Code of Ethics

REAL MONEY EUROPE LIMITED
Version 1.0 – August 2026

Preamble

This Code of Ethics sets out the values, principles of conduct and rules of behaviour that guide REAL MONEY EUROPE LIMITED in carrying out its activities. It applies to Directors, employees, collaborators, consultants, business partners, suppliers and all those who operate, in any capacity, in the interest of or on behalf of the Company.

REAL MONEY EUROPE regards ethics, legality, fairness, transparency and accountability as essential elements for building trustworthy relationships with clients, counterparties, partners, suppliers, collaborators and institutions. Compliance with this Code forms an integral part of the professional and contractual obligations assumed by its addressees.

Mission

REAL MONEY EUROPE operates in the field of LBMA physical gold intermediation and custody services, adopting a business model based on reliability, transparency, traceability of transactions, service quality and fairness in its dealings. The Company directs its activities towards safeguarding the trust of clients and the market, valuing professionalism, operational rigour and risk control.

REAL MONEY EUROPE promotes a corporate culture based on integrity, accountability, confidentiality and clarity, including in its dealings with third parties acting on its behalf in organisational and business activities. Every decision must be consistent with applicable legislation, internal procedures and the Company's long-term interest.

1. General Rules and Principles of Conduct

1.1 Scope of Application

This Code applies to all addressees, who are required to be familiar with its content and to conform their conduct to the values it expresses. Anyone acting on behalf of REAL MONEY EUROPE must act in compliance with the law, internal procedures and instructions received.

1.2 Legality and Compliance with Rules

Under no circumstances may the pursuit of an interest or advantage for the Company justify conduct contrary to the law, professional good faith or the principles of this Code. All activities must be carried out in accordance with applicable provisions and internal control safeguards.

1.3 Fairness, Honesty and Transparency

All addressees are required to act with fairness, honesty, diligence and transparency. Information, communications, data and documents must be truthful, clear, complete, understandable and always traceable.

1.4 Impartiality and Protection of Reputation

REAL MONEY EUROPE rejects favouritism and arbitrary discrimination and adopts objective criteria in decisions concerning clients, collaborators, suppliers and partners. The Company's reputation is an essential value and must be safeguarded by all addressees through professional, responsible conduct consistent with their role.

Guiding Principle

Every decision must be assessed not only in terms of its immediate outcome, but also in terms of its impact on legality, reliability, client trust, corporate reputation and the long-term sustainability of the relationship.

This principle guides every activity of REAL MONEY EUROPE, from commercial communications to document management, from relationships with partners to compliance checks.

2. Principles Governing Relations with Third Parties

2.1 Clients and Prospective Clients

Relationships with clients and prospective clients must be based on fairness, clarity, helpfulness, confidentiality and professionalism. Information provided must be understandable, not misleading, and consistent with the actual nature of the services offered by REAL MONEY EUROPE.

2.2 Business Partners and Parties Acting on Behalf of the Company

Business partners, including external support structures, must operate in accordance with the values and principles of this Code, with particular attention to transparency, confidentiality, the prevention of conflicts of interest and the protection of the Company's reputation.

2.3 Suppliers and Consultants

The selection of suppliers and consultants is based on criteria of competence, quality, reliability, fairness, cost-effectiveness and regulatory compliance. Relationships must be managed objectively and in a documentable manner, avoiding undue pressure or favouritism.

2.4 Refineries, Supply Chain Operators and Counterparties

In its dealings with refineries, specialised operators, depositaries and other counterparties in the supply chain, REAL MONEY EUROPE applies criteria of reliability, trustworthiness, traceability and consistency with the risk level of the relationship. Every relationship must be supported by adequate documentation and proportionate checks.

> Reliability, traceability and clarity are the guiding criteria in every relationship with external parties.

3. Anti-Money Laundering, Economic Legality and Traceability

REAL MONEY EUROPE attaches particular importance to preventing money laundering, terrorist financing, the use of resources of unlawful origin, and any transaction that is not transparent or adequately justified. All addressees must contribute, within their respective areas of responsibility, to the correct application of the identification, verification, traceability and record-keeping rules set out in the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010-2021 and in internal procedures.

It Is Prohibited to

- maintain relationships with persons involved, or suspected of being involved, in unlawful activities;
- accept or carry out transactions lacking adequate economic, commercial or documentary justification;
- obstruct internal controls or omit relevant information;
- engage in conduct designed to circumvent traceability, control or reporting obligations.

Required Safeguards

Any anomaly, inconsistency or potentially relevant circumstance must be promptly reported to the competent internal contacts in accordance with company procedures. The quality of controls depends on the completeness of the information gathered, its timely sharing, and the proper retention of supporting documents.

The Company promotes an approach based on:

- knowledge of the client and the counterparty
- verification of the economic consistency of the transaction
- traceability of flows
- adequate document retention
- immediate escalation of risk profiles

4. Accounting, Record-Keeping and Internal Controls

REAL MONEY EUROPE ensures that every transaction is properly authorised, recorded, verifiable, lawful, consistent and documented. Accounting records, administrative documentation, information flows and all corporate records must be complete, truthful, accurate and timely.

The Company promotes a system of internal controls appropriate to the nature of its activities, with the aim of preventing errors, irregularities and abuse, ensuring the traceability and verifiability of processes, and managing operational, reputational, legal and compliance risks.

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5. Data Processing and Confidentiality

REAL MONEY EUROPE safeguards personal data, corporate information and any confidential information of which it becomes aware in the course of its activities. Addressees must treat such information confidentially, in compliance with the GDPR, the Data Protection Act 2018 and internal procedures, avoiding unauthorised access, improper use, undue disclosure or processing that exceeds the permitted purposes.

Essential Rules

- use data only for legitimate and authorised purposes
- protect documents and credentials
- do not disclose information to unauthorised persons
- retain documentation in accordance with internal rules
- promptly report losses, breaches or anomalous access

6. Company Resources and IT Tools

Company resources, both tangible and intangible, must be used properly, responsibly and consistently with work-related purposes. IT tools, communication systems, access rights and credentials must be used in accordance with security rules, internal procedures and applicable legislation.

It is prohibited to use company resources for unlawful purposes or purposes unrelated to the business, to compromise the security of systems, to install unauthorised software, or to disseminate offensive, discriminatory content or content contrary to company values.

7. Conflicts of Interest, Gifts and Benefits

Addressees must avoid situations, even merely potential ones, in which personal interests or those of third parties could interfere with those of REAL MONEY EUROPE or compromise the objectivity of decisions. Any conflict of interest, even merely potential, must be promptly reported to the competent company contacts.

Gifts and Benefits

It is not permitted to offer, promise, request or accept money, gifts, benefits or other advantages that could improperly influence decisions, negotiations or professional relationships. Only tokens of business courtesy of modest value are permitted, provided they comply with internal procedures and do not compromise the integrity of the parties involved.

8. Relations with Staff and the Working Environment

REAL MONEY EUROPE recognises the central value of people and promotes a working environment based on respect, dignity, collaboration, accountability and the recognition of merit. The Company opposes all forms of discrimination, harassment, abuse, intimidation or conduct harmful to personal dignity.

8.1 Selection and Development

Decisions relating to selection, onboarding and professional development are based on criteria of competence, reliability, ability and merit.

8.2 Training

REAL MONEY EUROPE promotes the professional growth of its people and the development of a corporate culture geared towards legality, quality of work and risk awareness.

8.3 Equal Opportunities

The Company ensures working conditions based on fairness, respect and inclusion, free from arbitrary discrimination based on irrelevant personal factors.

8.4 Health and Safety

Health and safety at work are primary values. All addressees must adopt prudent, responsible conduct that complies with prevention rules, pursuant to the Safety, Health and Welfare at Work Act 2005.

9. Relations with Authorities, Bodies and Supervisory Institutions

In its dealings with supervisory authorities, public bodies, institutions and public administration, REAL MONEY EUROPE acts with the utmost fairness, transparency, cooperation and respect for the rules. The Company also operates in compliance with the safeguards and controls falling, as applicable, within the remit of the Anti-Money Laundering Compliance Unit (AMLCU) and FIU Ireland.

It is not permitted to provide false, incomplete or misleading information, to conceal data or documents, to promise or offer improper benefits, or to exert undue pressure on officials, authorities or persons performing a public service.

10. External Communication and Protection of the Company's Image

External communications must be fair, consistent, truthful and authorised in accordance with company procedures. No addressee may disclose externally any statements, data, documents or confidential information relating to REAL MONEY EUROPE without prior authorisation.

The Company's name, trademark and image may be used solely for lawful purposes and in the Company's interest, in a manner consistent with REAL MONEY EUROPE's institutional and reputational positioning.

11. Reporting, Oversight and Implementation of the Code

REAL MONEY EUROPE promotes the dissemination and effective application of this Code of Ethics and encourages the prompt reporting of conduct contrary to its principles, applicable legislation or internal procedures, through the Company's Whistleblowing System (the MITWhistle platform). Reports must be handled confidentially and seriously, and free from retaliation against anyone making a report in good faith, in accordance with the channels and procedures adopted by the Company.

Oversight Safeguards

The implementation of this Code is overseen by the competent corporate bodies and functions. The Company also operates in compliance with the obligations and controls applicable to the Anti-Money Laundering Compliance Unit (AMLCU) and FIU Ireland, according to their respective areas of competence.

12. Violations and Disciplinary System

Violation of the principles and rules contained in this Code constitutes a breach of the obligations assumed towards REAL MONEY EUROPE and may result in the application of the measures provided for by applicable legislation, applicable contracts, internal procedures and any disciplinary system adopted by the Company.

Any disciplinary measures shall be applied in accordance with the principles of proportionality, consistency and the right to be heard, taking into account the severity of the violation, the intentionality of the conduct and the circumstances of the specific case.

Dissemination, Updates and Approval

This Code of Ethics is brought to the attention of its addressees through means suitable to ensure its effective dissemination and awareness. REAL MONEY EUROPE reserves the right to update its content in light of regulatory, organisational or operational developments.

REAL MONEY EUROPE promotes a business model founded on legality, transparency, traceability, professional fairness and the protection of client trust.