

Introduction

Purpose of the Customs and Global Trade Control Framework

The Customs and Global Trade Control Framework is designed to ensure that all cross-border movements of goods, particularly energy products stored and processed at our terminals, are conducted in full compliance with applicable customs laws, excise duties, international trade regulations, and sanctions regimes. Given the highly regulated nature of the energy sector and the strategic importance of customs and trade compliance, the framework serves as a governance structure that enables:

- **Regulatory Compliance:** Ensuring the organisation meets all legal obligations related to customs, excise, VAT, and international trade, including accurate tariff classification, valuation, and origin management.
- **Risk Management and Internal Controls:** Providing a robust internal control environment with clear governance, roles, responsibilities, and oversight mechanisms to identify, assess, and mitigate customs and trade risks across the business, including audit preparedness and compliance monitoring.
- **Operational Efficiency:** Facilitating smooth and timely customs processes to prevent delays at borders, minimize costs, and avoid supply chain disruptions.
- **Governance and Accountability:** Providing clear roles, responsibilities, and oversight mechanisms to ensure consistency, accountability, and continuous improvement across all business units involved in international trade.
- **Operational Excellence and Strategic Trade Enablement:** Supporting commercial objectives through the optimal use of customs regimes (e.g., customs warehousing, transit, inward processing, excise warehouse), trade agreements, and efficient structure of supply chains. Ensuring the efficient and compliant movement of goods, reducing delays, lowering trade-related costs, and enabling uninterrupted flows through terminals and supply chains worldwide.

This framework integrates customs and trade compliance into the broader internal control environment of the group and contributes to its license to operate, especially important in a sector where reputational and regulatory risks are high.

Adaptability of the Control Framework

The Customs and Excise Control Framework is designed as a **dynamic and evolving structure**, intended to adapt to both internal and external developments. While the framework sets out a structured approach to compliance with controls grouped into operational, general compliance, and license-level categories, it is understood that **no control environment remains static**.

The **nature, design, and frequency** of controls are subject to **ongoing evaluation and adjustment** based on several factors, including:

- **Changes in the legislative and regulatory landscape**, such as amendments to customs or excise laws, procedural updates from authorities, or evolving EU and international trade requirements.
- **Business developments**, including new or discontinued product flows, service offerings, projects, legal entity changes, system upgrades, and shifts in roles or responsibilities within the organisation.
- **Outcomes of internal audits, reviews, or control monitoring**, where findings, non-conformities, or improvement opportunities may result in the strengthening, refinement, or replacement of existing controls.
- **Lessons learned** from incidents, errors, or stakeholder feedback, which are incorporated into the framework as part of a continuous improvement cycle.

To support this adaptability, the control framework is subject to **regular reassessment** as part of the compliance governance process. This ensures that controls remain **fit for purpose**, proportionate to the associated risks, and aligned with the terminal's licensing obligations and operational reality.

This dynamic approach enables the organisation to stay responsive, compliant, and forward-looking in a complex and evolving trade environment.

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