



ANTI-BRIBERY AND CORRUPTION POLICY

Golden Titan DMCC is a company specializing in the smelting, assaying, trading, and manufacturing of precious metals. We take pride in our unwavering commitment to integrity and honesty in all aspects of our business. Our reputation is one of our greatest assets and a key competitive advantage. It is imperative that all Golden Titan employees, as well as those associated with GoldX, uphold and protect this reputation.

Bribery and corruption are serious criminal offenses. Beyond the significant fines, penalties, and reputational damage that Golden Titan could face, bribery and the misrepresentation of the origin of refining materials can lead to severe human rights abuses and the financing of conflicts, as outlined in our Precious Metals Procurement Policy. Employees found guilty of engaging in bribery or corruption may face fines, imprisonment, or disciplinary action, including termination of employment. Third parties doing business with us are expected to adhere to applicable laws, our policies, and contractual obligations related to the prevention of bribery and corruption, or risk termination of the business relationship.

We are firmly committed to a zero-tolerance approach to bribery and corruption and will:

- Conduct all business dealings and relationships with fairness, honesty, transparency, and the highest ethical standards;
- Adhere to all applicable national and international laws and regulations aimed at countering bribery and corruption in every jurisdiction where we operate;
- Implement and enforce robust systems within Golden Titan to mitigate the risk of bribery and corruption; and
- Prohibit the use of our business operations and services for money laundering, terrorist financing, or any other illegal activities, including those involving suppliers of refining materials.