

Conflict of Interest & Ethical Conduct

At BASSEL®, integrity is embedded in our governance architecture and operational discipline. All commercial, financial, and strategic decisions are conducted with independence, transparency, and structured risk judgment to ensure that the interests of the Company and its stakeholders prevail at all times.

Commitment to Independent Judgment

BASSEL® maintains a strict zero-tolerance approach to conflicts of interest.

All directors, officers, employees, consultants, agents, and representatives are required to act with full objectivity, professional independence, and ethical responsibility in every transaction, negotiation, sourcing activity, financing structure, and commercial engagement.

A conflict of interest arises where personal, financial, professional, or external interests interfere — or may reasonably appear to interfere — with an individual's ability to act independently and in the best interests of BASSEL®.

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Conflicts may be actual, potential, or perceived. Each is addressed with equal seriousness and without exception.

Disclosure & Governance Framework

Any actual, potential, or perceived conflict must be disclosed promptly through established reporting channels.

All disclosures are reviewed objectively and independently under the oversight of senior management and, where appropriate, escalated to higher governance levels to ensure transparency and accountability.

Where necessary, appropriate safeguards may include:

Recusal from decision-making processes

Reassignment or restriction of responsibilities

Termination of conflicting relationships or arrangements

All related-party transactions must adhere to strict arm's-length principles and transparent approval procedures consistent with disciplined corporate governance practices.

Independent Compliance Function

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

BASSEL

The Core is Ours

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

Alignment with International Standards

BASSEL®'s conflict of interest framework is aligned with internationally recognized governance and compliance principles, including:

OECD Guidelines for Multinational Enterprises

FATF Recommendations on AML/CFT risk governance

ICC Rules and internationally accepted trade compliance standards

This alignment reinforces our commitment to responsible sourcing, disciplined financial conduct, and ethical global commodity operations across all jurisdictions in which we operate.

Confidentiality & Non-Retaliation

All non-public, proprietary, and commercially sensitive information obtained through association with BASSEL® must be safeguarded at all times.

BASSEL® maintains secure and independent reporting mechanisms that allow concerns to be raised in good faith and without fear of retaliation. Any form of retaliation against individuals who report concerns responsibly is strictly prohibited.

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BASSEL

Continuous Oversight

Compliance with this policy is mandatory

BASSEL® reserves the right to review, investigate, and take appropriate corrective action in any situation involving potential or actual conflicts of interest

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

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



APPROVED