

## **Anti-Corruption & Anti-Bribery Policy**

At BASSEL®, ethical conduct is embedded in our governance framework and operational discipline. We maintain a strict zero-tolerance approach toward corruption, bribery, facilitation payments, and any form of improper advantage in all jurisdictions where we operate.

All commercial activities are conducted with integrity, transparency, and disciplined risk oversight to ensure compliance with applicable laws and internationally recognized standards.

### **Commitment to Ethical Business Conduct**

BASSEL® strictly prohibits any form of bribery or corruption, whether direct or indirect.

No director, officer, employee, consultant, agent, intermediary, contractor, or representative acting on behalf of BASSEL® may offer, promise, give, request, authorize, or accept:

**1** Bribes, kickbacks, facilitation payments, or improper advantages

Cash or cash equivalents intended to influence decision-making

Gifts, hospitality, or benefits designed to improperly influence a public official or private counterparty

Any payment or advantage intended to obtain or retain business, licenses, permits, regulatory approvals, or commercial benefits

These prohibitions apply regardless of local customs, business practices, or competitive pressures.

### **Public Officials and Private Counterparties**

BASSEL® prohibits bribery involving both public officials and private individuals.

For the purposes of this policy, a “public official” includes government officials, employees of state-owned or state-controlled enterprises, political party officials, candidates for public office, and representatives of international organizations.

No payment, benefit, or advantage may be provided to any public official or private party with the intent of influencing official action or securing improper business advantage.

### **Third-Party Risk Management**

## **BASSEL** The Core is Ours

BASSEL® recognizes that corruption risks frequently arise through third parties, intermediaries, and joint venture partners.

Accordingly:

All agents, brokers, consultants, and intermediaries must undergo appropriate risk-based due diligence prior to engagement

Contractual arrangements must include anti-corruption representations and compliance undertakings

BASSEL® shall not engage or retain any third party where there is reasonable cause to suspect corrupt practices

High-risk jurisdictions and transactions are subject to enhanced compliance review and monitoring.

### **Gifts, Hospitality & Business Expenses**

Reasonable and bona fide gifts, hospitality, and business expenses may be permitted only where they:

Are lawful and transparent

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Are proportionate and infrequent

Are not intended to influence decision-making

Are properly documented and approved in accordance with internal control procedures

Any gift, hospitality, or expense that creates an appearance of impropriety is strictly prohibited.

### **Books, Records & Internal Controls**

BASSEL® maintains accurate and transparent books, records, and accounts that fairly reflect all transactions.

No false, misleading, incomplete, or undisclosed entries are permitted.

All payments must be supported by appropriate documentation and authorized in accordance with internal financial controls and governance procedures.

### **Independent Compliance Function**

BASSEL® operates under an Independent Compliance Function responsible for monitoring adherence to anti-corruption standards, internal policies, and applicable regulatory requirements.

This function operates independently from commercial operations and maintains structured reporting access to senior governance structures, ensuring impartial oversight and enforcement.

**Alignment with International Standards**

BASSEL®’s anti-corruption framework is aligned with internationally recognized regulatory and governance standards, including:

OECD Anti-Bribery Convention

U.S. Foreign Corrupt Practices Act (FCPA)

UK Bribery Act

FATF Recommendations on AML/CFT risk governance

ICC Rules and international trade compliance standards

This alignment reinforces our commitment to responsible global commodity trade and disciplined financial conduct across all jurisdictions.

**Reporting & Non-Retaliation**

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All employees and representatives are encouraged to report, in good faith, any suspected or actual violations of this policy.

Reports may be made through secure and independent reporting channels. Retaliation against individuals who raise concerns responsibly is strictly prohibited.

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**Continuous Oversight & Enforcement**

Compliance with this policy is mandatory

BASSEL® reserves the right to review, investigate, and take appropriate corrective action in response to any suspected violation. Violations may result in disciplinary action, termination of contractual relationships, and potential civil or criminal liability

**This policy forms an integral part of BASSEL®’s governance architecture and ethical operating framework**

**Reviewed and formally approved by the Independent Compliance Unit of BASSEL®**



APPROVED