

SOCIAL MEDIA PARTICIPATION GUIDELINES

for private and job-related use by TCT The Commodity Traders employees

www.thecommoditytraders.com



THE COMMODITY TRADERS
COMMODITIES OF THE WORLD



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Guidelines Overview

The TCT Commodity Traders Social Media Guidelines provide an overview of approved practices for creating, posting and working with social media.

The guidelines are designed to help you better understand the opportunities, manage the risks and ensure that all partners, employees, and contractors of TCT understand the responsibilities and boundaries associated with using social media in your work.

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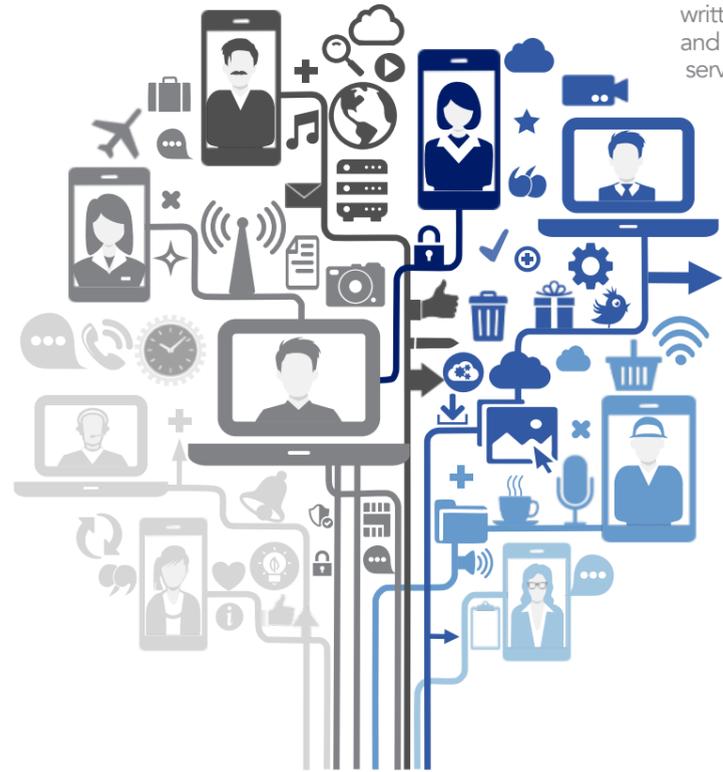
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INTRODUCTION

Social networking tools and media sites are two-way communication channels to share information, express creativity and connect with others. If used correctly social media can provide a rich experience for collaboration and the sharing of knowledge, ideas and experiences.

Through these tools we have the opportunity to create awareness of our programs and services, engage with our audience, actively listen and build communities. The following set of guidelines will help ensure that your programs social media align with the TCT position and best practices and reduce reputational risk while helping you achieve better results.

TCT uses several social media platforms such as Twitter, Instagram, Facebook, LinkedIn, and About.me among others. These guidelines were written to protect the Company brand, the staff and the users of social media. Furthermore, they serve to guide staff to use social media effectively in an ever changing online-world.



Here are definitions of the most commonly-used terms and abbreviations in the document:

TCT - Refers to TCT The Commodity Traders, B.V.

Employees - Refers to all team members of TCT The Commodity Traders, B.V.

MRD - Refers to the Media Relations Department, Corporate Communications.

