PUBLIC GOVERNANCE / W02

Code of Conduct

Public code | Version 1.0 | November 2026

Purpose and application

Mondiale International Trading W.L.L. (Mondiale) is committed to conducting its business with integrity, professional judgement and respect for applicable law. This public Code of Conduct sets out the principles expected in the conduct of company business.

These principles are relevant to managers, partners, personnel and persons representing Mondiale, and to external agents or intermediaries to the extent applicable to their role and contractual engagement.

Lawful and fair business

Business must be conducted in accordance with applicable laws, including the laws of the State of Qatar, and with respect for contractual commitments. Accurate information, honest dealing and fair treatment of commercial counterparties are essential to sustainable international trade.

Anti-bribery and corruption

Bribes, kickbacks, improper payments and other inducements intended to secure an improper advantage are not acceptable. Neither direct nor indirect payments may be used to achieve what would otherwise be prohibited.

Gifts, hospitality and business courtesies must have a legitimate purpose, be appropriate in value and circumstances, and not be offered or accepted to improperly influence decisions.

Conflicts of interest

Commercial decisions should be made in the interests of the business and without undisclosed personal conflicts. Any material actual or potential conflict involving a decision-maker, counterparty or intermediary should be declared and appropriately addressed.

Brokers, agents and intermediaries

Mondiale may engage or interact with brokers and other commercial intermediaries where there is a legitimate business purpose. Responsibilities, services and commercial arrangements should be appropriately understood and documented. Intermediaries must not be used to disguise an improper payment, prohibited party or non-genuine transaction.

Trade compliance and commercial integrity

Mondiale expects observance of applicable sanctions, trade restrictions and other relevant rules. Transaction descriptions, invoices, shipping documents and other commercial records should accurately reflect the underlying business arrangements.

Information and confidentiality

Confidential business information and personal data should be handled responsibly and disclosed only where there is a legitimate business or legal basis. Records should be prepared and maintained with reasonable care and should not knowingly be falsified or concealed.

Workplace and professional conduct

Mondiale expects professional, respectful conduct in its business relationships and working environment. Harassment, intimidation and deliberate misconduct are inconsistent with these principles.

Raising concerns

Concerns relating to suspected misconduct, fraud, corruption, conflicts of interest or integrity in a Mondiale-related transaction may be raised through info@mondialeinternational.com or the independently verified corporate telephone number +974 5022 0888. Reports will be considered in light of their circumstances and applicable obligations.

Governance and interpretation

This Code states public principles and is not a complete description of internal controls. Where law or an applicable contract imposes a stricter obligation, the stricter applicable obligation prevails. Nothing in this Code creates a guarantee about a particular transaction or a right to act contrary to law.

> Draft for approval by the Managers of Mondiale International Trading W.L.L. | Version 1.0 | Next review November 2027