1. INTRODUCTION & PURPOSE

IGR Metals Trading FZCO ("IGR FZCO") adopts a zero-tolerance approach to bribery, corruption, and unethical conduct across all aspects of its precious metals trading activities. This Policy is designed to establish clear principles and controls that support ethical business practices and protect the integrity of the company's operations.

The purpose of this Policy is to:

- Prevent, detect, and respond effectively to bribery and corruption risks.
- Define clear expectations for ethical conduct across all levels of the organization.
- Ensure consistency in how risks are identified, assessed, and managed.
- Strengthen internal controls, due diligence, and monitoring processes.
- Promote transparency and accountability in all transactions and relationships.
- Support responsible decision-making, particularly in complex or high-risk environments.

IGR FZCO conducts business with integrity, transparency, and accountability.
All employees and business partners are expected to avoid, reject, and report any form of bribery or corrupt practice, and to maintain accurate and transparent records at all times.

2. LEGAL AND REGULATORY FRAMEWORK

IGR FZCO functions under a multi-layered UAE legal regime, where anti-bribery obligations ascend from several Laws rather than a single statute.

Key Applicable Laws

- Federal Decree-Law No. 10 of 2025 (AML/CFT & Proliferation Financing)
- Cabinet Resolution No. 134 of 2025 (AML Executive Regulations)
- Cabinet Resolution No. 156 of 2025 (Administrative violations and penalties in the AML/CFT/PF context)
- DMCC Company Regulations
- UAE Federal Decree-Law No. 31 of 2021 (Penal Code), as amended
- UAE obligations under UN Convention Against Corruption
- FATF recommendations
- OECD Convention on Combating Bribery and Anti-Corruption guidelines

3. SCOPE

This policy applies to all activities conducted by IGR FZCO, including:

- Procurement and sourcing precious metals.
- Trading precious metals.
- Relationships with suppliers, and intermediaries.
- Transactions with customers and counterparties.
- Financial transactions related to the purchase or sale of precious metals

This Policy applies to:

- All employees, directors, and officers
- Contractors, secondees, and consultants
- Third parties including: Suppliers, Refiners, Brokers and agents, Logistics providers

Applies globally, including extraterritorial conduct where UAE jurisdiction applies.

4. OUR PRINCIPLES

IGR FZCO operates on the following core principles:

- Integrity: Conduct all business honestly and ethically.
- Transparency: Maintain accurate and complete records for all transactions.
- Accountability: Take responsibility for actions and decisions at all levels.
- Zero-Tolerance: Reject all forms of bribery, corruption, and undue advantage.
- Risk Awareness: Apply a risk-based approach in dealings with third parties and high-risk areas.
- Speak-Up Culture: Encourage reporting of concerns without fear of retaliation.

5. DEFINITIONS

For the purposes of this policy:

Term	Definition
Bribery	Offering, giving, receiving, or soliciting anything of value to improperly influence a decision. Bribery occurs when a person offers, gives, solicits, or accepts something of value to influence the actions of an individual in a position of trust or authority. This applies to dealings with both public officials and private parties. Examples: ▪ Offering cash, gifts, or entertainment to a government official to expedite permits, licenses, or customs clearance. ▪ Providing gifts, discounts, or favors for suppliers or customers to secure preferential treatment. ▪ Paying kickbacks or commissions to intermediaries to influence business decisions unlawfully.
Corruption	Abuse of entrusted power for private or commercial gain. It includes, but is not limited to: ▪ Conflict of interest where personal interests interfere with the company's obligations. ▪ Misappropriation of company assets or falsification of records to conceal improper payments. ▪ Collusion with third parties to fix prices or manipulate transactions in the precious metals market.
Facilitation Payment	Small, unofficial payments made to public officials to speed up routine administrative actions (e.g., customs clearance, licensing) are considered bribes and are strictly prohibited.
Undue Advantage	Any benefit not legitimately due, including money, gifts, services, or favors.
Kickback	Payment made in return for facilitating a transaction or appointment.
Gifts, Hospitality, and Donations	Offering or receiving gifts, hospitality, or charitable donations is only permissible if they are legal, reasonable, and properly documented, and cannot influence a business decision.
Politically Exposed Person (PEP)	Politically Exposed Person - An individual entrusted with prominent public functions, posing elevated corruption risk.

6. GOVERNANCE STRUCTURE

IGR FZCO maintains a structured governance framework to ensure effective oversight of this policy and trigger Roles & Responsibilities within their framework.

Level	Responsibility
Senior Management	Policy approval, oversight, tone from the top
Compliance Officer	Implementation, monitoring, reporting
Employees	Operational enforcement, reporting obligations and escalation
Internal Audit	Independent testing of controls

7. ANTI-BRIBERY & CORRUPTION RISK ASSESSMENT

IGR FZCO shall conduct periodic ABAC risk assessments to identify, evaluate, and mitigate exposure to bribery and corruption risks.
The assessment shall be conducted at least annually, or upon significant business changes.

- The assessment includes:
  - Geographic risks
  - Counterparty risks
  - Transactional risks
  - Delivery channels and intermediaries
- Classify risks as Low, Medium, or High
- All the required documents are well documented, approved by Senior Management, and retained for regulatory review
- Enhanced controls shall be applied to identified high-risk areas.

8. HIGH-RISK AREAS & RED FLAGS

Aligned with LBMA & OECD risk typologies, IGR FZCO recognizes elevated risk in:

- High-Risk Areas
  - Artisanal and small-scale mining (ASM)
  - Cross-border gold trading
  - Customs and logistics processes
  - High-risk jurisdictions
  - Cash-intensive transactions
- Red Flag Indicators
  - Unusual payment structures or offshore accounts
  - Requests for excessive commissions
  - Lack of transparency in ownership
  - Use of intermediaries without justification
  - Pressure to bypass controls

9. POLICY PRINCIPLES

IGR FZCO strictly prohibits:

- Bribery in any form (direct or indirect)
- Improper payments through third parties
- Kickbacks, secret commissions, or rebates
- Abuse of influence or position
- Concealment of corrupt practices through falsified records

This applies regardless of:

- Local and international business practices
- Cultural norms
- Competitive pressure

Employees should be alert to transactions that may indicate bribery or corruption, such as:

- Unusual cash payments or off-market pricing.
- Requests to use intermediaries with no clear business justification.
- Customers or suppliers offering gifts, favors, or unusual incentives.

10. PROHIBITED CONDUCT

The following are strictly forbidden:

- Offering or accepting cash, gifts, or benefits to influence decisions
- Payments via third parties to disguise intent
- Bribes disguised as:
  - Consulting fees
  - Commissions
  - Logistics or facilitation charges
- Political or charitable donations linked to business advantage
- Undisclosed conflicts of interest

11. GIFTS, HOSPITALITY & EXPENSES

Permitted only when all conditions are met:

- Legitimate business purpose
- Reasonable and proportionate value
- Not intended to influence decision-making
- Fully documented and approved

Restrictions

- Public officials may only receive symbolic or nominal gifts under UAE regulations
- Cash or cash equivalents are strictly prohibited
- Luxury or excessive hospitality is prohibited

12. FACILITATION PAYMENTS & EXTORTION

Facilitation payments are strictly prohibited
In cases of immediate threat to safety:

- Payment may be made
- Must be reported immediately
- Subject to internal investigation

13. CHARITABLE DONATIONS & SPONSORSHIPS

IGR FZCO may support charitable initiatives and sponsorships only when they:

- Serve a legitimate, documented business or community purpose
- Are legal, transparent, and proportionate in value
- Do not create, or appear to create any improper influence on business decisions
- Are pre-approved by the Compliance Officer

The Company strictly prohibits:

- Donations intended to obtain or retain business or influence any decision
- Contributions to individuals or entities linked to public officials for business advantage
- Cash donations or any form of donation that cannot be fully recorded and verified

All donations and sponsorships must be documented, recorded in a register, and subject to internal review to ensure compliance with this Policy.

14. THIRD-PARTY DUE DILIGENCE (ENHANCED)

IGR FZCO adopts a risk-based due diligence model, consistent with:

- DMCC compliance expectations
- UAE AML Law 2025 (risk-based approach obligation)

- Contractual Safeguards
  All third parties must:
  - Accept anti-bribery clauses
  - Agree to audit rights
  - Commit to compliance with UAE law and international standards
- Ongoing Monitoring:
  - Third parties shall be risk-rated (Low/Medium/High)
  - High-risk third parties subject to:
    Enhanced Due Diligence (EDD)
    Annual review
  - Periodic sanctions, PEP, and adverse media screening required

IGR FZCO reserves the right to terminate relationships based on compliance concerns.

15. RECORD KEEPING & FINANCIAL CONTROLS

The Company shall maintain:

- Accurate, complete, and transparent records
- Supporting documentation for all transactions
- Segregation of duties
- Multi-level approval mechanisms
- False accounting or off-book transactions are strictly prohibited.

16. SPEAK-UP & WHISTLEBLOWING

IGR FZCO ensures:

- Confidential reporting channels
- Protection against retaliation
- Anonymous reporting where legally permitted

Failure to report known misconduct may constitute a legal violation.

17. INVESTIGATIONS & ENFORCEMENT

All allegations will be:

- Promptly assessed
- Independently investigated
- Documented and escalated

Where required, cases will be reported to UAE authorities.

18. TRAINING & AWARENESS

Mandatory programs include:

- Annual ABAC training for all employees
- Role-specific training for high-risk functions
- Third-party awareness requirements

Training incorporates:

- UAE legal updates
- DMCC guidance
- LBMA compliance expectations
- Other Laws and Regulations

19. DISCIPLINARY MEASURES

Violations may result in:

- Warning
- Termination of employment or contract
- Financial penalties
- Referral to law enforcement

Risk assessments must be documented and available to regulators.

20. CERTIFICATION & ACKNOWLEDGEMENT

All relevant parties must:

- Acknowledge this Policy annually.
- Confirm compliance.
- Disclose conflicts of interest.

21. FINES AND PENALTIES

Type of Violation	Potential Penalty / Action
Employee or Contractor breach	Warning, suspension, termination, financial liability
Third-party non-compliance	Contract termination, reimbursement of improper payments, reporting to authorities
Violation of UAE ABAC laws / DMCC regulations (Federal Decree-Law No. 31 of 2021 (Penal Code) and Federal Decree-Law No. 10 of 2025)	Fines, administrative penalties, criminal prosecution (including imprisonment)

22. FINAL STATEMENT

IGR FZCO recognizes that bribery and corruption risks are heightened within the precious metals sector, particularly in global sourcing environments.
This Policy ensures that the Company:

- Meets UAE legal obligations
- Aligns with DMCC compliance expectations
- Satisfies LBMA Responsible Sourcing audits
- Reflects OECD best practices

Non-compliance will not be tolerated under any circumstances.

23. POLICY REVIEW

This Policy shall be reviewed:

- Annually, or
- Upon regulatory or business changes

POLICY APPROVAL

This policy has been approved by the Senior Management of IGR FZCO and is effective from the date of approval.

Effective Date: April 16, 2026
Next Review: November 20, 2026

Ganna Dinzler
Managing Director

Vishmi Nayanika
Compliance Executive

IGR METALS TRADING FZCO
License No : DMCC34175

Communication Details:
For questions and/or concerns related to above policy, please send an email to compliance@igrglobal.me
For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through the following link: https://www.igrglobal.com/contact/

Policy Acknowledgement:
By signing this document, we acknowledge that we have received, read and understand the Anti-Bribery & Anti-Corruption (ABAC) Policy.

We hereby undertake to commit to compliance with the Policy.
We also understand that IGR FZCO is open to considering ways to support and assist in establishing processes to promote, improve and develop our practices, if necessary.

Name:
Designation: