

## Anti- Modern Slavery and Human Trafficking Statement.

### OVERVIEW

This statement sets out INGOT Brokers and its subsidiaries commitment to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

INGOT Brokers respects its responsibility to take a solid approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate operations, including our employees , partners, supply chain workers, and customers, by keeping in place steps to ensure all parties involved in our operations have better understanding of modern slavery and human trafficking by monitoring and keeping an eye for risks that may arise.

### ORGANISATIONAL STRUCTURE

Established in 2006, INGOT Brokers was initially launched with a unique vision to provide unparalleled superior trading environment, and the best trading tools in the industry.

INGOT Brokers provides a broad range of products and services which include ETFs, MENA, International shares and indices, commodities, metals, energies, as well as currencies.

INGOT Brokers is a pioneer company in online financial trading, executing billions of transactions on monthly basis and its regulated by the Australian Securities and Investments Commission (ASIC) with AFSL license number 428015.

Our talented and experienced team is working hard to ensure that our clients and business partners, as well as our team of professionals, have the best investment conditions. The company is keen to continuously develop and provide the most competitive services in the market.

#### Social responsibility

Recognizing how important social responsibility is to Ingot`s customers, we focus on the main categories of corporate social responsibility (CSR):

**Environmental efforts:** One primary focus of Ingot is the environment. As awareness have been raised regarding the importance of reducing carbon footprint. Steps have been taken to reduce those footprints which were considered both good for the company and society as a whole, these steps includes using energy saving bulbs, no paper policy by keeping digital copies of all transaction rather than the old paper and file system.

**Philanthropy:** Ingot also practice social responsibility by donating to local and regional charities, the main focus is charities concerned with preserving human dignities, empowering women and refugees harbouring in this time of war and terror.

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**Ethical Labour practices:** The main focus is to treat employees on fair and ethical grounds, since Ingot operates on many international grounds, it has an international ethical code of conduct which is revisited and evaluated frequently to ensure that all employees (no matter of religion, ethnicity & gender) are being treated in equal matter, work in equal conditions and fairly compensated.

**Volunteering:** Frequent visits to orphanages, attending volunteer events says a lot about our core values. By doing good deeds without expecting anything in return, INGOT Brokers instils in its employees the art of giving from the heart, humility and the sense of giving back to community.

### TRAINING AND CAPACITY BUILDING

INGOT Brokers Provide training to staff in key risk functions to support the identification of labour and human rights issues. Environmental and social risk and anti-money laundering requirements are also integrated into INGOT Brokers training.

We also provide all new employees with face-to-face and/or online training in relation to the Code of Business Conduct; and We plan to conduct a human rights in the supply chain workshop which will include participation from relevant procurement and risk staff and several key suppliers.

### POLICIES AND PROCEDURES

As part of our commitment to combating modern slavery, we have implemented the following policies and procedures:

- Code of Business conduct;
- Whistle-blower Policy; and
- Recruitment and Retention Policy.

### RISK ANALYSIS AND DUE DILIGENCE

As a financial services organisation within a highly regulated environment, INGOT Brokers considers the risk of modern slavery within its operations to be low, However we undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers.

The Company's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular service or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping

