



Compliance & Governance Framework Policy

At BASSEL®, compliance is embedded within our governance architecture and operational discipline.

We are committed to conducting all activities in strict accordance with applicable laws, regulatory requirements, and internationally recognized compliance standards across every jurisdiction in which we operate.

This policy establishes BASSEL®'s overarching compliance framework and defines the structure through which legal, regulatory, ethical, and risk obligations are identified, managed, monitored, and enforced.

Governance Commitment

BASSEL® maintains a structured and risk-based compliance framework designed to:

1. Ensure lawful and ethical conduct across all operations

Prevent, detect, and mitigate compliance risks

Protect stakeholders, counterparties, and long-term corporate sustainability

Preserve institutional integrity and global market credibility

Compliance is a shared responsibility across the organization and is integrated into decision-making processes at all levels.

Independent Compliance Function

BASSEL® operates under an Independent Compliance Function responsible for:

Monitoring adherence to legal and regulatory obligations

Overseeing implementation of internal compliance policies

Conducting risk-based assessments and reviews

Escalating material compliance matters to senior governance structures

The Compliance Function operates independently from commercial operations and maintains structured

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reporting access to senior governance bodies to ensure impartial oversight and accountability.

Risk-Based Compliance Framework

BASSEL® applies a risk-based approach to compliance management, including:

Periodic compliance risk assessments

Transaction monitoring and enhanced review for high-risk jurisdictions

Third-party and intermediary due diligence

Internal control mechanisms and documentation standards

Structured escalation and remediation procedures

High-risk activities, jurisdictions, counterparties, or transaction types may be subject to enhanced compliance review.

Core Compliance Areas

BASSEL®'s compliance framework includes, but is not limited to:

Anti-Corruption and Anti-Bribery

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF)

Sanctions, trade controls, and export regulations

Conflict of Interest management

Data protection and confidentiality

Fair competition and antitrust compliance

Health, safety, environmental, and social responsibility

Detailed internal policies govern each of these areas and form part of this overarching framework.

Third-Party Risk Governance

BASSEL® recognizes that compliance risks frequently arise through business partners, agents, intermediaries, and joint venture participants.

Accordingly:

Risk-based due diligence may be conducted prior to engagement



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Compliance representations may be incorporated into contractual arrangements

Ongoing monitoring may be applied where appropriate

BASSEL® shall not knowingly engage in business relationships involving unlawful, unethical, or sanctionable conduct.

Reporting & Escalation

All individuals acting on behalf of BASSEL® are required to report suspected or actual compliance breaches through established reporting channels.

Reports are handled confidentially, objectively, and in accordance with internal investigation procedures. Retaliation against individuals who raise concerns in good faith is strictly prohibited.

Training & Awareness

BASSEL® promotes compliance awareness through structured guidance, communications, and training initiatives appropriate to operational risk exposure.

Alignment with International Standards

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BASSEL®'s compliance framework aligns with internationally recognized governance and regulatory principles, including:

OECD Guidelines for Multinational Enterprises

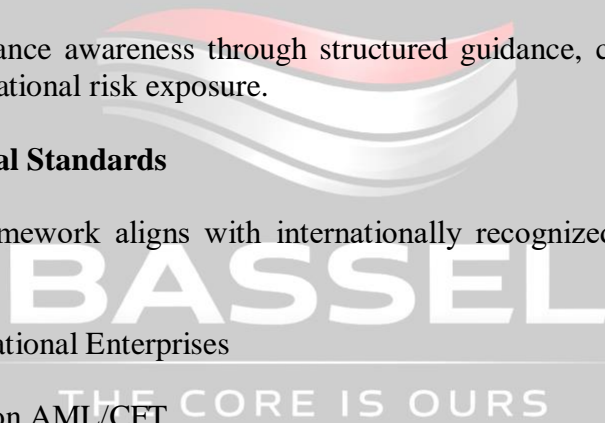
FATF 40 Recommendations on AML/CFT

OECD Anti-Bribery Convention

ICC compliance and trade standards

International sanctions regimes and trade control frameworks

This alignment reinforces BASSEL®'s commitment to responsible global commodity operations and disciplined financial conduct.



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 compliance breach. Violations may result in disciplinary measures, termination of contractual relationships, and potential civil or criminal liability

This policy constitutes the foundational governance framework of BASSEL® and applies to all directors, officers, employees, consultants, agents, and representatives

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



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