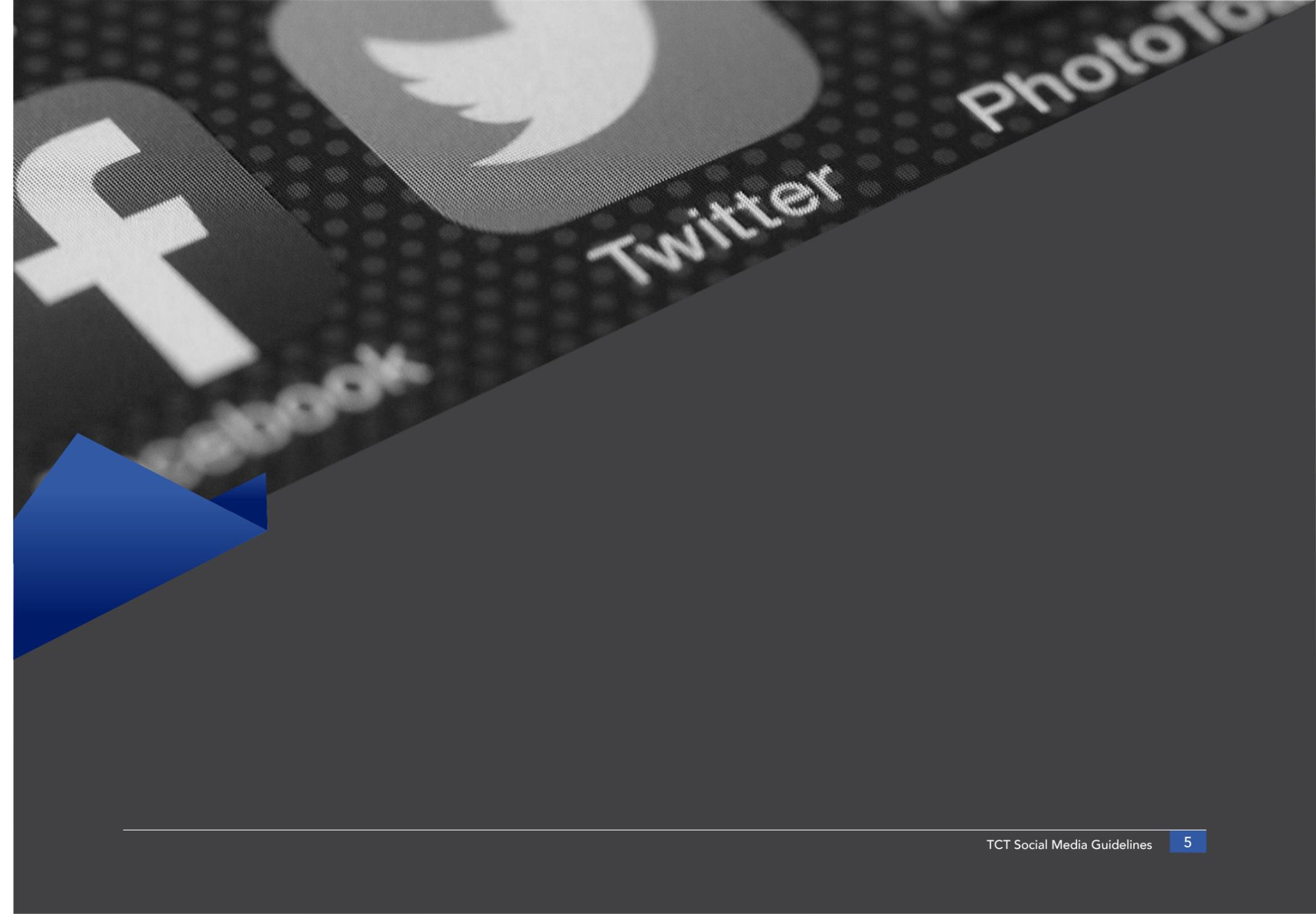
Social Media - Internet-based websites and applications that enable the creation and sharing of content or to participate in social networking.

Content - Any information that is communicated on a social media channel.

Main TCT Social Media Accounts - This refers to TCT The Commodity Traders' official social media accounts that are managed and maintained by the Media Relations Department.

Social Media Administrator - The individual who is in charge of a specific social media account. This person has the ability to moderate a social media account including posting, commenting and deleting comments based on TCT's Social Media Terms of Engagement.

As social media constantly changes, so will these guidelines. The latest version will be available on the TCT website. Please contact the Media Relations Department at compliance@thecommoditytraders.com if you have suggestions or questions.



WHY DOES TCT USE SOCIAL MEDIA?

This creates a dynamic communications opportunity that is constantly developing and changing. Social media contributes to the overall communications goals for TCT which include having a global progressive image and keeping stakeholders informed and engaged.

The unique benefits of social media include:

Increase Citizens' Access To TCT

Social media provides a direct connection between the public and TCT and fosters public engagement. TCT uses social media to provide real-time information to citizens on issues, programs and services, and news and events that affect them. TCT's presence on social media, using various platforms and accounts, provides citizens with different options to connect with TCT.

Build Relationships With Citizens, Partners and Stakeholders

Using social media regularly, TCT is able to create relationships with citizens and organizations in the community. TCT is able to support and share information from partner organizations and stakeholders which reinforces current bonds and builds stronger ties.

Provide Better Customer Service

As social media use continues to rise, it provides an increasingly popular option for citizens to ask TCT questions. Social media can be used to respond to inquiries from the public in a timely manner.

Enhance The Reputation and Image of TCT

Social media is an excellent way of showcasing different projects and programs that are enhancing the oil and gas industry and making it stand out from the crowd. TCT's social media accounts are entry points for our citizens and people worldwide to see what Edmonton is about. It is important that social media be exciting and vibrant as it is often the first impression the world receives of us.

Create A Dialogue With The Public

Social media offers the opportunity to engage in a real-time, back and forth conversation with the public. This enables stronger two-way communication that displays openness and transparency.

Provide Additional Communication Channels In Times Of Emergency

In the event of an emergency, social media allows TCT to reach citizens quickly and effectively. TCT can provide updates to help keep citizens safe, secure, and informed.

Provide Greater Scope To Adjust Communications Quickly When Necessary

Social media allows TCT to manage issues as they arise. Staff using social media can monitor trends and conversations on social media allowing the

TCT to prepare key messages and be on top of issues before they escalate.

Reach Specific Audiences On Specific Issues

TCT's social media provides messages from all different sectors in an effort to represent what is happening within the oil and gas industry. The public follows the main TCT accounts knowing that they will receive valuable information about all services. TCT also has more specific social media accounts to connect with specific groups of people on more concentrated issues such as Logistics Management and Storage Trade Support Services.

GENERAL RULES TO FOLLOW

If you're a TCT employee or contractor creating or contributing to blogs, forums, social networks, or any other kind of social media as part of your job at TCT The Commodity Traders - these guidelines are for you. They are intended to provide an overview of what communication tools exist, how to get started, and proper engagement with customers in the social media environment.

These guidelines also apply to individual consultants and any third party agencies working for or on behalf of TCT The Commodity Traders. It is the responsibility of the TCT employee working with these consultants and agencies to ensure these guidelines are followed.

In addition to the specific individual social media application guidelines below, the following provides an overall set of guidelines that apply to all social media participation, whether internal to TCT or on sites which are visible outside of TCT.

Maintain Confidentiality

Do not post confidential or proprietary information about TCT The Commodity Traders, B.V., its board of directors, its partners or your fellow employees. Use good ethical judgment and follow policies.

Maintain Privacy

Do not discuss a situation involving named or pictured individuals on a social media site without their permission. As a guideline, do not post anything that you would not present in any public forum.

Understand Your Personal Responsibility

TCT staff and authorized representatives are personally responsible for the content they publish on blogs, wikis or any other form of user-generated content. Be mindful that what you publish will be public for a long time—protect your privacy.

Be Aware of Liability

You are responsible for what you post on your own site and on the sites of others. Be sure that what you post today will not come back to haunt you.

Maintain Transparency

The line between professional and personal business is sometimes blurred: Be thoughtful about your posting's content and potential audiences. Be honest about your identity. In personal posts, you may identify yourself as a TCT staff member. However, please be clear that you are sharing your views as an individual, not as a representative of TCT The Commodity Traders.

Correct Mistakes

If you make a mistake, admit it. Be upfront and be quick with your correction. If you're posting to a blog, you may choose to modify an earlier post—just make it clear that you have done so.

Respect Others

You are more likely to achieve your goals or sway others to your beliefs if you are constructive and respectful while discussing a bad experience or disagreeing with a concept or person.

Be a Valued Member

If you join a social network, make sure you are contributing valuable insights. Don't hijack the discussion and redirect by posting self/organizational promoting information. Self-promoting behavior is viewed negatively and can lead to you being banned from Web sites or groups.

Think Before You Post

There's no such thing as a "private" social media site. Search engines can turn up posts and pictures years after the publication date. Comments can be forwarded or copied. Archival systems save information even if you delete a post. If you feel angry or passionate about a subject, it's wise to delay posting until you are calm and clear-headed. Post only pictures that you would be comfortable sharing with the general public (current and future peers, employers, etc.).

SOCIAL MEDIA GUIDELINES WHEN POSTING AS AN INDIVIDUAL

TCT understands that partners, employees or interns may maintain or contribute to personal blogs, message boards, conversation pages and other forms of social media (such as Facebook and Twitter) outside of their job and may periodically post information about their job or TCTs' activities on these outlets. If a partner posts Company or job-related information, he or she is required to exercise good judgment, abide by TCT policies, and take the following into consideration.

When posting to a social media site you should:

Adhere to the Business and Ethical Conduct Guidelines and other applicable policies

All Company partners, from the executive team to every intern, are subject to the Company Business and Ethical Conduct Guidelines in every public setting. In addition, other policies, including the Information Protection Policy and the Insider Trading Policy, govern partners' behavior with respect to the disclosure of information; these policies are applicable to your personal activities online.

Be Authentic

Be transparent and honest about your identity. In personal posts, you may identify yourself as a TCT staff member, intern or partner. However, please be clear that you are sharing your personal views and are not speaking on TCTs' behalf, unless you are authorized in writing by your manager to do so. TCT may request that you avoid certain subjects or

withdraw certain posts from a blog if it believes that doing so will help ensure compliance with applicable laws, including securities regulations.

If you identify yourself as a member of the TCT community, ensure your profile and related content are consistent with how you wish to present yourself to colleagues.

Use a Disclaimer

If you publish content to any website outside of TCT and it has something to do with the work you do or subjects associated with TCT, you are required to use a disclaimer such as this: *"The postings on this site are my own and do not represent TCT's positions, strategies or opinions."*

Don't Use The TCT Logo or Make Endorsements

Do not use the TCT coat of arms logo, wordmark or trademarks, and should respect copyright, privacy, fair use, financial disclosure, and other applicable laws. Do not use TCT's name to promote or endorse any product, cause or political party or candidate.

Take The High Ground

In online social networks, the lines between public and private, personal and professional are blurred. If you identify your affiliation with TCT in your comments, readers may associate you with the company, even with the disclaimer that your views are your own.

Remember you are creating perceptions about your expertise and about TCT by our shareholders, customers, and the general public-and perceptions about you by your colleagues and managers. Do us

all proud. Be sure that all content associated with you is consistent with your work and with Organization's values and professional standards.

Don't Use Pseudonyms

When establishing an account on a social media platform personally, partners, staff members or interns should not use TCT or any of its brands name in the individual's identity (e.g. username, "handle" or screen name), nor should an individual speak as a representative of TCT. If a media inquiry is generated, please direct it to the [Media Relations Department](#).

Protect Your Identity

While you should be honest about yourself, don't provide personal information that scam artists or identity thieves could use. Don't list your home address or telephone number. It is a good idea to create a separate e-mail address that is used only with social media sites.

You Are Responsible for Your Actions

Each individual bears full responsibility for the material he or she posts on personal blogs or other social media. When you participate in social media, we urge you to do so properly, exercising sound judgment and common sense. You should be aware that because you are legally responsible for your postings, you may be subject to liability if your posts are found defamatory, harassing, or in violation of any other applicable law. You may also be liable if you make postings which include confidential or copyrighted information (music, videos, text, etc.)

belonging to third parties.

Be Conscious When Mixing Your Business and Personal Lives

Online, your personal and business personas are likely to intersect. TCT respects the free speech rights of all of its partners, but you must remember that customers, colleagues and supervisors often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded on. Remember NEVER to disclose non-public information of TCT (including confidential information), and be aware that taking public positions online that are counter to TCT' interests might cause conflict.

Respect Your Audience

Don't use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in TCT's community. You should also show proper consideration for others' privacy and for topics that may be considered sensitive —such as politics and religion.

Monitor Comments

Most people who maintain social media sites welcome comments— it builds credibility and community. However, if you come across positive or negative remarks about TCT that you believe are important, consider sharing them by forwarding them to [webmaster@thecommoditytraders.com](#).

Let The Experts Respond to Negative Posts

You may come across negative or disparaging posts about TCT, or see third parties trying to start negative conversations. Unless you are an official online spokesperson, avoid the temptation to react yourself. Pass the post(s) along to our official in-market spokespersons who are trained to address such comments, at [\[webmaster@thecommoditytraders.com\]](mailto:webmaster@thecommoditytraders.com).



SOCIAL MEDIA GUIDELINES WHEN POSTING ON BEHALF OF TCT

Just as with traditional media, we have an opportunity – and a responsibility – to effectively manage TCTs’ online reputation and to selectively engage and participate in the thousands of conversations that mention us every day. The following principles guide how our Official spokespersons should represent TCT when they are speaking on behalf of TCT The Commodity Traders.

While social media tools are changing the way we work and how we connect with the public and other companies, the TCT policies and practices for sharing information remain the same.

