



Connecting Continents, Delivering Trust

C O D E   O F   C O N D U C T

**SCOPE:** BIACOMET GROUP Companies  
(BIACOMET AG, BIACOMET Africa Pty. Ltd and BIACOMET Middle East LLC)



# 1. ETHICAL BUSINESS PRACTICES

## 1.1

### **Compliance with Laws and Regulations**

Adhere to all applicable Swiss, international, and local laws and regulations in Southern Africa and Middle East, including those related to trade, finance, labor, environment, and anti-corruption.

## 1.2

### **Integrity and Transparency**

Conduct all business operations with honesty, transparency, and integrity. Avoid any form of bribery, corruption, or unethical practices in all dealings.

## 1.3

### **Anti-Bribery and Corruption**

Strictly prohibit the giving or receiving of bribes, kickbacks, or any other forms of undue advantage to influence business decisions. All payments and transactions must be properly documented and verifiable.



## 2. RESPECT FOR HUMAN RIGHTS AND LABOR STANDARDS

### 2.1 Human Rights

Respect and promote human rights as defined by the Universal Declaration of Human Rights. Avoid any activities that contribute to human rights abuses.

### 2.2 Labor Conditions

Ensure that all business partners and suppliers comply with fair labor practices, including the prohibition of child labor, forced labor, and discrimination based on race, gender, religion, or any other status.

### 2.3 Safe Working Environment

Promote a safe and healthy working environment for all workers in the supply chain. Ensure compliance with occupational health and safety standards.

# 3. ENVIRONMENTAL RESPONSIBILITY

## 3.1 Sustainable Sourcing

Commit to sustainable sourcing practices that minimize environmental impact. Prioritize suppliers who adhere to environmentally responsible practices, including the conservation of natural resources and the reduction of waste and emissions.

## 3.2 Compliance with Environmental Laws

Comply with all environmental laws and regulations in the countries where commodities are sourced and traded. Support initiatives that promote environmental sustainability and biodiversity.

# 4. RESPONSIBLE SOURCING AND SUPPLY CHAIN MANAGEMENT

## 4.1

### Due Diligence and Risk Assessment

Conduct thorough due diligence on all suppliers and partners to assess risks related to human rights, environmental impact, and ethical standards. Implement measures to mitigate identified risks.

## 4.2

### Transparency in Supply Chain

Maintain transparency throughout the supply chain by ensuring traceability of commodities. Report and address any concerns related to unethical sourcing practices.

## 4.3

### Fair Trading Practices

Engage in fair and equitable trading practices, including the provision of fair prices and timely payments to suppliers, particularly those from smallholder or disadvantaged backgrounds.



# 5. ANTI-MONEY LAUNDERING AND FINANCIAL INTEGRITY

## 5.1 Financial Compliance

Ensure all financial transactions comply with Swiss and international anti-money laundering (AML) regulations.  
Conduct regular audits to prevent illicit financial activities.

## 5.2 Know Your Customer (KYC) Policies

Implement strict KYC procedures to verify the identity and legitimacy of all trading partners and suppliers.

# 6. COMMUNITY ENGAGEMENT AND SOCIAL RESPONSIBILITY

## 6.1

### Local Community Support

Contribute positively to the communities in Southern Africa by supporting local development initiatives, including education, health, and infrastructure projects.

## 6.2

### Cultural Sensitivity

Show respect for the local customs, traditions, and cultural practices of the communities in which the company operates.

## 7.

# CONFIDENTIALITY AND DATA PROTECTION

## 7.1

### Confidentiality

Maintain the confidentiality of sensitive business information, including trade secrets, proprietary data, and personal information of stakeholders.

## 7.2

### Data Protection

Comply with data protection laws, including the General Data Protection Regulation (GDPR) and any relevant local data privacy regulations.



# 8. WHISTLEBLOWER PROTECTION AND GRIEVANCE MECHANISMS

## 8.1

### Whistleblower Protection

Establish a secure and confidential mechanism for reporting unethical behavior, misconduct, or violations of this Code of Conduct. Protect whistleblowers from retaliation.

## 8.2

### Grievance Mechanism

Provide a transparent and accessible process for stakeholders to raise grievances related to the company's operations and sourcing practices.

## 9.

# MONITORING, REVIEW, AND COMPLIANCE

### 9.1

#### Regular Monitoring

Conduct regular monitoring and audits of business practices and supply chains to ensure compliance with this Code of Conduct.

### 9.2

#### Continuous Improvement

Commit to continuous improvement by reviewing and updating this Code of Conduct as needed to reflect evolving best practices and regulatory changes.



# 10. ACCOUNTABILITY AND ENFORCEMENT

## 10.1 Responsibility

All employees, partners, and suppliers are expected to adhere to this Code of Conduct. Violations will result in appropriate corrective actions, including potential termination of contracts or employment.

## 10.2 Training and Awareness

Provide regular training to employees and partners on the principles of this Code of Conduct to ensure understanding and adherence.





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## C O D E O F C O N D U C T

This Code of Conduct reflects our commitment to ethical, sustainable, and responsible commodity trading. By adhering to these principles, we aim to build trust with our stakeholders and contribute positively to the global trading community.

Sincerely,

**Mr. Tarik Meier - Chairman & CEO**