



AFRICA GLOBAL TRADE LINK LTD

SUPPLIER DUE DILIGENCE POLICY

Connecting Markets. Creating Opportunities.

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01 PURPOSE & SCOPE

Purpose

This policy sets out the approach of Africa Global Trade Link Ltd ("AGTL" or "the Company") to conducting due diligence on suppliers, manufacturers, sellers, distributors and other commercial counterparties that the Company identifies, screens, sources or introduces in the course of its trade, sourcing, brokerage and business facilitation activities. Its purpose is to support informed introductions, protect the Company's reputation, and promote responsible and lawful trade practices.

Scope

This policy applies to all suppliers and commercial counterparties engaged with, evaluated, or introduced by AGTL across all sectors in which the Company operates — including minerals & metals, machinery & heavy equipment, vehicles & transport, industrial products & plant, commodities & raw materials, electrical & mechanical products, and spare parts & components — and across all markets in which the Company is active, including Africa, the Middle East, Asia, Europe and the Americas.

Relationship to Client & Counterparty Due Diligence

This policy governs AGTL's own preliminary screening, documentation and risk-classification practices. It does not replace, and is not a substitute for, the independent legal, financial, technical, tax, customs, regulatory and compliance due diligence that buyers, sellers, and other counterparties are responsible for conducting themselves, consistent with the applicable commercial mandate or agreement governing each transaction.

02 DEFINITIONS

Term	Meaning
Supplier	Any manufacturer, distributor, seller, producer, agent, or commercial source of products, equipment, materials or services identified, sourced, screened or introduced by AGTL.
Due Diligence	The process of gathering, verifying and assessing information about a supplier in order to evaluate its legitimacy, capability and risk profile.
Beneficial Owner	Any individual who ultimately owns, controls, or benefits from a supplier entity, whether directly or indirectly.
Enhanced Due Diligence (EDD)	Additional verification measures applied to suppliers assessed as higher risk.
Sanctions List	Consolidated lists of restricted persons, entities, vessels or countries issued by bodies such as the United Nations, European Union, US OFAC, UK, or other applicable authorities.
PEP	A Politically Exposed Person — an individual entrusted with a prominent public function, or a close associate or family member of such a person.
Red Flag	An indicator suggesting elevated risk of fraud, misrepresentation, illegality, sanctions exposure, or reputational harm.

03 GUIDING PRINCIPLES

AGTL's approach to supplier due diligence is built on the following principles, reflecting the Company's core commitments to integrity, professionalism, confidentiality, transparency, reliability, partnership and results:

- **Risk-based:** Effort and depth of due diligence are proportionate to the risk presented by the sector, geography and counterparty.
- **Documented:** Every supplier engagement is supported by a documented screening and assessment record.
- **Consistent:** The same minimum standard is applied across all sectors, geographies and business lines.
- **Confidential:** Supplier and counterparty information is handled in line with AGTL's confidentiality obligations.
- **Complementary:** This policy does not remove buyers' or sellers' own responsibility for independent due diligence.
- **Compliant:** Screening is aligned with applicable sanctions, anti-money-laundering, anti-bribery and export-control regimes.

04 RISK-BASED APPROACH

AGTL applies a risk-based approach to supplier due diligence, considering factors including: sector (minerals & metals are treated as elevated risk by default given conflict-mineral considerations); country or jurisdiction of origin and operation; transparency of ownership and control; transaction size and structure; prior engagement history; and any PEP, sanctions or adverse media exposure. Each supplier is assigned a risk classification that determines the depth of due diligence applied.

Risk Level	Typical Indicators	Due Diligence Applied
Low	Established supplier; transparent ownership; lower-risk sector and jurisdiction; positive prior engagement.	Standard Due Diligence
Medium	New supplier; moderate-risk sector or jurisdiction; limited independently verifiable track record.	Standard Due Diligence plus additional document verification
High	High-risk sector (e.g. minerals sourced from conflict-affected or high-risk areas); high-risk jurisdiction; complex or unclear ownership; PEP involvement.	Enhanced Due Diligence (EDD)
Unacceptable	Confirmed sanctions match; credible evidence of illegal activity; refusal to provide basic documentation; serious adverse findings.	Engagement declined or terminated

05 SUPPLIER DUE DILIGENCE PROCESS

Supplier due diligence follows a structured, staged process from initial identification through to ongoing monitoring:

#	Stage	What Happens
1	Initial Identification	Supplier identified through sourcing activity, referral, or a specific client requirement.
2	Preliminary Screening	Basic checks performed: confirmation of company existence, sector relevance, and initial sanctions/watchlist screening.
3	Documentation Collection	Required documentation requested and reviewed (see Section 06).
4	Risk Assessment & Classification	Supplier assigned a Low, Medium, High or Unacceptable risk rating per Section 04.

#	Stage	What Happens
5	Enhanced Due Diligence (if required)	Additional verification performed; independent professionals or specialist organizations engaged where necessary.
6	Approval Decision	Supplier is approved, approved subject to conditions, or declined.
7	Introduction / Engagement	Supplier introduced to the client or engaged for sourcing, with AGTL's role as connector and facilitator clearly recorded.
8	Ongoing Monitoring	Periodic re-screening and review applied for the duration of the relationship (see Section 11).

06 REQUIRED DOCUMENTATION

Depending on the transaction and the supplier's risk classification, the following documentation may be requested prior to introduction or engagement:

Document	Standard DD	Enhanced DD
Certificate of incorporation/business registration	Required	Required
Relevant business licence(s) for the sector	Required	Required
Proof of identity of authorized representative	Required	Required
Beneficial ownership information	If available	Required
Product / technical specifications	Required	Required
Certificates of origin/analysis (as applicable)	If applicable	Required
Import/export & compliance documentation	If applicable	Required
Responsible sourcing / chain-of-custody documentation	If applicable	Required
Trade references/transaction history	Recommended	Required
Sanctions & watchlist screening result	Required	Required
Adverse media check	Recommended	Required

Where necessary, independent professionals or specialist organizations may support laboratory testing, inspection, legal verification, financial verification, customs compliance, regulatory review or technical assessment.

07 SANCTIONS, PEP & ADVERSE MEDIA SCREENING

Before any supplier is introduced or engaged, AGTL screens the supplier entity and, where identifiable, its beneficial owners and authorized representatives, against relevant sanctions and watchlists — including those issued by the United Nations, European Union, US Office of Foreign Assets Control (OFAC), and United Kingdom authorities — and checks for PEP status.

Screening is repeated periodically for approved suppliers in line with Section 11. Any positive or possible match must be escalated in accordance with Section 10 before the engagement proceeds further. AGTL will not knowingly engage or introduce any supplier that is subject to applicable sanctions or trade restrictions.

08 ANTI-BRIBERY, CORRUPTION & AML

AGTL does not offer, give, solicit or accept bribes, kickbacks or other improper payments or benefits in connection with the identification, screening or introduction of suppliers. Suppliers must not offer gifts, payments, or other benefits to AGTL personnel intended to improperly influence supplier selection or business introductions.

As part of due diligence, AGTL considers anti-money-laundering (AML) relevant indicators, including unusual or unexplained payment routing, requests to direct payments through unrelated third parties or jurisdictions, reluctance to disclose ownership or control, and the use of shell or nominee structures without clear commercial rationale. Any such indicators are treated as red flags and escalated per Section 10.

09 SECTOR-SPECIFIC DUE DILIGENCE

AGTL's sourcing and brokerage activity spans multiple sectors. The following sector-specific considerations apply in addition to the standard due diligence requirements set out above:

- **Minerals & Metals:** Given the elevated risk of conflict-affected or high-risk sourcing associated with this sector, suppliers are subject to Enhanced Due Diligence by default, including responsible sourcing and chain-of-custody documentation, informed where relevant by recognized frameworks such as the OECD Due Diligence Guidance for Responsible Supply Chains.
- **Machinery, Vehicles & Equipment:** Verification of manufacturer or dealer authorization, product compliance and safety documentation, and, where relevant, export-control considerations for dual-use or restricted equipment.
- **Commodities & Raw Materials:** Verification of quality and quantity documentation, certificates of origin or analysis, and compliance with applicable trade, phytosanitary and regulatory requirements.
- **Cross-Border Transactions:** Additional attention to import/export control regimes, customs compliance, and applicable licensing requirements in both the origin and destination markets.

10 RED FLAGS & ESCALATION

The following are examples of red flags that require escalation before an engagement proceeds:

- Refusal or inability to provide basic corporate documentation
- Ownership structure that is deliberately opaque or left unexplained
- A sanctions, watchlist, or credible adverse media match
- Pricing, quantities, or documentation inconsistent with market norms
- Requests for payment to unrelated third parties or unrelated jurisdictions
- Pressure to bypass standard documentation or screening steps
- Credible allegations of illegal sourcing, forced labour, or environmental violations

Escalation

Any red flag identified must be escalated to senior management or the designated compliance focal point before the engagement proceeds. The engagement is placed on hold pending resolution. Confirmed sanctions matches or credible evidence of serious wrongdoing result in the engagement being declined or, if already underway, terminated without delay.

11 ONGOING MONITORING & PERIODIC REVIEW

Approved suppliers are subject to periodic re-screening, at a minimum annually, or sooner following a significant change such as a change in ownership, adverse media, or a change in sanctions status. Suppliers classified as High risk are reviewed more frequently. Any material change in a supplier's risk profile triggers reassessment under the risk-based approach set out in Section 04.

12 RECORD KEEPING & CONFIDENTIALITY

Due diligence records — including screening results, supporting documentation, risk classification and approval decisions — are retained for a minimum of five years, or such longer period as required by applicable law. Records are treated as confidential in line with AGTL's confidentiality obligations to clients and counterparties, and access is limited to authorized personnel.

13 ROLES & RESPONSIBILITIES

Role	Responsibility
Board of Directors / Senior Management	Own and approve this policy; approve the engagement of High-risk suppliers; review escalated matters.
Compliance / Risk Focal Point	Coordinate screening activity, maintain due diligence records, and receive and act on escalated red flags.
Business Development & Sourcing Teams	Conduct initial screening, collect required documentation, and apply this policy in day-to-day sourcing and brokerage activity.
All Personnel	Report any red flags or concerns promptly and comply with this policy at all times.

14 NON-COMPLIANCE

Failure to follow this policy may result in a supplier engagement being placed on hold, declined, or terminated, and may be subject to internal review or disciplinary action with respect to the personnel involved. Serious breaches — such as knowingly engaging a sanctioned party — are escalated to senior management immediately.

15 POLICY GOVERNANCE & REVIEW

This policy is owned by AGTL's Board of Directors / Senior Management and is reviewed at least annually, or sooner in response to regulatory change, business growth, or lessons learned from its application. It should be read together with AGTL's Corporate Profile, applicable commercial mandates, and any related internal policies adopted by the Company, such as an Anti-Bribery & Corruption Policy or Confidentiality Policy.

Role	Name / Signature	Date
Prepared by		
Reviewed by		
Approved by (Director / MD)		