In addition to the general guidelines discussed above, when your creating or posting to a social media site on behalf of TCT you need to:

Seek Approval

All official TCT blogs, Facebook pages, Twitter accounts, etc. must be (1.) approved by the Board; (2.) published using the approved TCT blogging platform and tools; and (3.) administered by the Social Media Team. Each article or comment to be posted will be reviewed and approved by a member of the Social Media Team prior to posting. [This should be customized depending on how detailed the approval process will be.]

Be Trained

All partners, employees or interns, who wish to officially represent TCT online must receive their

manager’s authorization and complete the social media training program prior to beginning or continuing these activities.

Be Accurate - Know and Follow TCTs’ Conduct Guidelines

Make sure that you have all the facts before you post. It’s better to verify information with a source first than to have to post a correction or retraction later.

If you have any confusion about whether you ought to publish something online, chances are the Business and Ethical Conduct Guidelines will resolve it. Pay particular attention to what the Business and Ethical Conduct Guidelines have to say about proprietary information, about avoiding misrepresentation and about competing in the field. If, after checking the Business and Ethical Conduct Guidelines, you are still unclear as to the propriety of a post, it is best to refrain and seek the advice of management.

Be Transparent

If you are blogging about your work at TCT, use your real name, identify that you work for TCT, and be clear about your role. It is never acceptable to use aliases or otherwise deceive people. This disclosure is equally important for any agency/vendor/partner/third party who is representing TCT online. They must disclose that they work “with TCT.” If you have a vested interest in something you are discussing, be the first to point it out. Nothing about transparency changes your obligation to keep proprietary information and content confidential.

Be Timely

Assign an administrator who can regularly monitor postings and content. Aim for standard times for postings and updates. The recommended minimum frequency is once to twice a week. But be sure not to overload your updates. Followers will stop paying attention if you overload them with information.

Must Be Responsible

What you write is ultimately your responsibility.

Remember that each published post or response will become a TCT document that is subject to discovery in a lawsuit or a government investigation. As a result, don’t put anything in a

published post or response you wouldn’t put in an internal memo.

It is also critical that we keep records of our interactions in the social media space. Because online conversations are often fleeting and immediate, it is important for you to keep track of them when you’re officially representing TCT.

Participation in social computing on behalf of TCT is not a right but an opportunity, so please treat it seriously and with respect. If you want to participate on behalf of the company, be sure to abide by its standard practice guidelines.

Respect Others

As a TCT representative, it is important that your posts convey the same positive, optimistic spirit that TCT instills in all of its communications. Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the social media space not only reflects on you – it is a direct reflection on TCT.

Users are free to discuss topics and disagree with one another, but please be respectful of others’ opinions. You are more likely to achieve your goals if you are constructive and respectful while discussing a bad experience or disagreeing with a concept or person.

Be a Valued Member

TCTs’ brand is best represented by its people and everything you publish reflects upon it. Official Company blogs and social network accounts should be used in a way that adds value to TCTs’ business. If it helps you, your coworkers, our clients or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes

directly or indirectly to the improvement of TCTs’ products, processes and policies; if it builds a sense of community; or if it helps to promote the TCTs’ Mission, then it is adding value.

Be Thoughtful

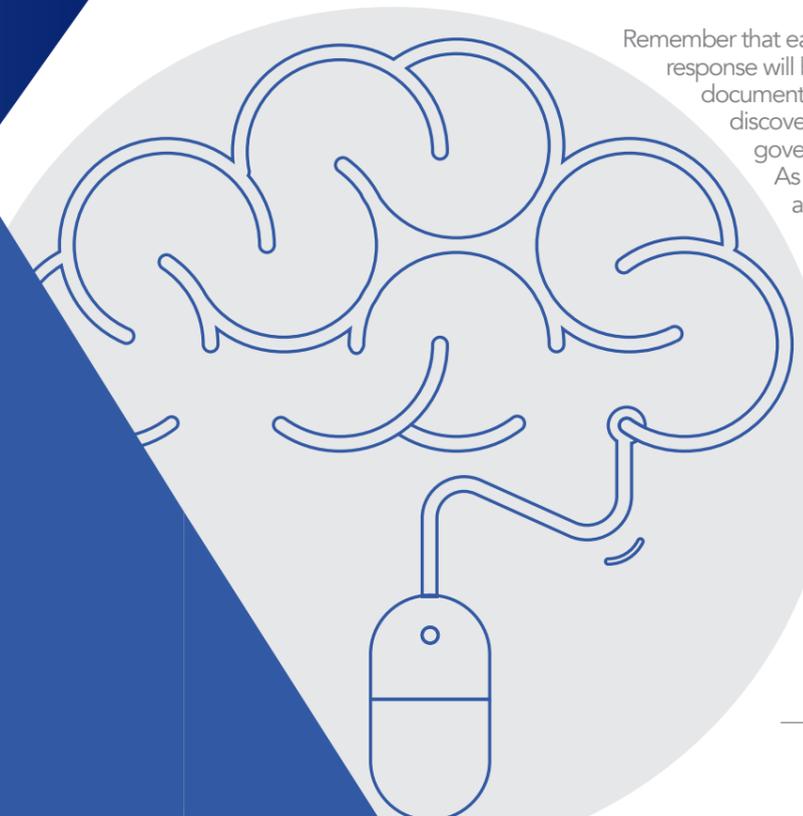
If you have any questions about whether it is appropriate to write about certain kinds of material in your role as a TCT employee, ask your supervisor before you post.

Use of The TCT Logo

If you create a social media site on behalf of the company, use simple graphics that represent the TCT brand. TCT’s [Marketing & Design](#) Team can provide guidance with graphics and design.

Protect TCTs’ Customers, Business Partners and Suppliers

Customers, partners or suppliers should not be cited or obviously referenced without their approval. You should also use great care in discussing confidential details of a business partnership or engagement of a vendor. If a client hasn’t given explicit permission for their name to be used, think carefully about the content you’re going to publish and get the appropriate permission where necessary. It is acceptable to discuss general details about kinds of projects and to use non-identifying pseudonyms for a client (e.g., Client 123) so long as the information provided does not make it easy for someone to identify the client or violate any non-disclosure or intellectual property agreements that may be in place with the client.



SOCIAL MEDIA GUIDELINES FOR MODERATING OFFICIAL TCT PLATFORMS

The policies below are designed to assist moderators of blog entries and social media posts to TCTs' official social media accounts. As a blog and social media post moderator, no post or comment will be published until you approve it. In general, if a post is consistent with the purpose of the blog and a comment is related to a post, and otherwise complies with TCT policies you should approve the blog entry or comment.

While we permit user participation, there are some guidelines we ask you to follow to help keep it safe for everyone. In addition, TCT has put in place automated controls to combat spam and malicious content. TCT does not endorse or take responsibility for content posted by third parties, referred to as user generated content. This includes text input and uploaded files (video, images, audio, executables, documents).

Know and understand TCT's Business and Ethical Conduct Guidelines, TCT's Online Public Communications Policy, and TCT's Media/Investor Inquiries Policy and Procedures

Official social media spoke persons will look to you for assistance in interpreting these policies so it is critical that you understand what they say and the rationales underlying the policies. If you have any questions, please contact the legal department.

In-House Training

All moderators should be trained regarding these social media policies, including their responsibilities to review content submitted for posting to ensure compliance with these policies.

Be Consistent

Be consistent with your review and your application of the standards for approving or rejecting a post or comment. The best way to avoid controversy and accusations of favoritism is to be consistent.

Balance The Online Dialogue

Try to keep a balanced dialogue. If the content is positive or negative and in context to the conversation, then we approve the content, regardless of whether it's favorable or unfavorable to TCT The Commodity Traders. But if the content is ugly, offensive, denigrating or completely out of context, you should reject the content.

Ensure That All Commenters Are Identified

Before approving any comment or post, confirm that the commenter has registered and clearly identifies himself or herself.

Links to Third Party Content

The linked content of any embedded hyperlinks within any posts or comments submitted for posting should be evaluated prior to posting. Any posted hyperlinks should be accompanied by a disclaimer stating that TCT does not guarantee the authenticity, accuracy, appropriateness or security of the linked web site or content. If you have any questions, please consult the legal department.



Evaluate the Content of The Blog Posting or Comment

Review the content of the blog posting or comment to ensure that the post or comment will not violate any copyright or trademark laws, does not disclose any proprietary or confidential TCT information that is inappropriate for the blog, and does not violate any of TCT's policies. If you have any questions as to whether content is permissible, please consult the legal department.

Don't Edit The Blog Posting or Comment

If a post or comment is incorrect or contains misspellings or other style mistakes, do not correct or edit the posting or comment. Return it to the author and ask the author to correct the posting or comment and resubmit it.

TCT Document

Remember that each post or comment will become a TCT document that is subject to discovery in a lawsuit or a government investigation. As a result, don't approve any post or comment that TCT wouldn't put in an internal memo or e-mail.

Use Your Best Judgment

Remember that there are always consequences to what is published. If a post makes you uncomfortable, particularly if you have concerns about whether the post unnecessarily discloses sensitive information or could have an impact on a partner or supplier, don't approve the blog post or comment.

SOCIAL MEDIA PLATFORMS

PLATFORMS TO CONSIDER as you build your social media presence.

The list below is by no means exhaustive but covers the most popular and tested networks for the oil and gas industry.

Facebook

A networking site with over 1 billion users. Users must register and create a personal profile. They can then add other users as “friends” and communicate via inbox messages, direct posts or comments. “Friends” receive notifications when other “friends” update their profiles. In addition, users may join or create common-interest groups, organized by workplace, and for example, can organize their “friends” into categories such as “people from work”. (www.facebook.com)

On TCT’s Facebook page, we aim to post relevant, interesting content and welcome your comments and suggestions. Although we encourage conversation and dialogue, we want to ensure a respectful environment for our customers, our associates, our future associates, our partners, our stakeholders and our prospects.

Twitter

A real-time information network that connects users to the latest stories, ideas, opinions and news about what they find interesting. It permits users to post information up to 140 characters long, which can include images, videos and conversations directly in Tweets to get the whole story at a glance, and all in one place. (www.twitter.com)

We use Twitter as a way to participate in conversations about our business, recruitment efforts and our industry. We may retweet news and links we believe are relevant to the work we do in the oil and gas industry and/or of interest to our followers. Tweets that we retweet do not imply endorsement on our part.

We will do our best to read all @replies and Direct Messages sent to us based on availability of our resources.

LinkedIn

A website with over 200 million professional members that offers features aimed at establishing professional networks, in order to exchange information, ideas and information about opportunities. (www.linkedin.com)

We use LinkedIn to share information about our Company and for recruitment efforts and may have more than one LinkedIn account. TCT may use its account(s) to connect with other LinkedIn users we believe are relevant to our industry and our company. This does not imply endorsement of any kind.

Instagram

More than 600 million people use Instagram every month. It’s the second-most popular social media network out there, after Facebook, and offers your business a trendy and hip platform to communicate with prospective customers and increase brand awareness.

We use Instagram to capture and share photos through our lens from around the world. (www.instagram.com)

About.me

The site offers registered users a simple platform from which to link multiple online identities, relevant external sites, and popular social networking websites such as Facebook, Twitter, etc...

We use About.me for our online profile service. For those members that are not computer savvy and can’t maneuver the internet easily, we’ve made it easy for you to have all our information all in one place. We have one official About.me account. (www.about.me)

Blog

A regularly updated website, usually maintained by an identified individual or organization, with regular posts of commentary, descriptions of events and other material, such as images or videos. Many blogs are interactive, which allows visitors to leave comments or send messages to each other. (www.blog.com)

Third-Party Sites

TCT strives to be a good social media citizen and will report any social media accounts that appear to be spam or bot-driven accounts. In addition to maintaining our own social media sites, TCT may subscribe or link to third-party websites and accounts we believe are relevant to our industry. This could include subscribing to the accounts and websites of companies and other commercial enterprises (and/or their employees) that comment and/or share videos and photos on industry-related matters. This does not imply endorsement of any kind.

TCT THE COMMODITY TRADERS SOCIAL MEDIA ACCOUNTS

The main TCT accounts are managed by the Media Relations Department and include:

Facebook

FB Page Name: TCT The Commodity Traders, BV
URL: www.facebook.com/tctrotterdam

Twitter

Twitter Handle: @tctrotterdam
URL: www.twitter.com/tctrotterdam

Instagram

IG Handle: TCTRotterdam
URL: www.instagram.com/tctrotterdam

About.me

Page Name: TCTRotterdam
URL: about.me/tctrotterdam

LinkedIn

Company Page Name: TCT The Commodity Traders, BV
URL: www.linkedin.com/company/the-commodity-traders



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Please direct all questions, comments, corrections or concerns to the media relations department.



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