MALCA-AMIT

Supplier Code of Conduct

2026

Preamble

Malca-Amit provides the luxury goods industry, high-net worth individuals and international banks with a global team of experts, including logistics, security, customs house and special operations professionals. In an industry where trust is the product, our reputation is built shipment by shipment, operation by operation. The service providers we work with are part of that reputation.

This Code sets out what we expect from every supplier, contractor, agent, and subcontractor (collectively "Suppliers") providing services to Malca-Amit.

1. Legal Compliance

Suppliers are expected to comply with all applicable international, national, and local laws and regulations - including those covering labour, immigration, health and safety, and the environment.

2. Forced Labour and Human Trafficking

The use of forced labour in any form is not tolerated . This covers bonded labour, prison labour, indentured labour, debt servitude, and human trafficking.

Workers should be free to leave their employment without penalty. No supplier should hold identity documents, require financial deposits, or use any other mechanism to restrict a worker's freedom of movement as a condition of employment.

Suppliers are expected to comply with the ILO Declaration on Fundamental Principles and Rights at Work and the ten principles of the UN Global Compact in the jurisdictions where they operate. Where a Supplier becomes aware of trafficking or forced labour within its own supply chain, it is expected to notify Malca-Amit immediately.

3. Child Labour

No one below the minimum legal working age may be employed by our suppliers - and in no case anyone under 15. Young workers between 15 and 18 should not be assigned to dangerous, nocturnal, or educationally disruptive roles. Proof of age should be available for all workers on request.

4. Working Conditions

Suppliers are expected to comply with applicable laws on working hours, rest periods, overtime, and leave - including maternity and paternity entitlements. Workers are expected to be paid at least the legally required minimum wage, on time, and without unauthorised deductions. Employment terms are expected to be provided in writing.

5. Freedom of Association

Workers have the right to join organisations of their choice, to raise concerns with management, and to bargain collectively. Suppliers are expected to respect these rights and should not intimidate or penalise workers who choose to exercise them.

6. Non-Discrimination

Hiring and management decisions are expected to be based on ability to do the job - nothing else. Discrimination on the basis of race, colour, sex, pregnancy, gender identity, age, disability, religion, political opinion, national origin, sexual orientation, or any other protected characteristic is prohibited.

Harassment, threats, and physical punishment of any kind are not tolerated.

7. Health and Safety

Suppliers are expected to provide a safe working environment and comply with all applicable occupational health and safety laws. Risk assessments should be conducted regularly. Workers should have access to appropriate protective equipment at no personal cost, and emergency procedures should be in place and communicated clearly.

Malca-Amit's operations involve specific security risks - secure transport, high-value asset handling, and armed environments. Suppliers working in these contexts are expected to maintain protocols that match that reality.

8. Environment

Suppliers are expected to comply with applicable environmental laws covering air emissions, water discharges, waste management, and hazardous substances. All materials used should come from permitted sources.

Malca-Amit is working to reduce its own environmental footprint. We ask suppliers to do the same - by measuring their emissions where possible and looking for ways to reduce them over time.

9. Anti-Corruption

Malca-Amit has zero tolerance for corruption. Suppliers are expected not to offer, promise, or accept bribes, kickbacks, or any form of improper payment - whether to public officials or private individuals - in connection with Malca-Amit business. This includes facilitation payments, even where local custom may treat them as acceptable.

Suppliers are expected to comply with applicable international anti-corruption standards. Financial records are expected to be accurate and sufficient to detect any irregularity.

10. Business Integrity

Working with Malca-Amit creates a position of trust. Suppliers are expected not to use that position - or any confidential information they access - for personal gain or to benefit third parties.

Any situation where a supplier's personal or financial interests could conflict with their obligations to Malca-Amit should be disclosed. This includes close personal or family relationships with Malca-Amit employees involved in procurement decisions.

We understand that business relationships sometimes involve meals or symbolic gestures. What we expect is transparency and proportion. Nothing should be offered or accepted that could reasonably be seen as influencing a business decision - and nothing at all during active tender or negotiation periods.

11. Anti-Money Laundering

Malca-Amit is committed to conducting business in full compliance with anti-money laundering laws and counter-terrorist financing regulations. Given the nature of our operations, we recognise that our sector carries inherent exposure to financial crime risk. We take that seriously, and expect our suppliers to do the same.

Suppliers are expected not to engage, knowingly or otherwise, in transactions involving proceeds from illegal activities. Suppliers should have appropriate procedures in place to detect and prevent money laundering and terrorist financing, remain alert to warning signs of suspicious activity, and report any concerns promptly. Suppliers are also expected not to maintain business relationships with individuals or entities subject to international sanctions.

12. International Trade Controls

Malca-Amit operates globally and is subject to a broad range of trade controls, export restrictions, and economic sanctions regimes. We ensure that our international business transactions comply with applicable trade control regulations.

Suppliers are expected to comply with all applicable export controls, import regulations, and economic sanctions in the countries where they operate. This includes restrictions on the movement of goods, technology, and services to sanctioned countries, entities, or individuals. Suppliers should not take any action that would cause Malca-Amit to be in breach of applicable trade control laws.

13. Tax Evasion

Malca-Amit has a zero-tolerance policy of facilitating a third party to evade taxes and has reasonable mechanisms in place to prevent this from happening. Suppliers must comply with all relevant tax laws and legislation in the jurisdictions in which they operate, remain alert to potential warning signs of suspicious tax evasion activity, and have guidelines, policies, and training in place to prevent the evasion of tax and facilitation of tax evasion.

14. Fair Competition

Suppliers are expected to compete on the merits of what they offer. Agreements with competitors on pricing, tendering, or market allocation are prohibited. Suppliers are expected to comply with applicable competition law in every jurisdiction where they operate.

15. Confidentiality and Data Protection

Malca-Amit's business involves sensitive information – e.g. client identities, asset movements, and security protocols. Suppliers who access this information are expected to keep it confidential and not share it with third parties without prior written authorisation by Malca-Amit.

Suppliers processing personal data on behalf of Malca-Amit are expected to handle it lawfully, protect it against unauthorised access, and comply with all applicable data protection laws.

16. Raising Concerns

If a Supplier believes that a Malca-Amit employee or anyone acting on our behalf has behaved improperly or illegally, we want to know. Reports can be made directly to Malca-Amit at *complianceofficer@malca-amit.com*. Concerns raised honestly and in good faith will be treated confidentially, and will not affect the business relationship.

Version 2.0, July 27, 2026