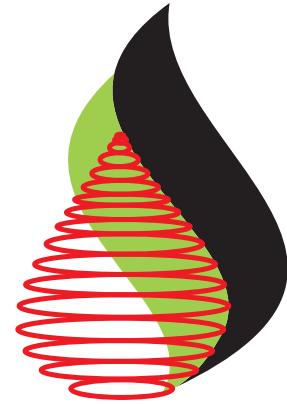


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TRINITY ENERGY
Energy for Life™

COMMUNICATION ON PROGRESS

2021

Trinity Energy Ltd
Republic of South Sudan

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INTRODUCTION

Trinity Energy became a signatory to the UN Global Compact in 2020. Joining the Compact has been one of the most impactful decisions made by the Company and has enfranchised us with the knowledge and tools to become a more sustainable organisation. We joined the Compact during a challenging time for the world. The COVID-19 pandemic fundamentally changed how businesses operate and has had dramatic effects on the lives of all people. In the shadow of a pandemic, sustainability becomes all the more poignant. The world is changing quickly, and unsustainable organisations are fragile—they lack resilience. Joining the UN Global Compact has helped us start the journey of becoming a more sustainable organisation, a more resilient organisation, and one that is excited to take part in building a brighter future.

This Communication on Progress is the first published by Trinity Energy. We are excited to reach this important milestone. In writing this Communication on Progress, we have had the opportunity to reflect on our progress. We are proud of our progress, and this report has helped us understand that we still have much to do. Over the past year, we have spent considerable time researching, reflecting, and planning on implementing best the guidance from the UN Global Compact, International Labour Organisation, and the Global Reporting Initiative, among others. Over the next year, we plan to take tangible steps and put into action the ideas and plans we developed over the past year.

The most notable lesson we have learned over the past year is that we can better formalise our processes related to sustainability. We have a robust corporate culture that values sustainable activity, and we can strengthen that culture with formal processes that support our commitments. We feel that it is essential to formalise processes because they help build a sense of accountability and commitment throughout the organisation. They also ensure that sustainability remains a priority for all parts of Trinity Energy as we continue to grow and succeed. This year, we will work on formalising processes and building the mechanisms required to more effectively collect and analyse data with significance to our sustainability efforts.

Doing business in East Africa can be challenging. As an energy company, our activities have an elevated risk of being unsustainable or even damaging. We are mindful of that reality and are grateful to have the tools and resources required to reduce our risks and build a more sustainable organisation. We are committed to making our efforts towards sustainability meaningful and beneficial for the people who rely on us—for them, for future generations, for the environment.

STATEMENT OF CONTINUED SUPPORT

I am pleased to reaffirm Trinity Energy's commitment to the United Nations Global Compact and its Ten Principles. The Ten Principles have, and will continue to, help Trinity Energy in building a more sustainable future. This document will communicate to our stakeholders how the United Nations Global Compact and its Ten Principles have contributed to our business over the past year.

As a new signatory to the UN Global Compact, this reporting period has been a time for planning and reflection. We have used this opportunity to "take stock" and assess our strengths and weakness. One hallmark development during this period has been the full review of our employee manual and handbook with the intention of better integrating sustainable practices and policies into our corporate culture.

I am proud of the Trinity Energy team's work during this reporting period and am excited to actualise the plans and objectives built over the past year. We understand that our organisation and industry have a long way to go. Trinity Energy is excited to take this journey, and I am confident we will be both a stronger company and have a more positive impact on our community as a result.

Robert Mdeza

Robert Mdeza
CEO, Trinity Energy Ltd.

ABOUT TRINITY ENERGY

Trinity Energy is a private energy company based in South Sudan's capital, Juba. Started in 2012, Trinity Energy has become the Nation's largest privately owned independent energy company.

Trinity Energy support clients with reliable access to high-quality fuel products. Our fuel depot in Nesitu safeguards our clients from exposure to changing market conditions. With one of the few fuel testing labs in South Sudan, our clients are confident their fuel is safe and compliant with accepted standards. Trinity Energy's experience allows us to offer an uninterrupted supply of fuel and lubricants, even in remote locations.

In 2019, Trinity Energy provided over 40% of South Sudan's energy demand. More than half of the Nation's fuel retailers rely on Trinity Energy's reliable supply chain to meet their clients' needs. The Company owns 6 million litres of fuel storage at our depot in Nesitu, including an additional 2 million litres of storage currently under development. This development makes Trinity Energy the Nation's largest fuel storage and logistics provider. Trinity Energy assures our clients of consistent and reliable fuel supply. Trinity Energy plays a critical role in guaranteeing the security of petroleum supply for the Country.

Our relationship with global and regional petroleum trading companies makes our upstream supply of fuel products unparalleled in South Sudan. We hold a global footprint to structure bespoke solutions for our customers with offices in South Sudan, Kenya, Ethiopia, and the United Arab Emirates. These factors combine to ensure our clients enjoy versatile services, quality products, and a secure supply of vital fuel products.

HUMAN RIGHTS

Trinity Energy recognises and respects the fundamental dignity and equality of all people. We recognise and respect the Universal Declaration of Human Rights and strive to encourage and promote human rights among our stakeholders. We work towards this goal by building a corporate culture that respects the fundamental rights of all people, creating policies and procedures that support our ethos, and recognising that we should always strive to do better.

As a South Sudanese oil and gas company, we are mindful of the human rights challenges posed by our industry and our locality. Recognising the Company's unique challenges and elevated burden of responsibility, Trinity Energy is formulating a comprehensive strategy to ensure that we are responsive to all stakeholders and mitigate any adverse human rights impacts associated with our activities.

Trinity Energy is committed to avoiding human rights violations through our everyday handling of projects and contracts. In addition, we are committed to addressing, reporting, and responding in a timely way to any human rights issues that may arise within our operations. Our philosophy is zero tolerance for unacceptable practices; this includes all levels of staff, contractors or subcontractors working with or for Trinity Energy.

Trinity Energy will, within six months, publish our Code of Conduct to inform our employees, partners, and stakeholders of our commitment to human rights. Before entirely publishing our Code of Conduct and other relevant policies and procedures, the Company must finish editing and reviewing our existing policies and our development of new policies. Trinity Energy strives to serve as a standard-bearer for the respect of human rights and the inherent dignity of all people.

ASSESSMENT, POLICY, AND GOALS

Trinity Energy is an independent energy company operating primarily in South Sudan. Our industry poses inherent challenges concerning human rights. Additionally, our operations in East Africa substantially increases our exposure to human rights related risks. We pride ourselves in our respect for human rights. However, we can improve the processes and systems necessary to comply with our commitments and objectives fully. Better understanding our human rights related risks, building more robust policies and procedures, and educating our entire supply chain are our primary goals for the coming year.

ASSESSMENT OF RELEVANT HUMAN RIGHTS ISSUES

We recognise that the industry in which we work substantially increases our risks of having a negative impact on human rights. We also recognise that we are in a position to impact the human rights of our stakeholders positively. While we have not yet completed our planned human rights risk assessment, we are conscious of the importance of introspection. As a company, we are aware that our operations may impact, either positive or negative, within specific areas of material interest to the protection and advancement of human rights.

COUNTRY RISK

Through our operations and activities, we provide fuel and energy to a diverse Nationwide client base. While we strive to do business ethically, the environment in which we work carries elevated human rights related risks. As we have yet to conduct a full Human Rights Risk Assessment, we cannot accurately determine our overall impact. The Company is cognisant that the nature of our operations carries substantial human rights risks, and we are actively working on developing internal mechanisms to understand our risks better and appropriately mitigate them.

EMPLOYEE HEALTH, SAFETY, AND WELLBEING

Trinity Energy is serious about its responsibility to provide a safe and healthy working environment for all its employees. Trinity Energy prides itself on offering our employees one of the healthiest and safest workplaces in South Sudan. However, we recognise that we can do better. We have many challenges to overcome in this respect. We embrace a safety and health culture but lack many formal or tangible mechanisms to support that culture.

Additionally, we have not implemented sufficient monitoring and evaluation mechanisms to make more informed decisions relating to employee and workplace health and safety. Our operations, particularly our bulk fuel storage operations, carry a substantial risk of directly impacting the rights of employees and the community. Through both our Human Rights Risk Assessment and Environmental Risk Assessments, we will better understand these risks and build mitigation mechanisms based upon the results of those assessments.

SUPPLY CHAIN TRANSPARENCY AND VISIBILITY

Trinity Energy is not a vertically integrated organisation, and we, therefore, rely upon a diverse range of contractors, vendors, and other outside parties. We recognise that we cannot understand the full extent of the risks associated with our supply chain. Further, we are cognisant of the potential for human rights violations within our supply chain and are actively working to understand them better and mitigate them accordingly. Currently, we do not contractually require our vendors or contractors to uphold the same ethical standards to which we hold ourselves.

While we understand that our supply chain introduces substantial risk to our operations, we have yet to finalise a plan to introduce more robust controls to our supply chain. Primarily, this is a factor of capacity and dissemination of information. Mitigating the risks of human rights violations within our supply chain will require a well-devised and concerted communication and education campaign. While contractual controls may appear effective in this respect, we believe they will only be effective if we can communicate the ethical and philosophical foundations of such changes to our entire supply chain. We commit to making positive change in this respect but are cognisant that we are both not as advanced as we should be and must work harder to ensure the sustainability of our operations.

STAKEHOLDER ENGAGEMENT AND DIALOGUE

South Sudan is a diverse country home to people, communities, and groups with varying interests and ideas. As a company that works Nationwide, Trinity Energy's operations and activities often interact with multiple stakeholders. Each stakeholder we encounter has individual challenges, needs, and ideas for change.

Trinity Energy is a genuinely local company—our diverse team represents many of the communities in which we work. However, we have not yet developed formal mechanisms to solicit, analyse, and incorporate stakeholder needs and desires into our decision-making process. This is not to say that we do not account for the needs and desires of our stakeholders. Instead, we have not built formal methods to assess this information, nor have we incorporated the use of stakeholder needs into formal decision-making processes company-wide. We are cognisant that this capabilities gap hinders our ability to be a positive influence on all stakeholders. To close this capabilities gap, Trinity Energy is exploring methods to engage stakeholders and record our stakeholder engagements for use in our decision-making processes more formally.

HUMAN RIGHTS POLICIES

Trinity Energy's existing policies and procedures are sensitive to human rights, but we acknowledge that we can do better. Currently, Trinity Energy's policies and procedures touch on three broad areas relevant to human rights;

1. Health and safety,
2. Fair treatment, and
3. Hours, Wages, and Leave.

Currently, however, we lack policies and procedures to adequately address the broad areas of community impact and country risk. Trinity Energy will undertake a review of all of our current policies and procedures to ensure that they fully reflect the high standards across Trinity Energy's operations. The Company will execute this review over the next six months to one year. Our goal is for our policies and procedures to have a practical, real-world focus that reflects clear direction from Senior Management and direct input from all levels of employees, contractors, and suppliers.

HEALTH AND SAFETY POLICIES AND PROCEDURES

Trinity Energy has an existing policy on health and safety. Additionally, the Company provides employees with equipment and training to offset risks to employee health and safety. We are reviewing our health and safety policies and systems to identify potential shortcomings and build a more robust system. An additional shortcoming is our lack of a formal system for employee feedback and consultation.

In 2020, we started a program to address an additional shortcoming to our health and safety systems. Historically, recording and tracking health and safety incidents have been a challenge for the Company. We lacked a formal and central system with which we could adequately record and track incidents in a manner that enfranchised decision-makers with valuable information. This year we have started formalising a system that would,

among other metrics, allow us to track health and safety incidents. In coordination with the system vendor, we expect the design and deployment of the system to be finalised before the end of 2021.

FAIR TREATMENT POLICIES AND PROCEDURES

Concerning fair treatment, Trinity Energy's current policies and procedures address both major areas; non-harassment and employee privacy. The Company's current policies and procedures clearly define harassment, identifies consequences, and provides remedies for employees subject to harassment. Additionally, our existing policies and procedures are sensitive to employee privacy and include specific information on collecting and storing data.

While we are confident that we offer our employees fair treatment, we do not have adequate formal systems to solicit employee feedback. Therefore, we are unable to say with authority that our employees share our confidence in this respect. As with many of our internal processes and procedures, we strive to understand our employee's needs but lack the formal systems to support that goal. As part of our commitment to become a more sustainable organisation, we will introduce more formal mechanisms to solicit feedback from stakeholders and build stronger and more communicative relationships with our employees.

HOURS, WAGES, AND LEAVE POLICIES AND PROCEDURES

Trinity Energy's existing policies, procedures, and practices are sensitive to the needs of our employees. Our employees have fair working hours through both policy and practice, are given adequate leave to maintain a healthy work/life balance and have formal employment status.

While we endeavour to ensure all employees have a living wage, two primary challenges prevent us from confidently stating so. First, we lack formal mechanisms to collect data and feedback from employees. Second, South Sudan's economic situation results in highly variable market conditions. These factors combine to make it difficult for us to state with confidence that our employees are receiving a fair wage.

As we embark on our six-month review of policies across Trinity Energy, we will begin to formalise data collection and employee feedback. Additionally, recognising the unique economic conditions in South Sudan, Trinity Energy will undertake a review of pay scales in South Sudan to make sure that they reflect market conditions and are reflective of fair working hours and wages for all employees.

HUMAN RIGHTS GOALS

Trinity Energy is committed to several human rights goals. We are dedicated to building corporate policies, procedures, and practices that comply with the UN Guiding Principles on Business and Human Rights. In furtherance of our commitments and recognition of our shortcomings, we have identified seven goals for the coming year.

HUMAN RIGHTS RISK ASSESSMENT

Within one year, the Company will conduct a full-scale Human Rights Risk Assessment. We will assess human rights risks and existing mitigations internally and externally and strive to safeguard the human rights of all stakeholders. We will evaluate the results at both the Executive and Board levels. The Company will act on the assessment results and implement, evaluate, or reevaluate mitigations and countermeasures to safeguard the human rights of all stakeholders more appropriately.

REVIEW OF ALL POLICIES AND PROCEDURES FOR HUMAN RIGHTS IMPACT

Within six months, the Company will review all policies and procedures to ensure consistency with our human rights commitments and objectives. We will revise or enact new policies and procedures as necessary. We will strive to remedy the shortcomings identified within this document and any additional shortcomings or gaps identified through the review. The Company will leverage guidance from the UN Guiding Principles on Business and Human Rights throughout this process, among other documents and reference material.

HUMAN RIGHTS IN OUR SUPPLY CHAIN

Within one year, we will develop and distribute a Supplier Code of Conduct and educational materials supporting the Code. Where appropriate and applicable, the Company will strive to include language in our supply chain partner agreements allowing Trinity Energy to terminate such agreements should the supply chain partner fail to uphold the principles of human rights or otherwise violate the tenets of our Supplier Code of Conduct. In support of this activity, Trinity Energy will develop educational material for suppliers that details the Company's commitment to the principles of Human Rights, educates our vendors and supply chain partners on the importance of Human Rights, and informs our vendors and supply chain partners that Trinity Energy requires respect for the principles of Human Rights and compliance with our Supplier Code of Conduct.

GRIEVANCE MECHANISMS

Trinity Energy will create internal and external grievance mechanisms that allow all stakeholders to report human rights abuses or risks to the Company, both internal to Trinity Energy and within our supply chain. Through robust policies, procedures, and data protection measures, we will endeavour to protect the anonymity of reporting parties.

We will implement policies and procedures to address reported human rights violations or risks. Included in these policies and procedures will be provisions for investigation, remediation, and public reporting.

STAKEHOLDER CONSULTATION

Trinity Energy will review appropriate Stakeholder Consultation Frameworks, including industry leaders and civil society groups. A working group, directly responsible to the Board of Directors, will develop and propose a formal Stakeholder Consultation Framework that is contextually appropriate, methodologically sound, and cognisant of the inherent challenges of communities and areas in which the Company works. Upon review, revision, and consultation with relevant stakeholders, the Board of Directors will approve a Stakeholder Consultation Framework and mandate its implementation.

ALLOCATION OF RESPONSIBILITY

Trinity Energy recognises that managing and upholding our commitment to human rights and respect for the inherent dignity of all people is a substantial responsibility. In that respect, we will explore creating an Executive-level position within the organisation with the sole responsibility of monitoring, directing, and reporting on corporate sustainability. The proposed Chief Sustainability Officer position will directly oversee Trinity Energy's sustainability initiatives and regularly report on relevant initiatives and mechanisms to the Trinity Energy Board of Directors. While we will endeavour to complete this goal within one year, we recognise that this may be a challenging time frame.

AWARENESS AND TRAINING

Trinity Energy will develop an employee training program to ensure all Trinity Energy employees—including the Executive Leadership Team and Board of Directors, are aware of Trinity Energy's commitment to Human Rights and stakeholder roles, responsibilities, rights, and expectations. Additionally, we will devise, formalise, and emplace both a process and an appropriate mechanism to track employee training—and retraining—on Human Rights and the Company's Code of Conduct.

IMPLEMENTATION

Over the past year, Trinity Energy has made moderate progress with respect to our human rights goals and commitments. The COVID-19 pandemic has dramatically inhibited our ability to make substantial progress. Notably, the transition to remote working and challenging market conditions in South Sudan has had a negative impact on our expected progress. Nonetheless, the Trinity Energy team adapted to the challenges. Rather than focusing on those things that would require in-person planning and consultation, we have focused on introspection and planning. In this respect, we feel better prepared to make tangible changes as we successfully adapt to our new way of working.

BUILDING STRONG POLICIES AND PROCEDURES

We have exerted most of our focus concerning human rights on the development of strong policies and procedures. We are in the process of evaluating our policies and procedures, including assessing their impact on human rights. Additionally, we are in the process of building new policies and procedures to address shortcomings and gaps in our policies, procedures, and practices. We have achieved full stakeholder support for this process and have begun reviewing relevant standards and guidance documents. Additionally, we are nearing

completion of the first significant revision of our HR Manual that incorporates general guidance and makes critical edits that were apparent even before our more lengthy review.

ASSESSING AND MITIGATING HUMAN RIGHTS RISKS

As with the review of the Company's Policies and Procedures, we have achieved full stakeholder support to build an internal mechanism to conduct human rights risk assessments. We find it essential to formalise conducting human rights risk assessments before we engage in the actual assessment. In this way, we can ensure continuity from one assessment to another, allowing us to make more informed decisions and track our progress.

One tangible way we have advanced our commitment to human rights is by implementing a centralised system for tracking organisation-wide metrics. We are actively working with the system vendor to enable the tracking of specific measures impacting human rights. This system will also allow us to better leverage communication with our employees and other stakeholders by centralising data, protecting data privacy and security, and franchising the Company with data analysis capabilities. By using the systems developed over the past year, the Company will be able to more accurately publish and report data critical to monitoring and evaluating our performance in the future.

RESPONDING TO HUMAN RIGHTS CONCERNS

Presently, we lack adequate internal mechanisms to monitor and identify human rights concerns in a formal manner. While we are confident our corporate culture and ethos allow us to respond to human rights concerns, we presently lack the formal internal mechanisms to ensure this process is as transparent and effective as possible. In the coming year, we plan to develop the capacity to monitor human rights concerns and centralise data that will allow us to evaluate where and how our operations and projects are most likely to impact human rights. This process of evaluating is critical both for internal operations and external publication.

MEASUREMENT OF OUTCOMES

This Communication on Progress is the first submitted by Trinity Energy. As mentioned previously, we have identified our ability to monitor outcomes as a capabilities gap concerning our commitments to human rights—and other elements of sustainability. We have commissioned the installation of organisation-wide software systems to track metrics critical to monitoring our performance.

Over the next year, Trinity Energy will conduct a full human rights risk assessment to assist in developing practices and policies designed to ensure compliance with our commitments. In conducting our human rights risk assessment, we will also closely inspect our supply chain to manage the risks posed to human rights by our entire value chain. We also plan to introduce contractual mechanisms to ensure suppliers comply with our human rights commitments and regularly submit to random audits to verify compliance.

As we implement the measures described above, we will ensure that our policies and practices comply with our commitments to human rights. Our efforts will be documented and published in our annual Communication on Progress.

LABOUR

Trinity Energy works in challenging environments. Although Labour Rights are well defined under South Sudan's Labour Act of 2017, the social and economic environment in the Country leads to challenges in promoting and protecting labour rights. For example, significant commodity price volatility makes it difficult to provide fair cost-of-living adjustments (COLAs) for South Sudanese employees. Additionally, there are few labour unions in the Country, and those that exist primarily represent public sector employees. Private industry in South Sudan has had such little exposure to labour unions that developing internal policies and procedures to guide interaction with labour unions and guarantee employees the right to collective bargaining has not been a priority. However, the presence of challenges or a lack of immediate need for policies and procedures does not mean that the organisations should not make changes or that companies should not strive to do better.

Trinity Energy is a recent signatory to the UN Global Compact. We recognise that we are not perfect and that our policies, procedures, and practices can better work to safeguard the rights of our employees. A hallmark of Trinity Energy's work over the past year, and one which will continue through next year, is introspection and investigation into how we can do better. In this context, we are working to assess our supply chain and improve our Labour Rights assessments. Additionally, we will revise, improve, and expand upon our existing policies and procedures.

ASSESSMENT, POLICY, AND GOALS

Trinity Energy prides itself on our commitment to our employees and our dedication to ensuring our employees are safe, happy, and healthy. We believe that our employees have the right to a fair living wage, that they should be free from harassment and discrimination, and that they have the right to engage in collective bargaining. Additionally, we stand firmly against all forms of forced or child labour. We are firm in our commitments.

Trinity Energy is proud to be a diverse company. The Trinity Energy team is comprised of talented individuals from diverse racial, ethnic, and religious backgrounds. Further, women are well represented with the Company. Although our diversity is visible, it is not yet measurable. Understanding the importance of fostering diversity and the inherent value of diverse voices, we recognise the need to actively monitor and promote diversity within the organisation.

While we are proud of the diversity of our overall team, we recognise that the management of the Company lacks diversity. Currently, 100% of the Executive Management Team at Trinity Energy is Male. Concerning the Board of Directors, one of the five Directors is female. The Executive Management Team and the Board of Directors are aware of this disparity, and the Company will proactively work to introduce broader diversity to the Executive Management Team and Board of Directors.

We believe that all employees have the right to collective bargaining, but we have yet to enshrine that commitment within our policies and procedures. We have not, and will not, engage in any activity that dissuades employees from collective bargaining or in any way retaliate against any employee or employee group who chooses

to do so. We have not yet built policies and procedures in support of this objective because there is very little union activity in South Sudan. However, following our precautionary approach to rights and freedoms, Trinity Energy will build policies, procedures, and systems that ensure our employees are free to engage in collective bargaining without the possibility of harassment or retaliation.

South Sudan is a young Nation, and while the Labour Act of 2017 is a robust document, few people fully understand their rights and responsibilities. One immediately apparent example of this is seen in the poor penetration of labour unions in South Sudan. The Labour Act guarantees the rights to collective bargaining and freedom of association, yet few people and groups choose to engage in collective bargaining. We believe that there is an opportunity in this situation, both for the Nation and the Company. As a Nation, South Sudan has robust laws that will support growth and development. As a Company, we can build better policies and procedures that comply with the law and our commitments to sustainability and human rights.

There are substantial labour rights risks in South Sudan as well. Notably, most organisations in South Sudan struggle to ensure employees are paid a living wage. The market conditions in the Nation are highly variable and often result in rapid and drastic changes in the value of currency or goods. What was a fantastic wage today may be below the poverty line tomorrow. Trinity Energy is not excluded from this challenge. We must rapidly adapt to market conditions and develop systems and mechanisms to ensure we continue to respect the rights and needs of our employees.

COLLECTIVE BARGAINING

Trinity Energy recognises the importance played by collective bargaining in ensuring the rights of workers. To date, we have not built policies and procedures to support the rights of our employees concerning collective bargaining. We intend to rectify this shortcoming and construct policies and procedures to support the rights of our employees concerning collective bargaining. However, collective bargaining is still in its infancy in South Sudan. Statutory guarantees under the 2017 Labour Act alone are not sufficient to create a system conducive to guaranteeing the rights of employees. Labour Unions, private industry, and the Government must work more closely together to ensure the rights to collective bargaining are guaranteed and the regulatory systems and mechanisms required to uphold those rights are strengthened.

SUPPLY CHAIN

Trinity Energy has numerous supply chain partners. While we endeavour to have full transparency of our supply chain, doing so in South Sudan—and East Africa—is often challenging. We are committed to the abolishment of all forms of forced and compulsory labour and child labour. We hope that our suppliers and vendors share that commitment. However, we do not yet have adequate processes and systems to ensure our suppliers share our commitment. Further, we recognise that we work in areas with significantly increased concerns regarding forced labour, compulsory labour, and child labour. We have yet to conduct a full audit of our supply chain. However, we are dedicated to carrying out a full supply chain audit to understand our risks in this respect better.

DATA COLLECTION AND VERIFICATION

Trinity Energy works across the entire Country of South Sudan. Poor network access and communication challenges significantly increase the difficulty of collecting and validating data. Trinity Energy is not alone in this challenge. Almost all organisations struggle with data collection and validation. One way this results in a risk to employee and labour rights is in employee age verification. Trinity Energy is working on a more robust means of collecting and validating data, including age data. While we have strict policies against the use of forced or compulsory labour and child labour, we believe building more robust systems will enable us to uphold our commitments and better understand our employees' needs.

One additional area where poor data availability, collection, and validation impacts employee rights are the provision of a living wage. As previously mentioned, South Sudan's market is occasionally volatile. The value of the South Sudanese Pound often fluctuates. Additionally, market rates often fluctuate throughout the year for staple foodstuffs, household goods, and other commodities critical to developing and understanding the definition of a "living wage". The lack of data and information about South Sudan's market conditions makes it difficult to develop methods for calculating living wages for employees. We are actively working on formalising the systems we employ to overcome these challenges to ensure continuity amongst our operations and future analysis. Additionally, recent actions by South Sudan's Central Bank and the International Monetary Fund appear to have had a positive impact on decreasing the market's volatility. We are optimistic that this will significantly assist our efforts to ensure all employees are paid a living wage.

LABOUR POLICIES AND PROCEDURES

Trinity Energy's existing policies and procedures offer our employees a great deal of protection. They attempt to respect the fundamental rights of all employees and comply with South Sudan's 2017 Labour Act. However, we recognise that we can do better. Over the next six months, the Company will review all policies and procedures with the objective of better ensuring our employee's rights and continuing to uphold our ethical commitments. Currently, Trinity Energy's policies and procedures concerning labour rights;

1. Prohibit the use of child labour
2. Prohibit the use of forced or compulsory labour
3. Defines and prohibits discrimination
4. Clearly states that Trinity Energy is an equal opportunity employer
5. Ensures all employees have a safe work environment

There are, however, some areas in which we can improve. Notably, we currently do not have a policy that guarantees and protects employees rights to collective bargaining. We intend to rectify this within six months.

CHILD LABOUR AND FORCED OR COMPULSORY LABOUR

Trinity Energy's policies and procedures currently prohibit the use of child labour and forced or compulsory labour. However, we feel as though we can improve these policies by extending them to our supply chain partners and constructing more robust mechanisms to identify and remedy potential incidents in contravention of our

policies and procedures. We intend to identify areas of concern and build mitigations appropriate to specific identified risks through our planned human rights risk assessment and labour rights risk assessment.

Additionally, we believe that training and education—both for our internal team and our supply chain partners—will have a substantial positive impact. Education and training on the effects and consequences of forced labour, compulsory labour, and child labour are critical to building a common ethical understanding. Following our assessments, we intend to explore means and measures to deliver training and educational material supporting our commitments and ethics most effectively.

NON-DISCRIMINATION

As stated in this document, Trinity Energy has a robust corporate culture against discrimination, but we lack formal systems to support that objective. By both policy and procedure, Trinity Energy employees have the means to report discrimination and are protected against retaliation from doing so. Discrimination is prohibited in all areas, including hiring, firing, promotions or transfers, and salary decisions. As of 2020, we have commissioned a software system that will allow us to better track diversity and discrimination related metrics. Currently, however, we have not fully implemented this system. As such, we are still at a disadvantage in tracking diversity data and are less able to identify and remedy any potential instances of systematic discrimination or inequality.

WORKPLACE HEALTH AND SAFETY

Trinity Energy has robust policies on workplace health and safety. Additionally, we have a corporate culture that promotes safety and health. However, as with section two above, we lack the formal mechanisms to track workplace health and safety incidents in a way that allows detailed analysis. As we lack a certain level of granularity in our data, we are not enfranchised to make decisions in a way that is as intelligent as possible. The computer software system commissioned in 2020 will better enable us to track health and safety incidents and other relevant data.

LABOUR GOALS

Trinity Energy is proud of how we treat our employees and the environment and culture fostered by the entire team. However, we recognise that culture and informal mechanisms are alone not sufficient to build a sustainable organisation and uphold our commitments and ethical responsibilities. Our participation in the UN Global Compact has illuminated our need to build more formal systems, review and revise our policies and procedures, and more effectively assess and mitigate risks. Our current goals focus on building better systems where we are aware of shortcomings and assessing our risks to identify shortcomings of which we are unaware.

SCREENING FOR CHILD LABOUR

Over the next year, we will create a separate policy and procedure document speaking specifically to the use of child labour. This separate policy will include mechanisms to conduct regular internal audits of our operations to ensure child labour is not used and a more robust means to verify employees' age. Additionally, we will include specific mechanisms to regularly review our supply chain to ensure all supply chain partners are equally committed to the abolition of child labour and do not use or profit from child labour. Finally, the policy will include

means to offer training to Trinity Energy employees and suppliers and partners on means and methods to identify and prevent the use of child labour within supply chains.

SCREENING FOR FORCED LABOUR

Over the next year, we will create a separate policy and procedure document speaking specifically to the use of forced labour. This separate policy will include mechanisms to conduct regular internal audits of our operations to ensure forced labour is not used. Additionally, we will include specific mechanisms to regularly review our supply chain to ensure all partners are equally committed to abolishing forced or compulsory labour and not using or profiting from forced labour. Finally, the policy will include means to offer training to Trinity Energy employees and suppliers and partners on means and methods to identify and prevent the use of forced labour within supply chains.

GENDER PAY EQUALITY

We will conduct an internal gender pay gap audit to ensure jobs of equal value are remunerated equally within the next year. We will undertake this audit following the full installation of the computer software system commissioned in 2020 to assist in collecting and evaluating data, including demographic data required to audit our internal gender pay gap. The gender pay gap audit results and employee gender ratio information will be reported to the Board of Directors for review and possible remediation where necessary.

HEALTH AND SAFETY PROGRAM

We will implement a system to digitally record and analyse data on injuries, accidents, losses, and absentee days within the next year. We will ensure that all non-private data is transparent and accessible to all employees. Additionally, we will implement a system through which employees can digitally and easily report safety and health-related concerns directly to a responsible authority with a specific mandate to review, investigate, and take action on safety and health-related concerns.

SUPPLY CHAIN RISK ASSESSMENT AND MAPPING

Within one year, we will conduct a supply chain risk assessment and map the processes within our supply chain to assess the risks to sustainability resultant from our sourcing and procurement activities. We will use the information from our supply chain risk assessment and mapping exercises to identify and prioritise sustainability metrics and use them to increase the overall sustainability of our supply chain. Critical to this process will be identifying and removing any element of the supply chain that relies on or profits from child labour or forced labour.

IMPLEMENTATION

Since signing the UN Global Compact, much of our effort in labour rights has been centred around reviewing relevant documents, standards, and literature. Labour rights, in particular, require synergy between National law, local and international best practices, and the Company's sustainability commitments. As such, members of the Trinity Energy team have spent a considerable amount of time reviewing documents such as the ILO Declaration on Fundamental Principles and Rights at Work and other Core Conventions, the South Sudan Labour Act of 2017, and other relevant reference information. The objective is to identify the most effective way of synergising local law, local custom, and international best practices sensitively to the social, economic, and political realities in South Sudan and East Africa.

Additionally, the Company has spent a considerable amount of time working to implement an ERP system organisation-wide. This ERP system will, amongst other business functions, allow us to track metrics critical to better understanding our employees, our team as a whole, and how we can better support their growth and protect their rights. It will also allow us to better track our progress towards Company sustainability goals.

MEASUREMENT OF OUTCOMES

The Trinity Energy Executive Management Team and Board of Directors will directly participate in developing and implementing the policies against forced labour and child labour. In this way, the Company will better ensure a seamless, organisation-wide implementation of the policies and procedures. Importantly, this will ensure all Departments understand the importance of the policies and procedures and are enfranchised to participate in the risk assessment process outlined therein. The policy design team will regularly communicate progress to the Board and Executive Management Team and coordinate closely with the Legal Department to ensure legal compliance.

The ERP system, partially intended to track labour rights specific metrics, will be implemented jointly between the system vendor and Trinity Energy. Trinity Energy's procurement team will coordinate with the Board and Executive Management Team and third-party sustainability experts to communicate system requirements to the vendor. The implementation of this system will be an interactive process. As the system is new, full implementation will take time, training, and adaptation.

In coordination with third-party experts, Trinity Energy will complete the supply chain mapping and risk assessment process. The Board of Directors and Executive Management team will oversee the process and enfranchise the third-party experts with an appropriate mandate to accomplish their task. The Board of Directors and Executive Management Team will work closely with the third-party experts to ensure the process is successful and that the Company is a fully participatory member of the process. The third-party experts will regularly report progress to the Board of Directors and Executive Management team. After the mapping and risk assessment process, the third-party experts will report their findings and coordinate with the Board of Directors and Executive Management team to implement the recommended mitigations.

ENVIRONMENT

Trinity Energy's primary line of business is the import and distribution of petroleum products in South Sudan. Due to the industry and the location in which we operate, our activities are at a high risk of causing environmental harm. We are, however, conscious of this reality and are dedicated to becoming a more sustainable organisation. We plan to do so by introducing more sustainable products and services, better understanding and mitigating our risks, working to derive as much energy from renewable sources as possible, and leveraging data to understand better and reduce our overall impact.

To accomplish our overall objective, we have set specific goals for ourselves. These goals include carrying out a full environmental risk assessment, introducing LPG and solar micro-grid products and services, and working to source our energy from renewable sources. This section details our current standing from an environmental perspective, how we plan to become a more sustainable organisation, and how we intend to impact our stakeholders positively.

ASSESSMENT, POLICY, AND GOALS

Trinity Energy works in South Sudan's energy industry and is one of the Nation's largest importers and retailers of petroleum products. We recognise that our industry is at a significantly increased risk of causing environmental harm, and we acknowledge that the industry is already causing environmental damage. We are actively building plans to diversify our product offering and expand the energy mix offered by Trinity Energy to include renewable sources. For the time being, however, we are primarily an importer and retailer of petroleum products. However, we are cognisant of the environmental risks that our operations may cause and take measures to mitigate those risks.

Currently, we know that our industry is at high risk for environmental damage. However, we are not as aware of our specific risks as we should be. The Company has three primary lines of business; bulk petroleum delivery, retail petroleum petrol stations, and bulk petroleum storage. Each of these three lines of business has unique environmental risks and opportunities. Additionally, we are constructing a petroleum refinery in Upper Nile State, South Sudan. The refinery also has unique environmental risks and opportunities. We work to mitigate our risks where ever possible. For example, we have specifically selected technology and processes for the refinery that are more environmentally sound to protect both the natural environment and the communities hosting our operations.

As with many other material subjects covered in this document, we have relied on our corporate culture, ethics, National law, and informal commitments to guide our decision-making process relating to environmental protection. However, we recognise that this is not sufficient to meet our obligations and commitments. We are committed to building a more sustainable organisation and to promoting more environmentally sound technologies and practices.

ENVIRONMENTAL POLICIES AND PROCEDURES

Trinity Energy is compliant with all relevant South Sudanese laws—and draft legislation—concerning environmental protection and stewardship. Such laws and draft legislation include;

- Environment Policy of South Sudan, 2010 (Draft)
- The Constitution of South Sudan, particularly Article 41 (1) and (2)
- The Environment Protection Bill, 2010 Cap 7 (Draft)
- The Land Act, 2009

However, we believe that we can do better. Compliance with South Sudanese law alone is insufficient to meet the standards we expect of ourselves and those expected of a participant in the UN Global Compact. We want to improve our formal environmental protection policies and procedures. Therefore, we plan to draft new environmental policies and procedures that comply with South Sudanese law, international best practices and our commitment to environmental stewardship and climate action. The development of new environmental policies and procedures will be coordinated with the development and review of other policies and procedures relating to sustainability.

ENVIRONMENTAL GOALS

Recognising that we are not doing as much as we can to protect our environment, we intend to make substantial progress towards greater sustainability in the next year. To accomplish this goal, we will need to conduct a great deal of research and analysis, identify new products to diversify our offered energy mix, embrace new technology, and change how we consume energy and resources. We believe the following goals will significantly help propel us in a positive direction.

IMPROVE PRODUCT MIX TO CONTRIBUTE TO CLIMATE ACTION

Within two years, we intend to introduce additional products to our offering that offer cleaner and sustainable energy to our customers. One area of focus is introducing cleaner fossil fuel products, such as LPG, that are more environmentally friendly and offer a healthier alternative to charcoal as cooking fuel. The second area of focus is the introduction of solar micro-grid products, such as pay-as-you-go solar. We intend to introduce cleaner energy and cooking fuel solutions to South Sudan and contribute to climate action by introducing these two product lines.

CLIMATE RISK AND OPPORTUNITY ASSESSMENT

Trinity Energy will conduct a climate risk and opportunity assessment within the next 18 months. This assessment will assist us in identifying vulnerabilities to climate change and opportunities for low carbon emission activities. This assessment will also help us in maintaining our internal commitments to climate action and climate protection. The assessment results will be reviewed by the Board of Directors and Executive Management Team, who will use the results and guidance to build a more comprehensive plan to address our environmental risks and become a more sustainable organisation.

LOW IMPACT RENEWABLE ENERGY USE

Within the next 24 months, we intend to expand the percentage of our energy consumption sourced from renewable energy and low-impact power sources. Such a measure will contribute to climate and environmental protection by decreasing our contributions to climate change and reducing our reliance on fossil fuels that may have higher carbon emissions. It will also enable us to lower operational costs, offsetting a portion of the higher initial capital costs.

IMPLEMENTATION

For some time, Trinity Energy has sought to diversify its product mix and introduce more sustainable products and services. The introduction of sustainable products and services is ethical, complies with our commitment to sustainability, and is commercially sensible. Becoming a signatory to the UN Global Compact has given us additional motivation to accelerate this process. However, our push towards sustainability began long before joining the Compact.

Beginning in 2019, Trinity Energy has researched sustainable products and services to introduce to South Sudan. In late 2019, Trinity Energy commissioned the services of a third-party expert to identify potential products and services that are sustainable and would be applicable in a South Sudanese context. This expert report concluded that the Company should introduce LPG and solar micro-grid technology. Since receiving this report, we have spent considerable time planning to introduce these products and services.

Beyond our efforts to introduce more sustainable products and services, we have also introduced cleaner technology. Trinity Energy is constructing a petroleum refinery in Upper Nile state, near Paloch. From the project's inception, we have intended to use clean and modern refinery technology to protect better the environment and the communities in which we operate. South Sudan has unfortunately seen numerous environmental catastrophes stemming from the petroleum industry over the past few years. Many team members come from places impacted by the use of antiquated technology, unclean technology, and poor practices in the petroleum industry. Therefore, we have seen the impacts first hand and are dedicated to building petroleum infrastructure that is clean, environmentally sound, and minimises risks to the environment and people as much as possible.

MEASUREMENT OF OUTCOMES

Currently, we are less capable of measuring our environmental performance than we would like; as with other sections in this document, measuring detailed metrics is a significant challenge for the Company. We are in the process of rectifying this shortcoming, however, with the implementation of a centralised ERP software system. Through this system, we will be more capable of measuring our environmental performance through the tracking and logging of metrics such as;

- Water consumption
- Effluent levels from our retail and bulk petroleum facilities
- Energy consumption by source (diesel or renewable)
- Waste levels and disposal methods

Once we begin offering sustainable products and services—LPG and solar micro-grid—we will start tracking consumer uptake and usage habits where possible. Our approach to measuring performance under the UN Global Compact will be based, as mentioned above, on monitoring several environmental metrics that we currently do not measure individually. In this manner, we will better judge our overall impact, both positive and negative.

How we measure our environmental performance will be fully integrated into our sustainability reports and our internal reporting structure and procedures.

ANTI-CORRUPTION

Trinity Energy consistently strives to conduct business in a manner that is ethical and transparent. Our corporate culture promotes transparency and ethical business practices. As an energy company working in East Africa, we recognise that our activities are at high risk of corruption and unethical practices. Therefore, we are sensitive to our responsibility to act appropriately, in line with our corporate values and the criteria set out by the UN Global Compact's ten principles and the Sustainable Development Goals. This set of principles is vital as it provides a global framework of behaviour to which all businesses can be held accountable.

Joining the UN Global Compact has enfranchised the Company with the tools and resources necessary to uphold our ethical commitments better. In reviewing guidance from the UN Global Compact and other organisations, we better understand how to build a more ethical and sustainable business. Over the next year, we plan to deploy more robust mechanisms to communicate our ethical commitments, investigate allegations of corruption, and monitor our anti-corruption program.

ASSESSMENT, POLICY, AND GOALS

The energy business, in general, is at a high risk of participating in, promoting, or otherwise furthering corruption or unethical business practices. The risks of corruption in the energy business in East Africa is even more pronounced. Trinity Energy attempts to differentiate itself by promoting ethical business practices and distancing itself from unethical activities. We have a firm policy against corruption, and our corporate culture and commitments promote ethical and transparent business practices. However, corruption and unethical business practices remain a concern. Due to the industry and locations in which we work, we have an increased responsibility to engage in ethical business practices and demonstrate that organisations can sustainably succeed in the industry.

We remain cognisant that corruption is a substantial risk, and we take measures to mitigate that risk. As per Trinity Energy policy and procedure, corruption and other forms of unethical business practices are explicitly prohibited. Employees of all levels found to have participated in unethical business practices are subject to summary dismissal on the grounds of gross misconduct. Yet, we recognise that policies and procedures alone are insufficient to mitigate the risks of corruption wholly. Further, we understand that the discovery and investigation of unethical business practices are often difficult. Therefore, we strive to build robust mechanisms to mitigate corruption risks within Trinity Energy and our supply chain.

One primary shortcoming we face is our lack of a comprehensive corruption risk assessment. We plan to carry out such a risk assessment in the next year. Additionally, we need to build more robust reporting mechanisms to ensure that employees, stakeholders, and other outside parties are enfranchised to confidentially report suspected incidents of corruption without fear of reprisals. We need a comprehensive training program for all employees, vendors, contractors, and partners that identifies corruption's ethical and corporate challenges and

builds a business case for transparent operations. While we believe that the above initiatives will reduce incidents of corruption, we are cognisant that we will not be fully able to design an anti-corruption program before finalising the corruption risk assessment process.

CORRUPTION RISKS

Although we have yet to complete a full corruption risk assessment, we can identify specific areas at a high risk of corruption. Primary among those areas is our supply chain. We have limited control over our supply chain, rely upon it for our day-to-day operations, and lack the necessary data and analysis to understand the nature of our risks fully. Another area of concern is our bulk fuel sales line of business. While we have fostered a corporate culture that is opposed to corruption and unethical practices, this business unit is engaged in high-value sales to a diverse range of organisations working in East Africa. We have not received any complaints of corruption, and we are confident that all business units within Trinity Energy operate with the highest ethical standards. However, as we lack the formal systems to solicit and process complaints, engage in appropriate investigations, and monitor business processes in a manner that allows investigative data collection, we are less capable of identifying and mitigating corruption risks than we would prefer.

ANTI-CORRUPTION GOALS

To build a more robust anti-corruption system and uphold our commitments to sustainability, Trinity Energy has developed six goals for the following year. These goals will help form the foundation of our anti-corruption system and enfranchise us with the data and information necessary to construct the system in an informed and intelligent manner. These goals are not the end of our efforts; instead, they are the start. We are cognisant that we lack sufficient information and insight to make the most informed decisions possible. We hope to build that information while simultaneously creating a solid foundation from which we will grow by accomplishing these goals.

CORRUPTION RISK ASSESSMENT

As we lack sufficient data to understand our corruption risks fully, we need to conduct a full corruption risk assessment. We will conduct this risk assessment within one year and use the results of this assessment to plan the development of our anti-corruption system more thoroughly. This assessment will be the foundation of our future anti-corruption goals and efforts. The Board of Directors and Executive Management Team will oversee the assessment process, review the results, and work with all Departments to build a comprehensive plan based on the mitigation recommendations presented in the final report.

CODE OF ETHICS

Our corporate culture and ethical commitments are at the core of our business. However, we have yet to define them in one singular document. Within the next year, we will do so. In formalising our code of ethics, we will be better able to share our values and commitments with all stakeholders and hold our entire team accountable for upholding our ethical and sustainability commitments. We will communicate our code of ethics to all stakeholders upon completion.

INSTRUCTION ON CODE OF ETHICS

Building a code of ethics is only the start. Within six months of completing the code of ethics, we will provide training courses to our employees and major suppliers on the new code of ethics. In doing so, we hope to support compliance with the code by enfranchising stakeholders with a more nuanced understanding of the rationale behind the code, the ethical imperative for compliance with the code, and the business case for maintaining an ethical organisation.

BREACHED CODE OF ETHICS POLICY

Following the Code of Ethics development, Trinity Energy will develop a specific policy governing the consequences of breaching the Code of Ethics and mechanisms to investigate alleged breaches. The consequences for violating the Code of Ethics will comply with South Sudan's Labour Act of 2017, which outlines acceptable consequences for employee malfeasance, including appropriate and acceptable reasons for summary dismissal. The Policy will require that breaches to the Code of Ethics are reported to the Board of Directors.

MONITORING ETHICS AND CORRUPTION

Within one year, Trinity Energy will develop mechanisms to monitor compliance with the Code of Ethics and Anti-Corruption Policy. The means for monitoring performance will be directly related to the expected behaviour under the Code of Ethics and Anti-Corruption Policy. The monitoring mechanisms developed under this policy will include employee self-assessments, data analysis through the ERP system and financial metrics, and other forms of monitoring and investigations intended to uncover individual breaches and potential risk areas for violation. The Board of Directors will review the monitoring results regularly and make Organisation-wide decisions based upon the monitoring results.

COMPLIANCE WITH UN CONVENTION AGAINST CORRUPTION

Trinity Energy will review the UN Convention Against Corruption within one year and incorporate the guidance into the applicable Company policies and procedures. The Company will endeavour to prevent, through policy and practice, the establishment of off-book accounts, the use of off-book transactions, recording of off-book expenditures, use of false documents, and other tenets of the Convention. In coordination with the Board of Directors and Legal Department, the Company will incorporate the principles in a manner consistent with our commitments and the laws of South Sudan.

IMPLEMENTATION

Trinity Energy works to do business ethically. Our commitment to ethical business is deeply ingrained in our culture and ideals. Joining the UN Global Compact has given us the tools and guidance necessary to formalise this commitment and build more robust systems and processes supporting our ethical ideals. Since the inception of Trinity Energy, we have strongly opposed corruption and unethical business practices. Within our Code of Conduct, corruption of any kind is considered gross misconduct and is therefore punishable by summary dismissal.

Before joining the UN Global Compact, the Company explored various means of becoming a more sustainable organisation. The two major paths we identified in this process were joining the UN Global Compact and publishing sustainability reports in compliance with the Global Reporting Initiative. We have since joined the UN Global Compact and are planning on publishing GRI compliant reports when we have gained the experience necessary and built the internal tools to support that effort. As part of this planned progression, we have understood that we need to gather more robust data and have the ability to track performance month-to-month and year-to-year. The need to track data and metrics is one of the many reasons we have commissioned the installation of the ERP software system. Using this system, we will be enfranchised to collect, analyse, and report on critical data. Some of this data will include metrics on corruption and ethical business.

MEASUREMENT OF OUTCOMES

On establishing the corruption and ethics monitoring procedures, Trinity Energy will be better able to measure its performance concerning anti-corruption. Monitoring of the anti-corruption performance will be the responsibility of the Board of Directors and Executive Management Team. We have yet to conceptualise and deploy this program, so the specific manner in which the Company will gather data and generate reports is still opaque. Developing these mechanisms is one of our goals for the coming year. Given the scope of data required for such a monitoring mechanism, we expect to deploy a software system to solicit data collection, analysis, and report generation. The anti-corruption monitoring system will include multiple metrics, including;

- Employee self-assessments
- Financial monitoring
- Public reports of alleged corruption or breaches of our Code of Ethics
- Legal proceedings for corruption or breaches of our Code of Ethics
- Internal complaints, allegations, investigations, and disciplinary action

The above list is non-exclusive and may change based upon the final design of the monitoring system.

Based on best practices of sustainability reporting, the Company will report on corruption and breaches of our Code of Ethics.