

2022 Communication on Progress

Trinity Energy Limited

24 November, 2022



Contents

- 0.1 About Trinity Energy 4
- 1 Labour 6**
 - 1.1 Assessment and Policies 6
 - 1.2 Implementation 10
 - 1.3 Goals 12
 - 1.4 Measurement of Outcomes 14
- 2 Human Rights 15**
 - 2.1 Assessment and Policies 16
 - 2.2 Implementation 20
 - 2.3 Goals 22
 - 2.4 Measurement of Outcomes 23
- 3 Environment 24**
 - 3.1 Assessment and Policy 24
 - 3.2 Implementation 26
 - 3.3 Goals 27
 - 3.4 Measurement of Outcomes 29
- 4 Anti-Corruption 29**
 - 4.1 Assessment and Policy 30
 - 4.2 Implementation 31
 - 4.3 Goals 33
 - 4.4 Measurement of Outcomes 35

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 dramatically affected 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, more resilient organisation, and one that is excited to take part in building a brighter future.

This Communication on Progress is the second published by Trinity Energy. While we remain proud of our progress since becoming a signatory to the UN Global Compact, we are mindful that we are not perfect and still have much work ahead of us to meet our goals. Over the past year, we have invested a great deal of time and effort in reviewing our internal policies and procedures and gaining a better understanding of internal factors that impact our sustainability objectives and goals.

Our internal policies and procedures will benefit from improvement, and we are actively working towards publishing more robust internal documentation. We have a strong corporate culture that values sustainable activity, and we can strengthen that culture with formal processes that support our commitments. 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 grow and succeed. This year, we will continue formalising processes and building the mechanisms required to more effectively collect and analyse data with significance to our sustainability efforts. Further, we will leverage outside consultants and contractors to develop and implement needed audits and risk assessment processes.

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 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, future generations, and the environment.

We thank all our employees, shareholders and stakeholders for their commitment to this journey that we are on and look forward to working with you as we continue to build a sustainable future for all.

0.1 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 that 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 a consistent and reliable fuel supply. Trinity Energy is critical in guaranteeing the Country's petroleum supply security.

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, and soon the United Arab Emirates. These factors combine to ensure our clients enjoy versatile services, quality products, and a secure supply of vital fuel products.

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 build a more sustainable future. This document will communicate to stakeholders how the United Nations Global Compact and its Ten Principles have contributed to our business over the past year.

As a recent signatory to the UN Global Compact, a hallmark of this reporting period has been our planning, reflection, and detailed reviews of our records and actions to support our future goals. 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 existing employee records to ensure that we meet our commitments to our employees and ethical business practices.

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 a stronger company and have a more positive impact on our community.



Mr. Robert Mdeza
Chief Executive Officer

1 Labour

The social and economic environment in South Sudan 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 organisations should not make changes or that companies should not strive to do better.

At Trinity Energy, we recognise that we are not perfect and that our policies, procedures, and practices can better work to safeguard the rights of our employees. Our work over the past year was an introspection and investigation into how we can do better. We are working to assess our supply chain and improve our Labour Rights assessments. Over the past year, we have extensively reviewed our existing labour policies and procedures to understand how we can improve. This resulted in the developing of a new set of policies which the Company will implement in the coming months. We recognise that the implementation of revised policies and procedures is not the be-all and end-all in protecting and promoting labour rights, but instead, we see them as part of a much larger process. We are committed to continuing to work on strengthening our policies and procedures, and we are confident that this will lead to meaningful improvement in our workplace and for our employees.

1.1 Assessment and Policies

At Trinity Energy, we proudly work to ensure the health, safety, and happiness of our employees and communities. 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.

Trinity Energy is quickly building a more diverse team that better represents the communities in which we work. The Trinity Energy team has always consisted of diverse individuals representing the communities we serve. Through conscious efforts, in accordance with our objectives outlined in our 2021 Communication on Progress, we have made successful efforts to increase the diversity of our executive and management teams.

We believe that all employees have the right to collective bargaining. As part of our internal

review of our labour policies and procedure, we have begun a consultation to determine where and how we can better support collective bargaining. 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 yet to build 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 with a robust labour law, but few employees understand their rights, and few employers understand their responsibilities. This poor understanding of the existing labour laws and cultural and social factors results in 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 engage in collective bargaining.

The labour rights risks in South Sudan are significant. Most organisations in the Country struggle to ensure that 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. This can mean that what was a decent 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 that we continue to respect the rights and needs of our employees.

Trinity Energy is committed to respecting the rights of our employees. We will continue to review our policies and procedures to ensure that they align with our values and the evolving needs of our employees. We will also continue to engage with our employees to ensure they are aware of their rights and feel comfortable exercising them.

1.1.1 Collective Bargaining

Trinity Energy recognises the importance of collective bargaining in ensuring workers' rights. Over the past year, we have engaged in a thorough review of our existing policies and procedures. In line with our commitments, we have entered into a consultative phase during which we will determine how best to support collective bargaining. This will include the development of policies and procedures that ensure our employees are free to engage in collective bargaining without the possibility of harassment or retaliation. 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.

1.1.2 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. In accordance with our commitments, we have retained the services of risk management experts to develop and implement internal supply chain risk assessments. We have yet to conduct a full audit of our supply chain, but we are dedicated to carrying one out to understand better our risks concerning forced labour, compulsory labour, and child labour. We are committed to abolishing all forms of forced and compulsory labour and child labour, and we hope that our suppliers and vendors share that commitment. However, we recognise that we work in areas with significantly increased concerns regarding forced labour, compulsory labour, and child labour, and thus recognise the importance of conducting a full supply chain audit.

1.1.3 Data Collection and Verification

Trinity Energy collects and validates data 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. In an effort to ensure compliance, Trinity Energy has conducted a full review of all employees files, with one objective being the verification of the age of all employees. Our internal evaluation allowed us to verify that all current Trinity Energy employees are over 18.

One way that poor data availability, collection, and validation impacts employee rights is in the provision of a living wage. South Sudan's market is occasionally volatile, which makes it difficult to develop methods for calculating living wages for employees. The value of the South Sudanese Pound often fluctuates, and market rates for staple foodstuffs, household goods, and other commodities can change throughout the year. This lack of data and information about South Sudan's market conditions makes it difficult to ensure that employees are paid a living wage.

Recent global events, including the invasion of Ukraine and the global economic fallout from the COVID-19 crisis, are likely to impact the developing world disproportionately. Nations like South Sudan are likely to face increased economic and social stress. Supply chain interruptions resulting from the above mentioned crises are also likely to result in food shortages, and introduce cascading effects throughout the South Sudanese economy. These factors are likely to impact Trinity Energy's ability to keep up with rapidly fluctuating costs of living, and while

we will continue to strive to offer all employees a living wage, we may only sometimes remain ahead of quickly changing market conditions.

1.1.4 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. 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

Within the past year, we have extensively reviewed our existing policies and procedures. Throughout our review process, we have identified areas for improvement. We are currently developing new policies and procedures, and through consultation with internal stakeholders, are working to better protect the labour rights of our employees.

1.1.4.1 Child Labour and Forced or Compulsory Labour Trinity Energy is committed to preventing child labor and forced or compulsory labor in its operations and supply chain. The Company plans to assess risks and identify potential areas of concern related to human rights and labor rights. Additionally, Trinity Energy intends to provide training and education on the effects and consequences of forced labor, compulsory labor, and child labor. This will help build a shared understanding of ethical practices across the Company and its supply chain partners. In furtherance of this objective, we have retained the services of a risk management professional to develop an internal risk assessment and management framework to better identify child labour and forced labour risks and rapidly instate corrective measures where necessary.

1.1.4.2 Non-Discrimination Trinity Energy has a robust corporate culture against discrimination, but we lack formal systems to support that objective. By policy and procedure, Trinity Energy employees have the means to report discrimination and are protected against retaliation. Discrimination is prohibited in all areas, including hiring, firing, promotions or transfers, and salary decisions. In 2021, Trinity Energy continued the installation of a software system

that will allow us to better track diversity and discrimination related metrics. With this system, we can better identify and remedy any instances of systematic discrimination or inequality. The Trinity Energy Human Resources team is working with the software partner to ensure data is captured correctly and consistently across all departments.

1.1.4.3 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 still need 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. In 2020, we commissioned the installation of a computer software system to assist in collecting and analysing health and safety related data. However, factors outside of our control have resulted in delays in that system's full implementation.

1.2 Implementation

Our current efforts have centered on our continuing review of our internal policies and procedures. Further, our internal reviews have set the objective of identifying and rectifying any existing internal violations of our policies or commitments. The Trinity Energy Human Resources team has reviewed all current employee records with one objective being the verification that all employees are of legal working age.

We have continued our review of 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 considerable 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 continued its work 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.

1.2.1 Screening for Child Labour

While we have yet to fully implement a separate policy and procedure document addressing the use of child labour, the Trinity Energy Human Resources team has conducted a thorough review of all existing employee records, contracts, and potential new hires to ensure that all Trinity Energy employees are of the legal working age. Further, we have retained the services of a risk management professional to build our formal internal and supply chain audits to ensure compliance. As part of our goals for 2023, we will strive to fully implement and disseminate new policies and procedures to better formalise our commitment against the use of child labour.

1.2.2 Screening for Forced Labour

While we have yet to fully implement a separate policy and procedure document addressing the use of forced labour, the Trinity Energy Human Resources team has thoroughly reviewed all existing employee records to ensure that all Trinity Energy employees are employed voluntarily. Further, we have retained the services of a risk management professional to build our formal internal and supply chain audits to ensure compliance. As part of our 2023 goals, we will strive to fully implement and disseminate new policies and procedures to better formalise our commitments against the use of forced labour. Further, over the coming two years, we aim to implement a system to provide staff training addressing and defining forced labour and the signs and symptoms of forced labour to increase awareness within Trinity Energy.

