

FCB TRADING & OESTE AGRO - CODE OF CONDUCT & GOVERNANCE

Global Integrity Code, Anti-Corruption Policies, KYC/AML & Whistleblower Framework

1. ETHICAL GOVERNANCE & CORE STANDARDS

FCB Group and Oeste Agro operate under unwavering principles of fiduciary integrity, contractual transparency, and ethical excellence. This Code is strictly binding across all employees, officers, global trading desks, and commercial partners worldwide.

2. ZERO-TOLERANCE ANTI-BRIBERY & ANTI-CORRUPTION

We maintain a strict zero-tolerance policy against any form of bribery, extortion, kickbacks, or corrupt inducements, aligning with the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), and international anti-corruption conventions.

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

All commercial counterparties must successfully complete comprehensive KYC (Know Your Customer) and AML (Anti-Money Laundering) verification prior to FCO or contract issuance. Real-time automated screening against OFAC (US Treasury), EU, and UK Sanctions Lists.

4. WHISTLEBLOWER PROTECTION & ETHICS HOTLINE

Independent, confidential reporting mechanism (whistleblowing@fcbtrading.com) ensuring complete reporter anonymity and absolute statutory protection against retaliation, aligned with ISO 37002 standards.

GOVERNANCE MATRIX & COMPLIANCE PILLARS

Governance Pillar	Regulatory Framework	Enforcement Protocol
Anti-Bribery & Corruption	UK Bribery Act 2010 & US FCPA	Strict zero tolerance, mandatory contract clauses
Anti-Money Laundering (AML)	FATF Guidelines & Strict KYC Protocols	Mandatory buyer background check prior to FCO
International Sanctions	OFAC (US), EU & UK Sanctions Lists	Automated embargo check and transaction blocking
Financial Integrity	Tier-1 Prime Global Banks & IFRS Rules	Settlement strictly via verified documentary L/C
Whistleblower Protection	ISO 37002 Whistleblowing System	Encrypted confidential channel with zero retaliation
ESG & Sustainability	Zero-Deforestation & Forestry Code	Satellite crop geo-tracking & ethical labor audits