



Group Code Of Ethics & Business Conduct

V.1

01/01/2023

APPROVALS AND REVISION HISTORY

The Company has approved this Code of Conduct and will periodically review and update, as necessary.

Effective Date	Version	Changes Made	Signatures
1 Jan 2023	1.0	Creation of Group Code of Ethics & Conduct	Laurent Mathiot, CEO Laurence Mathiot, Head of Ethics & Philanthropy

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I. INTRODUCTION

OCIM is a privately held group of companies headquartered in Paris and is owned and funded by the Mathiot family. The family's initial interests in real estate have since diversified into a series of other activities, including but not limited to precious and strategic metals financing and trading through OCIM.

OCIM Finance ('OCIM') functions as the group holding company; OCIM Metals & Mining SA ('OMM') and Electrum SA ('Electrum') are two of the main group subsidiaries. OMM is a metals merchant and financier focused on gold, silver, and platinum metals with a presence in Paris and Geneva, while Electrum provides a proprietary trading capability to support the group activities, primarily for hedging and risk management purposes, with teams in Paris and Geneva.

All employees, officers and contractors of OCIM are expected to uphold OCIM's commitment to honesty and integrity. OCIM also expects our agents, vendors, consultants, contractors, business partners, and all third-party representatives to uphold these standards when representing OCIM. This means that everything we do should comply with both the letter and the spirit of this Code of Ethics and Business Conduct (the "Code"); and strict adherence to ethical principles should be the foundation of our intentions and actions.

A. ABOUT OUR CODE

Our Code reflects OCIM's general principles to guide us in making ethical decisions and deciding what is the right thing to do. This Code describes a common set of expectations for our conduct and how we work with each other, our clients, and our business partners. This Code serves as a valuable resource to ensure our business interactions are conducted with integrity. By fully integrating ethics and integrity in business relationships and decision-making, we demonstrate a commitment to a culture that promotes the highest ethical standards.

This Code is a guide for making sound decisions in difficult or complex situations. It also provides information, support, and resources to help us act ethically and obey laws and regulations that OCIM must comply with. Complying with this Code involves creating an open, honest, and transparent environment where we can achieve our best work.

In this Code, we invite you to explore how we can fulfill our commitments to our partners and each other, while continuing to build upon a solid foundation for how we demonstrate integrity and trust. Our conduct is the foundation of our reputation, and our individual business decisions help us to maintain the reputation we have built with each other, our partners, and other stakeholders.

OCIM operates globally, which means we are subject to the laws and regulations of the geographies where we do business. This includes the responsibility to know and follow the laws and regulations in every location OCIM conducts business. While compliance with laws and regulations is mandatory, it also shows our commitment to acting as a responsible corporate citizen, as well as demonstrating that we care about and respect our stakeholders regardless of their geography. To the extent any local law or regulation is more restrictive than this Code, local law or regulation governs. Our Company policies, standards, and procedures complement the principles embodied in this Code. Non-compliance with laws and regulations may result in civil, criminal fines and penalties, imprisonment, and other adverse employment actions.



If you have questions about which legal standard to follow, seek guidance from the Head of Risk who will consult with legal counsel, as necessary, before taking any action. Any violation of laws or regulations will be considered a violation of this Code. Please ask questions if you are unsure. We will use all reasonable measures to prevent and immediately stop the occurrence of conduct that violates this Code.

B. WHO THIS CODE APPLIES TO

We must all live up to the ethical standards outlined in this Code. OCIM's continued success depends on our integrity and accountability, as individuals and as a Company. For this reason, this Code applies to all of us, including all OCIM officers and employees (collectively "Representatives" or "us"). As stated above, OCIM also expects our agents, vendors, consultants, contractors, business partners, and all third-party representatives to uphold these standards when representing OCIM.

C. YOUR RESPONSIBILITIES

To put people first, we must each read, understand, and comply with this Code along with Company policies, standards, and procedures, as well as applicable laws and regulations. We are all expected to:

- Embody the principles of this Code into decision making.
- Express differences of opinion.
- Speak up when something does not seem right.
- Consult with others, ask questions, pick up the phone, and ask for assistance.
- Be a lifelong learner, complete the trainings, read Company communications, and use OCIM resources effectively; and
- Adhere to the highest level of professional standards.

We have a non-negotiable obligation to report violations or suspected violations of this Code and we have a duty to report these by using any of the resources described herein. We are also encouraged to raise any issues or concerns regarding the Company's business or operations. We want to hear from you. A failure to report a suspected or actual violation of this Code is a violation of this Code in itself.

D. BEING A LEADER AT OCIM

As a leader at OCIM, you accept an additional set of responsibilities. Leaders are expected to lead by example. If you are a leader, you are expected to:

- Demonstrate what it means to act with integrity and to act in accordance with the principles of this Code, policies, and standards.
- Do the right thing even when no one is looking.
- Promote and enforce compliance with OCIM's ethical standards consistently and fairly.
- Develop your team members by setting clear, measurable, and challenging goals that encourage ethical behavior and the highest standards of conduct.
- Ensure that your team members know and understand this Code, Company policies and standards, laws, and that they have access to the resources necessary to adhere to OCIM's values.
- Exercise good judgment by responding thoughtfully and carefully to those who raise questions and concerns in good faith.
- Be personally accountable for your own behavior.

II. PROFESSIONAL ETHICS

OCIM is committed to a workplace that is free from discrimination and harassment. OCIM makes employment-related decisions based on values and does not discriminate against others. This may include but is not limited to, discrimination based on family status, race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability, veteran status, and genetic characteristics. We seek to provide an inclusive work environment where each person must be considered as an individual. We believe in equal opportunity for employment, development, and advancement for those qualified individuals. Discriminating against someone is a violation of this Code, policies, and standards, and in most cases, the law.

OCIM does not tolerate harassment. Harassment can take many forms, including but not limited to, verbal remarks, unwanted sexual advances, inappropriate sexual touching, sexually suggestive comments or jokes, offensive comments, physical advances; jokes or pictures related to race, religion, ethnicity, gender, or age; or visual displays. These forms of harassment may come from colleagues, managers, vendors, or contractors. The legal definition of harassment varies depending on jurisdiction, but such behavior always creates an intimidating, offensive, or demeaning environment for another person. This may also be considered a form of discrimination and does not have any place at OCIM. To keep harassment out of our workplace, we must stay conscious of our comments and actions to ensure they are appropriate and respectful. If you feel that you have experienced or observed any discriminatory or harassing behavior, you are strongly encouraged to disclose the situation to the Director of Human Resources or your manager.

A. SAFE AND HEALTHY WORKPLACE

OCIM is committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of employees, our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health, or security of our workplace, you should report it to CEO immediately by email. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to CEO.

B. CONFLICTS OF INTEREST

We must conduct business legally and ethically. The way we conduct ourselves in our business impacts our reputation and the trust we maintain with our stakeholders and partners. By recognizing and taking proactive steps to prevent conflicts of interest, we send a strong message about our loyalty to OCIM's integrity and our values. We make business decisions based on the best interests of our Company and its stakeholders, not for personal gain or benefit.

A "conflict of interest" is a situation in which a person or company has conflicting interests or responsibilities, financial or otherwise, and serving one's interests could have an adverse impact on those other interests or responsibilities. Conflicts can take many forms. It is not always clear whether an activity creates a conflict of interest. However, we require all Representatives to proactively and promptly disclose actual or perceived conflicts of interest, whether personal or organizational. Consult the Head of Risk when you suspect a conflict of interest exists, so that proper legal advice may be obtained and proper guidance provided.



C. OUTSIDE BUSINESS ACTIVITIES

A conflict of interest may arise if Representatives engage in an outside activity that may be inconsistent with OCIM's business interests. It is our responsibility to avoid situations in which our loyalty to OCIM, or availability to perform our job duties when required, could be compromised. Questions regarding outside activities should be directed to CEO.

III. INTEGRITY AND COMPLIANCE

OCIM is committed to maintaining the highest ethical standards and is conscious of its impact on the wider society. To that end, we respect and abide by all applicable laws and regulations for preventing money laundering, terrorist financing, bribery, corruption and forms of market abuse.

A. INSIDER TRADING

We may, while performing our duties, come into possession of "material non-public information" about the companies with whom we do business with. "Material non-public information" is any information that would affect the prices of securities, either positively or negatively, that is not generally available to the investing public. This information is generally referred to as "insider information." Buying or selling stocks using "insider information" or disclosing such information to others who might intend to buy or sell such securities is referred to as "insider trading" and is illegal. Please consult CEO if you have any questions or concerns.

B. ANTI-CORRUPTION

OCIM does not tolerate corruption and bribery consistent with laws that exist in many countries around the world. We never use, support, or promote corrupt practices. Many countries have enacted anti-corruption laws, and we abide by them wherever we work. These laws generally prohibit bribery of "Government Officials," and some also criminalize bribery of private individuals. Generally speaking, anti-corruption laws specifically prohibit making, promising, offering, or authorizing any "bribe" or kickback to obtain an improper business advantage. OCIM will not tolerate any form of improper payments or bribes regardless of to whom they are made.

Just as we cannot make improper payments or bribes on OCIM's behalf, we also cannot engage any third party to make an improper payment or bribe for us. OCIM also prohibits "facilitating payments," which are small payments made to individual officials to expedite routine government actions. An improper payment or bribe can be anything of value including cash payments, charitable donations, loans, travel expenses, gifts, entertainment, or any other favors.

Anti-corruption laws are complex, and the consequences of violating these laws are severe. For this reason, you should always avoid any activity that could be construed as corrupt. You may consult OCIM's Global Anti-Bribery and Corruption Policy for additional details and discuss any concerns or questions that you may have relating to anti-corruption or bribery with your manager or the Head of Risk.

C. COMPETITION AND ANTI-TRUST

We are all responsible for dealing fairly with partners, suppliers, competitors, and other third parties. Competition laws, also known as antitrust laws in some countries, are designed to preserve a level playing field for all businesses. These laws promote fair competition and protect consumers from unfair business practices. OCIM complies with all applicable competition and antitrust laws wherever we do business. Violations of competition

laws may subject both the Representatives involved and OCIM to severe consequences. In general, avoid entering into agreements relating to competitively sensitive matters or with competitors unless you have been specifically authorized to do so by OCIM.

D. ANTI-BOYCOTT LAWS

It is OCIM'S policy to fully comply with all applicable local, regional, and international trade laws, rules, and regulations. These laws are created to prohibit and restrict transactions with certain designated foreign governments, entities, persons, or end users. This means that we are not allowed to:

- Conduct any transaction involving prohibited entities or persons (e.g., those listed on country lists);
- Travel on Company business to any of the countries subject to sanctions without prior consent from CEO and
- Retain a third party (e.g., agents, sales representatives, distributors, contractors) to conduct any of the above actions.

There are severe penalties for violation of these laws, making them more important to follow. OCIM is required to report any suspected boycott requests to government officials so you should immediately notify the CEO if you suspect you have received any form of a boycott-related request for information.

E. MONEY LAUNDERING AND TERRORIST FINANCING

It is extremely important that we know and comply with all laws and regulations aimed to halt money laundering and terrorist financing. "Money laundering" is the process by which funds are moved through the financial system to hide all traces of their criminal origin. "Terrorist financing" refers to the use of funds that may come from legitimate or criminal sources but are destined for terrorist organizations. Our Company takes this seriously. These illicit activities have become the focus of considerable attention by governments, international organizations, and law enforcement agencies around the world. We must be attentive and exercise good judgment when dealing with unusual or suspicious activity. See our Global Anti-Money Laundering and Sanctions Policy for further details.

IV. GROUP PROTECTION

A. PERSONAL INFORMATION

Many countries have unique legal requirements governing the use, disclosure, storage, and/or privacy of personal information. While conducting business, we may collect and store personal information about Representatives, independent contractors, partners, and other third parties. OCIM is committed to the consistent application of data privacy and data protection laws when processing personal information. We also must ensure that third parties with access to personal information are contractually obligated to protect it in accordance with applicable data protection laws.

Recognizing that the definition of personal information varies based on applicable law or standard, for purposes of this Code, "Personal Information" is defined as any information that identifies, relates to, describes, or is capable of being associated with a particular individual. This may include information such as a unique personal identifier, name, alias, social security number, physical description, address, telephone number, e-mail address, and passport number, to name a few.

When we collect and process personal information, we comply with all applicable data protection laws to ensure that personal information is only collected for the intended business purpose, shared appropriately, protected to prevent misuse and unauthorized access, and retained only for as long as necessary. If you are unsure of local requirements, or have other privacy-related questions, you should contact the Head of Risk. You should also refer to the OCIM Global Cybersecurity Policy for further information.

B. CONFIDENTIAL INFORMATION

OCIM respects the privacy and confidentiality of information of our Representatives, business partners and third parties we do business with. In conducting our operations, we collect, store, use, transmit, and dispose of personal and confidential information in a way that is transparent and promotes trust. We gather, use, and keep personal, client, and other confidential information only if we have a legitimate reason to do so. Access to this information is provided only as necessary. Our duty of confidentiality does not end when we leave OCIM; we must continue to respect the confidentiality of information even after our departure.

We all play a key role in protecting confidential and personal information entrusted to us. To promote this behavior, we shall:

- Only use approved OCIM systems and applications in our work;
- Not divulge confidential information;
- Remain cautious when discussing matters in public settings;
- Promptly identify any unintended disclosure of confidential information and escalate within OCIM as appropriate.

C. COMMUNICATIONS WITH THE PUBLIC

Only authorized persons can speak as representatives of OCIM on matters of Company business. From time to time, we may receive inquiries from representatives in the news media, analysts, or investment community regarding, among other things, our business, our partners, our financial results, our business strategy, or issues related to Representatives and other matters. Unless you have Company authority to handle such requests, you should not respond to them. These types of requests should be immediately forwarded to the Director of Communications. Similarly, if you receive any requests from any government or a regulatory body, you must contact the Head of Risk immediately, so that proper legal advice may be obtained.

D. SOCIAL MEDIA USAGE

Social media is a great tool for many businesses, and it affords us many opportunities through which to engage our stakeholders and potential partners. We must all comply with all Company policies in the use of social media and related Company content and assets. Our Company policies apply to communications related to job responsibilities and to personal communications that may impact the Company. Representatives should always include a proper disclosure statement when speaking about the Company and/or our products and services. If you have any questions about using Company technology resources for social media, please consult with the Director of Communications.

E. PROTECTING FROM FRAUD AND THEFT

OCIM'S reputation depends on the integrity of all our actions and dealings with everyone, whether internally or externally. OCIM is committed to protecting our revenue, property, and assets. Accordingly, fraud, theft, and



related acts are never tolerated by OCIM. This includes falsification of information and financial statement fraud. Any concerns regarding fraud or financial irregularities should be brought to the immediate attention of the CEO.

V. BUSINESS RECORDS AND INFORMATION MANAGEMENT

Managing our business records is a critical component to building trust with our partners, personnel, and stakeholders. “Business Records” include electronic, emailed, scanned, and paper documents created, received, and maintained as evidence or information used by our Company for legal, regulatory, accounting, and business purposes. Effectively managing these records allows us to meet our business needs and to ensure our records are available when needed. In addition, it helps us comply with all applicable laws and regulations as well as preserve any relevant documents in case of litigation, audits, or investigations. We all must follow the record management practices and policies and retention schedules in the locations where we operate.

It is also critically important to preserve all documents if you receive a “legal hold” email from within OCIM or from legal counsel for OCIM. This usually applies to records connected with subpoenas seeking information and actual or anticipated litigation or regulatory action. We must retain, preserve, and not destroy any records that are required for the litigation or regulatory action. Contact the Head of Risk if you are unsure and have further questions.

A. USE OF COMPANY ASSETS

We rely on Company assets to support our work every day. Computers, mobile devices, information technology hardware and software, vehicles, facilities, inventory, equipment, intellectual property, and other assets are placed in our care and should be used only for legal, appropriate reasons.

We are all responsible for properly and appropriately protecting OCIM’s assets. These resources are the property of OCIM and are provided to us to complete our jobs efficiently and effectively. As permitted by law, OCIM reserves the right to monitor communications made using OCIM assets. Representatives should have no expectation of privacy when using OCIM assets such as e-mail, instant messages, and anything you create, store, send, or receive on these technology resources. While OCIM does not actively monitor our personal communications, it may access e-mails and other personal information from time to time as applicable laws permit.

When working with Company technology resources, Representatives should set up complex passwords that cannot be easily guessed and should never share passwords. Company personal information should not be stored with unapproved internet or cloud service provider to ensure we are appropriately protecting this information from unauthorized access or individuals.

Always understand that e-mail and other electronic communications generated on technology resources are subject to discovery in litigation or a regulatory inquiry, as applicable laws provide. We should always exercise due care and common sense in the use of all our technology resources.

If you have any questions about the appropriate use of OCIM technology resources, they should be directed to your manager or the Director of Information Technology. You should also review the OCIM Global Cybersecurity Policy for further information.