1.2.3 Gender Pay Equality

The Trinity Energy Human Resources team has comprehensively reviewed all existing employee records. The Company has not yet identified any systematic gender pay gap. However, our review of employment records identified the need to develop and formalise a more robust salary grading system. Trinity Energy has retained the services of an outside consultant to develop a salary grading system. The new salary grading system will further ensure that all employees are compensated based solely on merit, and not receive any preferential treatment based on age, gender, nationality, religious background, or other such factors.

1.2.4 Health and Safety Program

We have yet to implement a system to digitally record and analyse data on injuries, accidents, losses, and absentee days as defined in last years goals. This delay stems from our implemen-

tation of our internal ERP software platform, which has similarly been delayed due to factors outside of our control. We will continue to work towards full implementation of this system throughout the year of 2023.

1.2.5 Supply Chain Risk Assessment and Mapping

Trinity Energy has retained the services of an outside risk management professional to build and formalise a system through which we can conduct our supply chain risk assessments. While we have yet to complete this exercise, we are confident that we will make substantial progress over the year of 2023. 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.

Conducting such assessments in South Sudan, and within the developing world in general, can be more challenging than elsewhere. While we strive to only work with supply chain partners that share our sustainability commitments, there is a limit to what we can directly influence. We're often reliant on secondary sources of information, and face challenges in verifying the accuracy of this data. We must build effective relationships with our supply chain partners and collaborate with them to ensure they are aware of our expectations and their responsibilities under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and International Labour Organization (ILO) Conventions.

1.3 Goals

Trinity Energy is proud of how we treat our employees and of our corporate culture of respect and inclusiveness. 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 assess and mitigate risks more effectively. Our current goals build on our work over the past year, and work to further drive our efforts to build more formal systems and mechanisms cement our informal practices.

1.3.1 Formalise Risk Assessments and Screening

In collaboration with our outside risk management consultant, Trinity Energy will formalise and implement our internal risk assessment methods relating to the use of forced or compulsory labor and child labor. Before the end of 2023, Trinity Energy will finalise these formal processes and have completed internal human and labor rights risk assessment.

In the medium to long term (beyond the scope of the 2023 reporting period) Trinity Energy will develop a comprehensive and consistent approach to due diligence across all its business lines, operations and supply chains. This approach may include the use of audits, questionnaires and site visits.

1.3.2 Ensure Salary Grading Accounts for Gender Pay Equality

In collaboration with outside consultants, Trinity Energy will conduct an evaluation of employee salaries to ensure that they reflect fair pay according to job roles, regardless of gender. One strategy for achieving this goal will be to create a comprehensive job description for each position, which the Company will then use to establish a salary grade for each role. From here, the organisation can identify gender-based pay disparities and make necessary adjustments to ensure fairness.

In addition, Trinity Energy will continue its commitment to ensuring that women are well-represented in leadership roles across the Company. This includes ensuring that women are appointed to senior management positions and that the Board of Directors is sufficiently diverse.

1.3.3 Implement Health and Safety Tracking

Leveraging the power of the ERP software platform commissioned in 2019, Trinity Energy will begin the process of logging and tracking health and safety related incidents in 2023. This will allow us to report on health and safety metrics such as number of incidents per employee, most common causes of accidents, total number of hours lost from accidents, locations with the most incidents, etc.

This data will help us to identify areas where health and safety improvements need to be made, and will allow us to track the effectiveness of our safety initiatives over time.

1.3.4 Explore Cost of Living Tracking Methods

Due to market volatility in South Sudan, defining a living wage has historically been challenging. However, Trinity Energy is committed to providing all employees with a living wage. Therefore, it is incumbent on us to develop a mechanism through which we can effectively monitor the cost of living in South Sudan and review and update our minimum wage regularly. Such a system may include monitoring and tracking of various factors, including market prices for staple goods and services, inflation, and other factors. Developing and implementing such a system is likely to be complicated, and we therefore may only be able to broadly conceptualise this system within the 2023 reporting period.

1.4 Measurement of Outcomes

The Trinity Energy Executive Management Team and Board of Directors have directly participated in the development of the policies against forced labour and child labour. They will continue to participate in this process, and oversee their implementation upon their completion. In this way, the Company will better ensure a seamless, organisation-wide implementation of the policies and procedures. Importantly, this will ensure that all Departments understand the importance of the policies and procedures and are enfranchised to participate in the risk assessment processes outlined therein. The Human Resources team will ensure that all employees receive appropriate training on all new policies and procedures that are implemented throughout this process.

The ERP system, partially intended to track labour rights specific metrics, is in the process of implementation in collaboration with the system vendor. Various internal teams and groups are providing the systems vendor with requirements and collaborating internally and externally to ensure the system is implemented in an effective manner. Among those are the Human Resources team, the Management team, and the internal working group coordinating sustainability initiatives.

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.

2 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 our industry and our locality poses. We recognise that Trinity Energy can only achieve our objectives by working together in partnership with our communities, local and national governments, NGOs, academia and civil society. We are committed to promoting a culture of dialogue and collaboration that will enable us to understand the concerns of our stakeholders and identify practical solutions to any problems.

We are equally committed to protecting the human rights of our employees, contractors and other workers in our supply chain. Trinity Energy is an equal opportunities employer and strives to ensure a safe, fair and inclusive working environment for all staff. We recognise workers' vital role in ensuring that we maintain high standards of safety and environmental protection, as well as providing high-quality oil products.

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's strategy to support and uphold human rights is designed to promote and protect the human rights of our employees, contractors, vendors, local communities and other affected groups. We are committed to ensuring that all reasonable steps are taken to prevent, mitigate and remedy any adverse human rights impacts our activities may cause. Trinity Energy is currently developing a comprehensive due diligence process to identify, prevent, mitigate and remedy any adverse human rights impacts associated with our operations. This includes implementing policies and procedures to:

- Respect the human rights of all individuals affected by our activities;
- Avoid causing or contributing to adverse human rights impacts;
- Address any adverse human rights impacts that occur; and
- Communicate transparently about how we address our human rights impacts.

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.

2.1 Assessment and Policies

Trinity Energy is an independent energy company operating primarily in South Sudan. Our industry poses inherent challenges concerning human rights.

In 2020, Trinity Energy initiated a comprehensive review of our human rights policies and practices. The review has been guided by the principles enshrined in the United Nations Guiding Principles on Business and Human Rights (“UNGPs”). The UNGPs were developed through a multi-stakeholder process and unanimously endorsed by the UN Human Rights Council in 2011. They set out the respective roles and responsibilities of the state and business enterprises with respect to human rights.

The review will assess Trinity Energy’s current human rights policies, practices and procedures to identify gaps against the UNGPs. It will consider how Trinity Energy can best ensure that its activities respect human rights and address any adverse impacts that might arise from our operations. We will also seek input from employees, contractors and other stakeholders on this issue. We expect to complete our review by the end of 2023.

2.1.1 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. We are committed to promoting a culture of dignity, inclusion and respect. We aspire to be a workplace that is free from discrimination, harassment and victimisation. While we still need to complete 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 protect and advance human rights.

2.1.2 Country Risk

Our operations and activities 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. However, we have identified a number of areas with elevated risks or where we are likely to have an impact on human rights.

While we do not believe any of our supply chain partners use forced labour or child labour, we are unable to validate our belief. We are committed to working with our supply chain partners to ensure they do not utilise forced or child labour. We will make this a part of our due diligence and audit process. As such, we are committed to ensuring that none of our products are made using forced labour or child labour. We believe, however, that by investing in our communities and providing sustainable employment opportunities, we can help reduce the demand for these illegal practices.

Further, we are aware that some of our customers may utilise our products for purposes that may negatively impact human rights. We have a responsibility to our customers and their businesses, but also the communities in which they operate, to ensure that our products are not being used in a way that violates human rights. Therefore, we plan to explore methods and mechanisms for handling concerns about the use of our products.

2.1.2.1 Supply Chain Transparency and Visibility Trinity Energy is not a vertically integrated organisation; therefore, we 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 cognizant 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, 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 cognizant that we are both less advanced than we should be and must work harder to ensure the sustainability of our operations.

2.1.2.2 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 cognizant that this capabilities gap hinders our ability to influence all stakeholders positively. 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.

2.1.3 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 need policies and procedures to adequately address the broad areas of community impact and country risk.

Trinity Energy has started a review of all of our current policies and procedures to ensure that they fully reflect the high standards across Trinity Energy’s operations. Through our internal review, we have identified numerous areas for improvement. We are actively developing and implementing new policies and procedures to reflect our human rights commitment. 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.

2.1.3.1 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 need for a formal employee feedback and consultation system. In 2020, we started a program to address an additional deficiency in our health and safety systems. Historically, recording and tracking health and safety incidents have been a challenge for the Company. We needed a formal and central system with which we could adequately record and track incidents in a manner that enfranchised decision-makers with valuable information. Last year we 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 2023.

2.1.3.2 Fair Treatment Policies and Procedures Trinity Energy's policies and procedures address both non-harassment and employee privacy. The Company's current policies and procedures clearly define harassment, identify 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. We are committed to maintaining policies and procedures that protect our employees and their privacy. In the event that a policy or procedure is breached, employees can report the violation to a supervisor or human resources representative. All complaints will be investigated and addressed appropriately.

While we are confident that we offer our employees fair treatment, we must 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 need more 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 more robust and communicative relationships with our employees.

Additionally, we plan to offer all new employees training on the Company's fair treatment policies and procedures. The training will include the following:

- A review of the policies and procedures.
- Identification of potential red flags.
- An overview of the complaint process.

