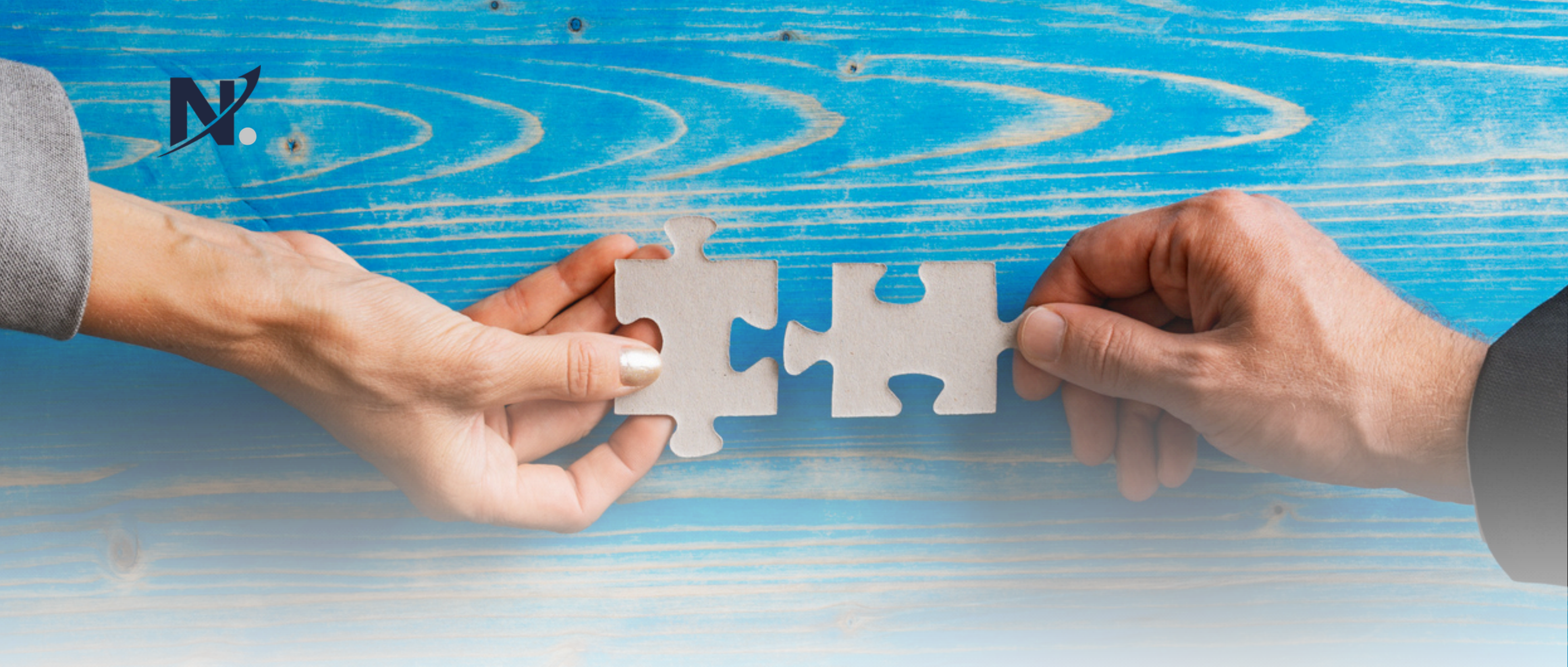
CODE OF CONDUCT

Release Version: 1st August, 2026

TABLE OF CONTENTS



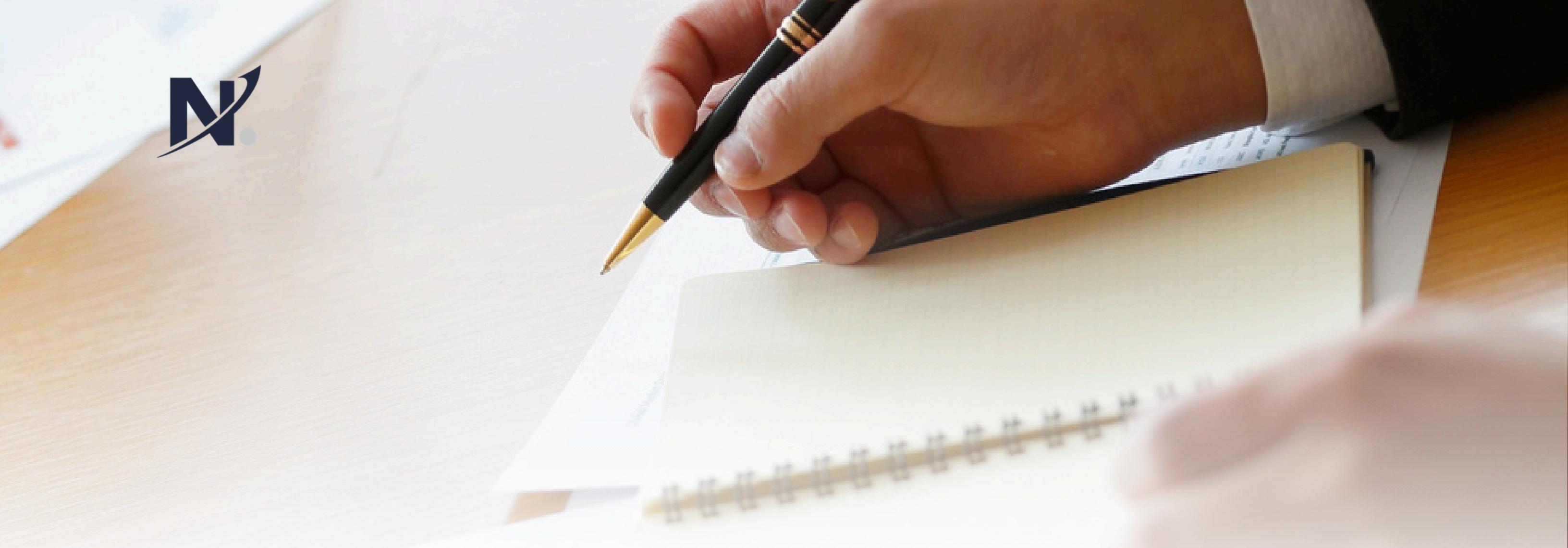
OVERVIEW

Operating across international commodity and financial markets, the company specializes in the sourcing, procurement, trading, distribution, and strategic investment of commodities and capital assets. Its business model focuses on identifying market opportunities, connecting global suppliers with buyers, and deploying proprietary capital into carefully selected investments that generate sustainable long-term value.

Leveraging market intelligence, international relationships, and disciplined risk management, the company facilitates efficient cross-border trade while providing strategic procurement solutions and reliable supply chain support. Its expertise spans metals, agricultural commodities, global sourcing, and trade facilitation across multiple international markets.

In addition to commodity trading, the company actively invests in financial markets, commodity-related assets, private equity opportunities, and strategic investments. Every decision is supported by thorough market analysis, prudent capital allocation, and comprehensive due diligence to balance growth with effective risk management.

Committed to integrity, transparency, operational excellence, and regulatory compliance, the company builds long-term partnerships with suppliers, customers, financial institutions, and strategic stakeholders. By combining commodity expertise with investment capabilities, it creates sustainable value while contributing to efficient and responsible global trade.



CODE OF ETHICS & BUSINESS CONDUCT

As an international commodity trading and investment company, the organization is committed to conducting all business activities with integrity, transparency, and accountability. This Code of Ethics and Business Conduct establishes the standards expected from all employees, directors, contractors, and business representatives, ensuring that every decision reflects ethical practices, legal compliance, and responsible corporate governance.

The company operates in accordance with applicable laws and internationally recognized standards relating to human rights, fair labour practices, anti-corruption, environmental responsibility, and ethical business conduct. Every individual associated with the organization is expected to understand, follow, and uphold these principles in their daily responsibilities.

Integrity, professionalism, fairness, and accountability are the foundation of every business relationship. The company is committed to delivering reliable services, protecting confidential information, honouring contractual obligations, and maintaining the highest standards of quality and operational excellence.

The same expectations extend to suppliers, contractors, service providers, and other business partners. By promoting ethical conduct, responsible decision-making, and long-term collaboration, the organization strengthens stakeholder trust, safeguards its reputation, and supports sustainable growth across global commodity and investment markets.

ABOUT US

Nexum Commodities Limited is a global trading and investment company specializing in commodities, strategic assets, and financial markets.

Through disciplined market analysis, prudent risk management, and strong international partnerships, Nexum identifies and executes opportunities across global commodity and financial markets using its own capital and strategic resources.

VISION

Connecting Global Markets, Capital and Commodities.

MISSION

To create value through disciplined commodity trading and strategic proprietary investments while maintaining the highest standards of integrity, compliance, and risk management.

CORE VALUES

- Long-Term Value Creation
- Responsible Capital Allocation
- Compliance and Governance
- Strategic Global Partnerships

INTEGRITY & CORPORATE CONDUCT

The company is committed to conducting business with integrity, transparency, and accountability while complying with all applicable laws, international regulations, and recognized industry standards. Ethical conduct is the foundation of every business decision and relationship.

Its Code of Conduct provides clear guidelines for employees, directors, suppliers, contractors, and business partners, promoting professionalism, fairness, respect, confidentiality, and compliance in all operations.

The company is committed to sustainable and responsible business practices by balancing commercial success with sound governance, environmental responsibility, and social accountability. Supporting policies on compliance, anti-corruption, risk management, workplace standards, and data protection reinforce these commitments.

The same high ethical standards are expected from all suppliers, service providers, and business partners, ensuring that every relationship is built on trust, accountability, and responsible business practices.

LEGAL COMPLIANCE

The company is committed to conducting its business in full compliance with all applicable local, national, and international laws, regulations, and industry standards across the jurisdictions in which it operates. Legal compliance forms the foundation of its corporate governance and business practices.

Where differences exist between local laws, international regulations, or internal policies, the company applies the higher or more stringent standard wherever practicable. In situations where specific legal requirements do not exist, business decisions and operations are guided by the principles of integrity, ethical conduct, transparency, and responsible corporate governance outlined in the company's Code of Conduct.

PRODUCT & SERVICE QUALITY

The company is committed to delivering reliable, high-quality services across its commodity trading, procurement, and investment activities. Every transaction is conducted with careful due diligence, strict operational controls, and a strong focus on accuracy, reliability, and regulatory compliance.

Robust quality management processes are implemented to monitor operations, identify potential risks, and continuously improve performance. Any operational issues, compliance concerns, or service deficiencies are promptly investigated, and appropriate corrective measures are taken to protect the interests of clients, business partners, and stakeholders.

Quality, operational excellence, and responsible risk management form the foundation of the company's business practices, ensuring consistency, transparency, and trust across all global operations.

SUSTAINABILITY & ENVIRONMENT SAFETY

The company is committed to conducting its business responsibly with a long-term perspective, creating sustainable value while considering the interests of stakeholders, the environment, and the communities in which it operates.

Environmental responsibility is integrated into business operations through responsible resource management, regulatory compliance, and continuous efforts to minimize environmental impact across trading, procurement, and investment activities.

The company is equally committed to providing a safe, healthy, and secure workplace for its employees, contractors, and visitors. By promoting strong health, safety, and environmental (HSE) practices, it strives to maintain a culture where safety, well-being, and operational excellence remain fundamental to every aspect of its business.

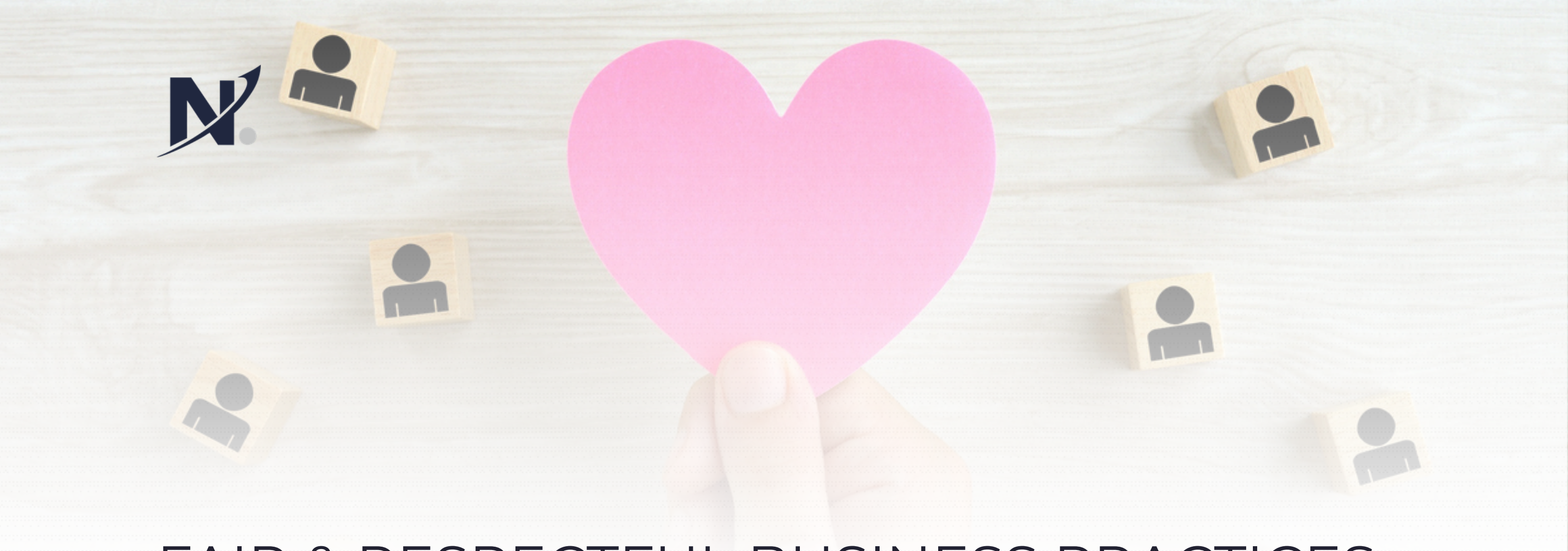
HUMAN RIGHTS

The company is committed to protecting and respecting the rights and dignity of every individual in accordance with the laws and regulations of the United Arab Emirates. It promotes a workplace built on fairness, equality, mutual respect, and professional conduct, ensuring that all employees are treated without discrimination, harassment, or unfair treatment.

The company fully complies with the UAE Labour Law (Federal Decree-Law No. 33 of 2021 and its amendments) and other applicable UAE regulations relating to employment, workplace health and safety, equal opportunity, employee welfare, and human rights. It maintains a zero-tolerance approach towards forced labour, child labour, human trafficking, abuse, or any form of exploitation.

Employment decisions are based on merit, qualifications, experience, and business requirements. The company is committed to providing fair working conditions, timely payment of wages, safe working environments, and respect for the rights of all employees.

The company also expects its suppliers, contractors, consultants, and business partners to comply with applicable UAE laws and uphold the same standards of ethical conduct, fair labour practices, and respect for human rights. Through continuous review of its policies and procedures, the company remains committed to fostering a responsible, inclusive, and legally compliant workplace.



FAIR & RESPECTFUL BUSINESS PRACTICES

1. FAIR COMPETITION

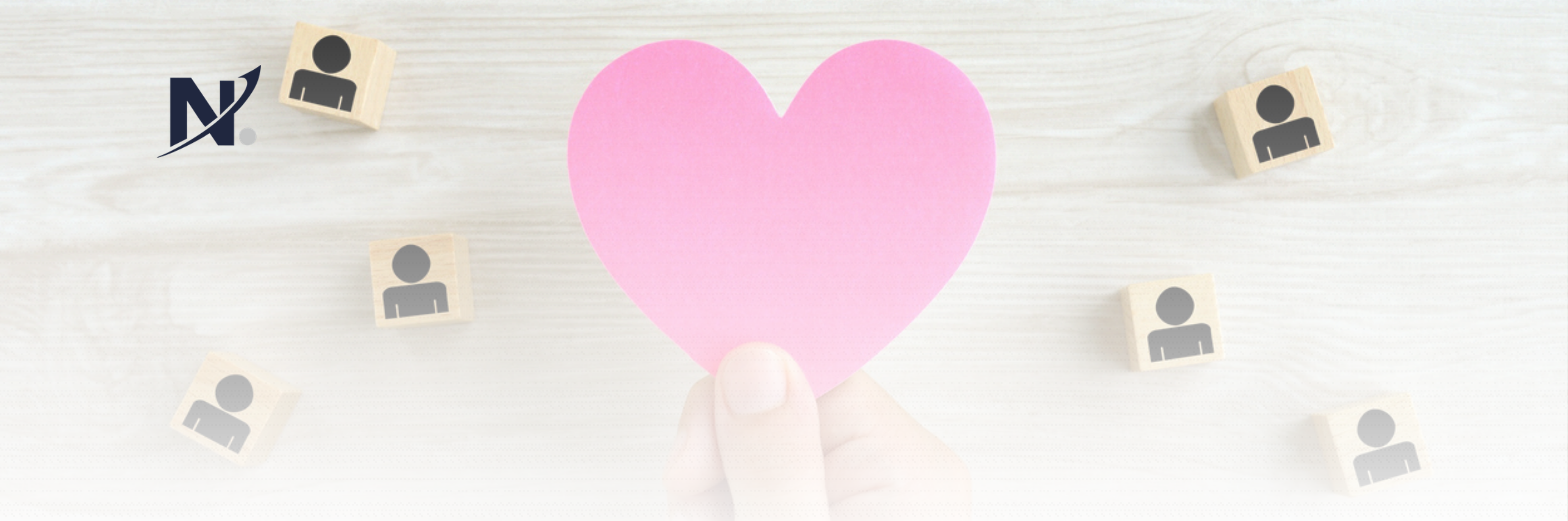
The company is committed to fair, open, and ethical competition in accordance with the competition laws and regulations of the United Arab Emirates and all applicable international jurisdictions. It does not engage in price-fixing, market allocation, bid-rigging, or any agreement that could unlawfully restrict competition. Employees are expected to seek legal guidance whenever there is uncertainty regarding competition-related matters.

2. TRADE COMPLIANCE

All business activities involving the import, export, procurement, and international trading of commodities are conducted in full compliance with UAE customs regulations, export controls, economic sanctions, and applicable international trade laws. Employees must ensure that every transaction meets all legal and regulatory requirements before execution.

3. ANTI-BRIBERY & ANTI-CORRUPTION

The company maintains a zero-tolerance approach toward bribery, corruption, facilitation payments, kickbacks, or any improper advantage. Employees, directors, and representatives must never offer, request, accept, or authorize anything of value intended to improperly influence a business decision. Reasonable business hospitality or promotional gifts may only be accepted when lawful, transparent, and consistent with company policy.



4. ANTI-MONEY LAUNDERING (AML)

The company complies with all applicable UAE Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations. Appropriate customer due diligence, transaction monitoring, and record-keeping procedures are maintained to prevent financial crime. Any suspicious activity must be reported through the appropriate internal channels.

5. CONFLICTS OF INTEREST

Employees and representatives must avoid situations where personal interests conflict, or appear to conflict, with the interests of the company. Any actual or potential conflict must be disclosed promptly. Business decisions must always be based on objective commercial considerations and the best interests of the organization.

6. RESPONSIBLE COMMUNICATION & SOCIAL MEDIA

The company communicates honestly, accurately, and professionally with customers, suppliers, regulators, and the public. Marketing materials and public statements must be truthful and not misleading. Employees are expected to use social media responsibly and avoid any communication that could harm the company's reputation or disclose confidential information.

7. BUSINESS PARTNER EXPECTATIONS

The company expects all suppliers, contractors, consultants, logistics providers, financial institutions, and other business partners to comply with applicable UAE laws and regulations while maintaining high standards of ethics, integrity, human rights, environmental responsibility, and responsible business conduct. Long-term relationships are built on mutual trust, transparency, compliance, and accountability.

DATA PRIVACY, PROTECTION & IT SECURITY

The company is committed to protecting confidential information, personal data, and business records in accordance with applicable laws and regulations of the United Arab Emirates, including relevant data protection and cybersecurity requirements. Confidential information must not be disclosed or accessed by unauthorized persons during or after employment or engagement with the company.

Personal information relating to employees, customers, suppliers, and business partners is collected, processed, stored, and shared only for legitimate business purposes and with appropriate safeguards to ensure its confidentiality, integrity, and security.

