

Introduction:

The success of a company is not defined only by number of business transactions or services provided. A great success is defined how relationships and confidence last with suppliers, employees, business relations, clients etc.

For **ZOE METALS** is very important to create respectful and ethical business environment within the company and outside.

This code of Conduct and Ethics provides a clear statement of the ethical values and professional standards that we expect to be followed by all employees and managers of **ZOE METALS**; With the reference to this important source of strategic guidance, the management is committed to conduct its business with decisions and policies developed to respect the adopted regulations, and in particular, it states that **ZOE METALS**:

- ✓ Is aware that integrity is essential for long-term success
- ✓ Takes responsibility for its actions and honors its commitments to its employees and stakeholders
- ✓ Is respecting employee's privacy and all those in relation with the company and third parties.
- ✓ Guarantees the right of freedom of expression for each employee.
- ✓ Is committed to ensure a healthy working place and pleasant atmosphere.
- ✓ Guarantees the safety of each employee and rejecting any forced and/or child labor.
- ✓ Will never tolerate any physical and verbal violence its employees. This is applicable to any communication with suppliers, clients, third parties and within the company.
- Rejects all forms of discrimination, recognizing that personnel qualification and performance are the only relevant criteria for the salary and any additional payments and benefits
- ✓ Commits to act in socially and environmentally responsible manner
- ✓ Keeps up to date and accurate records of all its business activities
- ✓ Avoid conflict of interests or its appearance

Business Conduct and Relations

- ✓ Assuring respect and respectable treatment to our clients' complaints.
- Acting in good faith on behalf of the company assuring transparency in each action and business transactions.-Maintaining confidentiality of any information entrusted by its clients excluding legal issues;
- ✓ Honor business obligations

Responsible Sourcing and information

- Conducting a responsible sourcing in terms of compliance making certain to follow up a high standard of due diligence.
- Under any circumstance ZOE METALS will never tolerate any injured actions that can be damaging ZOE METALS reputation-Any false information exposing the ZOE METALS's reputation will be immediately reportable to the law regulator department

This policy is aligned with Corporate Responsibility and Human Rights

No code of conduct can respond to all situations. The purpose of this Code is to establish a corporate culture based on ethical values and to guide our professional conduct when situations arise.

Changes to the Policy

The Compliance Department along with the Board reserves the right to change this Policy from time to time as it considers necessary.

Board Approval Date: November 27, 2024 Effective Date: December 02, 2024 Due for review: May 08, 2025

Signatures

Kutluay Furkan Caner Managing Director

Luisa Fernanda Compliance Officer

Vishmi Nayanika Compliance Assistant

Communication Details:

For questions and/or concerns related to above policy, please send an email to compliance@zoemetals.com

For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through the email: info@zoemetals.com

Policy Acknowledgement:

By signing this document, the customer agrees to act responsibly and follow the principles outlined here. The customer will also explain this Code clearly to employees, contractors, and subcontractors, and ensure compliance with the requirements.

Name: Designation: Company Name: Date & Place Signature: Stamp: