

OUR COMMITMENTS

Speaking Up: Whistleblowing at Agora Prime

Agora Prime Metals Trading FZCO expects wrongdoing to be reported, and it protects the people who report it. Anyone connected to our business who becomes aware of conduct that is unlawful, unethical or contrary to our policies can raise it with us in confidence, and will not suffer for having done so. This position is endorsed by our Board and senior management, and it applies across every market in which we operate.

Who can raise a concern

The protections described here extend to our employees, whether permanent, temporary or interning, and equally to contractors, consultants, suppliers, clients, business partners, job applicants and any other party who acquires information about wrongdoing in a work-related context. Concerns can be raised regardless of where the person is located.

What should be reported

We want to hear about anything that suggests serious misconduct or a breach of law, regulation or our own standards. That includes, but is not limited to:

- **Fraud and financial irregularity** — misappropriation of funds, falsified records, money laundering or terrorist financing.
- **Bribery and corruption** — unlawful payments, facilitation payments or kickbacks offered, solicited or accepted.
- **Trade and sanctions breaches** — contravention of international trade controls, sanctions regimes or customs law.
- **Harassment and discrimination** — bullying, sexual harassment, or unequal treatment on any protected ground.
- **Data protection and privacy failures** — misuse of personal data or breach of applicable data protection law.
- **Health, safety and environmental harm** — unsafe working conditions, unlawful discharge, or breach of environmental regulation.

Deliberate concealment of any of the above is itself reportable. A reporter does not need to be certain that wrongdoing has occurred; a reasonable, honestly held suspicion is enough.

How to raise a concern

Concerns may be raised with our Designated Whistleblowing Officer, who operates independently of routine line management and is accountable to the Board. Employees may also raise a matter with their line manager or with Human Resources, in which case it is passed promptly to the Designated Whistleblowing Officer. External parties, and anyone who prefers not to use an internal route, may write to compliance@agoraprimetrading.com. Reports may be submitted anonymously; where a reporter identifies themselves, their identity is treated as confidential.

What happens next

We acknowledge receipt of a report within seven days. The Designated Whistleblowing Officer then carries out a preliminary assessment, normally within one to two weeks, to determine whether a formal investigation is warranted. Investigations are conducted objectively by people with no personal or professional stake in the matter, drawing on legal, financial, human resources or external specialist expertise as the case requires. We aim to conclude and report within three months, and we tell the reporter the outcome so far as confidentiality and the rights of others allow. Where wrongdoing is established, we act on it: through corrective measures, disciplinary action, changes to our controls and procedures, and disclosure to the authorities where we are required or it is right to do so.

Confidentiality and protection from retaliation

A reporter's identity is not disclosed to anyone without a legitimate need to know, absent their consent or a binding legal obligation; where disclosure becomes unavoidable, we tell them first wherever it is possible to do so. Reports and case records are held on secure systems with controlled access and handled in line with applicable data protection law.

Retaliation is prohibited absolutely. That prohibition covers dismissal, demotion, suspension, salary reduction, withheld promotion, unwarranted criticism, harassment and blacklisting — and it covers subtle forms of reprisal just as firmly: exclusion, unfavourable reassignment, or the quiet creation of an untenable working environment. Anyone who retaliates faces disciplinary action up to and including termination of employment or contract, whatever their seniority. We monitor the treatment of those who report during and after a matter is closed, and we investigate allegations of reprisal with the same seriousness as the original concern. Protection applies to anyone who reports in good faith, whether or not the concern is ultimately substantiated.

Fairness to all parties

Those implicated in a report are presumed innocent until the evidence establishes otherwise, are entitled to due process and, where applicable, to representation. Reports made maliciously or in the knowledge that they are false are not protected and may themselves result in disciplinary action.

Governance and review

Oversight rests with the Board and senior management, supported by dedicated compliance personnel who administer the framework, deliver training, and report on volumes, themes, timeliness and outcomes. The framework is reviewed at least annually, and sooner where regulatory developments, organisational change or lessons from a specific matter make it necessary. It reflects the requirements of UAE law, including federal data protection legislation, and voluntarily adopts the standards of the EU Whistleblowing Directive (Directive (EU) 2019/1937) across our operations, applying the more protective standard where the two differ.

To raise a concern, or to ask a question about how we handle reports, write to compliance@agoraprimetrading.com.