B. INTELLECTUAL PROPERTY AND CONFIDENTIAL BUSINESS RECORDS

The intellectual property and confidential information of the Company are irreplaceable assets. We must secure and protect the use of these valuable assets. Intellectual property includes copyrights, patents, trademarks, brand names and logos, research and development, inventions, and trade secrets. At all times, Representatives should take precautions to protect the intellectual property and confidential business records of the Company. Any suspected theft of intellectual property or unauthorized disclosure of or access to our Company information should be immediately reported. The law protects our rights to this property as it does with other forms of physical property. To the extent permissible by law, the rights to all intellectual property created with OCIM's materials, on OCIM's time, at OCIM's expense, or within the scope of our duties belong to OCIM.

We respect the trade secrets and confidential information of other companies and individuals. We collect information from the public domain and do not permit the inappropriate collection of others proprietary information. To gather information about a competitor, seek out public sources such as the media, trade literature, the internet, court papers, regulatory filings, or other public documents. You should avoid discussions of competitive information with Representatives of competitors in all circumstances, including at professional association or industry meetings. Be truthful and never misrepresent who you are or where you work to learn about competitors.

VI. SHARED RESPONSIBILITY

A. CHARITABLE AND POLITICAL CONTRIBUTIONS

OCIM is committed to citizenship and community involvement. We have the power to make a positive difference in the communities where we live and work through our volunteer and charitable activities. While we encourage you to support your communities, all decisions to make corporate donations to charities or government agencies (other than those made by you in your personal capacity completely unrelated to your employment at OCIM) must be made in compliance with our Global Anti-Bribery and Corruption Policy. In doing so, OCIM will abide by all applicable laws relating to charitable contributions.

OCIM's political contributions are made in accordance with the laws of the jurisdictions where we engage in these activities. Political activities by corporations, including lobbying, are regulated, and must be reported under the laws of many countries where OCIM does business.

We respect the right of employees to engage in political activity to support political groups, government officials, or candidates. Any such activity must be voluntary and performed at the Representatives own time and expense. It must be clear that the employee is acting independently and not as a representative of OCIM.

B. LOBBYING ACTIVITIES

The term "lobbying" covers many kinds of activities. You may be engaged in lobbying if your work involves any of the following:

- Contacts with legislators, regulators, executive branch officials, or their staffs;
- Communications with government officials;
- Efforts to influence legislative or administrative action; and
- Providing gifts or entertainment to government officials

Lobbying activities may require disclosure and may be subject to specific rules. If you intend to engage in lobbying work on behalf of OCIM or its subsidiaries, you must discuss any such activities with the CEO. You may also consult the Global Anti-Bribery and Corruption Policy for further guidance.

VII. SUSTAINABLE PRACTICES

We aim to act as environmental stewards when conducting business on OCIM's behalf. We comply with all applicable environmental laws and regulations as well as any guidelines set forth by our Company. We show our respect for the environment by striving to minimize any environmental hazards, conserve and protect natural resources, and manage our use of energy and other resources responsibly. We seek to provide services that protect and positively transform the environmental impact. We help solve important social problems in our communities by contributing our professional expertise and by collaborating with other organizations to achieve maximum results.

A. RESPECTING HUMAN RIGHTS

OCIM has a zero-tolerance policy for the use of child or forced labor, or human trafficking practices. As part of our commitment to our global community, we uphold individual human rights in all our operations, and we stand against the use of modern slavery in all forms. This means, in part, that we do not employ children and that we do provide healthy work environments, reasonable working hours, and fair wages for those who work on our Company's behalf. Further, we will not knowingly do business with subcontractors, business partners, or vendors who violate these human rights practices. If you have any reason to believe that any third party is engaging in any of the above practices, you have an obligation to report the misconduct to your manager or the Head of Risk.

B. ENVIRONMENTAL STEWARDSHIP

OCIM is committed to the promotion of environmental protection and consideration of impacts in all facets of its organization. We consider the direct and indirect impacts on the environment that arise from our activities around the world and ensure we remain compliant with global standards for the protection of the natural environment. To that end, we take special care to avoid partnering with individuals and entities who lack a demonstrable commitment to environmental protection and tailor training to address risks associated with corruption and environmental degradation.

C. RESPONSIBLE SOURCING

OCIM maintains the highest ethical standards and promotes the use of these standards within the mineral supply chain, including during extraction and resale. To that end, prior to OCIM entering into business relationships, Representatives must adhere to the due diligence processes and risk management framework in place to ensure against environmental and social damage.

D. REPORTING MISCONDUCT

If you witness or learn about a violation of this code, of the law or of any of OCIM's policies or procedures, it is your duty to report it.

Ethical misconduct in the workplace reflects badly on OCIM and can create workplace dissension and erode the trust that we need to have for each other to prosper as a business. It may only take one act of misconduct to create a lasting negative impression with customers and stakeholders.



Even if something is “just a rumor,” you should report it immediately. Although we all want to maintain good relationships at work, your first professional obligation is to the health of OCIM. Without a foundation of trust and honesty, the integrity of our entire workplace can rapidly deteriorate.

At OCIM, we believe that we should be able to voice our issues and concerns in a safe and secure environment. To that end, OCIM encourages you to contact your manager or other senior representative of the firm for workplace issues including financial matters such as fraud, theft, and conflicts of interest; misconduct, or violations of this Code, policies, and standards. Other examples include harassment, discrimination, or workplace hazards, accidents, and safety incidents.

E. HOW INVESTIGATIONS OF REPORTED ISSUES ARE MANAGED

OCIM will treat reported information in a confidential manner to the extent permitted by law and consistent with good business practices. Our commitment to our non-retaliation policy is non-negotiable. We are all expected to cooperate in any internal or external investigations. When you make an internal report, you can expect the following to occur:

- Your report will be handled promptly, verified for accuracy and completeness; and
- You may receive follow-up communications requesting additional information, whenever necessary.

Please do not conduct your own investigation. Doing so could compromise the integrity of our investigation. If you are asked to participate in any investigation other than by the CEO, whether internal or external, you must contact the CEO.

F. NO RETALIATION

OCIM does not tolerate retaliation against anyone who raises a concern under the Code, policies, and standards, or whoever assists with any investigations. If your concern is made in good faith, you will not be retaliated against. Acting in “good faith” means that you come forward with all information you may have, giving a sincere and complete report. If your report or allegation turns out to be untrue, it does not matter as long as you deliver that information honestly and with integrity. If you make a report in bad faith or retaliate against a person for making a report or participating in an investigation in good faith, you will be held accountable.

What is a good faith report? It is one in which the reporter reasonably believes to be true, and reasonably believes to constitute illegal conduct, fraud, or a violation of an organization's policy. The good faith requirement focuses on the existence of the violation or suspected violation, and not necessarily on the motives of the reporter in bringing it to the attention of OCIM.

What does retaliation look like? Retaliation and adverse employment consequences include intimidation, harassment, and discrimination; and can include failure to promote, adverse impact on compensation, termination, discharge, suspension, demotion, other change in responsibilities, whether formal or informal, and other negative consequences.

G. CONSEQUENCES FOR VIOLATIONS

Violations place all of us at risk of damaged reputation, hindering our professional prospects, and possibly being subject to fines or civil or criminal liabilities as individuals and as a Company. Those engaging in unethical or illegal behavior, or who otherwise violate this Code, policies, and standards, and those who direct, disregard,

approve, or facilitate such behavior, may be subject to adverse employment actions, as well as be subject to local laws.

VIII. WAIVER AND AMENDMENT OF OUR CODE

Our Code, policies, and standards apply equally to all Representatives and OCIM subsidiary companies and affiliates. As such, waivers of our Code for executive officers or directors are rarely if ever made. Waivers must be approved in advance by the CEO that has been delegated that authority.



IX. EXHIBIT A: SIGNATURE PAGE

RECEIPT AND ACKNOWLEDGEMENT

I hereby acknowledge that I have received, carefully read, and understand the “Code of Conduct and Business Conduct” of OCIM and agree to comply in all respects with all such procedures to which I am subject.

I understand that the CEO is available to answer any questions I have regarding the OCIM Group Code of Ethics & Business Conduct.

Laurent Mathiot
box SIGN 4PZX277R-4WPPV9QX

Signature

Laurent Mathiot

Name (Please print)

5 nov. 2024

Date

Laurence Mathiot
box SIGN 4KR56R95-4WPPV9QX

Signature

Laurence Mathiot

Name (Please print)

5 nov. 2024

Date