

OUR COMMITMENTS

Supply Chain Commitment

Agora Prime Metals Trading FZCO trades precious and base metals across international markets from its base in the Dubai Multi Commodities Centre. The integrity of the chain that carries those metals from source to counterparty is inseparable from the integrity of our business. We hold every supplier, agent, service provider and partner we work with to a single standard of conduct, applied consistently wherever they operate, and we accept the same standard for ourselves.

What we expect of every supply chain relationship

Our expectations are set out in full in our internal governance framework and are reflected in the terms on which we contract. They rest on four commitments that apply to all counterparties, in all markets, without exception.

- **Human rights and labour.** We do not tolerate child labour, forced labour or exploitation in any form. Our counterparties must provide safe and healthy working conditions, pay wages that meet or exceed local statutory requirements, hire and promote without discrimination, and respect freedom of association and the right to collective bargaining.
- **Environmental responsibility.** We expect efficient use of energy and raw materials, active reduction of waste and emissions, sound handling of hazardous materials, and compliance with the environmental law of every jurisdiction in which our counterparties operate. Where sourcing may affect local ecosystems, we expect impact to be assessed and mitigated.
- **Anti-bribery and business ethics.** We maintain a zero-tolerance position on bribery, facilitation payments, kickbacks and corruption of any kind. Financial and operational transactions are documented, reconciled and open to audit.
- **Financial crime prevention.** Every counterparty is subject to know-your-customer verification and sanctions screening before onboarding, with enhanced due diligence applied to higher-risk relationships, jurisdictions and transaction types. Suspicious activity is reported to the competent authorities without delay.

How we assess and select counterparties

No counterparty is onboarded on reputation alone. Before we transact, we assess track record and regulatory standing, financial and operational capability, demonstrated adherence to ethical and environmental standards, the quality and completeness of documentation offered, and the internal controls in place to identify and manage risk. Assessment does not end at onboarding: relationships are monitored on a risk-sensitive basis throughout their life, and reviewed when circumstances change.

Additional scrutiny for precious metals

Precious metals carry elevated risk, and we treat them accordingly. Suppliers in this segment must evidence the origin of the material and support a verifiable chain of custody from extraction through to delivery. They must demonstrate compliance with the precious metals regulations applicable to them, submit to periodic audit, and satisfy enhanced due diligence where they operate in higher-risk regions. We monitor the geopolitical and market conditions surrounding these flows continuously, and we decline business where origin, legality or ownership cannot be established to our satisfaction.

When standards are not met

Where a counterparty falls short of these commitments, dealings may be suspended immediately pending investigation. We require a corrective action plan with defined owners, milestones and deadlines, and we verify delivery through enhanced monitoring and follow-up review. Where shortcomings are serious, repeated or unremedied, we terminate the relationship and, where the law requires or the circumstances warrant, pursue the matter further with the appropriate authorities.

Accountability

This commitment is owned at senior management level and is embedded in our onboarding, transaction approval and monitoring processes rather than held apart from them. Our staff and partners receive training on the standards described here. Performance is measured, reviewed and reported internally, and the framework itself is reviewed regularly so that it keeps pace with regulatory change, emerging risk and evolving international good practice.

We welcome engagement from suppliers, clients, counterparties and other stakeholders on any aspect of this commitment. Concerns about conduct anywhere in our supply chain can be raised in confidence at compliance@agoraprimetrading.com.