MARMARA METAL REFINERY

STAFF CODE OF CONDUCT

MARMARA METAL REFINERY FZE

DOCUMENT NO: MMR-STAFF-COC-05 | 600 M2 WAREHOUSE U2-125 SHARJAH, UAE

DOCUMENT OWNER: MARMARA MANAGEMENT

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THE PURPOSE AND SCOPE OF THE STAFF CODE OF CONDUCT

The Staff Code of Conduct ("The Code") outlines the standards of professional behavior expected from all employees of **Marmara Metal Refinery FZE** ("Marmara"). All employees must read this document carefully and ensure full understanding of what is required, what is prohibited, and how to conduct themselves in a manner that protects Marmara's reputation, customers, and business interests.

The Code aims to:

- Establish a minimum standard of conduct expected from every Marmara employee.
- Protect the business interests of Marmara, its employees, customers, and stakeholders.
- Maintain Marmara's reputation for integrity, transparency, and ethical conduct.
- Ensure compliance with applicable UAE laws, SAIF Zone regulations, and international best practices.

The Code applies to all Marmara employees, including:

- Full-time, part-time, temporary, outsourced, and contract staff
- Trainees, interns, consultants, and short-term employees
- Any person representing Marmara in any capacity

Marmara workplace includes any location where an employee conducts business or represents Marmara, including:

- Marmara premises, offices, warehouses, and facilities
- Customer premises, meetings, events, and training locations
- Any location where an employee is present due to employment with Marmara

All employees must act — and be seen to act — in accordance with these principles. Failure to comply may result in disciplinary action, termination, or legal consequences.

HONESTY AND INTEGRITY

Honesty and integrity are core values of Marmara. Employees must:

- Act fairly, ethically, and professionally in all dealings.
- Ensure all verbal and written communication is truthful and not misleading.
- Avoid any dishonest or unethical activity.
- Report suspected misconduct immediately to their manager or the Compliance Department.

Dishonesty or unethical behavior may result in disciplinary action, including termination or legal prosecution.

CONFIDENTIALITY

"Confidential Information" includes all technical, non-technical, business, operational, financial, customer-related, and proprietary information belonging to Marmara.

Employees must:

a) Protect confidential information using the same level of care as their own sensitive information.

b) Not disclose confidential information to any person or entity without written authorization.

c) Understand that information is not confidential if:

- It is publicly available without breach.
- It is lawfully received from a third party.
- It is already in the employee's lawful possession.

d) Disclose confidential information to authorities only when legally required.

e) Not copy or reproduce confidential materials without approval.

f) Return all confidential materials upon request or upon termination.

g) Maintain confidentiality indefinitely, even after employment ends.

h) Understand that breaches may result in injunctive relief and legal action.

i) Indemnify Marmara for any loss caused by breach of confidentiality.

RESPONSIBILITY

Marmara employees must take responsibility for their actions and honor commitments made to colleagues, customers, and stakeholders.

TRANSPARENCY

Marmara is committed to transparent business practices. Employees must:

- Maintain open communication with regulators and authorities when required.
- Ensure accurate and timely submission of financial statements and regulatory documents.
- Conduct business relationships in a constructive and transparent manner.

INTELLECTUAL PROPERTY

Intellectual Property ("IP") includes all creative, technical, operational, and proprietary materials belonging to Marmara.

Employees must:

a) Understand that all work created during employment belongs solely to Marmara.

b) Assist Marmara in protecting and enforcing IP rights.

c) Not use Marmara's name, logo, or trademarks without written approval.

d) Report any suspected infringement of Marmara's IP.

e) Not contest Marmara's ownership of its IP.
Use of Marmara's IP does not grant employees any ownership rights.

COMPANY PROPERTY

All products, materials, documents, strategies, data, and tools created or used during employment are the property of Marmara.
Upon termination, employees must return all company property, including:

- Documents, notebooks, records
- Equipment, devices, tools
- Client lists, price lists, research materials
- Any materials related to Marmara's business

COMPLIANCE WITH LAWS, REGULATIONS & BEST PRACTICES

Employees must comply with:

- UAE laws and regulations
- SAIF Zone rules
- UAE AML/CFT/CPF regulations
- The best international practices in the gold and precious metals industry

Employees must:

- Prevent money laundering, corruption, terrorist financing, and proliferation activities.
- Avoid anti-competitive behavior and unethical business practices.
- Protect human rights, health, safety, and the environment.
- Maintain accurate business records according to regulatory retention periods.
- Follow strict Know Your Customer (KYC) and Know Your Counterparty (KYCC) procedures.

RISK CULTURE

Marmara identifies risks and applies a risk-based approach across all operations. Management promotions:

- Strong risk awareness
- Frequent training
- Open-door communication

GIFTS AND BENEFITS

Employees must not accept or give cash gifts. Non-cash gifts may be accepted only if:

- They are of nominal value (approximately USD 100 or less).
- They are not solicited.
- They are not linked to a specific business decision or transaction.
- They do not create a conflict of interest or appear improper.

Employees must avoid any improper advantage or inducement.

HARASSMENT AND DISCRIMINATION

Marmara promotes a respectful, inclusive, and harassment-free workplace.

Employees must not engage in discrimination or harassment based on:

- Race, gender, disability, nationality, religion, marital status, or any protected characteristic

All allegations will be handled sensitively and promptly.

SAFETY AND SECURITY

Employees must:

- Maintain a safe working environment
- Report accidents, hazards, or unsafe conditions immediately
- Avoid violence, threats, or abusive behavior
- Not possess or consume alcohol or illegal drugs on Marmara premises

Violence or intoxication may result in disciplinary action.

NON-COMPETITION

For two years after termination, employees must not:

- Solicit or contact Marmara customers
- Engage in competing activities involving customers they served during employment

NON-SOLICITATION

For two years after termination, employees must not:

- Solicit Marmara employees for employment in the same industry
- Encourage Marmara staff to leave the company

STANDARDS & CONSEQUENCES OF BREACH

Employees must fully comply with this Code. Breaches may result in:

- Disciplinary action
- Summary termination
- Legal action
- Loss of benefits

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TO BE COMPLETED BY UNDERSIGNED EMPLOYEE AND RETURNED TO THE COMPLIANCE DEPARTMENT

“I hereby acknowledge that I have read, understood, and agree to comply with Marmara Metal Refinery FZE’s Staff Code of Conduct. I understand that failure to adhere to these policies may result in disciplinary action.”

Employee Name: _____
Signature: _____
Date: _____