



Compliance, Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT), and Supply Chain Management Policy

STATEMENT

The policy of Emirates Gold DMCC (“we”) is to (a) engage only in legitimate business abiding by all relevant rules and regulations which apply to our activities, (b) maintain the highest ethical and moral standards, and (c) operate always under best practice exercising due-care and all necessary due-diligence. In particular, we commit to:

- Following all rules and laws that regulate our activities.
- Upholding the highest standards and to communicate such standards to our clients.
- Refraining, rejecting or disengaging from any action which we believe may support directly or indirectly criminal activity, corruption, financial abuse, terrorism, abuse of human rights, money laundering or any other activities which do not meet the highest ethical and moral standards.
- The adoption, implementation and maintenance of a compliance and supply chain management system which will also fully comply with the responsible supply chain guidance issued by the OECD, LBMA and DMCC.

SPECIFICS

1. We do not tolerate nor profit, assist, facilitate or contribute to:

- a) Torture, degrading or cruel treatment in any form whatsoever.
- b) Any form of forced or compulsory labour, including the worst forms of child labour (as defined by the International Labour Organization Convention No 182*) which includes:
 - all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
 - the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
 - the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
 - work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.
- c) Any other forms of human rights violations.
- d) War crimes, violations of international humanitarian law, crimes against humanity or genocide.
- e) Any form of criminal activity, including but not limited to money laundering, extortion, corruption or law breaking activity.

We commit to rejecting or immediately suspending and discontinuing engagement with suppliers or customers where we identify a reasonable risk that they are sourcing (or are linked) to parties committing any of the abuses described above.

2. We will not tolerate any direct or indirect support to non-state armed groups or their affiliates who:

- a) Illegally control mine sites, transportation routes or other points in the supply chain.
- b) Illegally tax or extort money or minerals at points in the supply chain, such as mining sites, or points where minerals are traded or exported.

* Web link: <http://www.ilo.org/public/english/standards/relm/ilc/ilc87/com-chic.htm>



We commit to reject or immediately suspend and discontinue engagement with suppliers or customers where we identify a reasonable risk that they are providing direct or indirect support to non-state armed groups as described above.

3. We recognize that the role of public or private security forces is to maintain the rule of law, including safeguarding human rights, providing security to mine workers and their equipment, and protecting the mine sites and transportation routes. We therefore commit to eliminate however possible (for instance through disengagement with the relevant suppliers) direct or indirect support to public or private security forces that illegally control mine sites, transportation routes or actors in the supply chain, or who commit abuse or the actions described in i and ii of paragraph 2 above.
4. We commit to not offering, promising, giving or demanding any bribes, and we will resist the solicitation of bribes to:
 - a) conceal or disguise the origin of minerals.
 - b) misrepresent taxes, fees and royalties paid to governments for the purpose of mineral extraction, trade, handling, transport and export.

We will however ensure to the extent possible that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments as required.

5. We will support efforts and contribute to the elimination of money laundering and the financing of terrorism, and we commit to reject or disengage from counterparties where we identify a reasonable risk of such activity.

MANAGEMENT SYSTEM

We commit to implement, centralize, communicate, monitor, adapt and improve a robust due-diligence management system, which will address:

- Clear responsibilities and escalation channels for all relevant employees.
- A risk assessment framework to classify risk associated to the supply chain.
- A robust Know-Your-Customer (KYC) framework for all our suppliers.
- Monitoring of transactions and risk mitigation steps based on the risk assessment of suppliers.
- Maintaining records.
- Mandatory training for all relevant employees.

The above policy is an integral part of our activity and we require every employee to fully comply with it. The latest version of this policy will be available on our website www.emiratesgold.ae

CONTACT INFORMATION

If you have any questions regarding the content of this policy please contact:

Email: compliance@emiratesgold.ae

Tel: +971 4 367 9030 and ask to speak to a member of our compliance team.

ACKNOWLEDGMENT

We wish to thank the Organisation for Economic Co-operation and Development (OECD) for the guidance provided in Annex II of the “OECD Due Diligence Guidance for the Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” on which part of our policy statement is based.