



Group Conflicts Of Interest Policy

V.1

04/10/2024

APPROVALS AND REVISION HISTORY

The Company has approved this Policy and will periodically review and update as necessary.

Effective Date	Version	Changes Made	Owner, Reviewer(s), and Approver(s)
4 Oct 2024	1.0	Creation of Conflicts of Interest Policy	Laurent Mathiot, CEO

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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' or 'the Company') 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.

II. SCOPE OF POLICY

OCIM, their affiliates and related entities (hereinafter known as "OCIM", "the Company") are committed to achieving the highest standards of professionalism and ethical conduct in its operations and services and expects its Representatives (as defined below) to conduct their business according to the highest ethical standards of conduct and to comply with all applicable laws. This Conflicts of Interest Policy (this "Policy") is intended to increase awareness of potential conflicts of interest and establish a procedure for reporting them. This Policy is intended to supplement but not replace any applicable laws governing conflicts of interest.

This Policy applies to directors, officers, and employees of OCIM and reflects the standard to which the Company expects adherence from its business associates, partners, agents, contractors, technical and other consultants, agents, or any other person associated with or acting on behalf of the Company (collectively referred to as "Representatives" in this policy). OCIM applies this Policy consistently and without discrimination to all Representatives, and in compliance with all applicable policies, employment and labor laws and regulations.

III. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest is a situation in which the concerns or interests of two different parties are incompatible or contradictory. It may also be a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official or professional capacity. The most common situations that create a conflict of interest or the appearance of one are those related to:

- Family, friends, and personal relationships
- Personal financial interests
- Corporate and outside business opportunities

It is not possible to list every situation that may result in a conflict of interest. This Policy provides details on the most common situations, as noted above, as well as legal and business conflict situations that create a conflict of interest, pose a potential for future conflicts, or have the appearance of one. Representatives must avoid any type of conflict and identify those situations that create or appear to create a conflict between your personal benefit and OCIM's interests.

IV. AVOIDING CONFLICTS OF INTEREST

Representatives should always act in the best interest of OCIM and not permit outside interests to interfere with your decision making or job duties. You must avoid conflicts of interest, promptly cease activities that cause conflicts to exist and provide written disclosure (see below) of any conflict of interest or potential conflict of interest that you are aware of upon hire or that may occur during your employment at OCIM.

V. DISCLOSURE, REPORTING AND APPROVALS

If a potential or actual conflict of interest exists or if you are unsure whether one exists, you must refrain from the activity. You must then promptly disclose the conflict of interest or potential conflict of interest in writing to the CEO. OCIM leadership will work with you, your manager, legal counsel and any other functional group(s) necessary to address the actual or potential conflict of interest and, if appropriate, obtain the required approvals. In the event you have a question as to whether any activity might constitute a conflict of interest, or if you believe that a violation of this Policy has occurred, please also contact CEO. Nothing in this Policy is intended to interfere with your rights under applicable laws and OCIM will not construe this Policy in a way that limits such rights.

VI. FAMILY, FRIENDS, AND PERSONAL RELATIONSHIPS

Representatives should avoid any personal conflicts but if this should arise, they should make every effort to disclose it in writing and submit it to CEO.

VII. PERSONAL FINANCIAL INTERESTS

You and the Representatives you manage, directly or indirectly, must not take part in or attempt to influence any OCIM decision or any business dealings with a current or potential competitor, customer, partner, vendor, supplier, or other business entity in which you have a direct or indirect financial interest. In addition, to avoid the appearance of a conflict, you must disclose any direct or indirect financial interest in a current or potential competitor, customer, partner, vendor, or supplier with which you discover OCIM plans to do business.

VIII. CORPORATE AND OUTSIDE BUSINESS OPPORTUNITIES

You must not interfere with any existing or potential OCIM business opportunities. OCIM business opportunities include investment or trading activities or pursuing lines of business that are related to OCIM's business mission and existing lines of business. You must not direct any such opportunity to a relative, close personal friend or to a business enterprise in which a relative or close personal friend is involved or has a direct or indirect financial interest. Additionally, your outside business activities must not compete with or reflect adversely on OCIM or give rise to a conflict of interest or appearance of a conflict of interest. You must not engage in any outside activity that is likely to involve disclosure of OCIM's proprietary or confidential information or that is likely to divert time and attention from your responsibilities at OCIM. It is essential to recognize that even the appearance of a conflict of interest is sufficient to raise the level of awareness to this Policy.

Personal and business-related activities such as speaking engagements and publishing opportunities must not compete with or reflect adversely on OCIM, nor should they give rise to a conflict of interest. Any written or oral presentations or publications that concern or are related to the business of OCIM or where you are representing yourself as an OCIM Representative must be pre-approved by the Director of Communications. For personal written or oral presentation or publications that are not related to the business of OCIM, it should be clear that you are representing yourself and not OCIM.

IX. FAVORS AND GIFTS

Representatives should always make business decisions in the best interests of OCIM and should not allow undue influence from gifts, favors, entertainment, payment, or loans to influence their business decisions. Please consult the Group Anti-Bribery and Corruption Policy for more information.

X. PRIVACY AND CONFIDENTIALITY

All Information relating to conflicts of interest will be treated as confidential. Any Personal Information collected, stored, used, or disclosed under this Policy will be managed in accordance with relevant internal policies.

XI. CONSEQUENCES OF VIOLATING THIS POLICY

Any Representatives found to have violated this Policy may be subject to legal and disciplinary actions, up to and including termination of employment. OCIM prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a potential conflict of interest for violation of this Policy or cooperating in related investigations.

XII. EXHIBIT A: SIGNATURE PAGE

RECEIPT AND ACKNOWLEDGEMENT

I hereby acknowledge that I have received, carefully read, and understand the “Conflicts of Interest Policy” 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 Conflicts of Interest Policy.

Laurence Mathiot
box SIGN 4KR56R95-4LPP8X99

Signature

Laurent Mathiot

Name (Please print)

5 nov. 2024

Date