ANTI-MONEY LAUNDERING & KYC POLICY

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Version 1.1 · Summary of the policy applied by Rathmar Trading, LLC, Rathmar Metals Ltd and Rathmar Metals A.Ş. and their offices in Houston, Zurich and Istanbul. The full policy is provided to counterparties on request.

1. PURPOSE

This policy prevents Rathmar's trading, shipping and payment flows from being used for money laundering, terrorist financing, proliferation financing or tax evasion. It reflects U.S. federal money-laundering law, the Swiss Criminal Code (Article 305bis), the laws of the countries where we trade, and the FATF standards.

2. RISK-BASED APPROACH

Each counterparty is risk-rated on its jurisdiction, ownership, sector, products, trade routes and payment arrangements. The rating sets the depth of due diligence and the frequency of review.

3. KNOW YOUR COUNTERPARTY

Before trading we verify legal existence and registration; ownership through to ultimate beneficial owners holding 25 percent or more or exercising control; directors and authorized signatories; business activity; bank details; and, where risk requires, source of funds. Counterparties and their owners are screened against sanctions, politically exposed person and adverse-media databases.

4. ENHANCED DUE DILIGENCE

Enhanced due diligence applies to politically exposed persons, state-owned entities, counterparties in higher-risk jurisdictions (including those identified by the FATF), complex or opaque ownership structures, and unusual payment arrangements. It requires senior approval.

5. TRADE-BASED MONEY LAUNDERING

We watch for prices away from the relevant market benchmark, payments to or from third parties, circular trades, inconsistent or altered documents, misdescribed goods, and unusual routing or routing with no commercial logic.

6. PRECIOUS METALS AND MINERALS

For every precious-metals and minerals trade we verify the source of the metal: the mine, producer or refiner it comes from and its chain of custody to the point of sale. Assay and weight are reconciled against the contract, assay certificates and shipping documents on every lot, and the contract price is checked against the relevant benchmark on every trade. Differences that are not explained are escalated to Compliance before the trade proceeds.

7. PAYMENTS

We do not make or accept cash payments. Payments are made to and received from accounts held in the counterparty's own name, in its country of incorporation or operation. Third-party payments are permitted only under a signed tripartite agreement approved by Compliance.

8. MONITORING AND SUSPICIOUS ACTIVITY

Relationships are reviewed periodically according to risk and whenever something material changes. Staff report suspicions to Compliance without alerting the counterparty; Compliance decides whether to report to the authorities.

9. RECORDS AND TRAINING

Due-diligence and transaction records are kept for at least ten years after the relationship ends. Staff are trained on joining and every year after.