

Document Subject	CODE OF CONDUCT & ETHICS POLICY
Company name	Fine Gold LLC
Trade license number	643756
Activity	Non-Manufactured Precious Metal Trading
Code	FG/HMR
Version number	005
Effective date	May 01, 2026
Contact Details	Compliance@finegold.ae

1. Purpose

The purpose of this Code of Conduct & Ethics Policy ("the Policy") is to define the standards of behavior, professionalism, and integrity expected of **FINE GOLD LLC** ("FINE GOLD"), its employees, partners, and all customers who engage with us.

This policy reflects our belief that ethical behavior is the foundation of trust, compliance, and long-term business success. We are committed to maintaining transparent, fair, and responsible practices across the precious metals value chain.

This document outlines the principles that guide our decisions and interactions, ensuring that our business operations meet the highest ethical and regulatory standards.

2. Scope

This policy applies to:

- ✓ All employees, managers, and board members of **FINE GOLD**
- ✓ All customers, suppliers, contractors, and business partners
- ✓ Agents, intermediaries, and representatives acting on our behalf
- ✓ Any internal or external party connected to our business operations
- ✓ **FINE GOLD** group of Companies

The Code sets expectations for customers while also reflecting internal conduct rules already established within **FINE GOLD**

3. Our Ethical Commitments

At **FINE GOLD**, our ethical commitments serve as the foundation for how we conduct business and interact with customers, partners, and colleagues.

These principles guide our daily decisions and define the standards we expect from everyone who works with us.

FINE GOLD commits to:

- ✓ **Integrity:** We act honestly and responsibly in all business dealings.
- ✓ **Transparency:** We communicate openly, disclose relevant information, and act without hidden intentions.
- ✓ **Fairness:** We maintain fairness in pricing, negotiations, contracting, and customer treatment.
- ✓ **Respect:** We respect individuals, cultures, laws, and communities.
- ✓ **Confidentiality:** We safeguard all data and protect customer information.
- ✓ **Compliance:** We follow the laws of the UAE, international regulations, and best practice standards across all areas of operation.
- ✓ **Accountability:** We take responsibility for our decisions and actions and expect others to do the same.

These values form the core of **FINE GOLD's** ethical framework.

4. Legal & Regulatory Framework

This policy is guided by:

- ✓ **Federal Decree-Law No. (10) of 2025** on AML/CFT and Proliferation Financing
- ✓ **Cabinet Resolution No. 134 of 2025. Cabinet Resolution No. (156) of 2025 (Schedule of Goods Subject to Control and Non-Proliferation)**, which governs proliferation financing controls and dual-use goods obligations applicable to the DPMS sector.
- ✓ **Federal Decree-Law No. 31 of 2021** (UAE Penal Code)
- ✓ **Cabinet Resolution No. (71) of 2024** – penalties & enforcement
- ✓ **Federal Law by Decree No (34) of 2023** Concerning Combating Discrimination, Hatred and Extremism
- ✓ **UAE Labor Law and Civil Code**
- ✓ **LBMA and OECD Responsible Sourcing Principles**
- ✓ The ethical expectations outlined in the **FINE GOLD** Compliance Manual

5. Expected Standards of Conduct

FINE GOLD expects everyone associated with our entity to uphold professional behavior and act responsibly at all times.

These standards ensure fairness, respect, and compliance across all business activities.

All individuals working with or for **FINE GOLD** must follow:

- ✓ **Honesty & Truthfulness:** Information provided must always be accurate, complete, and not misleading. Customers must not falsify documents, identities, or transaction details.
- ✓ **Professionalism:** We expect all interactions to be respectful, courteous, and businesslike.
- ✓ **Fair Business Practices:** Discrimination, harassment, intimidation, or abuse of any kind is not tolerated.
- ✓ **Respect for Laws & Regulations:**
All parties must comply with:
 - AML/CFT requirements
 - Trade, import/export laws
 - Health and safety regulations
 - Local and international sanctions
 - Environmental and social obligations
- ✓ **Avoiding Conflicts of Interest:** A conflict arises when personal interests interfere with professional duties.
 - Favoring relatives or friends
 - Having undisclosed financial interests
 - Receiving personal benefits that influence decisions
- ✓ **Protection of Company Assets:** Physical assets, precious metals, equipment, and information must be protected and used responsibly.
- ✓ **Anti-Bribery & Anti-Corruption:** No gifts, payments, commissions, or benefits may be offered or received to influence decisions.
- ✓ **Environmental & Social Responsibility:** We expect partners and customers to follow responsible sourcing principles, protect workers' rights, and respect communities.

All employees must comply with the UAE's AML, CFT, CPF, and sanctions rules. Staff must report any suspicious activity to the Compliance department, participate in required training, and avoid any action that could be considered tipping-off. Tipping-off is a criminal offence under Federal Decree-Law No. (10) of 2025. Any breach of these obligations may lead to disciplinary action and, where relevant, referral to the competent UAE authorities.

6. Confidentiality & Data Protection

Protecting information is essential to maintaining trust.

This section explains how confidential data must be handled and the responsibilities of those who access or manage sensitive information.

FINE GOLD protects the confidentiality of all information shared by customers and partners. Customers and third parties must:

- ✓ Not disclose sensitive business or customer information
- ✓ Use company information only for legitimate business purposes
- ✓ Adhere to data protection laws and contract clauses

Unauthorized disclosure or misuse of information is strictly prohibited.

7. Responsible Use of Communication & Technology

Communication tools and technology must be used with care.

The guidance below explains how systems should be used responsibly to safeguard the company and its stakeholders.

- ✓ Communication should be professional and appropriate
- ✓ IT systems must not be misused
- ✓ Unauthorized access, tampering, or sharing of data is prohibited
- ✓ Cyber risks must be reported immediately

Customers and partners must avoid transmitting malicious software or illegal content.

8. Anti-Money Laundering & Counter-Terrorism Financing Conduct

Ethical business conduct includes strict adherence to AML/CFT requirements.

The statements below highlights the responsibilities customers and partners must follow when engaging in financial or commercial transactions with **FINE GOLD**

Ethical conduct includes full adherence to **FINE GOLD's** AML/CFT expectations:

- ✓ Provide complete and accurate KYC documents
- ✓ Cooperate with due diligence or enhanced due diligence
- ✓ Avoid transactions with sanctioned or high-risk parties
- ✓ Refrain from structuring transactions to evade detection
- ✓ Report discrepancies or suspicious activity

All parties must recognize that **FINE GOLD** conducts ongoing monitoring of business relationships in accordance with Article 8 of Cabinet Resolution No.134 of 2025, and additional information may be requested to keep customer profiles accurate and up to date.

9. Human Rights & Labor Principles

Respect for human rights is central to our values.

The principles that follow outline the standards we expect from customers and partners in the treatment of people, workers, and communities.

FINE GOLD respects human rights and expects customers and partners to:

- ✓ Avoid forced or child labor
- ✓ Provide safe working conditions
- ✓ Treating employees with dignity
- ✓ Follow UAE labor laws
- ✓ Uphold non-discrimination principles

We do not tolerate suppliers or customers that violate human rights.

10. Responsible Sourcing & Supply Chain Conduct

Responsible sourcing protects the integrity of the precious metals industry.

The points below describe the expectations and obligations related to ethical supply chains and the lawful origin of materials.

Responsible sourcing is essential in the precious metals sector **FINE GOLD** expects:

- ✓ Full transparency of supply chain
- ✓ Verifiable documentation of origin
- ✓ Compliance with OECD guidance for minerals from conflict-affected areas
- ✓ No involvement in smuggling, illegal mining, or conflict minerals
- ✓ Ethical treatment of communities and workers
- ✓ Avoidance of environmental harm

Suppliers who cannot verify the ethical and legal origin of materials will not be accepted.

11. Health, Safety & Environmental Standards

FINE GOLD is committed to creating a safe and environmentally responsible workplace.

The standards outlined here help protect people, assets, and the environment. All parties must:

- ✓ Maintain safe working practices
- ✓ Report incidents or unsafe conditions
- ✓ Follow environmental regulations
- ✓ Dispose of waste responsibly
- ✓ Avoid harmful chemical usage without controls

FINE GOLD promotes environmentally responsible refining and trading practices.

12. Fair Competition & Anti-Fraud

Fair competition is essential for a healthy market.

The guidance that follows clarifies the behaviors that support clean, honest business practices and prohibit fraudulent or anti-competitive conduct.

FINE GOLD prohibits:

- ✓ Misleading statements
- ✓ Market manipulation
- ✓ Fraudulent contracting
- ✓ Abuse of dominant position
- ✓ Price collusion or cartel behavior

We expect our customers and partners to uphold fair market practices.

13. Reporting Concerns & Seeking Guidance

When unsure about a situation or concerned about misconduct, individuals should feel comfortable raising concerns.

The information below explains how issues can be reported safely and confidentially.

Anyone who becomes aware of:

- ✓ Ethical misconduct
- ✓ Fraud
- ✓ Unlawful activity
- ✓ Conflicts of interest
- ✓ Harassment or discrimination
- ✓ Bribery or corruption
- ✓ Misuse of company resources
- ✓ Breaches of this Code

Should report the issue promptly through:

- ✓ A designated **FINE GOLD** contact
- ✓ The Compliance Department
- ✓ Company management

All concerns will be treated with confidentiality and professionalism.

We strictly prohibit retaliation against individuals who report in good faith.

14. Consequences of Violations

Violations of this Code carry serious implications.

The points below outline the actions that may be taken if an employee, customer, or partner does not adhere to these standards.

If employees, customers, or partners violate this Code, consequences may include:

- ✓ Written warnings
- ✓ Suspension or termination of business relationships
- ✓ Financial and legal liability
- ✓ Reporting to regulatory or law enforcement authorities
- ✓ Civil or criminal penalties under UAE law

Compliance with this Code is mandatory for maintaining a business relationship with **FINE GOLD**.

15. Continuous Improvement

Ethical standards must evolve with our business and industry.

The commitments below describe our ongoing efforts to enhance our practices, training, and compliance culture.

FINE GOLD is committed to reinforcing:

- ✓ Compliance culture
- ✓ Employee training
- ✓ Updated ethical standards
- ✓ Modern reporting and monitoring systems
- ✓ International best practices

We continuously evaluate our ethical framework to ensure transparency and accountability.

16. Policy Review

This Code is reviewed annually or earlier if:

- ✓ New regulations are issued
- ✓ Changes in the Business operations
- ✓ Industry standards change
- ✓ Internal assessments indicate the need for improvement

Updated versions may be shared with customers and partners.

18. Final Statement

FINE GOLD believes that ethics are not only legal requirements, but fundamental principles that define who we are.

We expect our employees, customers, and partners to uphold these values in every interaction.

By doing so, together we protect the integrity of the precious metals industry and build trusted, long-term relationships based on respect, responsibility, and transparency.

19. Approval and Acknowledgement

Approved By	Shiyad Kattuparambil Abdulkareem Managing Director		
Prepared by	Luisa Fernanda Compliance Officer/MLRO		

Next Review date to be scheduled in February 10, 2026

20. Document Version Control

Version	Date	Summary of Changes
001	2023	Initial issuance.
002	2024	Updates following regulatory review.
003	November 28, 2025	Amendments to align with Federal Decree-Law No.(10) of 2025
005	May 01, 2026	New regulation updates and amendments

COMMUNICATION DETAILS

For questions and/or concerns related to compliance manual, please send an email to compliance@finegold.ae

For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through email compliance@finegold.ae

Fine Gold LLC

Compliance Department

Al Ras, UAE - Dubai

POLICY ACKNOWLEDGMENT & DECLARATION OF COMPLIANCE

By signing below, I/we acknowledge that:

- ✓ We have received, read, and understood this policy in its entirety.
- ✓ We agree to comply fully with all requirements, standards, and obligations outlined in this policy.
- ✓ We understand our responsibilities under applicable UAE laws, including:
 - ♦ Federal Decree-Law No. (10) of 2025 on AML/CFT & Proliferation Financing
 - ♦ Cabinet Resolution No. 134 of 2025 (AML/CFT Executive Regulations)
 - ♦ Cabinet Resolution No. (74) of 2020 (Local Terrorist List)
 - ♦ Cabinet Resolution No. (71) of 2024 (Administrative Violations and Penalties for DNFBPs under Ministry of Economy Supervision)
 - ♦ Any relevant industry guidelines (OECD, FATF, LBMA, DMCC Good Delivery)
- ✓ We commit to providing accurate and truthful information and to cooperating with all compliance requests, including due diligence, reporting, screening, and monitoring.
- ✓ We understand that violations of this policy may result in consequences including:
 - ♦ Termination of the business relationship
 - ♦ Reporting to competent UAE authorities
 - ♦ Freezing or suspension of transactions
 - ♦ Administrative, civil, or criminal penalties
- ✓ We acknowledge that **Fine Gold LLC** may update this policy as required by law or internal governance, and that we are responsible for complying with the latest version.
- ✓ We understand that **Fine Gold LLC** is available to provide clarification or support regarding the implementation of this policy.

Authorized Signatory:

Name:

Title:

Company:

Date:

Signature: