

ETHICAL CODE OF SUPPLY CHAIN

As we continually strive to achieve economic success by providing professional Services, our company and our shareholders are committed to uphold the highest ethical and professional standards consistent with our Values and Ethical code. The relationship between Salor Gold trading LLC and its Upstream and Downstream Companies in supply chain, is an important component to achieve high performance in our business.

1.PURPOSE:

Salor Gold trading LLC Ethical code is applicable to all its Upstream and Downstream supply chain Companies as it lays down the code of conduct to be maintained by all when dealing with Salor Gold trading LLC. They must also operate in full compliance with all applicable laws and regulations of the countries in which they operate. It provides for self-certification against all standards, validating of the self-certification and procedures for maintaining or terminating contracts with them that do not meet the standard.

This Supplier Code of Ethics has been designed to help them to understand their responsibilities and to create an awareness of the business and ethical standards that they must follow in their business dealings with, or on behalf of, Salor gold trading LLC. Our values are grounded in concepts of integrity, honesty, and the highest ethical standards.

2.APPLICATION:

Upstream and Downstream supply chain Companies must read, accept, and comply with the following conditions to be eligible to do business with or on behalf of Salor gold trading LLC.

3. HUMAN RIGHTS

Upstream and Downstream supply chain Companies must support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. Salor gold trading LLC does not tolerate any threats, intimidation, or attacks against human rights defenders.

4. COMPLIANCE WITH LAWS

Upstream and Downstream supply chain Companies must comply with all applicable laws, rules, and regulations in every jurisdiction in which they do business with Salor gold trading LLC. If the Local laws are less restrictive than the principles set forth in this Supplier Code of Ethics, in those situations, Suppliers are expected to comply with this Supplier Code of Ethics, even if the conduct they are contemplating would otherwise be legal under applicable laws. If local laws are more restrictive than this Supplier Code of Ethics, Suppliers are expected to, at a minimum, comply with applicable local laws. We are with the commitment to support the development of sustainable businesses and economic opportunities wherever it operates, and Suppliers are expected to adhere to all applicable laws and contractual commitments applicable to Salor.

It is required that they must read, accept, and comply to the below stated principles and guidelines:

- a. The Ten Principles of the UN Global Compact: <https://www.unglobalcompact.org/what-is-gc/mission/principles>
- b. Anex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
<https://www.oecd.org/corporate/mne/GuidanceEdition2.pdf>

5. LABOR

Upstream and Downstream supply chain Companies are expected to comply with the International Labor Organization's Declaration of Fundamental Principles and Rights at Work as well as any contractual terms with respect to work conditions in its contract with Salor gold trading LLC. They should uphold:

- The freedom of association and the effective recognition of the right to collective bargaining
- The elimination of all forms of forced and compulsory labor
- The effective abolition of child labor
- The elimination of discrimination in respect of employment and occupation.

- Provision of safety and health of workers by creating safe working conditions and a healthy work environment for all their workers.

6. ANTI-CORRUPTION

Upstream and Downstream supply chain Companies must comply with all applicable anti-corruption laws, including the FATF Regulations, European Union Derivatives, United States Foreign Corrupt Practices Act, and the AML rules of the UAE Federal Law. They are expected to comply with applicable anti-bribery and anti-corruption laws and to behave ethically in all business dealings for or on behalf of the Salor gold trading LLC.

7. IMPROPER PAYMENTS:

Upstream and Downstream supply chain Companies are prohibited from offering, promising, giving, requesting, or accepting improper payments, e.g., a bribe, a “kickback,” or anything of value (including gifts, meals, entertainment, etc.) directly or through a third party in an attempt improperly to gain or retain business or influence a decision. They should not make payments to government employees to expedite the timing of activities that the government employee is required to perform (e.g., customs declarations, etc.) except if it is an official express service offered by the relevant government entity.

8. SUPPLY CHAIN:

Upstream and Downstream supply chain Companies must carefully scrutinize, select, and monitor the third parties they use who will act for or on behalf of the Salor gold trading LLC and conduct appropriate diligence and background checks, considering the activity, origin, and government interaction of the third party. Third parties, contractors, agents, or subcontractors should be selected based on merit and competitiveness. They are responsible for ensuring their own third parties comply with this Supplier Code and applicable standards and policies with respect to business conducted for or on behalf of the Salor gold trading LLC.



9.AUDITS AND ASSESSMENTS:

Upstream and Downstream supply chain Companies are expected to cooperate with internal and external investigators and auditors. They must notify Salor Gold trading LLC, if allowed, of any investigation, audit, assessment, or unusual request that relates to the Salor gold trading LLC or concerns the work they are performing on behalf of the Salor gold trading LLC.

10.CONFLICTS OF INTEREST:

Upstream and Downstream supply chain Companies must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question objectivity or loyalty to the Salor gold trading LLC. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/familial relationships, sponsorships, or honorariums, and use of confidential information. It is required that they acknowledge that they will not use their position to profit personally at the expense of Salor Gold Trading LLC.

11.RECORD KEEPING & REPORTING:

Upstream and Downstream supply chain Companies are required to maintain Accurate and transparent books and records should always demonstrate proper due diligence on all parties dealing thereof, to be compliant with applicable laws and regulations. They are expected to support the identification, investigation, addressing and reporting of suspected or actual breaches of the requirements of this Code. As such, They must Have effective procedures in place to enable their employees and contractors, in confidence and without fear of reprisal, to ask questions, raise concerns and/or report suspected or actual breaches of the requirements of this Code of conduct. They must be watchful for and report internally any irregular payments, suspicious transactions, or suspected money laundering within a reasonable timeframe.



12.CONFIDENTIAL INFORMATION:

Upstream and Downstream supply chain Companies must safeguard Salor Gold Trading LLC confidential and personal data and follow relevant data protection, privacy, and information security laws and regulations. In doing so, they agree only to acquire and seek to acquire confidential information or personal data through proper means. That information must be kept secure and accessible only to those with a legitimate need to access it .They will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning the Salor to anyone else without written consent from the Salor gold trading LLC.

13. THE ENVIRONMENT

Upstream and Downstream supply chain Companies are expected to comply with UN global Compact- Environmental Principle and all related Standards and Procedures. They should:

- Support a precautionary approach to environmental challenges
- Undertake initiatives to promote greater environmental responsibility
- Encourage the development and diffusion of environmentally friendly technologies

14. ACCOUNTABILITY

Salor gold trading LLC can fulfill its commitment to integrity and compliance along with the support of its Upstream and Downstream supply chain Companies, as such we expect them to be alert to any potential violations of law or the Supplier Code in the context of the their relationship with the Salor Gold trading LLC and to notify the Ethics & Compliance Office of any such concerns. If you have a concern about the conduct of the Salor gold trading LLC employee, contractor, representative, or counterparty, you can reach the Salor gold trading LLC Ethics & Compliance Helpline (anonymously or otherwise) at:

E-mail: Lirisha@salorgroup.com



ACKNOWLEDGEMENT:

We acknowledge that we have received and read a copy of Ethical code and shall abide by the policies and principles of “Salor Gold Trading LLC ” Ethical code at all times during the course of business relationship with the company. We will direct all questions regarding the Policy or any other work-related ethical issues to the Compliance Officer.

Authorized person’s name:

Designation:

Firm Name:

Date& Place:

Signature and Stamp: