RESPONSIBLE BUSINESS PRINCIPLES
(Version 1.01. Effective 25 March 2026.)

mTrade conducts its business on a principal trading basis across multiple jurisdictions. These Responsible Business Principles outline the standards that govern our commercial conduct and compliance framework.

1. Commercial Integrity

Each mTrade entity transacts for its own account, takes legal title to goods and assumes full commercial risk. We are committed to fair dealing, transparent contractual arrangements and clear allocation of responsibility in our commercial relationships.

mTrade does not act in a fiduciary, custodial or investment management capacity unless expressly agreed in writing and, where required, authorised under applicable law.

2. Legal and Regulatory Compliance

Each entity complies with the laws and regulations applicable in the jurisdictions in which it operates. This includes compliance with anti-money laundering, counter-terrorism financing, sanctions, and trade control requirements. Policies and procedures are maintained to support effective compliance oversight and risk management.

3. Anti-Bribery and Corruption

mTrade prohibits bribery and corruption in any form. We maintain policies and internal controls designed to prevent improper payments, inducements or other corrupt practices in connection with our business activities.

4. Sanctions and Trade Controls

mTrade conducts its activities in accordance with applicable sanctions and trade control regimes. Screening and internal review processes are maintained to prevent transactions involving sanctioned jurisdictions, entities or persons.

5. Counterparty and Sourcing Standards

mTrade seeks to transact with counterparties that operate in accordance with applicable laws and recognised commercial standards. Where relevant, we seek to ensure that commodities, goods or other materials are sourced and traded in compliance with applicable import, export, customs and trade regulations.

6. Conflicts of Interest

mTrade maintains procedures designed to identify and manage potential conflicts of interest, including related-party transactions, in accordance with applicable governance standards. Commercial decisions are made in the interests of the relevant entity and in accordance with applicable law.

7. Risk Management and Governance

mTrade maintains internal governance frameworks designed to identify, assess and manage operational, commercial and compliance risks associated with its activities. These frameworks are reviewed periodically and updated as appropriate to reflect changes in law, regulation and business operations.

8. Scope

These Responsible Business Principles apply to each entity operating under the mTrade trading name and are intended to reflect the standards governing our commercial conduct. They do not create contractual rights or fiduciary obligations.