



Mezzarion Global Compliance System (MGCS)

Public Policy Overview

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Applies To: Mezzarion Holding and its operating subsidiaries, controlled joint ventures, employees, contractors, and third parties acting on Mezzarion's behalf.



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1) What MGCS Is

The Mezzarion Global Compliance System (MGCS) is Mezzarion's Group-wide compliance and integrity framework. It governs how we conduct business lawfully, ethically, and safely across:

- Global Trade (commodities and corridor execution)
- Investment Management (capital allocation and structured transactions)
- Mining & Resources (mining, processing, laboratories, and resource-linked infrastructure)

MGCS is designed for high-scrutiny environments and prioritises traceability, risk discipline, and decision accountability.

2) Core Principles

Mezzarion operates under these compliance principles:

1. Integrity First: truthful conduct; no misrepresentation or falsification of records.
2. Zero Tolerance for Corruption: bribery, kickbacks, and improper influence are prohibited.
3. AML and Sanctions Discipline: no engagement with prohibited parties, routes, or evasion structures.
4. Human Rights and Dignity: no forced labour, trafficking, or abusive practices.
5. Safety and Environmental Responsibility: protection of life and operational safety is non-negotiable.
6. Auditability by Design: decisions and transactions must be explainable and evidenced.
7. Risk-Based Controls: higher risk = higher scrutiny and stricter approvals.

3) Scope and Application



MGCS applies to Mezzarion Holding and Group subsidiaries (including financial, trade, logistics, mining/labs, real assets, and operating platforms), and to third parties acting for or representing Mezzarion.

Where local law is stricter than MGCS, local law prevails. Where MGCS is stricter, MGCS prevails unless prohibited by law.

4) Governance and Accountability

MGCS uses a structured accountability model:

- Business leadership owns compliance outcomes in day-to-day execution.
- Group Compliance sets standards, monitors adherence, and escalates issues.
- Independent assurance (internal audit and/or external assurance) tests effectiveness.

Mezzarion leadership is accountable for ensuring commercial performance never overrides compliance obligations.

5) Ethical Conduct and Conflicts of Interest

Mezzarion expects personnel to avoid conflicts that impair judgement or create improper influence. Conflicts must be disclosed and managed, including:

- outside business interests
- related-party relationships
- gifts/benefits beyond acceptable thresholds
- roles that create dual loyalties or undue influence

6) Anti-Bribery and Corruption



Mezzarion prohibits bribery in any form—direct or indirect—including through agents, brokers, consultants, or intermediaries.

Controls apply to:

- gifts and hospitality
- charitable donations and sponsorships
- political contributions (where applicable and lawful)
- government and state-owned entity interactions
- success-based compensation arrangements (must be legitimate, transparent, and compliant)

7) AML/CFT and Sanctions Compliance

Mezzarion applies risk-based due diligence to prevent money laundering, terrorist financing, sanctions breaches, and financial crime.

We assess and screen, where relevant:

- contracting entities and beneficial owners
- directors and key controllers
- payment sources and settlement chains
- sanctions exposure and adverse media indicators
- vessel/port routing exposure (where applicable)

Mezzarion does not support transaction structures designed to conceal true counterparties, ownership, payer identity, end-user, or end-use.

8) Trade and Export Compliance



Where trade compliance requirements apply, Mezzarion implements controls for:

- restricted goods and prohibited end uses
- licensing obligations (if applicable)
- route and transshipment risk
- documentation integrity across the transaction lifecycle
- contractual clarity on roles, responsibilities, and delivery terms

9) Competition and Fair-Dealing

Mezzarion prohibits anti-competitive conduct, including price-fixing, market allocation, bid-rigging, and improper information sharing. Personnel must avoid discussions or arrangements that could distort fair market competition.

10) Third-Party Standards

Third parties representing or supporting Mezzarion must meet standards aligned to MGCS, including ABAC, AML/sanctions, human rights, and data/information security expectations proportional to risk.

Mezzarion reserves the right to:

- conduct due diligence
- contractually require compliance undertakings
- verify performance and remediation
- terminate relationships for serious breaches

11) Human Rights and Supply Chain Integrity



Mezzarion does not tolerate:

- forced labour, trafficking, child labour
- unlawful mining activity or illicit resource flows
- intimidation, coercion, or retaliation against complainants
- unsafe working conditions that endanger life

Suppliers and contractors are expected to uphold lawful and humane labour practices and cooperate with corrective actions where gaps are identified.

12) Data Protection and Information Security

Mezzarion protects personal data and sensitive business information using:

- lawful processing principles
- appropriate access controls and safeguards
- vendor security expectations proportional to risk
- incident response and notification protocols where required by law/contract

13) Health, Safety, and Environment

Mezzarion prioritises life, operational safety, and responsible environmental conduct across mining, logistics, laboratories, and industrial operations.

We maintain systems for:

- hazard identification and controls
- contractor and site safety governance



- incident reporting and investigation
- corrective actions and continuous improvement

14) Reporting Concerns and Non-Retaliation

Mezzarion supports ethical escalation through formal reporting channels.

- concerns may be raised by employees, suppliers, customers, and partners
- retaliation against good-faith reporting is prohibited
- reports are handled confidentially and investigated appropriately

15) Records, Auditability, and Transparency

Mezzarion requires complete and accurate recordkeeping to support:

- lawful execution
- financial integrity
- operational traceability
- audit readiness for banks, partners, regulators, and internal governance

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Operational Sections

16) MGCS Policy Catalogue



MGCS comprises the following policy families, updated periodically:

- Code of Conduct and Ethics
- ABAC (Anti-Bribery & Corruption)
- AML/CFT and Sanctions
- Trade / Export Compliance
- Competition and Fair-Dealing
- Third-Party Risk Management
- Human Rights and Supplier Integrity
- Data Protection and Information Security
- HSE and Operational Integrity
- Whistleblowing and Investigations
- Records Management and Audit Readiness
- Training and Culture
- Monitoring, Testing, and Continuous Improvement
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17) Responsibility and Ownership Model Across the Group

Mezzarion maintains clear ownership to prevent “nobody owns the risk.”

- Group Leadership: sets tone and approves risk appetite.



- Business Units / Subsidiaries: own implementation and evidence.
- Group Compliance: standards, monitoring, escalation, and advisory support.
- Finance Controls: payment integrity, financial crime controls, and auditability.
- Legal (where applicable): contractual integrity and regulatory alignment.
- Assurance: independent testing of control effectiveness.

18) Risk Register and Risk Treatment Discipline

Mezzarion maintains a structured risk register and treatment process:

- risk identification and classification (financial crime, sanctions, safety, legal, reputational, operational)
- inherent vs residual risk evaluation
- documented controls and owners
- remediation actions with timelines
- periodic review and escalation of high-risk issues

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19) Gifts, Hospitality, and Benefits

Mezzarion maintains strict rules around gifts and hospitality:

- must be lawful, reasonable, and business-justified



- cannot be used to influence decisions
- must be disclosed/recorded where required
- higher scrutiny applies to public officials and state-linked counterparties

20) Due Diligence Standards for Counterparties and Partners

Mezzarion applies risk-based onboarding and due diligence, including:

- identity and corporate verification
- beneficial ownership and control mapping
- sanctions/PEP/adverse media screening
- capability and track record checks
- bank/payment-chain verification
- asset/site verification where relevant (especially in mining and commodity supply)

Enhanced scrutiny is applied for higher-risk jurisdictions, intermediaries, politically exposed connections, or irregular payment structures.

21) Trade Execution Integrity and Document Discipline

Mezzarion applies document integrity controls appropriate to trade execution, including:

- clear contracting authority and contracting entity identification



- disciplined use of transaction documents (contracts, invoices, shipping docs, CoQs/assays where applicable)
- chain-of-custody principles where quality/grade is material
- evidence retention to support audit and dispute resolution

22) Trade Finance Controls

Where trade finance instruments are used (e.g., LC/SBLC and escrow structures), Mezzarion applies strict controls to ensure:

- instrument legitimacy and bank credibility
- clarity of triggers and documentary conditions
- avoidance of ambiguous or manipulable clauses
- controlled settlement chains and verified payer identity
- appropriate approvals commensurate with risk

23) Whistleblowing Workflow and Investigation Standards

Mezzarion applies a defined approach to reports and investigations:

- triage based on severity and risk type
- confidentiality and evidence integrity
- fair process and documented outcomes
- corrective actions and control strengthening
- non-retaliation enforcement



24) Conflict Disclosures and Related-Party Controls

Mezzarion requires disclosures and controls for:

- related-party transactions
- referral arrangements and intermediary relationships
- external business interests that overlap with Mezzarion's mandate
- any arrangement that could impair impartiality or create undisclosed incentives

25) Competition Law Conduct Rules

Mezzarion's competition compliance includes:

- restrictions on competitor communications
- meeting discipline and documentation
- prohibition of market manipulation and bid coordination
- escalation obligations when risk indicators appear

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26) Operational Safety Critical Controls

Mezzarion maintains safety-critical controls for higher-risk operations (mining, logistics, laboratories, construction/industrial environments), including:



- competency requirements and supervision
- contractor safety governance
- incident reporting, investigation, and corrective action
- emergency readiness and response standards
- continual improvement based on lessons learned

27) Supplier and Contractor Standards

Mezzarion expects suppliers and contractors to meet standards on:

- legal compliance and permits
- labour and human rights protections
- anti-corruption and integrity
- safety and environmental requirements
- security and confidentiality obligations
- cooperation with verification and remediation where necessary

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28) Document Control, Versioning, and Publishing Discipline

Mezzarion maintains disciplined document governance:



- controlled versions of policies and procedures
- formal approvals and publication controls
- clear ownership and review cycles
- retention and access controls aligned to risk and confidentiality

29) Regional and Jurisdictional Adaptation

MGCS is implemented with jurisdictional overlays where required by:

- regulatory expectations
- data protection laws
- mining and environmental regimes
- customs/trade rules
- sanctions/export control frameworks

Mezzarion's approach is to comply with the highest applicable standard unless prohibited by local law.

30) Training and Competency Standards

Mezzarion uses role-based training:

- baseline training for all personnel



- enhanced training for high-risk roles (trade execution, intermediaries, procurement, finance, logistics, labs, public sector interfaces)
- periodic refresh and targeted training following incidents or regulatory changes

31) Metrics, Monitoring, and Management Reporting

Mezzarion monitors compliance via indicators such as:

- due diligence cycle time and completion rates
- sanctions/PEP hit resolution timeliness
- third-party risk completion and remediation rates
- incident/investigation volumes and closure timelines
- HSE incidents and corrective action closure
- audit findings and remediation performance

32) Enforcement and Consequences

Breaches may result in:

- corrective actions and training
- restrictions of authority or access
- disciplinary action up to termination
- termination of third-party relationships
- reporting to regulators/law enforcement where legally required

33) Continuous Improvement and Review



MGCS is reviewed periodically and improved through:

- monitoring and internal testing
- assurance reviews and audits
- incident learnings and remediation
- legal and regulatory updates
- evolution of operational footprint and risk profile

34) External Engagement and Partner Expectations

Mezzarion expects partners to cooperate with compliance requirements, including:

- transparency on ownership and payment structures
- cooperation with screening and due diligence
- adherence to integrity and safety expectations
- contractual compliance commitments for higher-risk relationships

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35) Contact

For compliance-related inquiries or to raise concerns, contact:

Mezzarion

(Designated channels are shared in official Mezzarion documentation and engagement materials.)