

Anti-Bribery and Corruption Policy

Agora Prime Metals Trading FZCO | Version 1.0

Agora Prime Metals Trading FZCO conducts its business honestly and transparently. We operate a zero-tolerance approach to bribery and corruption in every market we trade in and every relationship we enter into. This position is set by our Board of Directors, applies without exception, and is not open to commercial negotiation.

Who this applies to

Our Anti-Bribery and Corruption Policy binds every director, officer, employee and contracted member of staff. It also extends, through our contracts, to the agents, brokers, suppliers, consultants, joint venture partners and other third parties who act for us or alongside us. We expect the same standards from those we do business with as we hold ourselves to.

What we prohibit

- Offering, promising, giving, soliciting or accepting a bribe of any kind, whether involving a public official or a private counterparty, and whether given directly or through an intermediary.
- Facilitation payments — small unofficial payments made to speed up routine administrative processes. We do not make them, and we do not permit others to make them on our behalf.
- Kickbacks, secret commissions and any arrangement under which part of a contractual payment is quietly returned in exchange for preferential treatment.
- False, incomplete or misleading records. Every transaction we undertake is documented accurately and is capable of withstanding audit.

Gifts, hospitality and conflicts of interest

We recognise that courtesy and hospitality have a legitimate place in business, particularly in the region in which we operate. Gifts and hospitality are permitted only where they are modest, transparent, properly recorded and clearly unconnected to any business decision. Cash and cash equivalents, lavish entertainment, and anything offered during a live tender or contract negotiation are not permitted. Employees are required to disclose any personal, financial or family interest that could interfere — or appear to interfere — with their duty to the Company, and to step back from decisions where such an interest exists.

Assessing risk and knowing our counterparties

We carry out a formal bribery and corruption risk assessment at least annually, and again whenever we enter a new market, restructure our supply chain or form a significant partnership. Before we engage a third party we conduct risk-based due diligence covering ownership and beneficial ownership, sanctions and watchlist screening, past conduct and financial standing. Our contracts contain anti-bribery undertakings and, in higher-risk arrangements, audit rights. Where serious concerns arise, we are prepared to decline or end the relationship.

Raising a concern

Anyone — including employees, contractors, suppliers and other external parties — may report a suspected breach in confidence through our reporting channels or by contacting the Compliance function directly. Reports made in good faith are protected: we do not tolerate retaliation in any form against a person who speaks up. Every credible report is assessed promptly, impartially and confidentially, and substantiated breaches lead to disciplinary action up to dismissal, contract termination, recovery of losses and referral to the UAE authorities where the law requires it.

Governance and review

The Board of Directors owns this policy and endorses it formally. Senior management embeds it in day-to-day operations, the Compliance function maintains and advises on it, and Internal Audit tests it independently. All staff receive anti-bribery training on joining and refresher training at least annually. The policy is reviewed at least once a year, and immediately where UAE law, our risk profile or our operations change.

This policy is aligned with the UAE Federal Penal Code and the UAE's anti-money laundering framework, and reflects internationally recognised anti-corruption standards. Counterparties may request further information at compliance@agoraprimetrading.com.