



Oasis Global Trading FZ-LLC

Code of Conduct

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1. Purpose of the Code of Conduct and Its Applicability

This Code of Conduct sets out the minimum standard of conduct we expect from anyone working for or representing Oasis Global Trading FZ-LLC (hereinafter – the “Company”) and its subsidiaries.

The Code of Conduct applies to everyone who works for or represents the Company or its subsidiaries, including employees, managers and officers, contracted staff and secondees.

We expect our business partners, contractors, suppliers and customers to align themselves to the principles set out in the Code of Conduct.

The Code of Conduct is a foundation document setting out the principles on how we conduct business. All the Company’s policies will be aligned to the Code of Conduct. If any Company policy conflicts with this Code of Conduct, this Code of Conduct will prevail.

2. Company Values and Mission

Our Values:

- Integrity – We act honestly and ethically in all business dealings
- Accountability – We take responsibility for our actions and decisions
- Transparency – We communicate openly and truthfully
- Sustainability – We support environmentally responsible practices
- Respect – We treat all individuals fairly and professionally
- Compliance – We align compliance efforts with business goals, identify opportunities for risk mitigation, enhance operational efficiencies, ultimately driving long-term value and profitability

Our mission is to deliver reliable, efficient, and responsible fertilizer trading solutions that

support global food security and sustainable agricultural growth.

We connect producers and markets across the world through trusted partnerships, operational excellence, and commitment to ethical business practices. We strive to create long-term value for our stakeholders by ensuring supply chain integrity, market transparency, and environmental responsibility.

3. Professional Behavior and Ethics

At Oasis Global Trading FZ-LLC, we are committed to acting professionally, based upon dignity, mutual respect, and trust, valuing transparency and ethical decision-making.

Employees, managers and officers are expected to deal fairly with our customers, suppliers, competitors, business partners, regulators, and other employees.

Every decision should be made ethically. Before making a decision or a judgement, employees should consider whether or not:

- this is legal and complies with the Code of Conduct and Company policies
- this is beneficial for the Company
- they would be comfortable if their actions were made public.

4. No Discrimination

The Company does not tolerate any form of discrimination, including discrimination based on race, religion, nationality, gender, age, disability, or any legally protected characteristic.

We do not tolerate any form of sexual harassment, harassment in any other form, or bullying. All cases of such behavior should be promptly reported to the HR director.

The Company provides equal opportunities for all employees in the workplace, including in recruitment, training, the maintenance of a job and the enjoyment of its benefits, promotion, ensuring that all employment-related decisions are based on skills and qualifications rather than personal characteristics.

The Company encourages diversity, equity and inclusion, ensuring that everyone is valued for their knowledge, skills, experience, and culture.

5. Compliance with the Laws and Policies

We always comply with all applicable laws of the United Arab Emirates (UAE) and the jurisdictions where the Company operates in all business activities.

We understand that legal violations can cause considerable *business* consequences including fines, legal actions or claims for damages, put our reputation at risk and weaken customer trust and confidence.

Violations of laws may also result in disciplinary action, including termination, fines and imprisonment.

In our work, we should always follow and comply with the laws of all the jurisdictions in which we operate, this Code of Conduct and all the Company policies. Everyone is responsible for acting consistently with all Company policies and laws applicable to assigned duties and responsibilities. Accordingly, employees who are unsure of the legal or regulatory implications of their actions should seek management or supervisory guidance.

6. Speak-Up and Non-Retaliation

We encourage everyone to speak up and raise any concerns openly.

Any questions or concerns can be addressed to:

- direct manager
- HR
- Legal Department

The Company is committed to addressing all issues fairly.

The Company has zero tolerance for any form of retaliation against anyone who makes a report in good faith or who participates in an investigation. Anyone engaged in retaliation of any kind will be subject to disciplinary action.

7. Safety and environment

The Company is committed to compliance with the national legislation related to the safety, protection and occupational health care of our workers.

We keep our workplace safe by following safety standards and ensuring that the workplace is free from physical and psychological hazards, weapons, and violent acts.

Alcohol, narcotics or other psychotropic substances are strictly prohibited on Company premises.

We are also committed to protecting the environment, implementing green practices and minimizing the environmental footprint of our activities.

The Employees are required to report any accidents immediately to their direct manager and the HR department.

8. Avoiding Conflicts of Interest

A conflict of interest occurs when a Company employee or manager or officer has an outside interest, financial or otherwise, or is subject to multiple influences, that may adversely affect their decision making or influence their judgement for the benefit of a third party.

Any Company employee, manager or officer shall avoid any situation that may create a conflict of interest. Any actual, potential or perceived conflict of interest shall be properly disclosed to the direct manager and the HR department.

9. Antibribery, Anti-Money Laundering, International Sanctions and Trade and Antiboycott Laws

The Company does not tolerate any form of bribery or corruption. We comply with the anti-

corruption laws, rules and regulations of all countries in which we operate, requiring the same from our business partners, customers, contractors, and third parties.

The Company strictly complies with the anti-money laundering legislation, including but not limited to provisions of Federal Decree by Law No. (10) of 2025 of the UAE Regarding Anti-Money Laundering, and Combating the Financing of Terrorism and Proliferation Financing, along with its executive regulations and related implementing decisions.

Employees, managers, officers as well as business partners, customers and contractors are prohibited from promising, offering or giving to a public official, directly or indirectly, an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties.

The Company complies with all export controls, economic sanctions, customs, and anti-boycott laws.

In particular, the Company strictly complies with economic, financial or trade sanctions laws, regulations, embargoes or restrictive measures administered, enacted or enforced by the United Nations Security Council (UNSC), Swiss State Secretariat for Economic Affairs (SECO), the United States Office of Foreign Assets Control (OFAC), the Council of the European Union, the competent authorities of the United Arab Emirates (including, without limitation, the UAE Cabinet, the UAE Central Bank and any authority responsible for the implementation or enforcement of UAE sanctions laws and regulations) or a respective governmental institution authorized to administer sanctions in the UAE.

The Company has implemented a robust sanctions screening process to ensure that:

- All counterparties are screened against relevant sanctions lists before transactions;
- Continuous monitoring of high-risk relationships is performed;
- Documentation of all screening activities is available for audit purposes.

Before engaging with third parties, the Company:

- Conducts risk-based due diligence;
- Includes sanctions compliance obligations in contracts;
- Monitors ongoing relationships for compliance risks.

10. Handling Gifts and Entertainment

The Company recognizes that business gifts and entertainment on a modest scale are commonly used to build and strengthen working relationships in a business environment. However, some gifts and entertainment can be seen as improper influence or even as bribes attracting criminal liability.

Gifts and entertainment must only be accepted or provided if there is a genuine business relationship and where the value of such gifts and hospitality is reasonable.

Gifts and entertainment, whether given or received, must be modest in nature and may not exceed a value of USD 200, or the equivalent in another currency.

No gifts or entertainment must be offered or received if that gift/offer might compromise an individual's ability to make independent business judgments on behalf of the Company.

It is strictly prohibited for an employee to solicit gifts or to give or receive as gifts cash or cash equivalents, jewelry, works of art, or any other inducement or hospitality/entertainment in return for favorable treatment, or the promise of favorable treatment. Cash or cash equivalents (like cheques, travelers' cheques) should not be accepted or offered under any circumstances.

11. Personal Data Privacy

The Company respects the confidentiality of Personal Data and commits to full compliance with the UAE Federal Decree Law No. 45/2021 on the Protection of Personal Data and other personal data protection laws of the countries in which we operate.

Personal Data means any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an identifier such as his name, voice, image, identification number, online identifier, geographical location, or one or more physical, physiological, economic, cultural or social characteristics.

Within the employment relationship the Company may process certain sensitive Personal Data – this is either required by law or is necessary for fulfilment of our contractual

obligations towards you.

Processing of Personal Data shall not be done without the explicit consent of its owner, except for cases in which the processing is necessary to protect a public interest or to carry out any of the legal procedures and rights in accordance with the applicable Personal Data protection law.

If you have questions concerning your Personal Data processing, you may discuss them with your direct manager or the HR department at any time.

12. Protection of Information and Intellectual Property

Company information is considered a valuable asset and shall always be protected.

The Company's confidential information and confidential information of our customers, business partners and contractors shall be used internally only when it is necessary for the specified purpose(s) on a strict need-to-know basis; and shall not be disclosed to anyone outside the Company except as permitted by law, where disclosure is required by legal process or an order or requirement of a court of competent jurisdiction or government department or agency, or where the Legal Department otherwise determines it is appropriate.

The Company's confidential information shall mean any and all information or data which are related to the business and affairs of the Company and/or any of its affiliates, including all agreements, statements, notes, records, reports, results, maps, charts, strategic plans, and other data, whether in written, oral or electronic form and whether or not noted thereon to be confidential.

The Employees shall keep the confidentiality of the Company's confidential information during the term of employment and shall not, at any time after the termination of employment (without limitation in time), disclose to any person or make use of any of the Company's confidential information, except as required by law or with the prior written consent of the Company.

Improper handling of confidential information (including but not limited to unauthorized viewing, copying, distributing, downloading to an external storage device, personal email, or

non-company cloud storage, damaging, altering, and removing information from the premises) may result in disciplinary action, including termination of employment, and other legal actions, including criminal prosecution.

We respect the intellectual property of third parties and may only use it if granted the right to do so. If relevant third-party intellectual property was provided to the Company under a confidentiality agreement, it may be used and distributed only in compliance with that agreement.

We use third-party software – including open-source software and firmware – only within the scope allowed by law and in compliance with the respective license conditions.

13. Consequences of violations

All the Company employees, managers and officers are bound by the provisions of the Code of Conduct. Any questions related to the Code of Conduct can be addressed to the management, Legal Department or HR.

Violations of the Code of Conduct can affect the Company reputation and can lead to damages or penalties, including fines from public authorities and criminal consequences.

Therefore, violations of the Code of Conduct are considered serious disciplinary violations leading to the imposition of disciplinary sanctions up to termination of employment, in accordance with the Company's Staff Regulations and applicable labour law.

14. Acknowledgement

All employees must review and comply with this Code of Conduct.

15. Continuous improvement

This Code will be reviewed periodically to ensure alignment with regulations and best practices. As such, it may be updated upon occasion.