ANTI-BRIBERY & CORRUPTION POLICY

Last updated: November 2026

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. SCOPE

This policy applies to Rathmar Trading, LLC, Rathmar Metals Ltd and Rathmar Metals A.Ş., to all their staff, and to agents, brokers, consultants and other third parties acting on our behalf. It reflects the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Swiss Criminal Code (Articles 322ter to 322^{decies}) and the anti-corruption laws of the countries where we trade.

2. WHAT IS PROHIBITED

No one may offer, promise, give, request or accept anything of value, directly or through a third party, to improperly influence a decision or to obtain or keep business. This applies to public officials and to private parties alike.

3. PUBLIC OFFICIALS AND STATE-OWNED COUNTERPARTIES

Employees of government agencies, state-owned companies, national oil companies, port and customs authorities and public international organizations are treated as public officials. Any gift, hospitality, travel or payment involving them needs prior written approval from Compliance.

4. FACILITATION PAYMENTS

Facilitation payments are prohibited, including small payments to speed up customs clearance, port access or permits. The only exception is a payment made under threat to personal safety, which must be reported to Compliance immediately and recorded.

5. THIRD PARTIES

Agents, brokers, consultants, surveyors and logistics providers are subject to due diligence before engagement, sign written contracts with anti-corruption clauses, and are paid commissions proportionate to documented services, by bank transfer to an account in their own name in the country where they operate. No cash payments are made.

6. GIFTS AND HOSPITALITY

Gifts and hospitality must be reasonable, proportionate and recorded in a register reviewed by Compliance. Cash and cash equivalents are never given or accepted.

7. POLITICAL AND CHARITABLE CONTRIBUTIONS

Rathmar makes no political contributions. Charitable donations need Compliance approval and are never made to obtain or keep business.

8. RECORDS AND CONTROLS

Payments are supported by invoices and evidence of services received. Compliance reviews higher-risk payments and third-party relationships.

9. TRAINING AND REPORTING

Staff are trained on joining and every year after. Suspected breaches are reported to Compliance or at speakup@rathmar.com.