



ACT

THE BIOMETHANE FAQ

A practical guide to
cutting Scope 1 emissions
with confidence

ACT ON IT.

Index.



01. [What Is Biomethane and How Is It Generated?](#)

02. [What Are Feedstocks?](#)

03. [Biomethane Certificates: What Are Guarantees of Origin \(GoOs\) and How Does It Work?](#)

04. [The Difference Between Guarantees of Origin and Sustainability Certificates](#)

05. [What You Need to Know About the EU Regulatory & Policy Landscape](#)

06. [What Are the Opportunities for Cross Border Trade of Biomethane Within Europe?](#)

07. [What Factors Are Driving Corporate Demand for Biomethane?](#)

08. [What Factors Determine the Price of Biomethane?](#)

09. [How Biomethane Can Support Your Organization's Net-Zero Strategy](#)

10. [What Role Does ACT Play in Simplifying Biomethane Procurement?](#)

11. [How ACT Can Help You Navigate the Biomethane Market With Confidence](#)

12. [What Are the Next Steps?](#)

01.

What Is Biomethane and How Is It Generated?

Both biogas and biomethane are renewable gases that help abate emissions across the entire value chain.

Their use is essential to accelerate the reduction of GHG emissions in energy intensive sectors such as building construction, industry, transport, and agriculture.

In most cases, the deployment of biomethane to replace fossil fuels does not require the investment of additional resources to develop new infrastructure. The existing gas infrastructure is biomethane-ready. This is key to ramping up decarbonization and providing affordable renewable energy for consumers.

Let's take a closer look at biogas and biomethane.





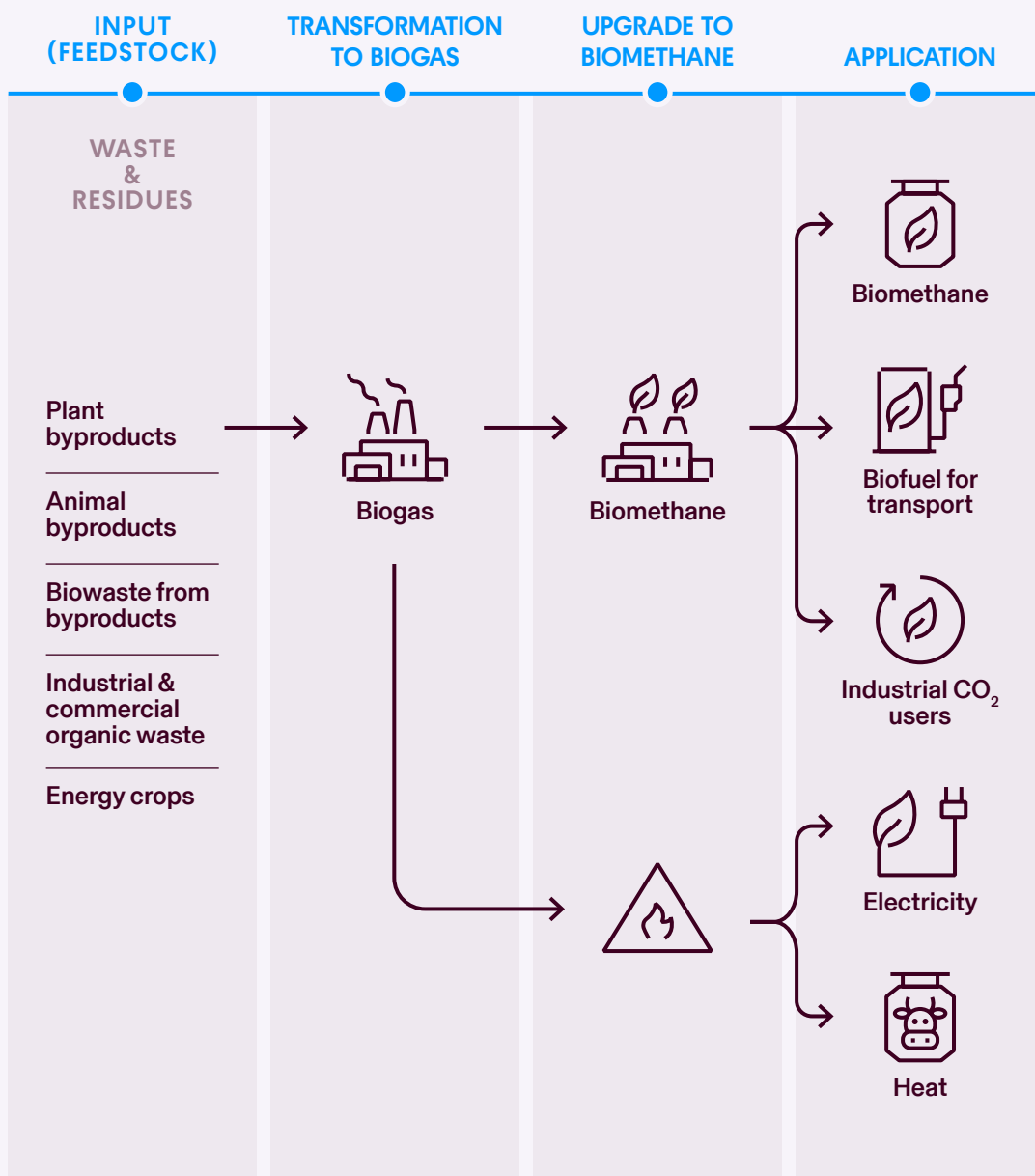
Biogas

Biogas is generated through the anaerobic decomposition of organic materials — known as feedstocks — inside a Biogas digester, where a variety of bacteria facilitate the breakdown of organic matter. The result is a renewable gas that can be utilized for various applications, including generating renewable electricity and providing heating.

Biomethane

Biomethane is derived from the refinement and purification of Biogas in a process known as upgrading, wherein impurities such as CO_2 , H_2O , H_2 , S , and others are eliminated, resulting in a high caloric, pure gas.

This purified form of Biogas can be used as a natural gas substitute and can be seamlessly integrated into the gas grid. Biomethane finds application as a vehicle fuel, as feedstock in some industries, and can be utilized for combined heat and electricity generation, just like Biogas.



What Are Feedstocks?

Biomethane facilities use a variety of feedstocks. Feedstocks comprise of organic materials including: organic materials such as crops, agricultural residues, animal manure, and organic waste.

Biomethane's exact carbon intensity and lifecycle emissions are dictated by the type of feedstocks used to create it. This is due to the nature of how different feedstocks are produced.

For example, Biomethane produced from feedstock that utilizes 100% waste materials, minimizes land use changes and avoids heavy use of fertilizers and pesticides. As such, waste feedstocks have lower carbon intensity compared to energy crops cultivated specifically for bioenergy purposes.

In practice, facilities produce Biomethane using a mixture of feedstocks and can be grouped into three main categories:

CATEGORY 1 Waste/Residues

Biomethane in this category is produced by facilities that exclusively use waste as the input feedstock. Common waste sources include livestock waste (manure and slurry), municipal waste, and/or food and beverage waste.

CATEGORY 2 Waste/Crops

Biomethane in this category is produced by facilities that use a mixture of waste and intermediate crops as input feedstock. Intermediate crops do not compete with food production and are used to improve soil health through crop rotation in between seasons for other crops.

While some facilities in Europe still operate on energy crops, the existing regulations do not favor this practice, leading to a downward trend. Since 2017, there has been a noticeable decline, with very few new plants established to run on monocrops.

CATEGORY 3 All Other Feedstocks

Biomethane in this category is produced by facilities that use a mixture of waste, where there are certain limitations to biomethane derived from food and feed crop under RED II. These crops may or may not compete with food production and are not approved under REDII.

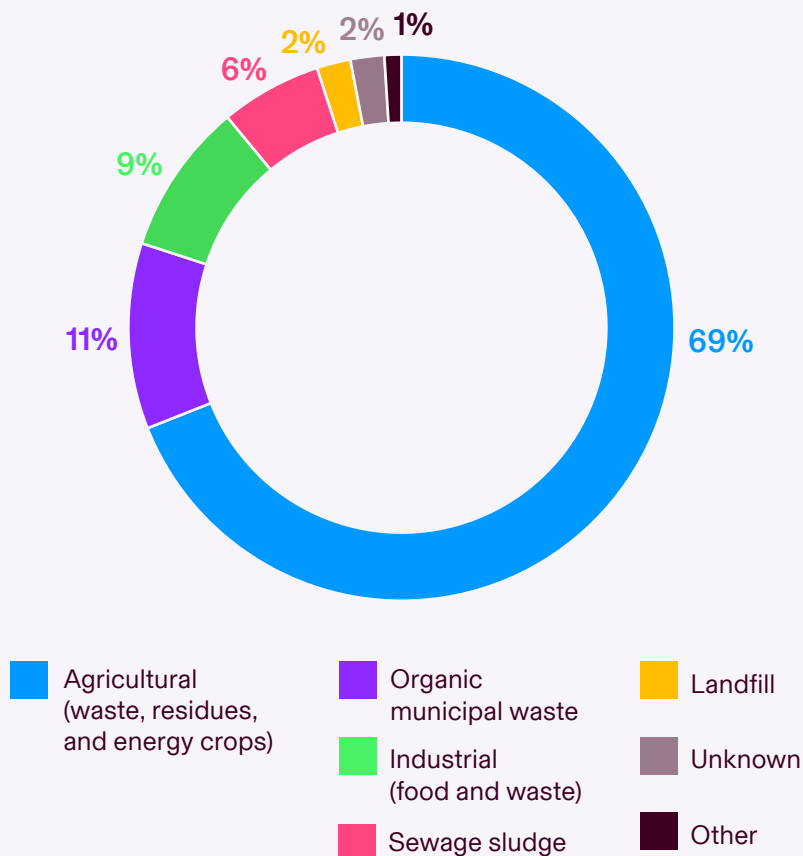




European Biomethane Supply Per Feedstock Type

The primary feedstock types for Biogas and Biomethane facilities in Europe are derived from agriculture. However, different countries have different regulations and feedstock sources can vary greatly. For example, while 70% of French Biomethane comes from agricultural residues, roughly 80% of German Biomethane comes from energy crops, and around half of the UK's production comes from waste/residue.

Source: EBA Statistical Report 2022





03.

Biomethane Certificates: What Are Guarantees of Origin (GoOs) and How Do They Work?

Biomethane

Biomethane is injected into a shared gas pipeline network and mixed with natural gas. For this reason, GoO certificates are the only way to prove renewable gas traceability.

Guarantees of Origin

GoO certificates are an unbundled approach that proves that biomethane has been injected into the grid on a specific date, indicating validity for a certain period of time (typically 12 months). A GoO can be traded and canceled upon consumption. After this point, the GoO is considered redeemed. This is important principle to ensure double counting has not occurred.

Biomethane Injection

Biomethane must meet the quality standards required for injection into the natural gas grid. Typically, the gas transmission system operator (TSO) will install the metering facilities to ensure safe biomethane injections.

Measurement and Tracking

Biomethane producers install measurement and tracking systems to monitor the quantity and quality of Biomethane injected into the grid, where it mixes with the natural gas supply.

Issuance of GoOs

Once a Biomethane producer is certified, Biomethane certificates are issued for the Biomethane they produce. Each GoO represents one megawatt hour (MWh) of Biomethane injected into the grid and contains information about its source, production date, and environmental impact.*

*Generally, the European Biomethane certificates are valid for one year except for UK Renewable Gas Guarantees of Origin (RGGOs) where validation lasts for three years and three months.

Transactions

GoOs can be traded between market participants including producers, traders and end-consumers. The market for GoOs happens over-the-counter, meaning that buyers and sellers contact each other directly to transact. A GoO can be traded multiple times before it is consumed. **When the end-user consumes the GoO, the certificate is deemed canceled and cannot be traded or consumed thereafter.**

04.

The Difference Between Guarantees of Origin and Sustainability Certificates

WHAT YOU SHOULD KNOW

While a Guarantee of Origin certificate focuses specifically on verifying the renewable origin of energy, a Proof of Sustainability (PoS) certificate is a broader certification. It encompasses sustainability aspects beyond just the source of energy, and is often implemented in the context of adhering to compliance criteria. The specific use and requirements for each certificate may vary depending on the context and the goals of the certification process.

FOR EXAMPLE

The Fuel Quality Directive (2009/30/EC) plays a pivotal role in regulating fuel specifications and establishing mandatory greenhouse gas (GHG) emission reduction targets for fuel suppliers in the transportation sector. To achieve these targets, the directive emphasizes the use of Biomethane, biofuels, and alternative fuels that meet the criteria outlined in the Renewable Energy Directive (2018/2001/EU (RED II)). The PoS certification emerges as a crucial element in this process, serving as a key requirement for demonstrating the sustainability of delivered biofuels.

The link between GoOs and PoS in the transport sector thus establishes a transparent and accountable system that aligns with the EU's broader goals of fostering sustainability and reducing greenhouse gas emissions in the transportation industry.

NOTE

It's important to check with specific Biomethane certification schemes, industry standards, or relevant authorities for the most accurate and up-to-date information. Certification processes and criteria can vary, as new developments occur in the sustainability certification landscape.



Guarantee of Origin (GoO)

Proof of Sustainability (PoS)

WHAT IS THEIR PURPOSE?

Disclosure of the renewable attributes of Biomethane to the end-consumer, relevant to Article 19 of RED II.

Proof of Sustainability certificates demonstrate compliance with the RED II sustainability criteria of renewable Biomethane (Articles 25-30). They are certificates issued under voluntary schemes recognized by the European Commission, such as ISCC and REDcert.

WHAT DO THEY DOCUMENT?

Origin and production facility details, time of production, exclusion of double disclosure/ sale via audit, operational date of the facility (or commissioning date), technology, and state support scheme. Some of them also document the feedstock and final carbon intensity of the gas.

The certificates include detailed information about production methods, such as the source of feedstock, the quantity of Biomethane produced, greenhouse gas emissions savings, and details of all the steps in the Biomethane value chain.

USAGE

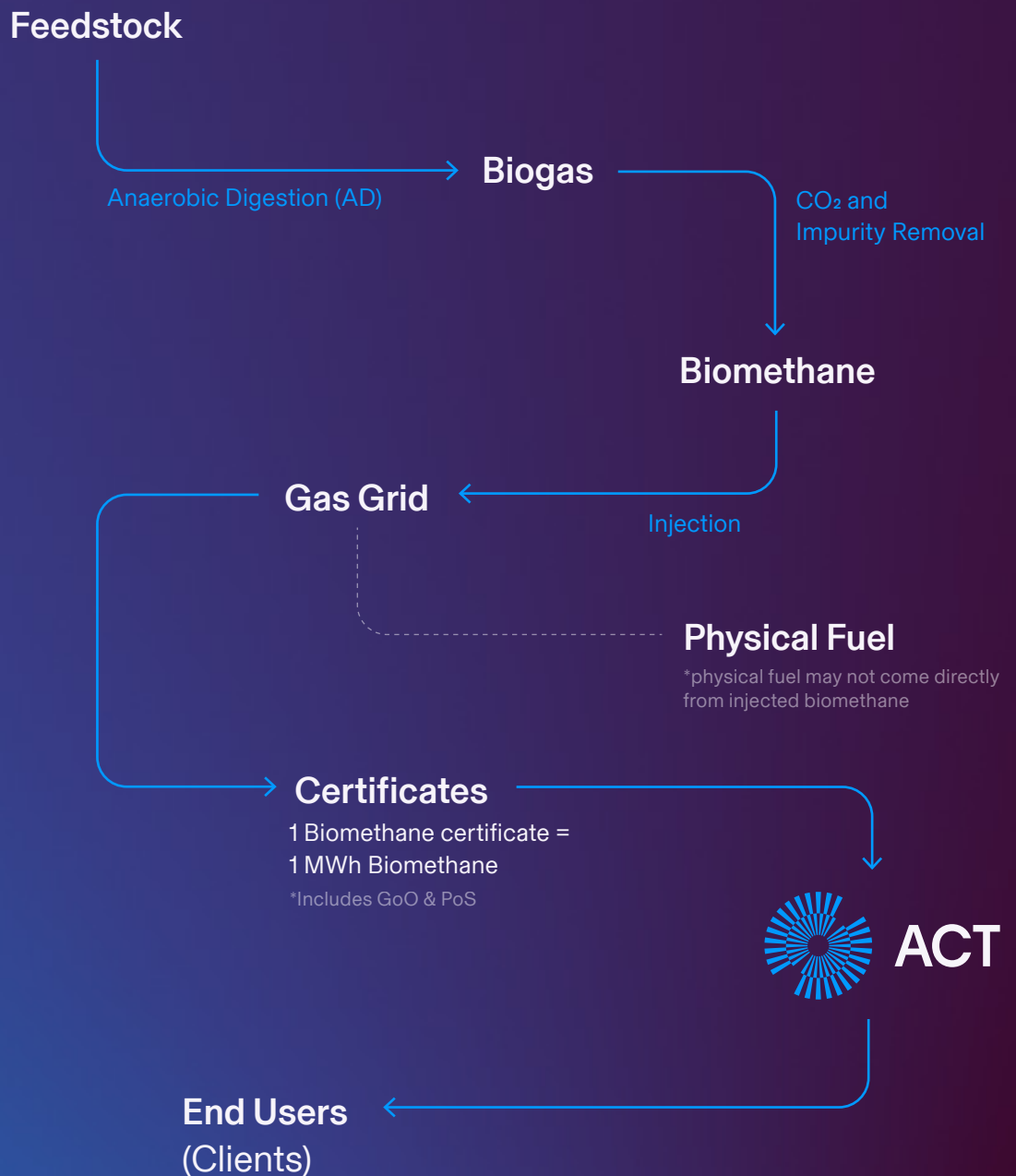
Used primarily by voluntary buyers that have Scope 1 sustainability targets. By purchasing GoOs, your organization can claim the corresponding volume represented in MWh as renewable gas usage. The GoOs must then be canceled by the corresponding registry, which ACT can handle on behalf of your organization. Once a GoO has been properly canceled, your organization can claim, disclose, and communicate its use.

Organizations that need to demonstrate compliance RED II criteria, or want detailed data on lifecycle emissions, carbon intensity, and feedstock, can purchase Proof of Sustainability.

Purchase via a contract or possession of a GoO from a National Issuing Body is also required to prove the traceability, or no double counting, of the biomethane.



The Biomethane Offtake Process



05.

What You Need to Know About the EU Regulatory & Policy Landscape

The Biomethane industry is still relatively young compared to other renewable energy sectors.

Although there are ongoing global efforts to develop and implement certification and quality standards for Biomethane, there are multiple barriers that have an impact on the development of Biomethane production plants, as well as standardizing certification schemes at national and international levels.

In the EU, efforts have been made over the years to establish consistent standards for renewable gases. Key initiatives that shed light on the current regulatory framework in Europe include the following:

2018

EU Renewables Energy Directive (RED II) — Introduction of GoOs

Once biogas is produced, it is typically purified into biomethane to meet the quality standards required for injection into the natural gas grid.

2022

RePowerEU — 35 billion cubic meters by 2030

In response to the European energy crisis caused by over-dependence on imported natural gas, the European Commission significantly expanded its biomethane capacity target in 2022 to 35 bcm* by 2030. This is equivalent to roughly 10x the current annual EU Biomethane production.

*35 bcm is a non-binding target

2023

RED III — Increased renewable energy targets for EU

The newly adopted Renewables Energy Directive raises the share of renewable energy in the EU's overall energy consumption from 32% to 42.5%. Member states will contribute to achieving more ambitious targets in sectors where the RE adoption has been slower. For transportation specifically, countries can choose between a target of 29% share of renewables or a 14.5% reduction in GHG intensity by 2030. The new rules also establish a 5.5% share of advanced biofuels supplied to this sector by 2030.

EU MEMBER STATE SUPPORT SCHEMES

Different countries have different regulations, incentives, and subsidies for Biogas and Biomethane. These local factors play a significant role in how the price is determined.



06.

What Are the Opportunities For Cross Border Trade of Biomethane Within Europe?

Despite the efforts of stakeholders and governmental bodies, there is not yet a common European renewable gas market, and Biomethane is not yet solidly integrated into national gas markets.

To reach these goals effectively, market initiatives in the private sector work to facilitate effective cross-border Biomethane trade.

European Renewable Gas Registry (ERGaR)

The ERGaR Certificates of Origin (CoO) Scheme and the AIB EECS Gas Scheme provide the technical requirements for cross-border transfers of Biomethane. The ERGaR CoO Scheme has been facilitating the cross-border trade of Biomethane since 2021 and is operated by the European Renewable Gas Registry. In the first quarter of 2024, the amount of Biomethane transferred via the ERGaR CoO scheme reached 723 GWh, almost doubling the amount from the previous quarter.

Association of Issuing Bodies (AIB)

The Association of Issuing Bodies (AIB) seeks to bring together European organizations responsible for energy attribute tracking systems across all energy carriers and technologies. In pursuit of a dependable and secure international Guarantee of Origin (GoO) system, the AIB has formulated a standardized framework known as the European Energy Certificate System (EECS). This system establishes common principles and operational rules. To optimize cross-border transfers, particularly as volumes increase, and to guarantee the reliability of such transfers, it is essential to harmonize additional details. The EECS plays a pivotal role in streamlining these details while remaining adaptable to evolving circumstances, fostering consensus among issuing bodies.



07.

What Factors Are Driving Corporate Demand for Biomethane?

European energy independence

The European Commission has made EU energy independence from imports a clear and immediate priority and has identified Biomethane as a critical component as part of the REPowerEU Plan to respond to the energy crisis.



Biomethane is an essential product for businesses taking climate action as its effectiveness and use are recognized and encouraged by targetsetting initiatives and GHG reporting standards.

Science-based climate action targets

Thousands of global companies choose to align with the Science Based Targets initiative (SBTi), which provides a framework for setting climate targets in line with the Paris Agreement and aligns with guidance proposed by the GHG Protocol. While there isn't a section specifically dedicated to biomethane, its use and accounting fall under the broader principles and methodologies outlined in these frameworks.

Technological advancements

Advances in Biomethane production technologies have made the process more efficient and cost-effective. Innovations in anaerobic digestion and Biogas upgrading techniques have lowered production costs, making Biomethane a viable and competitive energy option for businesses.



08.

What Factors Determine the Price of Biomethane?

The price of Biomethane is determined by a combination of factors, similar to the pricing of other energy commodities.

These factors can vary by region and market dynamics, but generally include:

Subsidy Schemes

One of the factors that plays a major role in the pricing of Biomethane is the existence of subsidy schemes — or lack thereof. Different countries have different regulations, incentives, and subsidies for Biomethane. These local factors play a significant role in how the price is determined.

Market Demand

The level of demand for Biogas and Biomethane in various sectors, such as energy generation, heating, cooling, and transportation, can influence pricing. Higher demand often corresponds to higher prices.

Feedstock

Different input feedstocks require different processes to create Biogas and therefore might be more costly than others as a base source material. For example, agricultural residues and food waste are typically abundant and tend to have a lower impact on production costs. Additionally, some Biogas source feedstocks are not from sustainable or circular sources, and feedstocks sourced from waste streams are viewed more favorably than those that require dedicated land use. Lastly, factors such as the energy content of the feedstock, or whether they fall under regulatory incentives also play a role.

Certification

There are many certification organizations for the production of Biogas and Biomethane that can vary by region or country, and there are both private and government certification schemes, including sustainability certifications (PoS). Not all certification schemes are held to the same level of scrutiny and can be more or less rigorous depending on national requirements.

Vintage

Each certificate has a date of creation. The market values creation date differently, so certificates from different years will be valued differently.

It should be noted that Biomethane is still a relatively young environmental commodity and the market is still taking shape, which plays a significant factor in the pricing of Biomethane.





09.

What Factors Determine the Price of Biomethane?

In addition to reducing Scope 1 emissions, purchasing Biomethane offers several compelling advantages for your organization that align with environmental, economic, and social considerations.

Here are the key reasons why your organization should consider buying Biomethane:

TO HIT SUSTAINABILITY TARGETS & MEET REGULATORY OBLIGATIONS

Organizations can mitigate their GHG emissions that stem from natural gas consumption by purchasing Biomethane certificates or Biomethane fuels. This can help them hit their climate action targets, meet regulatory compliance obligations, and increase energy resilience within their operations.

TO STAY COMPETITIVE

Consumers, investors, and the public increasingly prioritize supporting organizations that are working hard to reduce their emissions and contribute to a more sustainable world. Your organization can gain a competitive advantage and become an environmental leader in your sector by sourcing renewable natural gas via Biomethane certificates as they provide concrete proof of your decarbonization efforts to all your stakeholders.

TO TAKE TRANSPARENT CLIMATE ACTION

GoOs enable your organization to trace the origins of its energy consumption and prove its renewable attributes through various tracking standards. GoO issuers verify energy origin and register 1 GoO for each MWh produced by vetted renewable gas suppliers.



Voluntary Framework Guidance



GREENHOUSE
GAS PROTOCOL

The Greenhouse Gas Protocol's Scope 2 Guidance previously included a provision that allowed its EAC criteria to be applied to Scope 1. However, this provision was removed in 2019. Since then, the decision regarding the applicability of biomethane certificates for Scope 1 reductions has been left to the discretion of companies and their sustainability auditors. As a result, companies have the autonomy to determine their own sustainability approaches.* New draft guidance on market-based solutions is expected in Q4 2025.

"In the absence of guidance, companies purchasing certificates may wish to consult with their auditors and consider rules provided by relevant target-setting programs or applicable regulatory schemes in their jurisdiction(s) on how to report these purchases in their reports, while ensuring full transparency and following all GHG accounting and reporting principles."

(GHGP's interim guidance)



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

"The SBTi currently recommends that companies follow the guidance within the GHG Protocol Corporate Standard on the use of green gas."

