



CARGO METALS
Your trusted partner in global metals trading

Anti-Bribery & Sanctions Compliance Statement

Zero-Tolerance Policy on Bribery, Corruption and Sanctions Violations

Version 1.0 | Effective Date: February 11, 2026

Jurisdiction: Republic of Panama

Prepared by: Legal & Compliance Department

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

Document Information

Entity	Cargo Metals (a trading name of Integrax Global Partners Corp.)
Legal Registration	Folio 155779750 — Registro Público de Panamá
Registered Address	Torre PDC, Obarrio, Avenida Samuel Lewis, Piso 15, Panama City, Republic of Panama
Jurisdiction	Republic of Panama
Compliance Contact	compliance@cargometals.com

Version History

Version	Effective Date	Owner	Description
1.0	February 11, 2026	Legal & Compliance	Initial release — Panama incorporation; anti-bribery and sanctions framework aligned with applicable Panamanian law and international standards

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1. Purpose of This Statement

Cargo Metals (a trading name of Integrax Global Partners Corp.) is committed to conducting its business with integrity, transparency, and full compliance with applicable anti-bribery laws and international sanctions regimes. This statement outlines the Company's zero-tolerance approach to bribery, corruption, and dealings with sanctioned entities, and applies to all activities carried out in connection with Cargo Metals' trading operations.

2. Legal & Regulatory Framework

This statement is aligned with the anti-bribery, anti-corruption, and sanctions laws, regulations, and supervisory requirements applicable to Cargo Metals in the Republic of Panama, including the rules applicable to its business activities, ownership structure, and reporting obligations.

Specific legal and regulatory references are included for context and are intended to reflect the requirements applicable to Cargo Metals' activities in Panama. The Company undertakes to maintain this statement in line with the requirements actually applicable to it, and to update it as those requirements evolve.

3. Scope of Application

This statement applies to:

- All personnel acting on behalf of or in connection with the Company
- Agents, brokers, and intermediaries engaged by the Company
- Suppliers, buyers, and logistics partners
- Any third party engaged in trade transactions with the Company

4. Anti-Bribery Commitment

Cargo Metals maintains a strict zero-tolerance policy towards all forms of bribery and corruption. The Company prohibits:

- Offering, giving, promising, or receiving anything of value — directly or indirectly — to improperly influence a business decision or gain an unfair commercial advantage
- Making facilitation payments to expedite or secure routine actions by public officials or private parties
- Paying or receiving undisclosed kickbacks, rebates, or commissions in connection with any trade transaction

This prohibition applies regardless of local custom, business practice, or whether the conduct is considered acceptable in the counterparty's jurisdiction.

5. Prohibited Conduct

The following activities are strictly prohibited under this statement:

- Bribing public officials, government representatives, or private individuals
- Concealing payments or transfers through false invoices, shell entities, or fictitious transactions
- Engaging in trade with entities known to be under investigation for corruption, financial crime, or sanctions violations
- Circumventing applicable sanctions through indirect transactions, third-party intermediaries, or complex ownership structures
- Misrepresenting the origin, nature, or value of goods or payments in trade documentation

6. Gifts, Hospitality & Facilitation Payments

Cargo Metals permits modest and proportionate gifts and hospitality only where:

- They are customary and appropriate in the relevant business context and jurisdiction
- They are not intended to influence, and could not reasonably be perceived as influencing, a business decision or relationship
- They are properly recorded, disclosed, and approved in accordance with the Company's internal procedures

Facilitation payments — payments made to expedite routine government or administrative actions — are strictly prohibited under this policy, regardless of their size or local practice.

7. Third-Party Due Diligence

Prior to engagement, all third parties are subject to due diligence to assess:

- Ownership structure and ultimate beneficial ownership
- Reputation, litigation history, and adverse media
- Exposure to sanctions lists and political affiliations
- Alignment with the Company's anti-bribery and compliance standards

All material contracts with third parties shall include appropriate anti-bribery representations and, where warranted, audit rights in favour of the Company.

8. International Sanctions Compliance

Cargo Metals is committed to full compliance with all applicable international sanctions regimes. The Company screens all counterparties, transactions, and jurisdictions against relevant sanctions lists prior to engagement and on an ongoing basis, including:

- United Nations Security Council consolidated sanctions list
- European Union consolidated financial sanctions list
- U.S. Office of Foreign Assets Control (OFAC) sanctions list
- UK HM Treasury financial sanctions list

- Panama national law enforcement and regulatory databases

Cargo Metals does not engage in any trade, transaction, or business relationship with any individual, entity, vessel, or jurisdiction that is subject to active international or national sanctions.

9. Reporting & Whistleblower Protection

Any personnel, agent, or counterparty who becomes aware of — or has reasonable grounds to suspect — a violation of this statement is encouraged to report it promptly and confidentially to:

Compliance Contact: compliance@cargometals.com

Cargo Metals prohibits any form of retaliation against individuals who raise concerns in good faith. Confidentiality will be maintained throughout the investigation process to the extent permitted by applicable law.

10. Enforcement & Disciplinary Measures

Violations of this statement may result in:

- Immediate termination of the business relationship, contract, or engagement
- Disclosure to relevant regulatory, law enforcement, or judicial authorities
- Civil or criminal proceedings under applicable Panamanian or international law

The Company reserves the right to take all necessary legal and commercial steps to protect its integrity and reputation in the event of a confirmed violation.

11. Policy Governance & Review

This statement is reviewed at least annually by the Legal & Compliance Department and updated as required by changes in law, risk exposure, or operational scope. Material amendments are subject to approval by the Board of Directors of Integrax Global Partners Corp..

For all compliance-related enquiries, please contact: **compliance@cargometals.com**

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