Employees will be given an opportunity to ask questions and discuss any concerns they may have. Additionally, we plan to offer employees periodic training on fair treatment and privacy policies and procedures.

2.1.3.3 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. We also provide an employee assistance program to address any needs that may arise from time to time.

While we endeavour to ensure all employees have a living wage, two primary challenges prevent us from confidently stating so. First, we need formal mechanisms to collect data and feedback from employees. Second, South Sudan's economic situation results in highly variable market conditions. The volatile market conditions often result in unpredictable price fluctuations, making it difficult to ensure a fixed living wage. However, we plan to address this challenge by frequently monitoring the cost of living relative to employees' salaries. Further, our holistic approach to compensation ensures that we address the needs of our employees and their families. We provide a comprehensive benefits package for all staff and have a range of programs to ensure our employees' health, safety and well-being.

We are committed to paying employees competitive salaries in line with their skills and experience. Our salaries are reviewed on a regular basis and are benchmarked against local salaries in order to ensure that our salaries remain competitive. Moving forward, we will formalise data collection and analysis to guarantee that all Trinity Energy employees are paid a living wage. Further, in collaboration with an outside consultant, Trinity Energy is building a salary grading system to ensure that employees are paid a fair wage.

2.2 Implementation

Over the past year, Trinity Energy has made moderate progress with respect to our human rights goals and commitments. As we have moved back to in-office work, we have also expanded our team. The Human Resources department, in particular, has seen a good deal of changes, many of which revolve around introducing more formal systems and reviewing existing policies and procedures. These developments have allowed us to make moderate progress towards our goals. However, we only partially accomplished all goals outlined in 2021.

2.2.1 Human Rights Risk Assessment

Trinity Energy still needs to complete a full-scale Human Rights Risk Assessment. However, we have retained the services of an outside risk management professional to assist the Company in developing and implementing a human rights risk assessment process and procedure. This outside consultant is currently working on the formal process and we are confident that we

will be able to conduct a full scale human rights risk assessment before the conclusion of the next reporting period.

2.2.2 Review of All Policies and Procedures for Human Rights Impact

Trinity Energy has reviewed all policies and procedures to ensure consistency with human rights commitments and objectives. In some cases, we have revised or enacted new policies and procedures as necessary. We will continue to leverage guidance from the UN Guiding Principles on Business and Human Rights throughout this process, among other documents and reference material.

2.2.3 Human Rights in Our Supply Chain

Trinity Energy needs to develop a Supplier Code of Conduct or the supporting educational materials. However, the Company is developing internal policies and procedures related to human rights, and we will develop the Supplier Code of Conduct and supporting educational materials once these policies and procedures are finalised. We have retained the services of an outside professional consultant to assist the Company in developing and implementing these policies and procedures. While we are confident that we will develop these policies before the end of the next reporting period, we can not commit to introducing such policies to our supply chain partners before holding an in-depth stakeholder consultation.

2.2.4 Grievance Mechanisms

Trinity Energy still needs to create internal and external grievance mechanisms. However, these mechanisms are a part of our policy and procedure development initiative, and we are confident that they will be developed before the end of the next reporting period. The delay in implementing these mechanisms has been due to a delay in the implementation of our new ERP software system.

2.2.5 Stakeholder Consultation

Trinity Energy has not yet reviewed any Stakeholder Consultation Frameworks. However, the Company is developing internal policies and procedures related to human rights, and we will review relevant Stakeholder Consultation Frameworks once these policies and procedures are finalised. We have retained the services of an outside professional consultant to assist the

Company in developing and implementing these policies and procedures. However, Trinity Energy remains committed to working with all stakeholders and regularly consults with stakeholders to ensure our projects and activities are as beneficial as possible while avoiding adverse impacts.

2.2.6 Allocation of Responsibility

Trinity Energy has had discussions at the Executive level regarding the creation of a Chief Sustainability Officer position. However, the Company has other priorities at this time, and we have yet to be able to commit the necessary resources to create this position. We remain committed to this goal and will revisit the idea of creating a Chief Sustainability Officer position once we have completed our other priority initiatives.

2.2.7 Awareness and Training

Trinity Energy still needs to develop a comprehensive employee training program to ensure that all employees are aware of Trinity Energy's commitment to human rights and stakeholder roles, responsibilities, rights, and expectations. However, the Company has begun to develop the policies and procedures necessary to track employee training on human rights and the Company's code of conduct. The Human Resources department is currently developing these policies and procedures, and we hope to have them in place before the end of the next reporting period. The Human Resources department will build a training program that is inclusive of all new policies and procedures, including Human Rights policies and procedures. We expect to begin work on this program once all new policies and procedures have been created and approved.

2.3 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 several goals for the coming year.

2.3.1 Human Rights Risk Assessment

Trinity Energy has retained the services of an outside risk management professional to assist the Company in developing and implementing a human rights risk assessment process and

procedure. In collaboration with this outside consultant, Trinity Energy will develop and implement a policy and procedure for conducting human rights risk assessments before the end of the next reporting period. Once we have developed and formalised our internal human rights risk assessment process, we will continue to conduct a full scale human rights risk assessment. Ideally, we would like to have this assessment completed before the end of the coming reporting period, but we cannot fully commit to this timeframe.

