

FCB TRADING & OESTE AGRO - CODE OF CONDUCT & GOVERNANCE (AR)

Mithaq al-Suluk al-Rasmi, Mukafahat al-Rashwa wa al-Hawkama (Corporate Ethics)

1. ETHICAL GOVERNANCE & CORE STANDARDS (AL-HAWKAMA)

FCB Group and Oeste Agro maintain the highest standards of integrity, contractual transparency, and ethical excellence. This charter applies unconditionally across all directors, traders, and partners worldwide.

2. ZERO TOLERANCE ON BRIBERY & CORRUPTION (MUKAFAHAT AL-RASHWA)

Unconditional zero-tolerance policy against any form of bribery, extortion, or illicit kickbacks, in full compliance with the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), and international anti-corruption treaties.

3. RIGID KYC/AML PROTOCOLS & SANCTIONS SCREENING (OFAC / EU / UK)

All commercial counterparties are screened through mandatory Know Your Customer (KYC) and Anti-Money Laundering (AML) protocols. Automated real-time screening against OFAC (US Treasury), EU, and UK Sanctions Lists.

4. WHISTLEBLOWER PROTECTION & ETHICS POINT HOTLINE

Encrypted, independent channel (whistleblowing@fcptrading.com) operating under ISO 37002 guidelines, ensuring absolute anonymity and legal protection against retaliation.

GOVERNANCE PILLARS & COMPLIANCE MATRIX

Governance Pillar	Sovereign & International Framework	Operational Protocol
Anti-Bribery & Corruption	UK Bribery Act 2010 & US FCPA	Strict zero tolerance across all international desks
Anti-Money Laundering (AML)	FATF Standards & Stringent KYC Rules	Full vetting of buyer credentials prior to FCO
International Sanctions	OFAC, EU & UK Sanctions Directives	Real-time automated transaction screening
Financial Settlement	Tier-1 Prime Global Banks & IFRS	Settlement via verified documentary L/C (DLC/SBLC)
Whistleblower Protection	ISO 37002 Whistleblower Guidelines	Encrypted confidential channel with zero retaliation
Halal & ESG Compliance	Fambras Halal, Cdial Halal, ESG Standards	100% certified Halal slaughtering & farm geo-tracking