



ANTI-BRIBERY & CORRUPTION POLICY AND PROCESS

Emirates Gold FZCO



Emirates Gold requires compliance with all anti-bribery and corruption laws in all markets and jurisdictions in which it operates. These laws include, but are not limited to, the UK Bribery Act, the US Foreign Corrupt Practices Act, the UAE Federal Penal Code, and the HK Prevention of Bribery Ordinance.

Emirates Gold's Anti-Bribery and Corruption Policy includes global Anti-Bribery & Corruption Policies, which emphasise that Emirates Gold does not tolerate the giving or receiving of bribes, including for trading and for facilitating any undue favours. Emirates Gold emphasizes that books and records must be fair and accurate, and reasonably detailed.

We expect all employees, associated persons, and other third parties with whom Emirates Gold works to comply with Anti-Bribery & Corruption Policies in the performance of their dealings for or on behalf of Emirates Gold.

PURPOSE

This Policy consolidates Emirates Gold's stance on bribery and corruption, complementing the company's core value of integrity and the standards of behaviour expected from the company's staff. Emirates Gold's Policy position is that any form of bribery and corruption is prohibited. This applies to accepting, offering, paying, giving, soliciting, or authorising bribes. This Policy sets Emirates Gold's minimum standards. Where local laws are stricter than the standards contained herein, the local laws prevail.

BACKGROUND

The reputational and financial risks of Emirates Gold being involved in or becoming a vehicle for bribery and corruption are risks the company takes seriously and zero tolerance against such practices. Corruption increases uncertainty in business and the costs of transactions. It restricts international trade and reduces investment, and therefore growth, both within a region and globally. The international community has been aware of the negative effect corruption has on national economies and has enacted international agreements and domestic laws to help combat this.

DEFINITIONS

- **Bribery**
This is the offering, suggesting, paying, or authorising of a payment to someone for their, or another's, personal gain with the intention either to motivate active or passive deviation from a duty or to secure the performance of a duty.
- **Bribe**
A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage.
- **Corruption**
It refers to the state or situation resulting from providing, soliciting, authorising, or offering a bribe.

Emirates Gold FZCO Global Anti-Bribery & Corruption Programme includes the following Global Standards

- Emirates Gold shall not engage in bribery or corrupt practices in any form, whether direct or indirect.
- Emirates Gold shall not engage in bribery with a public official or private party. This includes any advantage provided to a close family member or other closely connected person of the public official or private party.
- Emirates Gold shall not engage in the provision of a facilitation payment. Facilitation payments

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are typically small, unofficial sums made to secure or expedite a routine government action by a government official.

The Anti-Bribery & Corruption Policy also imposes the following requirements on the activities of Emirates Gold's employees:

- **Associated Persons**
Emirates Gold must ensure that appropriate due diligence and controls are applied, according to the Policy, relating to any associated persons they engage to ensure that they comply with the letter and spirit of applicable anti-bribery legislation and regulation.
- **Gifts, Entertainment, and other Advantages**
Emirates Gold shall not offer or permit any gift, entertainment, or other advantage to be offered without the appropriate controls being applied.
Staff may accept gifts valued below 500 AED, provided they inform their respective department head. Gifts valued above 500 AED are strictly prohibited, and staff must politely decline any such offers.
- **Recruitment**
All recruitment must be merit-based, fair, and in keeping with the stringent hiring standards applied to all employees. Hiring, for paid or unpaid, temporary, or permanent roles, must not be used to influence business.
- **Charitable Giving**
Emirates Gold shall not offer or permit any charitable giving to be used as a subterfuge for bribery.
- **Political Contributions**
Emirates Gold shall not use Emirates Gold's funds, property, or facilities to provide support for, nor contribute to, any political organisation or political candidate, as Emirates Gold is politically neutral.

The prevention, detection, and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this. Emirates Gold also maintains clear whistle-blowing policies and processes to ensure that individuals can report concerns confidentially and to ensure that such concerns are investigated and remediated appropriately. Emirates Gold is committed to strict adherence to all internal policies, including those related to whistle-blowing, ethical conduct, and regulatory compliance. The company ensures that all employees and stakeholders are informed of these policies and accessible documentation. Non-compliance is addressed promptly through established disciplinary procedures, reinforcing a culture of accountability and integrity across all operations.

Abhijit Shah
CEO and Board Member
Emirates Gold FZCO