2.3.2 Finalize Policy Development

Trinity Energy is in the process of developing new policies and procedures, including human rights-related policies and procedures. We expect to have the new policies completed and approved by our Board of Directors before the end of the next reporting period.

2.3.3 Formalize Grievance Mechanisms

Trinity Energy is committed to formalising our grievance mechanisms. The development and implementation of a new ERP software system will assist us in this goal as the software will allow for the tracking of Grievances. We are currently working with our software vendor to ensure that this functionality is built into the system. We would like to have this functionality operational before the end of the next reporting period.

2.3.4 Develop Vendor Code of Conduct

Trinity Energy is committed to developing a vendor code of conduct. This code of conduct will outline the expectations we have of our vendors with respect to human rights. We hope to finalise this code of conduct before the end of the next reporting period. However, before disseminating this policy to our vendors, we must consult to ensure that the policy is feasible and practical. We are as yet unable to commit to a timeframe for the completion of this consultation period.

2.4 Measurement of Outcomes

This Communication on Progress is the second 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. Further, the Trinity Energy management team and our Board of Directors remain invested in building a more sustainable company that positively affects our community.

Over the next year, Trinity Energy will develop a human rights risk assessment framework to assist in developing practices and policies designed to ensure compliance with our commitments. In conducting our human rights risk assessment, we will closely inspect our supply chain to manage the risks posed to human rights by our entire value chain. We also plan to consider the introduction of contractual mechanisms to ensure suppliers comply with our human rights commitments.

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.

3 Environment

Trinity Energy is committed to becoming a more sustainable organisation and reducing our environmental impact. We recognise that our industry and location pose a high risk of causing environmental harm, and we are dedicated to mitigating this through better understanding and management of our risks, introducing more sustainable products and services, and working towards sourcing our energy from renewable sources.

In order to achieve our goal of becoming more sustainable, we have set specific targets for ourselves. These include conducting a full environmental risk assessment, introducing LPG and solar micro-grid products and services, and sourcing a percentage of our energy from renewable sources. This section provides an overview of our current environmental performance, our plans for becoming more sustainable, and the positive impact we aim to have on our stakeholders.

3.1 Assessment and Policy

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 cognizant 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 should be more aware of our specific risks. 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 this is insufficient to meet our obligations and commitments. We are committed to building a more sustainable organisation and to promoting more environmentally sound technologies and practices.

3.1.1 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 including;

- 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)

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. This is why Trinity Energy strives for sustainable environmental management: we aim to continuously improve environmental performance, minimise environmental impact and proactively address emerging environmental issues, and do this whilst maintaining compliance with all relevant legislation. However, we still need more formal environmental protection policies and procedures.

3.2 Implementation

For some time, Trinity Energy has sought to diversify its product mix and introduce more sustainable products and services. Introducing 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 a third-party expert's services to identify sustainable products and services that 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. Over the past few years, South Sudan has unfortunately seen numerous environmental catastrophes stemming from the petroleum industry. 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.

3.2.1 Improve Product Mix to Contribute to Climate Action

As an alternative to harmful fuel sources, Trinity Energy is committed to providing cleaner energy solutions and also to introducing alternative products to the market. We have made significant progress on our goal of introducing additional products that offer cleaner and sustainable energy to our customers. We have introduced LPG pilot projects at our petroleum stations in Kenya and are planning consumer studies to implement LPG at all stations. Discussions are also taking place about building a strategy for solar micro-grid. However, this product has yet to be introduced.

3.2.2 Climate Risk and Opportunity Assessment

Trinity Energy still needs to complete a full climate risk and opportunity assessment. We have hired an outside consultant to assist us in conducting this assessment. However, we have yet to be able to complete the assessment due to the fact that our new ERP software system has yet to be fully installed. We are confident that we will be able to complete the assessment and review the results with our Board of Directors and Executive Management Team within two years.

3.2.3 Low-Impact Renewable Energy Use

Trinity Energy is committed to expanding our use of renewable and low-impact energy sources. We have made good progress on this goal and currently have solar power systems installed on a number of our retail petroleum stations. We expect to have solar power systems installed on all of our retail petroleum stations within a reasonable time frame.

3.3 Goals

We recognise that we could do more to protect our environment and are committed to making substantial progress towards greater sustainability in the next year. To accomplish this goal, we will continue to conduct extensive research and analysis, identify new products to diversify our energy mix, embrace new technology, and change how we consume energy and resources. The following goals will significantly help propel us in a positive direction.

3.3.1 Develop and implement formal environmental protection policies and procedures

As part of our ongoing effort to revise and develop our organisation wide policies and procedures, we will develop new policies and procedures addressing environmental protection and stewardship. Given the scope of our potential positive and negative environmental impact, this process will be iterative and ongoing. During the upcoming reporting period, we will develop a general framework for these policies and procedures, specifically a formalised framework under which we can build more detailed policies and procedures as we can better understand the scope of our impacts and requirements.

3.3.2 Promote Sustainable Resource Use Amongst Employees, Contractors and Suppliers

We recognise that our employees, contractors and suppliers play a significant role in our ability to achieve our environmental sustainability goals. We will promote sustainable resource use amongst these groups through a variety of means, including education and training, policy development and implementation, and supplier engagement. We plan to develop a sustainable resource management policy for our business within the next reporting period.

We also recognise the value of engaging our customers to help them achieve their own environmental sustainability goals, and we will continue to develop our sustainability communications and programs with this in mind.

3.3.3 Increase Energy Efficiency and Reduce Greenhouse Gas Emissions

We will continue to invest in energy efficiency measures across our operations with the goal of reducing our overall energy consumption and greenhouse gas emissions. We will also explore opportunities to diversify our energy mix and increase our use of renewable energy sources. Within the next two years we plan to have installed solar-powered infrastructure at all applicable retail fuel stations. Further, we will continue exploring means to conserve resources, including water and electricity, at all locations.

3.3.4 Develop and implement formal environmental protection policies and procedures

As part of our ongoing effort to revise and develop our organisation wide policies and procedures, we will develop new policies and procedures addressing environmental protection and stewardship. Given the scope of our potential positive and negative environmental impact, this process will be iterative and ongoing. During the upcoming reporting period, we will develop a general framework for these policies and procedures, specifically a formalised framework under which we can build more detailed policies and procedures as we can better understand the scope of our impacts and requirements.

3.3.5 Conduct Environmental Impact Assessment

We will conduct an environmental impact assessment to identify the potential environmental impacts of our operations and develop plans to mitigate or avoid these impacts. Trinity Energy will conduct this assessment on an ongoing basis as our operations change and evolve. Within the next year, we will have an overall framework developed within which we will be able to

conduct environmental impact assessments. Completing a full environmental impact assessment for the organisation is contingent on completing this framework. Ideally, we would like to complete a full environmental impact assessment for our organisation within the next two years, but we still need to commit to that goal.

3.3.6 Explore implementation of ISO 14001 Environmental Management System

We will explore the implementation of the ISO 14001 Environmental Management System standard across all of our operations. This standard provides a framework for organisations to develop and implement an effective environmental management system. Within the next year we will review the suitability and applicability of the ISO 14001 standard for our operations and present to the Board of Directors a recommendation on whether or not to pursue accreditation to this standard.

3.4 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 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

With the pilot introduction of our LPG product, we hope to source and analyse customer uptake data to better support our objective of broader implementation and adoption, particularly in South Sudan. Over the following months, we aim to better understand how, when, and why our customers purchase LPG products with the objective of better understanding how we can work with the market to ensure this product is widely used.

4 Anti-Corruption

Trinity Energy is committed to conducting business in an ethical and transparent manner. Our corporate culture promotes transparency and ethical business practices. As an energy com-

pany 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 for all businesses to be held accountable.

Joining the UN Global Compact has enfranchised the Company with the tools and resources necessary to uphold our ethical commitments better. 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.

Trinity Energy is committed to the highest standards of ethical behaviour and we recognise that our actions can have a profound and lasting impact on the communities in which we operate. We are therefore dedicated to working with our employees, business partners and other stakeholders to ensure that our activities are conducted in a responsible and sustainable manner.

Ethical business practices are essential to our long-term success, and we are committed to acting in accordance with the highest standards of integrity. We have implemented policies and procedures designed to promote compliance with applicable laws and regulations and prevent and detect bribery and corruption. We expect our employees, officers and directors, as well as our agents, contractors and other business partners, to adhere to these standards.

We recognise that the fight against bribery and corruption is an ongoing process and we are committed to review and update our policies and procedures on a regular basis. We also recognise the importance of engaging with our stakeholders on these issues, and we welcome any feedback or suggestions on how we can further improve our anti-corruption efforts.

4.1 Assessment and Policy

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 take measures to mitigate that risk. As per Trinity Energy's policy and procedure, corruption and other unethical business practices are 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 wholly mitigate the risks of corruption. 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 is our need for 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 report suspected incidents of corruption without fear of reprisals confidentially. 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 cognizant that we will only be fully able to design an anti-corruption program after finalising the corruption risk assessment process.

4.1.1 Corruption Risk

We still need to complete a full corruption risk assessment, but we have identified specific areas that are at a high risk of corruption. The primary area of concern 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 fully understand the nature of our risks. 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, but we are less capable of identifying and mitigating corruption risks than we would prefer because we lack formal systems to solicit and process complaints, engage in appropriate investigations, and monitor business processes in a manner that allows investigative data collection.

4.2 Implementation

Trinity Energy is committed to conducting business ethically. We have always opposed corruption and unethical business practices, and our Code of Conduct considers any form of corruption to be gross misconduct punishable by summary dismissal. Joining the UN Global Compact

has given us the tools and guidance necessary to formalise our commitment to ethical business and build more robust systems and processes to support our ideals.

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 realised 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.

Over the past year we have introduced more robust financial controls and monitoring mechanisms. These controls include mechanisms to deter and prevent unethical business practices and behavior. All Trinity Energy employees are now subject to increased financial security, particularly as it relates to cash disbursements. Through these controls we hope to discourage any potential corrupt activities and business practices.

4.2.1 Corruption Risk Assessment

Trinity Energy has not yet conducted a full-scale corruption risk assessment. However, we have retained the services of an outside risk management professional to assist the Company in developing and implementing a corruption risk assessment process and procedure. This outside consultant is currently working on the formal process and we are confident that we will be able to conduct a full scale corruption risk assessment before the conclusion of the next reporting period.

4.2.2 Code of Ethics

We have made good progress on this goal and have held high-level discussions regarding our Company's ethical commitments. We are waiting on the formalisation of other policies and procedures before formalising the introduction of our new code of conduct. We wish to complete the development of our other policies and procedures before formalising a new code of ethics as we want to ensure that our ethical commitments are aligned with all other aspects of our business. We are confident that we will be able to complete this goal within the next reporting period.

4.2.3 Instruction on Code of Ethics

Once the Company completes the new code of ethics, it will provide training courses to employees and major suppliers on the code of ethics. Trinity Energy expects to complete and formalise a new code of ethics within this reporting period, and will then work to develop and schedule an appropriate training regimen to ensure that all employees and major suppliers are aware of the code and its requirements.

4.2.4 Breached Code of Ethics Policy

Trinity Energy has not yet developed a specific policy governing the consequences of breaching the Code of Ethics and mechanisms to investigate alleged breaches. However, the Company is in the process of developing a Code of Ethics and we are confident that we will be able to develop a policy governing the consequences of breaching the Code of Ethics and mechanisms to investigate alleged breaches before the conclusion of the next reporting period.

4.2.5 Monitoring Ethics and Corruption

As noted in the original goal, the implementation of the ERP system has been delayed. However, the Company has made significant progress on the development of the Code of Ethics. Once the Code of Ethics is finalised, the Company will develop the monitoring mechanisms referenced in the goal.

4.2.6 Compliance with UN Convention Against Corruption

Trinity Energy has reviewed the United Nations Convention Against Corruption and has incorporated the guidance into the applicable Company policies and procedures. The Company has endeavoured 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 our new policies and procedures in a manner consistent with our commitments and the laws of South Sudan.

4.3 Goals

Trinity Energy is committed to building a more robust anti-corruption system and upholding our commitments to sustainability. To do this, we have developed goals for the coming year

that will help form the foundation of our anti-corruption system. These goals will provide 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; they are the start. We are cognizant 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.

4.3.1 Complete the Development of the Corruption Risk Assessment Framework

In coordination with an outside risk management professional, Trinity Energy will develop a Corruption Risk Assessment (CRA) Framework. The CRA Framework will be a comprehensive and systematic approach to evaluating and mitigating corruption risks associated with our business activities. The framework will consider the Company's business model, the countries in which we operate, the products and services we offer, our relationships with governmental and non-governmental organisations, and our interactions with local communities. The framework will identify potential corruption risks at each stage of our business and guide how to mitigate those risks best.

4.3.2 Complete the Development of a new Code of Ethics

Trinity Energy will develop and implement a new Code of Ethics that will provide employees, agents, consultants and business partners with guidance on identifying and dealing with potential corruption risks, among other matters relevant to ethical and transparent practices. The Code of Ethics will also establish standards and procedures for reporting any potential violations of anti-corruption laws.

4.3.3 Implement a New Employee Training Program on the Code of Ethics

Trinity Energy will develop and implement an employee training program on the new Code of Ethics. The training program will include both online and in-person components and will be mandatory for all employees. The training program will cover topics such as the Company's commitment to compliance with anti-corruption laws, the new Code of Ethics, and identifying and dealing with potential corruption risks.

4.3.4 Conduct a Corruption Risk Assessment of All Business Units

Trinity Energy will conduct a Corruption Risk Assessment of all business units. The purpose of the corruption risk assessment is to identify the potential corruption risks associated with each business unit's activities and to develop and implement plans to mitigate those risks. The Corruption Risk Assessment will consider the business model of each business unit, the countries in which the business unit operates, the products and services offered, the business unit's relationships with governmental and non-governmental organisations, and the business unit's interactions with local communities.

4.3.5 Implement Corrective Actions Based on Corruption Risk Assessment Findings

Trinity Energy will develop and implement corrective actions based on the findings of the Corruption Risk Assessment. The corrective actions will address the identified risks and seek to mitigate or eliminate those risks. The corrective actions will be tailored to the specific risks identified in the Corruption Risk Assessment and will be implemented on a case-by-case basis.

4.4 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.