

MONTAGE COMMODITIES FZCO

Dubai Multi Commodities Centre, Dubai, U.A.E.

Trading License No. DMCC74413

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Document Reference: MO-ABAC-001

Effective Date: 1 November 2025

Approved by: Management of Montage Commodities FZCO

1. Purpose and Scope

This Anti-Bribery and Anti-Corruption Policy (the “Policy”) sets out the standards of conduct and procedures that Montage Commodities FZCO (“the Company”) and all persons acting on its behalf must follow to ensure compliance with applicable anti-corruption laws and regulations.

Montage Commodities FZCO is a Free Zone Company registered in Dubai Multi Commodities Centre, principally engaged in the international trading of petrochemicals, crude oil, refined oil products and fertilisers. The Company operates from offices in Dubai, Sharjah, Ho Chi Minh City, Suzhou and Lahore, serving customers and suppliers across multiple jurisdictions.

This Policy applies to all directors, officers, employees, agents, consultants, joint venture partners, subcontractors and any other persons or entities acting on behalf of or in association with the Company, regardless of location.

2. Policy Statement

Montage Commodities FZCO adopts a **zero-tolerance approach** to bribery and corruption in all its forms. The Company is committed to conducting business ethically, transparently and in full compliance with all applicable anti-bribery and anti-corruption laws, including but not limited to:

- The UAE Federal Decree-Law No. 31 of 2021 on the Issuance of the Crimes and Penalties Law and applicable anti-corruption provisions
- The UAE Federal Law No. 11 of 2018 on the Establishment of the Anti-Corruption Authority
- The U.S. Foreign Corrupt Practices Act (FCPA)
- The UK Bribery Act 2010
- The French Law No. 2016-1691 (Sapin II)
- All other applicable local and international anti-corruption laws in jurisdictions where the Company operates

3. Key Definitions

Bribery: The offering, giving, soliciting or accepting of any inducement or reward, whether financial or otherwise, that is intended to influence or is perceived to influence the actions, judgment or decisions of any person in order to gain a commercial, contractual, regulatory or personal advantage.

Corruption: The abuse of entrusted power or position for private gain, including but not limited to bribery, extortion, fraud, embezzlement and money laundering.

Public Official: Any person holding a legislative, executive, administrative or judicial office, whether appointed or elected, at national or local level; any person exercising a public function for a government, public agency or enterprise; and any official or agent of a public international organisation.

Facilitation Payment: An unofficial, improper, small payment made to a public official to secure or expedite the performance of a routine or necessary action to which the payer is legally entitled.

Thing of Value: Includes cash, gifts, hospitality, entertainment, travel expenses, charitable donations, political contributions, employment or internship offers, and any other tangible or intangible benefit.

4. Prohibited Conduct

No person subject to this Policy shall, directly or through any intermediary:

- Offer, promise, give, authorise or accept any bribe, kickback or other improper payment or benefit to or from any person, whether in the public or private sector, for the purpose of obtaining or retaining business, securing an improper advantage, or influencing any act or decision.
- Make or authorise any facilitation payment, regardless of local custom or practice. Facilitation payments are strictly prohibited under this Policy.
- Offer or provide gifts, hospitality, entertainment or other things of value to any public official or private counterparty where the purpose or effect is to improperly influence a business decision or secure an unfair advantage.
- Make or authorise any contribution to a political party, political campaign or candidate for public office on behalf of the Company without prior written approval from senior management.
- Engage any agent, intermediary, consultant or other third party without conducting appropriate due diligence and obtaining proper written authorisation.
- Falsify, conceal or fail to accurately record any transaction, payment or financial record of the Company.

5. Gifts, Hospitality and Entertainment

Reasonable and proportionate hospitality or promotional gifts given or received in the ordinary course of business may be permissible provided they meet all of the following criteria: they are not offered or received with the intention of influencing business decisions; they are of modest value and proportionate to the business relationship; they comply with applicable laws and the recipient's own organisational policies; they are properly recorded in the Company's books and records; and they have been approved in advance by the employee's line manager for any gift or hospitality exceeding USD 200 in value.

Gifts or hospitality involving public officials require prior written approval from senior management, regardless of value.

6. Third-Party Due Diligence

The Company recognises that the use of agents, consultants, intermediaries and other third-party representatives presents heightened corruption risk. Before engaging any third party who will interact with public officials or business counterparties on the Company's behalf, the following steps must be taken:

- Conduct risk-based due diligence on the prospective third party, including verification of identity, business reputation, beneficial ownership and any connections to public officials or politically exposed persons.
- Ensure that the third party has been informed of and agrees to comply with this Policy and all applicable anti-corruption laws.
- Include appropriate anti-corruption representations, warranties and audit rights in all written agreements with third parties.
- Monitor the activities of third parties on an ongoing basis and renew due diligence at appropriate intervals.

7. Books, Records and Financial Controls

The Company shall maintain accurate and reasonably detailed books and financial records that properly reflect all transactions and dispositions of assets. The Company's financial statements are audited annually by independent external auditors (currently NBN Auditing of Accounts, Dubai) in accordance with International Financial Reporting Standards (IFRS) and International Standards on Auditing (ISAs).

No undisclosed or unrecorded fund, account or asset shall be established or maintained for any purpose. All payments must be supported by appropriate documentation and approved in accordance with the Company's internal authorisation procedures.

8. Trade Sanctions and Export Controls

The Company shall comply with all applicable economic and trade sanctions, embargoes and export control laws and regulations, including those imposed by the United Nations, the European Union, the United States (OFAC), the UAE and any other relevant jurisdiction. No transaction shall be entered into with sanctioned persons, entities or countries in violation of applicable sanctions laws.

9. Reporting and Whistleblowing

All persons subject to this Policy are required to report promptly any known or suspected violations of this Policy, applicable anti-corruption laws, or any other unethical conduct. Reports may be made to the employee's direct manager, senior management, or via the Company's designated compliance contact.

The Company is committed to protecting any person who reports a concern in good faith from any form of retaliation, discrimination or adverse consequence. All reports will be treated confidentially to the extent possible and investigated promptly and thoroughly.

10. Training and Awareness

The Company shall ensure that all employees and relevant third parties receive appropriate training on this Policy and applicable anti-corruption laws. Training will be provided upon onboarding and refreshed periodically, with additional targeted training for employees in higher-risk roles or jurisdictions.

11. Consequences of Non-Compliance

Any violation of this Policy may result in disciplinary action up to and including termination of employment or contractual relationship, as well as potential civil and criminal liability for the individual concerned and the Company. The Company will cooperate fully with relevant authorities in the investigation and prosecution of any bribery or corruption offences.

12. Policy Review

This Policy shall be reviewed and updated at least annually, or more frequently as required by changes in applicable laws, regulations or the Company's business operations. Any amendments to this Policy must be approved by senior management.

APPROVED AND ADOPTED

For and on behalf of Montage Commodities FZCO

