



Policies Statements

V.2

27/01/2025

APPROVALS AND REVISION HISTORY

The Company has approved this Policies Statements and will periodically review and update, as necessary.

Effective Date	Version	Changes Made	Signatures
27 Jan 2025	2.0	Global Policies Statements	Laurent Mathiot, CEO Maxime Piccot, Head of Due Diligence

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I-ADHERENCE TO ANTI-MONEY LAUNDERING (“AML”) POLICY

The OCIM Group and each of its majority-owned subsidiaries (collectively, “OCIM”) are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist activities.

OCIM has implemented a risk-based global Anti-Money Laundering (“AML”) Policy designed to comply with all applicable AML laws and regulations relating to the prevention of money laundering and terrorist financing in the jurisdictions where OCIM operates. The AML Policy consists of, among other things:

- Designation of a Compliance Function which is responsible for coordinating and monitoring compliance with the AML Program;
- AML risk assessments on a regular basis;
- Written policies, procedures, and a system of internal controls designed to facilitate ongoing compliance with applicable AML laws and regulations;
- Counterparty Know Your Customer standards reasonably designed to identify and verify all counterparties and, where applicable, beneficial owners, source of funds, and the nature and intended purpose of the business relationship, to the extent warranted by the risk of money laundering or terrorist financing or as required by regulation;
- Performance of additional due diligence on higher risk counterparties, including those who are assessed to be politically exposed persons;
- Identification and reporting of suspicious transactions or activities to appropriate regulatory authorities in accordance with applicable laws;
- AML training for appropriate personnel;
- Independent audit and compliance testing functions to review and assess OCIM for compliance with the AML Program and applicable laws;
- Prohibition from conducting business in certain high risk jurisdictions; and
- Record keeping and reporting requirements.

Compliance with the legal and regulatory requirements is critical for OCIM to protect itself and to do its part to protect the international financial system from the abuses of illicit finance. Moreover, compliance with our AML Policy and internal procedures allows us to maintain good standing in the jurisdictions in which we transact business. OCIM cooperates to the fullest extent permitted by law with investigations and inquiries from law enforcement and regulatory authorities.

II-STATEMENT OF COMMITMENT TO GLOBAL SANCTIONS COMPLIANCE

OCIM has also implemented and strictly adheres to policies and procedures designed to comply with the prohibitions and restrictions mandated by sanctions laws and regulations applicable in the jurisdictions where OCIM operates.

III-STATEMENT OF COMMITMENT TO RESPONSIBLE SOURCING GUIDANCE

OCIM has also implemented a Supply Chain Policy based on OCIM's Group Code of Ethics & Business Conduct towards increasing transparency at suppliers to ensure that no contribution is made to human rights problems such as conflict materials. With regards to gold, silver and palladium, OCIM adheres to guidance from the Responsible Sourcing programme at the London Bullion Market Association ('LBMA') including, the LBMA Responsible Gold Guidance, LBMA Responsible Silver Guidance and Responsible Platinum and Palladium Guidance (RPPG). This guidance is based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas as well as Swiss Anti-Money Laundering and Combatting Terrorist Financing regulations.

IV-ADHERENCE TO ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

OCIM is committed to conducting its business dealings in an honest and ethical manner. To achieve this commitment, OCIM maintains a zero tolerance approach against all forms of bribery and corruption in conducting its business. OCIM complies with all applicable laws, regulations and guidelines where it operates.

OCIM's commitment is guided by its Group Code of Ethics and Business Conduct Policy, which includes policies, procedures, approval processes, risk assessments, due diligence, and employee training programs. All members of the organization and third parties must uphold the highest levels of integrity and accountability in discharging their duties to ensure that business activities are conducted in compliance with anti-corruption and anti-bribery integrity.

All members of the organization and third parties are strictly prohibited from the following activities:

- Receiving and offering bribes or participate in any form of bribery and corruption in its business dealings;
- Receiving (accepting) or offering (giving) any form of gifts, entertainment and corporate hospitality, whether directly or indirectly with the intention to bribe, to retain or gain a business advantage, or for personal gain;
- Corporate Social Responsibility (CSR), donations and sponsorships made to improperly influence business outcomes;
- Donating or offering political contributions whether in monetary or non monetary form; and
- Making any form of facilitation payments.

Disciplinary actions may be taken against an offender and OCIM reserves the right to terminate any relationships with third parties for breaches of the policies, including reporting to relevant authorities, where investigations confirm corruption.

Reporting of policy violations

Members of the organization and third parties who encounter actual or suspected violations of the policies are required to promptly report their concerns in good faith.

A reporting channel has been put in place which serves as an avenue for confidential reporting of any non-compliance with the policies and which protects the complainant from retaliation.

RECEIPT AND ACKNOWLEDGEMENT

I hereby acknowledge that I have received, carefully read, and understand this “Policies Statements” of OCIM dated January 27, 2025, and agree to comply in all respects with all such procedures to which I am subject.

I understand that the Head of Risk is available to answer any questions I have regarding this Policies Statements

Laurent Mathiot
box SIGN 4PZX277R-1JJPJ2VZ

Signature

Laurent Mathiot

Name (Please print)

Maxime Piccot
box SIGN 4ZRJW8Z9-1JJPJ2VZ

Maxime Piccot

27 janv. 2025 27 janv. 2025

Date