



Version: 1.0

Effective Date: 01/02/2026

Approved By: Board of Directors

Owner: Money Laundering Reporting Officer (MLRO)

Applicability: All directors, officers, employees, contractors, agents, suppliers, and business partners

Review Cycle: Annual or upon regulatory change

1. PURPOSE

Gold Brick Gold Trading LLC (“GBGT”) is committed to conducting its business with **integrity, transparency, fairness, and accountability**.

This Code of Ethics establishes the **ethical standards and behavioural expectations** governing all GBGT activities and integrates the Company’s commitments to:

- Anti-money laundering and counter-terrorist financing
- Anti-bribery and anti-corruption
- Responsible gold sourcing
- Sanctions and counter-proliferation compliance
- Whistleblower protection
- Fair dealing and professional conduct

This Code supports compliance with **UAE laws, MoE DNFBP requirements, FATF standards, OECD & LBMA principles**, and international best practices.

2. SCOPE

This Code applies to:

- All GBGT directors, senior management, and employees
- Contractors, consultants, agents, brokers, and intermediaries
- Suppliers, refiners, transporters, and service providers acting on GBGT’s behalf

Compliance with this Code is a **condition of employment and engagement**.

3. COMPLIANCE WITH LAWS & REGULATIONS

All covered persons must comply with:

- UAE AML/CFT/CPF laws and regulations
- Targeted Financial Sanctions (UN & UAE)

- Anti-bribery and anti-corruption laws
- Trade, customs, export control, and tax laws
- Environmental, labour, and human rights laws applicable to their role

Ignorance of the law is not an excuse for non-compliance.

4. INTEGRITY & FAIR DEALING

GBGT expects all persons to:

- Act honestly and in good faith
- Avoid deceptive, misleading, or unethical practices
- Conduct transactions on a commercially reasonable basis
- Maintain accurate and complete records
- Avoid conflicts of interest or disclose them immediately

5. ANTI-MONEY LAUNDERING, CFT & CPF

GBGT maintains a **zero-tolerance approach** to money laundering, terrorist financing, and proliferation financing.

All persons must:

- Follow GBGT's AML/CFT/CPF policies and procedures
- Perform customer and supplier due diligence as required
- Report suspicious activity immediately via Internal Suspicious Reports (ISR)
- Never engage in tipping-off

AML/CFT breaches are treated as serious misconduct.

6. SANCTIONS & COUNTER-PROLIFERATION FINANCING

GBGT strictly prohibits:

- Any dealings with sanctioned or designated persons or entities
- Any attempt to bypass or evade sanctions

All parties must:

- Cooperate with sanctions screening
- Immediately escalate potential matches
- Comply with asset-freezing and reporting obligations

7. RESPONSIBLE GOLD SOURCING

GBGT is committed to responsible sourcing aligned with **OECD and LBMA standards**.

All gold traded by GBGT must:

- Have lawful origin
- Not be linked to conflict, human rights abuses, corruption, or criminal activity
- Be supported by verifiable chain-of-custody documentation

Suppliers must comply with GBGT's **Responsible Sourcing Policy** and **Supplier Code of Conduct**.

8. ANTI-BRIBERY & ANTI-CORRUPTION

GBGT prohibits:

- Bribes, facilitation payments, and kickbacks
- Improper gifts or hospitality
- Corrupt dealings with public or private sector parties

All persons must:

- Decline and report any attempted bribery
- Obtain approval for gifts or hospitality where required

- Ensure third parties comply with anti-bribery standards

Bribery is treated as a **money laundering predicate offence**.

9. GIFTS, HOSPITALITY & CONFLICTS OF INTEREST

- Gifts and hospitality must be modest, infrequent, and transparent
- Cash or cash-equivalent gifts are prohibited
- Conflicts of interest must be declared immediately
- Personal interests must never override GBGT's interests

All declarations must be recorded and approved in line with company procedures.

10. WHISTLEBLOWER & SPEAK-UP POLICY

GBGT encourages all persons to report concerns in **good faith**, including:

- AML/CFT or sanctions breaches
- Bribery or corruption
- Fraud or misconduct
- Ethical or regulatory violations

Reporting Channels

- Confidential report to the MLRO
- Written report to Compliance
- Designated whistleblower channel (if applicable)

Non-Retaliation

- GBGT strictly prohibits retaliation against whistleblowers.
- Any retaliation will result in disciplinary action.

11. CONFIDENTIALITY & DATA PROTECTION

All persons must:

- Protect confidential and sensitive information
- Use data only for legitimate business purposes
- Comply with applicable data protection requirements
- Avoid unauthorised disclosure

12. TRAINING & AWARENESS

GBGT provides:

- Mandatory ethics and AML training at induction
- Annual refresher training
- Role-specific training for high-risk functions

All covered persons must complete required training.

13. BREACHES & DISCIPLINARY ACTION

Violations of this Code may result in:

- Disciplinary action up to termination
- Termination of supplier or third-party relationships
- Regulatory reporting
- Civil or criminal proceedings

14. REPORTING & ESCALATION

Concerns must be escalated promptly via:

- Line management
- Compliance or MLRO

- Whistleblower channels

Failure to report known misconduct may itself constitute a breach.

15. GOVERNANCE & OVERSIGHT

- The Board oversees ethical conduct and compliance culture
- Senior Management ensures implementation
- The MLRO monitors adherence and escalates issues

16. ACKNOWLEDGEMENT

All covered persons must acknowledge that they:

- Have read and understood this Code
- Agree to comply with its requirements
- Understand consequences of non-compliance

BOARD APPROVAL

Approved by the Board of Directors of **Gold Brick Gold Trading LLC**

Name: MOSES JAYARAJ

Title: Director

Date: 01/02/2026



STAMP: _____