All employees, contractors, and authorized users are responsible for maintaining information security and are required to follow the company's data protection and IT security policies. Access to company systems and information is granted strictly on a need-to-know basis using appropriate technical and organizational controls.

The company's IT infrastructure is protected through appropriate cybersecurity measures, including secure access controls, malware protection, regular system updates, data backups, disaster recovery procedures, and continuous monitoring. All technology systems and applications are developed, tested, implemented, and maintained in accordance with established security and operational standards to protect company assets and support business continuity.

PROTECTION OF CORPORATE ASSETS & INTELLECTUAL PROPERTY

The company is committed to protecting its physical assets, financial resources, confidential information, intellectual property, and digital systems from loss, theft, misuse, unauthorized access, or damage. All employees, contractors, and business partners are expected to use company assets responsibly and solely for legitimate business purposes, unless otherwise authorized.

Confidential business information, trade secrets, commercial data, client information, and proprietary knowledge must be safeguarded during and after the period of engagement with the company. Unauthorized disclosure, reproduction, or use of such information is strictly prohibited.
The company respects intellectual property rights and complies with the applicable laws and regulations of the United Arab Emirates. All personnel are expected to protect the company's intellectual property and respect the proprietary rights of customers, suppliers, partners, and other third parties. Appropriate security measures and internal controls are maintained to protect corporate assets and ensure business continuity.

FINANCIAL ACCURACY & INTEGRITY

The company is committed to maintaining accurate, transparent, and reliable financial information in compliance with the applicable laws and regulations of the United Arab Emirates (UAE), internationally accepted accounting principles where applicable, and its internal financial governance policies. Strong financial controls and responsible reporting support informed decision-making, regulatory compliance, and long-term business sustainability.

1. ACCURATE FINANCIAL RECORDS

All financial transactions are recorded accurately, completely, and in a timely manner. Business records, contracts, invoices, and supporting documentation are maintained in accordance with UAE legal requirements and internal record retention policies. Digital record-keeping systems are used to enhance efficiency, security, and traceability.

2. FINANCIAL REPORTING

Financial statements, management reports, and related documentation are prepared fairly and accurately, reflecting the company's financial position in accordance with applicable UAE accounting, tax, and regulatory requirements. Internal controls are maintained to ensure consistency, reliability, and transparency in financial reporting.

3. AUDITS & REGULATORY COMPLIANCE

The company cooperates fully with external auditors, internal auditors, tax authorities, and other regulatory bodies. All required financial disclosures, statutory filings, and audit requirements are completed accurately and within the prescribed timelines under UAE law.

4. GOVERNMENT & REGULATORY AUTHORITIES

The company maintains professional and transparent relationships with UAE government entities and regulatory authorities. All reporting, licensing, taxation, customs, and other statutory obligations are fulfilled honestly, accurately, and in accordance with applicable legal requirements.

5. FINANCIAL CONTROLS & RISK MANAGEMENT

Robust financial controls and risk management procedures are implemented to safeguard company assets, maintain liquidity, and support sustainable growth. Financial risks are identified, assessed, monitored, and managed through appropriate governance, segregation of duties, authorization controls, and regular reviews to ensure the company's long-term financial stability.

COMPLIANCE & REPORTING

Compliance with this Code of Conduct is essential to maintaining the company's ethical standards and legal obligations. All employees, contractors, suppliers, and business partners are expected to comply with applicable laws, regulations, and the principles outlined in this Code.

Any suspected violation of the Code, company policies, or applicable laws should be reported promptly to the designated Compliance Officer or through the company's Compliance Reporting Channel. Reports may be made confidentially, and where permitted under applicable UAE laws, anonymously.

The company is committed to investigating all reported concerns fairly, promptly, and impartially. Where a breach is confirmed, appropriate corrective and disciplinary actions will be taken in accordance with UAE laws, company policies, and the nature of the violation.

No individual who reports a concern in good faith will be subject to retaliation, discrimination, or any form of adverse treatment. The company encourages a culture of openness, accountability, and ethical conduct, ensuring that all concerns can be raised without fear while protecting the confidentiality of those involved to the fullest extent permitted by law.

Approval for this statement

This statement was approved on 1st July, 2026.