

CODE OF ETHICS DECLARATION

At REFAI GROUP UK LTD, we uphold the highest standards of ethical conduct, professionalism, and transparency in all our interactions. This declaration serves as a formal commitment to integrity in our business operations, internal procedures, and public representation. We pledge to foster a culture that prioritizes ethical behavior and decision-making at every level of the organization. This Code of Ethics Declaration reflects our dedication to the following core principles:

- ·• Promoting honesty, respect, and fairness across all levels
- Avoiding conflicts of interest in all business activities
- Fully complying with applicable laws and industry regulations
- Encouraging ethical decision-making throughout all departments
- Reporting unethical behavior through safe and confidential channels

This document is issued as an official statement of our core ethical values and guiding principles, reinforcing our unwavering commitment to conduct that reflects integrity and accountability.

Location: London, United Kingdom Issued: 08 April 2025

Hussein H. Fawaz

Chairman of the Board

