



CARGO METALS
Your trusted partner in global metals trading

Anti-Bribery & Sanctions Compliance Statement

Cargo Metals Limited
Version 1.0 | Effective Date: July 30, 2025



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Anti-Bribery & Sanctions Compliance Statement

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Effective Date: July 30, 2025

Jurisdiction: Hong Kong SAR

Prepared by: Legal & Compliance Department

Applies to: All employees, agents, suppliers, buyers, and counterparties



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Table of Contents

1. Purpose of This Statement
2. Scope of Application
3. Anti-Bribery Commitment
4. Prohibited Conduct
5. Gifts, Hospitality & Facilitation Payments
6. Third-Party Due Diligence
7. International Sanctions Compliance
8. Reporting & Whistleblower Protection
9. Enforcement & Disciplinary Measures
10. Policy Review & Amendments
11. Contact Information



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1. Purpose of This Statement

Cargo Metals Limited ("the Company") is committed to conducting business with integrity, transparency, and full compliance with anti-bribery laws and international sanctions regimes. This statement outlines the Company's zero-tolerance approach to bribery, corruption, and dealings with sanctioned entities.

2. Scope of Application

This statement applies to:

- All employees, directors, and officers of Cargo Metals Limited
 - Agents, brokers, and intermediaries acting on behalf of the Company
 - Suppliers, buyers, and logistics partners
 - Any third party engaged in trade transactions with the Company
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3. Anti-Bribery Commitment

Cargo Metals prohibits all forms of bribery, including:

- Offering, giving, or receiving anything of value to improperly influence business decisions
- Facilitating payments to expedite routine government actions
- Kickbacks or commissions not disclosed in official contracts

The Company complies with the Prevention of Bribery Ordinance (Cap. 201, Hong Kong SAR) and relevant international laws, including the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act (FCPA).

4. Prohibited Conduct

The following activities are strictly prohibited:

- Bribing public officials or private individuals
 - Concealing payments through false invoices or shell entities
 - Engaging in trade with entities known to be under investigation for corruption
 - Circumventing sanctions through indirect transactions
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5. Gifts, Hospitality & Facilitation Payments

Cargo Metals permits modest gifts and hospitality only when:

- They are customary in the jurisdiction
- They are not intended to influence business outcomes
- They are properly recorded and approved

Facilitation payments are strictly prohibited under this policy.

6. Third-Party Due Diligence

Prior to engagement, all third parties shall undergo due diligence to assess:

- Ownership structure and beneficial ownership
- Reputation and litigation history
- Sanctions exposure and political affiliations

Contracts shall include anti-bribery clauses and audit rights.

7. International Sanctions Compliance

Cargo Metals complies with all applicable sanctions regimes, including:

- United Nations Security Council Resolutions
- European Union Consolidated Sanctions List
- U.S. Office of Foreign Assets Control (OFAC)
- UK HM Treasury Sanctions List
- Hong Kong Trade and Industry Department restrictions

The Company does not engage in trade with sanctioned individuals, entities, or jurisdictions.

8. Reporting & Whistleblower Protection

Suspected violations may be reported confidentially to:
compliance@cargometals.com

Cargo Metals prohibits retaliation against whistleblowers and ensures confidentiality throughout the investigation process.



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9. Enforcement & Disciplinary Measures

Violations of this policy may result in:

- Termination of employment or contract
 - Disclosure to regulatory authorities
 - Civil or criminal prosecution under applicable laws
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10. Policy Review & Amendments

This statement is reviewed annually and updated as required by changes in law, risk exposure, or operational scope. Amendments must be approved by the Board of Directors.

11. Contact Information

For questions or concerns regarding this statement, please contact:

Legal & Compliance Department

Cargo Metals Limited

Email: compliance@cargometals.com