

Code of Conduct Policy

Agora Prime Metals Trading FZCO | Version 1.0

The Code of Conduct establishes the ethical framework and operational principles governing the behaviour of our employees, officers, directors and affiliated third parties. It reflects our corporate values and aligns with applicable UAE law and international best practice.

SCOPE AND APPLICATION

The Code applies to all employees and officers regardless of position or location, to members of the Board and executive management, and to contractors, consultants and third-party agents involved in or influencing our operations. Business partners, suppliers and vendors whose conduct may reflect on the Company are made aware of these standards and, where applicable, agree to comply with them. Every employee is expected to integrate these principles into daily activity, and management is accountable for ensuring their teams do the same.

CORE VALUES

Five values underpin the Code. Integrity requires honesty and transparency in all dealings, with personal accountability at every level. Respect commits us to treating each individual with dignity and fairness and to an inclusive culture that values diversity. Excellence drives quality of work and continuous improvement. Compliance obliges adherence to the legal and regulatory frameworks governing our operations in the UAE and globally. Responsibility commits us to acting as responsible corporate citizens and to sustainable operating practices.

ETHICAL BUSINESS CONDUCT

Employees must identify and immediately disclose actual or perceived conflicts of interest, which are documented, independently assessed and managed through recusal, reassignment or ongoing monitoring where required. The Company maintains zero tolerance towards corruption: bribes, kickbacks and facilitation payments are prohibited without exception, and gifts or hospitality must be modest, disclosed and never capable of influencing a business decision. Our practices align with UAE anti-corruption legislation and with international standards including the OECD instruments and the United Nations Convention against Corruption. All business is conducted transparently, in fair competition, and with complete documentation of transactions and agreements.

INFORMATION, WORKPLACE AND ENVIRONMENT

Confidential information — trade secrets, proprietary data, customer records and financial information — is protected through access restrictions, encryption, secure storage and contractual obligations on vendors and partners, consistent with UAE data protection requirements. The Company enforces zero tolerance towards harassment, bullying and discrimination, supported by confidential reporting channels, prompt impartial investigation and access to counselling and mediation. We maintain safe working conditions in compliance with UAE occupational health and safety standards and pursue sustainable operations through energy efficiency, waste reduction and resource conservation.

REPORTING, ACCOUNTABILITY AND REVIEW

Confidential and anonymous reporting channels are available to employees, contractors and partners, overseen by designated compliance officers. Whistleblowers acting in good faith are protected from retaliation and their identity safeguarded throughout any investigation. Confirmed breaches attract proportionate disciplinary action, ranging from formal warning to termination and legal referral, subject to a structured appeals process. Compliance is monitored through internal audit, external review and defined performance indicators, and the Code is reviewed periodically to reflect emerging regulatory requirements and best practice. Induction and refresher training, together with targeted programmes in higher-risk areas, keep the Code embedded in day-to-day decision-making.

The full policy document is maintained by the Company and is available to employees via the company intranet and to counterparties, clients and regulators on request.