



Executive Summary

1. Introduction & Purpose

Multi Met Trading LLC ("the Company") establishes this Code of Conduct as the definitive ethical framework governing the behavior of all employees, officers, directors, and affiliated third parties. It outlines the expected standards of integrity, transparency, and accountability, aligning with the Company's core values and ensuring compliance with UAE laws and international best practices.

- **Communicate Purpose:** Clearly articulate the Code's role in defining standards, promoting accountability, ensuring legal compliance, fostering a positive work environment, guiding ethical decision-making, and enhancing stakeholder trust.
- **Establish as Foundational:** Position the Code as a cornerstone of corporate governance and internal culture, emphasizing its dynamic nature and importance to the Company's reputation and success.

2. Scope & Applicability

- **Ensure Broad Dissemination:** Distribute the Code to all individuals and entities within its scope. Obtain acknowledgment where appropriate.
- **Integrate into Operations:** Embed the Code's principles into daily activities, management oversight, and third-party agreements. Ensure external partners are aware of and, where applicable, adhere to these standards.

3. Core Values & Ethical Principles

- **Promote & Embed Values:** Actively foster these core values through leadership example, communication, training programs, and performance management systems.
- **Cultivate Ethical Culture:** Reinforce a culture where ethical conduct is expected, valued, and demonstrated in all business interactions and decisions.

4. Regulatory Environment & UAE Compliance

- **Maintain Legal Alignment:** Continuously monitor the legal and regulatory landscape. Regularly review and update the Code to ensure ongoing compliance with all applicable UAE and international requirements.

5. Responsibilities & Accountability

- **Define Individual Responsibility:** Ensure all individuals understand their obligation to read, adhere to, and report violations of the Code.
- **Empower Management:** Equip managers to lead by example, provide training, monitor compliance within their teams, and address issues promptly.
- **Ensure Executive Oversight:** Maintain Board and Senior Executive accountability for overall governance, implementation, periodic review, and updating of the Code.



MULTI MET TRADING L.L.C. is a Limited Liability Company Registered with the UAE Department of Economic Development, certificate number: 4992516.

The registered office address is Office 505, Montazah Tower, Khalidiyah, Abu Dhabi, United Arab Emirates

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6. Standards for Professional Conduct

- **Manage Conflicts of Interest:** Implement clear procedures for identifying, disclosing, reporting, and managing actual, potential, or perceived conflicts of interest. Provide relevant training.
- **Enforce Anti-Corruption Policy:** Maintain a strict zero-tolerance stance against bribery and corruption. Conduct regular risk assessments and training.
- **Promote Fair Business Practices:** Ensure all business dealings are conducted fairly, ethically, and transparently, complying with competition laws and promoting ethical marketing.
- **Protect Confidential Information & Data:** Enforce robust policies for handling confidential company, client, and employee information. Ensure strict compliance with the Data Protection Policy and applicable laws (e.g., PDPL).
- **Maintain Respectful Workplace:** Foster an inclusive environment free from harassment, discrimination, and bullying. Implement and enforce a zero-tolerance policy, providing clear reporting mechanisms and ensuring impartial investigations.
- **Ensure Health, Safety & Environmental Stewardship:** Commit to providing a safe work environment. Comply with all HSE regulations and promote environmentally responsible practices. Encourage reporting of safety/environmental concerns.
- **Regulate Gifts, Entertainment & Political Contributions:** Establish and enforce clear guidelines and thresholds for giving/receiving gifts and entertainment to prevent conflicts or impropriety. Prohibit unauthorized political contributions. Require necessary disclosures and approvals.
- **Ensure Proper Use of Assets:** Define and enforce rules for the responsible and ethical use of all company assets (physical, financial, technological, intellectual property) for legitimate business purposes only.

7. Disciplinary Procedures & Corrective Actions

- **Implement Fair Discipline:** Establish and consistently apply a fair, transparent, and proportionate disciplinary process for Code violations, ensuring due process and appropriate corrective actions.

8. Reporting, Whistleblowing & Protection

- **Maintain Reporting Channels:** Provide accessible, secure, and confidential channels for reporting concerns (linking to the Whistleblowing Policy).
- **Guarantee Non-Retaliation:** Enforce a strict policy protecting individuals who report concerns in good faith from any form of retaliation.
- **Ensure Prompt Investigation:** Investigate all reported concerns promptly, thoroughly, and impartially.

9. Monitoring, Auditing & Continuous Improvement

- **Implement Oversight Mechanisms:** Conduct regular monitoring and periodic internal/external audits to assess compliance with the Code. Use findings to drive continuous improvement, update policies, and refine training.



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10. Digital & Cyber Security Standards

- Enforce Digital Security: Implement and enforce clear standards for cybersecurity, data protection, and the acceptable use of company IT systems and networks (referencing relevant IT/Data Protection policies). Provide regular cybersecurity awareness training.

11. External Relationships (Customers, Suppliers, Vendors)

- Set Ethical Expectations: Communicate ethical standards to customers, suppliers, and vendors. Conduct appropriate due diligence and ensure fair dealings (linking to Supply Chain Policy).

12. Public Communications & Social Media

- Manage Communications: Provide clear guidelines on authorized company communications and responsible personal social media use relating to the Company. Designate official spokespersons.

13. Training, Awareness & Implementation

- Provide Comprehensive Training: Implement mandatory Code of Conduct training during onboarding and conduct regular refresher courses for all employees and relevant third parties. Offer specialized training for high-risk roles.
- Ensure Accessibility & Understanding: Make the Code readily accessible. Use various communication methods (interactive sessions, newsletters) to reinforce principles and address questions. Implement feedback mechanisms to improve clarity and training effectiveness.



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