(SBTi's Corporate Net-Zero Standard)



GHGP recommends adhering to the relevant target-setting programs (as mentioned above). The Carbon Disclosure Project (CDP) offers fundamental guidance on this matter.

When gas is sourced from a shared pipeline network with multiple sources including both renewable and non-renewable sources, certificates are required to demonstrate the renewable origin of gas.

(Reporting Questionnaire)

For additional information please refer to "Interim Update on Accounting for Biomethane Certificates" GHG Protocol, August 2023. CDP aligns with the GHG Protocol, so the reporting guidelines for Biomethane may change following the publishing of the updated Land Sector and Removals Guidance.



10.

What Role Does ACT Play in Simplifying Biomethane Procurement?

Backed by deep market expertise and an extensive network of Biomethane producers across Europe, we can tailor procurement strategies to your sustainability targets, technical requirements, and budget.

SHORT-TERM

Spot Purchasing

We assess your organization's needs and find a solution (physical delivery, certificates, and/or mass-balancing requirements).

In certain countries, Biomethane certificates can be used to fulfill EU-ETS compliance requirements.

MID-TERM

Production Offtakes

We can match you with a Biomethane production facility to structure a multi-year fixed price agreement for sourcing Biomethane. Depending on the transaction structure it can include physical delivery and/or certificates.

Purchasing full or partial offtakes of future production from specific Biomethane facilities is a high-quality alternative to purchasing fixed volumes of already produced Biogas.

This alternative gives you better visibility to the source of the Biomethane, which allows for more quality control. Additionally, forward purchases help Biomethane plants plan long-term production and invest in expansion.

LONG-TERM

Gas Purchase Agreements

We can help structure a legal agreement between you, a buyer, and a seller, a Biomethane facility developer.

In exchange, the buyer receives Biomethane (physical or certificates) for every MWh of energy produced.

GPA's are long-term contracts, typically spanning 10-15 years and these contracts are backed by the buyer's credit.

The agreement establishes a fixed price at which the buyer agrees to buy Biomethane from the new Biomethane facility or upgraded Biogas facility project.

This purchasing strategy gives you ownership over your renewable gas supply and long-term budget visibility.



We provide another route to market for organizations looking to purchase Biomethane.

Bundled Procurement

When a Biomethane GoO and physical gas are traded in the same contract, we refer to this as a bundled GoO contract, or green tariff.

Grey Gas from a non-renewable source is coupled with GoOs from a renewable source directly within the supply contract with the end consumer. A common misconception is that green tariffs provide GoOs and gas from the same underlying asset. Only when GoOs are purchased through a Gas Purchase Agreement (GPA), or when explicitly stated by the energy supplier, can the source of the GoO be traced to the same origin as the underlying gas. However, long-term green gas offtakes are still a developing market.

- + A single contract for physical gas & GoOs
- Less transparency on characteristics of GoOs (feedstock, vintage, etc.)
- High reliance on energy supplier for providing competitive GoO pricing and visibility on market opportunities

Unbundled Procurement

When a GoO and physical gas are traded in separate contracts, we refer to this as an unbundled GoO contract. The end consumer can maintain their physical gas contract with the gas supplier and separately match the contract with an equivalent number of GoOs from a third-party.

This unbundled procurement removes the reliance on energy/utility suppliers for green credentials, creating a bespoke Biomethane procurement process with a transparent understanding of the sourcing market and generating assets.

- + More transparency on the characteristics of GoOs for reporting emission reductions in accordance with CDP/SBTi/RE100, as well as market factors/arbitrage in the relevant sourcing country
- + Access to all GoO market sellers to ensure competitive pricing
- Two separate contractual entities for the physical gas & GoOs





11.

How ACT Can Help You Navigate the Biomethane Market **With Confidence**

Global Presence, Local Reach

Our dedicated sales team of 60+ experts is here to support you, with trusted relationships across Europe's Biomethane industry. We speak your language, with native speakers across all key markets, ensuring smooth, efficient negotiations. Plus, our extensive network for physical flows and mass balancing means we're ready to help you validate quotes and secure the best pricing options to meet your needs.

Infrastructure & Administrative Support

Rely on us for seamless Biomethane administration, backed by our expertise, experience, and robust infrastructure. Our Sustainability Compliance department specializes in major European sustainability certification schemes across all energy sectors, ensuring you have the support you need to navigate compliance with confidence.

Policy & Trend Tracking

Our Research & Development team actively supports lobbying efforts and keeps you informed about regulatory changes in the European market, ensuring you stay up-to-date and ahead of industry shifts.

With our extensive experience in the unsubsidized Biomethane market, local schemes, and the Bioticket market, we offer you valuable insights into competitive trends, helping you make informed, strategic decisions.

13+

years experience in
Biomethane markets

9,000+

clients worldwide
(and growing)

100+

dedicated Biomethane
market experts



12.

What Are the Next Steps?

Understanding & Discovery

ACT experts will meet with your organization to address any remaining questions you may have and begin discussions regarding your unique needs and wants.

ONLINE MEETING

1

Indicative Proposal

Upon onboarding of your organization, ACT can create and share a tailor-made proposal with indicative prices, and together, we discuss any questions or feedback you may have.

E-MAIL

3

Firm Proposal

Once all of your organization's requirements are agreed upon, ACT will provide a firm proposal with volumes and prices.

E-MAIL

5

Contract

ACT will send your organization a contract.

DIGITAL DOCUMENT

7

Communicate Requirements

Your organization gathers and shares information with ACT detailing your preferences regarding specific needs and requirements, including preferred country of origin, approximate consumption, and timelines to ACT.

E-MAIL

2

Finalize Requirements

Together, we will discuss the proposal and address any questions or hear any feedback you might have.

ONLINE MEETING

4

Transaction Confirmation

After all your organization's requirements are met, and all parties agree, ACT will source Biomethane in your required volumes.

E-MAIL

6

Delivery

ACT handles the administration for your organization to ensure the certificates are correctly delivered and canceled on your behalf. To support your communication efforts, we provide a symbolic certificate noting your purchase.

8



We Are ACT

ACT develops and provides comprehensive and innovative environmental solutions that empower businesses globally to act on and achieve their environmental goals efficiently and transparently – no matter how ambitious.

Through solution discovery, optimized procurement strategies, environmental project development services, innovative digital decarbonization solutions, and physical environmental products, ACT simplifies and streamlines its clients' decarbonization process.

Since 2009, over 9,000 clients have chosen ACT as their strategic decarbonization partner, leveraging their extensive global environmental regulation, market, standard, product, and technical expertise to deliver the results they need to hit their targets.

The exception: ACT Financial Solutions. As an MFID-II licensed investment firm, they have special legal requirements they must comply with, affecting the language we can use while speaking for them or about them. Therefore, when discussing their offering, we distinguish between ACT and ACT Financial Solutions. If you are required to refer to or speak as ACT Financial Solutions, you must be briefed further.

Our History, Milestones & Growth

2009

ACT is founded

ACT is founded as one of the first players in the EU Emissions Trading System (EU ETS) market. Clients hit environmental targets, we start driving impactful and sustainable change.

2010

Entry into Energy Efficiency

Our clients achieve environmental and regulatory compliance through our suite of energy efficiency solutions.

2014

Opening of New York office

We begin providing regionalized solutions to clients based in North America.

2018

Opening of Shanghai office

Local environmental solutions can now be provided from a new office in Shanghai.

Introduction of ACT Financial Solutions

ACT opens a dedicated firm focused on regulated financial products under MiFID II.

2019

Opening of Paris office

ACT establishes an office in France, dedicated to energy efficiency project development and CEE white certificates.

2021

Bridgepoint becomes a partner

ACT welcomes Bridgepoint as a minority investor, valuing the company at over US\$ 1 billion.

2022

Opening of Singapore office

ACT expands to better provide environmental solutions to the APAC region.

Offering climate action projects as a service

We begin designing and developing high-impact carbon emissions reduction and removal projects to amplify our impact and better serve our partners.

2023

Acquired Green Project Technologies

We expand our offering to help clients calculate, manage, and disclose their emissions more efficiently, optimizing their environmental goals.

2024

Opening of London & Tokyo offices

ACT establishes a London office to better support clients participating in the UK ETS, and an office in Tokyo to help clients in Japan hit their environmental targets more efficiently.

ACT Commodities becomes ACT Group

ACT Commodities rebrands to ACT Group, to better reflect the wide scope of products and solutions we offer clients.

2025

Launch of new website

Our improved, user-friendly ACT Group website goes live, making it easier than ever for clients to access global environmental solutions.

Opening of Madrid & Miami offices

A new office in Miami improves access to the LATAM region, with the Madrid office extending client-focused environmental solutions to the surrounding region.



We believe sustainability should be actionable and achievable. That's why we give every organization the tools to act on their environmental goals.

This is our ambition. What's yours?
ACT ON IT.



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