

Answers to the written questions submitted by Hubert Mathet

The Management Board hereby makes available below the answers provided by the Supervisory Board to the written questions submitted by Mr Hubert Mathet on 3 June 2026, in accordance with Articles L. 225-108 and R. 225-84 of the French Commercial Code.

In view of the historical ties that existed between Rubis and Mr Bergene, can the Supervisory Board provide a comprehensive account of the following:

1. The dates on which Mr Bergene served as a member of Rubis SCA's Supervisory Board.

Mr Bergene served as a member of Rubis' Supervisory Board during two separate periods:

- a first period from June 2000 to June 2015, during which he held five consecutive terms of office; and
- a second period beginning at the Shareholders' Meeting of 10 June 2021, at which his appointment was approved by more than 99.723% of the votes cast.

As part of that term of office, Mr Bergene was appointed member and Chairman of the Audit and CSR Committee, as well as member of the Compensation, Appointments and Governance Committee. He was then unanimously elected Chairman of the Supervisory Board on 27 July 2023 and held that position until his resignation on 15 May 2025;

2. The effective dates and termination dates of the various contracts entered into between Nitrogas/Mr Bergene and certain suppliers of Rubis SCA.

3. All business, financial, commercial or contractual relationships that existed directly or indirectly, or that existed during the years in which Rubis SCA maintained an ongoing relationship with Mr Bergene or companies related to him.

4. The corresponding financial amounts, the goods or services involved, the terms on which those transactions were entered into and the procedures used to ensure that they were carried out on arm's length terms.

Questions 2 to 4 are closely related and therefore call for a single answer.

As a preliminary point, the Supervisory Board notes that, based on the information available to it and the verifications carried out in this respect, no direct contractual relationship and no financial flows have been identified between the Rubis Group, on the one hand, and Nitrogas (a company 50%-owned by Mr Bergene) or Mr Bergene, on the other hand, with the exception of two sector-specific assignments carried out on behalf of Rubis subsidiaries in 2013 and 2016. These assignments were not financially material and did not form part of an ongoing business relationship.

As regards the relationships between Nitrogas and certain suppliers of the Rubis Group, which were mainly established and developed before Mr Bergene's return to the Supervisory Board in 2021, and whose performance continued only residually under pre-existing contracts, the Supervisory Board points out that these were relationships in which Nitrogas acted as a broker (particularly in relation to vessel chartering or acquisition) on behalf of third-party commercial counterparties of the Rubis Group.

Accordingly, the Supervisory Board does not have information relating to those relationships, to which neither Rubis nor its subsidiaries were party. It also points out that Mr Bergene exercised no decision-making power and no influence over the transactions concerned in the performance of his duties within Rubis. No information brought to the Board's attention suggests that those transactions were not carried out on normal market terms or that they gave rise to any exclusivity whatsoever.

5. Any situations involving conflicts of interest identified in connection with the aforementioned contracts.

Following the in-depth legal analysis conducted by its legal counsel, the Supervisory Board reviewed any potential conflicts of interest that might arise from the relationships between Mr Bergene and the Rubis Group.

That review led the Supervisory Board, by majority of its members, to consider that no characterised conflict of interest could be identified: no direct contractual relationship (other than the two above-mentioned historical, isolated and non-material sector analyses), no economic dependence and no power to influence the Group's transactions were identified. Likewise, the Supervisory Board did not identify any related-party agreement requiring specific disclosure or approval under the applicable legal and regulatory provisions.

6. The specific measures taken by the Supervisory Board to ensure the independence of its decisions and to protect the interests of all minority shareholders in connection with these relationships.

As a preliminary point, it is recalled that the Supervisory Board is composed entirely of members regarded as independent under the criteria of the Afep-Medef Code. With the assistance of its specialised Committees and, where appropriate, independent external advisers (lawyers, executive search firms or other specialised advisers), the Supervisory Board has established procedures, notably regarding the assessment of the independence of its members, and ensures that those procedures are applied.

The Supervisory Board also continuously pursues the strengthening of its governance practices in order to ensure the independence of its decisions and due consideration of the interests of all shareholders.

To that end, the Supervisory Board has initiated a review of its procedures for the selection, appointment and monitoring of Board members, in order to provide a better framework for identifying, reviewing and documenting any contractual, professional or financial relationships that may exist with companies connected with Rubis' businesses.

This approach is intended in particular to enhance the transparency of the analyses conducted by the Supervisory Board and to ensure a consistent assessment of situations likely to raise independence issues.

Does the Supervisory Board consider that the information publicly disclosed to date regarding the relationships between Rubis and Nitrogas/Mr Bergene enables shareholders fully to assess the related financial, strategic and governance issues?

In the context of its ongoing supervisory role over management, and in the interests of all shareholders, the Supervisory Board carried out an in-depth review of Mr Bergene's situation, particularly in light of the applicable independence criteria. On the basis of that review, it considered, by majority of its members, that the useful and relevant information for shareholders' assessment had been brought to their attention in due course. As previously indicated, the Supervisory Board intends to strengthen its procedures for the selection, appointment and monitoring of its members in order to provide a better framework for identifying and reviewing relationships connected with Rubis' businesses.