

	FINE GOLD LLC CODE OF CONDUCTS AND ETHICS	No	FG/CCE/01
		Rev No.	002
		Date	2025
		Email	Compliance@finegold.ae

Introduction

The success of a company is not defined only by the number of business transactions or services provided. True success is defined by how long relationships and trust last with suppliers, employees, business relations, clients etc.

For **FINE GOLD**, it is very important to create a respectable and ethical business environment within the company and outside.

Scope

This policy applies to:

- ✓ All **FINE GOLD** business units and employees.
- ✓ All gold suppliers, business partners and customers.
- ✓ All operations related to the purchasing, refining, and trading of precious metals.

Governance Framework

- ✓ **Management Structure:** The management is responsible for oversight and strategic direction of this policy/procedure.
- ✓ **Compliance Officer:** A Compliance Officer has been appointed to implement and supervise all the due diligence practices and procedures and is directly reporting to the management.
- ✓ **Compliance Training:** Adequate resources are allocated to ensure staff are trained and competent.

Roles and Responsibilities

- ✓ **Employees:** All employees within the company group must understand and comply with this policy.
- ✓ **Compliance Officer & Department:** Responsible for monitoring due diligence activities, training, procedures, reporting, and regulatory framework coordination.

This Code of Conduct and Ethics provides a clear statement of the ethical values and professional standards that we expect to be followed by all employees and managers of **FINE GOLD** ; With reference to this important source of strategic guidance, the management is committed to conducting its business with decisions and policies developed to respect the adopted regulations, and in particular, it states that **FINE GOLD**:

- ✓ Is aware that integrity is essential for long-term success
- ✓ Takes responsibility for its actions and honors its commitments to its employees and stakeholders
- ✓ Is respecting the privacy of employees and all those in relation to the company and third parties.
- ✓ Guarantees the right of freedom of expression for each employee.
- ✓ Is committed to ensure a healthy working place and pleasant atmosphere.
- ✓ Guarantees the safety of each employee and and rejects any form of forced or child labor.
- ✓ Will never tolerate any physical and verbal violence its employees. This is applicable to any communication with suppliers, clients, third parties and within the company.
- ✓ Rejects all forms of discrimination, recognizing that personnel qualification and performance are the only relevant criteria for the salary and any additional payments and benefits
- ✓ Commitment to act in socially and environmentally responsible manner
- ✓ Keeps up to date and accurate records of all its business activities
- ✓ Avoid conflict of interests or its appearance

Business Conduct and Relations

- ✓ Assuring respect and respectable treatment of our clients' complaints.
- ✓ Acting in good faith on behalf of the company assuring transparency in each action and business transactions. - Maintaining confidentiality of any information entrusted by its clients excluding legal issues.

- ✓ Honor business obligations

Responsible Sourcing and information

- ✓ Conducting a responsible sourcing in terms of compliance making certain to follow up a high standard of due diligence.
- ✓ Under any circumstance **FINE GOLD** will never tolerate any injured actions that can damage **FINE GOLD** reputation. Any false information that damages **FINE GOLD**'s reputation will be promptly reported to the relevant legal authorities

This policy is aligned with Corporate Responsibility and Human Rights

No code of conduct can respond to all situations. The purpose of this Code is to establish a corporate culture based on ethical values and to guide our professional conduct when situations arise.

Changes to the Policy

The Compliance Department along with the Board reserves the right to change this Policy from time to time as it considers necessary.

Board Approval Date: October 01, 2024

Effective Date: October 07, 2024

Due for review: June 02, 2025

Next Review: November 03, 2025

Signatures

Shiyad Kattuparambil Abdulkareem
Manager



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Manager



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Compliance Officer



Communication Details:

For questions and/or concerns related to above policy, please send an email to Compliance@finegold.ae

For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through the following link:

<https://www.finegoldllc.com/Contact>

Policy Acknowledgement:

By signing this document, the customer agrees to act responsibly and follow the principles outlined here.

The customer will also explain this Code clearly to employees, contractors, and subcontractors, and ensure compliance with the requirements.

Name:

Designation:

Company Name:

Date & Place:

Signature:

Stamp: