Code of Conduct

1. The "Code of Conduct" is a policy, or document, explaining how anyone doing business with Global Brokers & Consultants Limited ("GLOBAL BROKERS"), and anyone contracted to work for GLOBAL BROKERS, is expected to conduct themselves. It is about "doing the right thing" in general – following the law, acting honourably and treating others with respect. This Code of Conduct applies to anyone doing business with or acting on behalf of GLOBAL BROKERS.

2. "Business Partners" means any individual or organization GLOBAL BROKERS deals with during planning or doing business, anywhere in the world. This include (but is not limited to) actual or potential suppliers, customers, agents, logistics providers, joint venture partners, contractors, sub-contractors, brokers, distributors, banks, financial institutions, pro fessional advisors (such as lawyers and accountants), government and public bodies (including their officials, representatives, politicians and political parties), directors and interns, among other.

3. Trade compliance encompasses the practical aspects of business transactions and involve following regulations regarding sanctions, anti-bribery and corruption, tax evasion and money laundering, human rights, and the environment, among other things. Sanctions are restrictions put in place and enforced mainly by the US, the EU and the UN. Some sanctions prohibit doing business with specific countries, while some prohibit doing business with certain persons or certain products. Business should not be conducted with any sanctioned party, including re-selling or diverting products to sanctioned parties or territories.

4. **Bribery and corruption**: To offer a bribe means offering something of value to a business partner, with the condition of gaining an advantage in business dealings. To receive a bribe means receiving something of value from a business partner, with the anticipation of a benefit in return. The term 'something of value' encompasses various forms, such as money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value. Corruption is the abuse of entrusted power or authority for personal gain.

5. GLOBAL BROKERS is committed to comply with national and international anti-bribery and corruptions laws around the world. These laws can apply to acts wherever in the world they take place and irrespective of local standards or cultural norms. GLOBAL BROKERS also maintains its own Anti-Corruption and Bribery Policy which is publicly available.

6. **Money laundering and tax evasion**: To prevent becoming part of money laundering and tax evasion schemes, restrictions for payments to and from business partners are in place.

7. Payments and receipts are only permitted to business partners registered in GLOBAL BROKERS's systems and will be screened with various compliance checks.

8. **Conflict of Interest**: A conflict of interest arises when personal, social, financial or political activities or business relationships interfere with a business partner's objectivity and dedication to GLOBAL BROKERS. Actual conflicts, as well as the appearance of conflicts, must be avoided or reported to GLOBAL BROKERS.

9. **Confidentiality**: Confidential information and trade secrets include any material and information that GLOBAL BROKERS does not make or want to make publicly known at a given time. This is among GLOBAL BROKERS's most valuable assets and Business Partners must protect them as disclosing them may cause irreparable harm to GLOBAL BROKERS.

10. **Human rights**: GLOBAL BROKERS believes that all people have the right to be treated with respect and have the same value and should have the same rights and possibilities, regardless of gender, race, political views, sexual orientation, religion and ethnic background. Discrimination of any kind is forbidden at GLOBAL BROKERS. Other important human rights subjects are freedom of association and collective bargaining, safe and healthy workplace, workplace security, forced labor and human trafficking (modern slavery), child labor, work hours, wages and benefits. International laws regarding these issues must be followed.

11. **Environment**: The minimum requirements of local and national environmental laws and regulations should be followed.

12. **Due diligence and screening:** All business partners to GLOBAL BROKERS are screened for "flags" (sanctions and warning signs of bribery, corruption and crimes against human rights and the environment). Further due diligence in the form of investigations and seeking legal advice may be performed as needed. Any research documentation and reports will be saved in a secure manner.

13. **Possible consequences**: Any relationship with individuals and organizations working on behalf of GLOBAL BROKERS could be terminated if this policy is breached. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made together by senior management and other designated advisors. Punishment for individuals found guilty of bribery and corruption could be fines and/or imprisonment for up to ten years. Punishment for companies failing to prevent bribery and corruption could result in unlimited fines.