures	5 business days	60 days	Suspension pending remediation
MINOR	Isolated breaches; documentation gaps; process weaknesses	15 business days	90 days	Re-audit; probationary status
OBSERVATION	Best practice gap;	30 business days	180 days	Tracked only; no

	improvement opportunity			immediate consequence
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18 SUPPLIER ACKNOWLEDGEMENT FORM

This Acknowledgement Form must be completed, signed, and returned to Tzero Labs Procurement within 30 days of receipt of this Code, and annually thereafter. Digital signatures are accepted via the Supplier Portal.

SECTION A — SUPPLIER DETAILS

Field		Field	
Supplier Legal Name	_____	Registration No.	_____
Trading Name (if diff.)	_____	Country of Incorpor.	_____
Registered Address	_____	Postal Code	_____
Primary Contact Name	_____	Job Title	_____
Contact Email	_____	Contact Phone	_____
Tzero Labs Vendor ID	_____	Contract Ref.	_____

SECTION B — COMPLIANCE DECLARATIONS

#	Declaration	YES	NO
1	We have read, understood, and accept the Tzero Labs Supplier Code of Conduct in full	<input type="checkbox"/>	<input type="checkbox"/>
2	Our organisation currently complies — or has a time-bound plan to comply — with all Code requirements	<input type="checkbox"/>	<input type="checkbox"/>
3	We commit to promptly notifying Tzero Labs of any material change in our compliance status	<input type="checkbox"/>	<input type="checkbox"/>
4	We have not been subject to any material legal violation or bribery conviction in the past 5 years (or have disclosed such matters)	<input type="checkbox"/>	<input type="checkbox"/>
5	We agree to cooperate fully with any compliance	<input type="checkbox"/>	<input type="checkbox"/>

	audit or investigation conducted by or on behalf of Tzero Labs		
6	This Code will be communicated to and required of our Tier-1 sub-suppliers within 6 months of signing	<input type="checkbox"/>	<input type="checkbox"/>
7	We agree to complete the annual Supplier Self-Assessment Questionnaire (Form COC-SAQ-001) upon request	<input type="checkbox"/>	<input type="checkbox"/>

SECTION C — AUTHORISED SIGNATURES

Authorised Signatory 1		Authorised Signatory 2	
Full Name	_____	Full Name	_____
Job Title	_____	Job Title	_____
Signature	_____	Signature	_____
Date	_____	Date	_____

RETURN THIS FORM TO TZERO LABS

Email: supplier-compliance@tzero-labs.com | Subject: CoC Acknowledgement — [Company Name] — [Vendor ID]

Post: Attn. Procurement Compliance, Tzero Labs, [Registered Office Address]

Deadline: Within 30 days of receipt. Annual renewal required by January 31 each year.

Document Title	Supplier Code of Conduct — Global Compliance Standard
Document Reference	COC-SUP-001
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Approved By	Chief Procurement Officer & General Counsel
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