
Bullion Link Trading - FZCO

Code of Conduct and Ethics

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1. INTRODUCTION

Bullion Link Trading - FZCO General Management share the conviction that the success of the company depends directly on the behaviour of each employee. Together we are committed to building the future of Bullion Link Trading - FZCO on the foundations of professional expertise and integrity. This requires ensuring the engagement of all employees and earning the trust of our partners, clients and stakeholders, as well as public officials and representatives of civil society in every country where Bullion Link Trading - FZCO does business.

To do this, we must of course scrupulously comply with prevailing laws and regulations. At the same time, we must go further and make certain that every decision is guided by a deep sense of ethical responsibility. This begins with an ability to learn from inappropriate practices.

The world in which Bullion Link Trading - FZCO operates continues to change at an accelerated pace. Bullion Link Trading - FZCO can manage these changes by anticipating them, adapting and innovating, thanks to a culture anchored by solid values that are applied without compromise.

This spirit shapes our Code of Conduct and Business Ethics, which defines the rules which govern all our actions, consistent with our core values. This Code of Conduct and Business Ethics guides our thinking and our behaviour. It expresses what we aspire to be: one of the most respected entities with a global reach.

The Code of Conduct and Business Ethics is a guide for our actions and decisions. There are no specific rules that can apply to every situation. Rather, the Code of Conduct and Business Ethics should be sufficiently embedded to ensure that, aided by personal judgement, this spirit is always respected.

We place our trust in all our employees to fully engage with these values and principles, which underpin our contribution to society, our unity and our success.

2. MISSION AND VALUES

In order to ensure that the impact of the work of Bullion Link Trading - FZCO's employees is positive, Bullion Link Trading - FZCO upholds the highest standards of conduct and ethics in the areas of Human

Rights, labour, the environment and anti-corruption. As such, Bullion Link Trading - FZCO acknowledges and is committed to respecting a number of principles and norms which underpin the way it does business:

- The United Nations Sustainable Development Goals¹
- The 10 Principles of the United Nations Global Compact²
- The internationally-accepted OECD Guidelines for multinational enterprises³
- The internationally accepted standards of Human Rights, as defined in the International Bill of Human Rights
- The core labour standards set out by the International Labour Organisation⁴

2.1. Mission

In today's environment, it is not enough just to respect laws and regulations. We also want to demonstrate that the activities of Bullion Link Trading - FZCO have a positive impact on all our stakeholders at large, and that Bullion Link Trading - FZCO is both a profitable company and a responsible actor in the economies it serves.

Bullion Link Trading - FZCO integrated model allows us to offer the first-class service that clients demand and deserve. Maintaining an integrated model is not just about the diversification of risks. It is also about the way all employees serve our clients. Bullion Link Trading - FZCO's integrated models enables us to have a detailed knowledge of our clients as well as the ability to draw on the broad resources and capabilities of Bullion Link Trading - FZCO to offer the best possible solutions. The integrated model allows us to gain the trust of our clients across the globe.

We also have a duty to be always attentive to the expectations of our employees, Bullion Link Trading - FZCO's most valuable asset. It is their hard work and their ideas that drive the success of Bullion Link Trading - FZCO. In order to succeed, our employees need to work in an inspiring, stimulating and safe environment.

¹ United Nations Department of Economic and Social Affairs for Sustainable Development

² United Nations Corporate Sustainability value system and principles

³ OECD Guidelines for Multinational Enterprises

⁴ International Labour Organisation Standards and Principles

When everyday behaviours are anchored in the Values and everyone acts with impeccable conduct, it builds trust with colleagues and clients. This trust is what will set Bullion Link Trading - FZCO apart within the industry.

Bullion Link Trading - FZCO mission encompasses a broad spectrum of stakeholders. It is the responsibility of everyone to ensure that our values and rules are more than mere words and make them come alive at both a personal and collective level within Bullion Link Trading - FZCO.

Bullion Link Trading - FZCO will be guided in the pursuit of its mission by the Values, which underpin all actions and decisions across the organisation.

- a) We want to have a positive impact on our stakeholders – customers, employees, shareholders – and on society;
- b) Our highly committed teams will deliver first-class service and products to our clients;
- c) We will offer an inspiring, stimulating and safe place to work for our colleagues;
- d) We want to be among the most trustworthy players of our industry, by anchoring further our Values and Ethics in everything we do.

2.2. Values

2.2.1. Our strengths

- a) Stability – We build upon our solid long-term oriented management, our diversified and integrated business model and our international footprint;
- b) Responsibility – We build upon our culture of responsibility and integrity to ever better serve the interest of our customers;
- c) Expertise – We build upon the recognised and expanding knowledge of our teams;
- d) Good place to work – We foster a stimulating workplace where people are treated fairly and with respect.

2.2.2. Our driving forces

- a) Agility – We want to behave more simply, to embrace useful innovation and digital transformation;
- b) Compliance Culture – We believe in promoting clear rules to foster a strong culture of compliance and ethics;
- c) Client satisfaction – We believe that our success lies in being customers’ and clients’ preferred choice. We seek to listen carefully to them and work closely with them;
- d) Openness – We promote open-minded attitudes towards our stakeholders. We aim for everyone in Bullion Link Trading - FZCO to feel included, to have their say and to be empowered.

2.3. What it takes to get there

2.3.1. How business is done

- a) Address the clients’ needs in an open and responsible manner; with the highest standards of compliance and ethics;
- b) Collectively build on our expertise to achieve excellence in the businesses we chose to operate;
- c) Consider the consequences of our actions on the wider society

2.3.2. How work is performed

- a) Foster digital and useful innovation;
- b) Simplify further the way of working to gain agility;
- c) Allow people to experiment in a test-and-learn approach;
- d) Trust and empower people to embrace business opportunities and client development within a clear framework;
- e) Make decisions at all levels of the organisation and be accountable for actions.

2.3.3. How people are cared for

- a) Actively promote diversity;
- b) Encourage mobility to offer diversified experiences;

- c) Develop talents and continue to invest in Bullion Link Trading - FZCO's key asset: its people.

3. THE RULES OF CONDUCT

3.1. Customer's Interests

3.1.1. Values

- a) Expertise
- b) Client Satisfaction
- c) Compliance Culture

3.1.2. Rules of Conduct

- a) Understanding customers' needs
- b) Ensuring fair treatment of customers
- c) Protecting our customers' interests
- d) Protect customers' confidentiality
- e) Communicating transparently in sales and marketing
- f) Dealing fairly with customers' complaints

3.2. Financial Security

3.2.1. Values

- a) Responsibility
- b) Compliance Culture

3.2.2. Rules of Conduct

- a) Fighting and prevention of money laundering, bribery, corruption and terrorism financing
- b) Complying with sanctions and embargoes

3.3. Professional Ethics

3.3.1. Rules of Conduct

- a) Never using inside information in personal transactions
- b) Avoiding conflicts of interest in outside activities
- c) Taking measures against bribery and corruption

3.4. Respect for Colleagues

3.4.1. Values

- a) Good place to work
- b) Openness

3.4.2. Rules of Conduct

- a) Applying best standards in professional behaviour
- b) Rejecting any forms of discrimination
- c) Ensuring the safety of the workplace

3.5. Bullion Link Trading - FZCO Protection

3.5.1. Values

- a) Stability
- b) Agility

3.5.2. Rules of Conduct

- a) Building and protecting Bullion Link Trading - FZCO long term value
- b) Protecting Bullion Link Trading - FZCO information
- c) Communicating responsibly

- d) Acting ethically with external parties
- e) Taking risks responsibly while ensuring close risk control

3.6. Involvement with Society

3.6.1. Values

- a) Responsibility
- b) Compliance Culture

3.6.2. Rules of Conduct

- a) Promoting respect for Human Rights
- b) Protecting the environment and combating climate change
- c) Acting responsibly in public representation

4. THE CODE OF CONDUCT & ETHICS IN PRACTICE

The Code of Conduct and Ethics provides clarity for all employees regarding what is expected from them while exercising their roles and responsibilities.

All Bullion Link Trading - FZCO employees have a duty to:

- Know and comply with all of the rules of conduct contained in the Code
- Take all required and identified training to understand their responsibilities
- Operate and conduct business in line with the Code in all aspects of their role
- Be alert and challenge others if they are not operating in the spirit of the Code

4.1. Making Decisions

While the rules of conduct can help guide every decision, there is not a relevant rule for every situation. Ultimately, making the right decision must rely on personal judgement and on Bullion Link

Trading - FZCO's Values. If what you intend to do is not consistent with these, you should ask yourself why you should do it.

If you have any concerns or doubts, seek guidance from an appropriate authority: your line manager, senior manager, legal or compliance.

4.2. How the Code fit in Local and International Laws

All employees are expected to be familiar with international standards, and comply with the applicable laws, rules and regulations in all areas, and with the professional standards that apply to their professional activities.

In order to ensure the stability of the financial system, the industry we work in is highly regulated. Being aware of, and complying with, the laws and regulations under which Bullion Link Trading - FZCO operates is not just a critical part of our business but fundamental to who we are. We aim to comply not just with the letter of the law but also with the spirit and intent of the law. Respecting the law is a must. Engaging in unfair, deceptive and abusive acts or practices would negatively affect customer confidence, put Bullion Link Trading - FZCO's reputation at risk and could result in regulator criticism, legal action, fines, penalties and other negative repercussions for Bullion Link Trading - FZCO.

Bullion Link Trading - FZCO is committed to always cooperating with the relevant regulatory bodies. If you ever have a question about the laws and regulations that apply to your activity or about what response to provide to a regulatory body, contact your relevant compliance, legal or tax officer for help and advice.

The Code of Conduct and Ethics articulates what is expected from each one of us; i.e. best in class behaviours, within the framework of the laws and regulations in force in the regions in which Bullion Link Trading - FZCO does business. In the potential event of a conflict between national legislation and the rules contained in the Code, Bullion Link Trading - FZCO will comply with the applicable local laws while trying to identify appropriate ways to implement and respect the rules in the Code. When a situation requires interpretation by Bullion Link Trading - FZCO employees, it must be done in a way that is consistent with the strictest ethical criteria applicable.

4.3. Additional Responsibilities for Managers

Managers have a duty to lead by example and hold themselves to the highest standards of conduct, while ensuring that those standards are clear and transparent to those who report to them. They should:

- a) Create an atmosphere that encourages open, honest and respectful communication;
- b) Communicate the letter and spirit of the Code to their teams and other colleagues;
- c) Actively understand the risks inherent in their colleagues' work and take a role in assuring the quality of the work of their reports;
- d) Set an example for honest and respectful communication with customers, colleagues and other people related to Bullion Link Trading - FZCO, while respecting applicable confidentiality rules;
- e) Respond effectively and quickly to any concerns that colleagues raise and take prompt action when any mistakes or misconduct are uncovered.

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