



ARAM

PRECIOUS METALS

**ANTI-BRIBERY AND
CORRUPTION POLICY**

PURPOSE

Aram Precious Metals Trading FZE is committed to conducting business with honesty, integrity, and transparency. We recognize that bribery and corruption undermine trust, distort competition, and have serious social and economic consequences. As a company engaged in the import, export, trading of non-manufactured precious metals, in the United Arab Emirates, we are committed to preventing bribery and corruption in all aspects of our operations.

Our Anti-Bribery and Corruption Policy is guided by the following principles:

- **Zero Tolerance:** We have zero tolerance for bribery and corruption in any form, whether it involves offering, giving, soliciting, or accepting bribes or other improper advantages.
- **Compliance with Laws:** We comply with all applicable anti-bribery and corruption laws, regulations, and standards, including the UAE Federal Law No. 3 of 1987 on Combating Fraud and UAE Federal Law No. 7 of 2016 on Anti-Money Laundering and Combating the Financing of Terrorism.
- **Prohibition of Bribery:** We prohibit our directors, employees, agents, contractors, and representatives from engaging in any form of bribery or corruption, whether directly or indirectly, in relation to our business activities.
- **Gifts and Hospitality:** We recognize that gifts, hospitality, and entertainment can be used to improperly influence business decisions. Therefore, we establish clear guidelines and controls regarding the giving and receiving of gifts, hospitality, and entertainment to ensure compliance with applicable laws and ethical standards.
- **Due Diligence:** We conduct due diligence on our business partners, including suppliers, contractors, agents, and representatives, to assess their integrity and reputation and to mitigate the risk of involvement in bribery and corruption.
- **Conflicts of Interest:** We require our directors, employees, and representatives to disclose any conflicts of interest that may arise in connection with their duties or responsibilities and to refrain from engaging in activities that could create or appear to create a conflict of interest.

- **Reporting and Whistleblowing:** We provide channels for employees and stakeholders to report any concerns or suspicions regarding bribery or corruption confidentially and without fear of retaliation. We investigate all reports promptly and take appropriate action to address any violations of this policy.
- **Training and Awareness:** We provide training and awareness programs to our directors, employees, agents, and representatives to ensure they understand their responsibilities under this policy and are equipped to identify and prevent bribery and corruption.
- **Monitoring and Review:** We monitor compliance with this policy on an ongoing basis and conduct regular reviews to assess its effectiveness and identify areas for improvement.
- **Leadership Commitment:** Our senior management demonstrates leadership commitment to preventing bribery and corruption by promoting a culture of ethics, integrity, and compliance throughout the organization.

Aram Precious Metals Trading FZE expects all individuals and entities acting on its behalf to adhere to this Anti-Bribery and Corruption Policy and to conduct business with the highest standards of integrity and ethical conduct. Failure to comply with this policy may result in disciplinary action, termination of contracts, and legal consequences, as appropriate.

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January 2, 2024

