

ANTI-BRIBERY POLICY IN MATAM COMMODITY AG

INTRODUCTION

Matam Commodity Ag is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. This document describes Matam Commodity Ag Policy prohibiting bribery and other improper payments in the conduct of our business operations and employee responsibilities for ensuring implementation of the Policy.

POLICY OVERVIEW

Matam Commodity AG strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Matam Commodity AG to possible criminal prosecution, reputational harm or other serious consequences. This Policy applies to everyone at Matam Commodity AG, including all officers, employees and agents or other intermediaries acting on our behalf. Each officer and employee of Matam Commodity AG has a personal responsibility and obligation to conduct our business activities ethically and in compliance with all applicable laws based on the countries wherein Matam Commodity AG does business. Failure to do so may result in disciplinary action, up to and including dismissal. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of our business. Matam Commodity AG has developed a comprehensive program for implementing this Policy, through appropriate guidance, training, investigation and oversight.

The following summary is intended to provide personnel engaged in international activities a basic familiarity with applicable rules so that inadvertent violations can be avoided and potential issues recognized in time to be properly addressed.

WHAT MATAM COMMODITY AG PROHIBITS

Offering, promising or giving “anything of value” to a foreign official to gain an improper business advantage. In addition to cash payments, “anything of value” may include:

- Gifts, entertainment or other business promotional activities;
- Covering or reimbursing an official’s expenses;
- Offers of employment or other benefits to a family member or friend of a foreign official;
- Political party and candidate contributions;
- Charitable contributions and sponsorships.

Under the law, Matam Commodity AG and individual officials or employees may be held liable for improper payments by an agent or other intermediary if there is actual knowledge or reason to know that a bribe will be paid. Willful ignorance – which includes not making reasonable inquiry when there are suspicious circumstances – is not a defense, and it also does not matter whether the intermediary is itself subject to anti-bribery laws. All employees therefore must be alert to potential “red flags” in transactions with third parties. Matam Commodity AG is keeping accurate books and records that reflect transactions and asset dispositions in reasonable detail, supported by a proper system of internal accounting controls. These requirements are implemented through our standard accounting rules and procedures, which all personnel are required to follow without exception. Special care is exercised when transactions may involve payments to foreign officials.

The presence of red flags in a relationship or transaction requires greater scrutiny and implementation of safeguards to prevent and detect improper conduct. Appointment of an agent or other third party ordinarily requires prior approval by an appropriate senior manager, description of the nature and scope of services provided in a written contract, and appropriate contractual safeguards against potential violations of law or Matam Commodity AG policy. This Policy imposes on all personnel specific responsibilities and obligations that will be enforced through standard disciplinary measures and properly reflected in personnel evaluations. All officers, employees and agents are responsible for understanding and complying with the Policy, as it relates to their jobs.

Every employee has an obligation to:

- Be familiar with applicable aspects of the Policy and communicate them to subordinates;
- Ask questions if the Policy or action required to take in a particular situation is unclear;
- Properly manage and monitor business activities conducted through third-parties;
- Be alert to indications or evidence of possible wrongdoing; and
- Promptly report violations or suspected violations through appropriate channels.

Any employee who has reason to believe that a violation of this Policy has occurred, or may occur, must promptly report this information to his or her supervisor, the next level of supervision, or Matam Commodity AG management. Alternatively, information may be reported in confidence by calling +41 43 508 64 93 . Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Employees who violate this Policy will be subject to disciplinary action, up to and including dismissal. Violations can also result in prosecution by law enforcement authorities and serious criminal and civil penalties. When seeking guidance and/or reporting concerns, the following contacts and reporting options are available to you: +41 43 508 64 93 or office@matamcommodity.com



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