



POLICY FOR RESPONSIBLE SUPPLY CHAIN OF PRECIOUS METALS

Emirates Gold FZCO



Introduction

Emirates Gold FZCO is committed to ethical trade and developing a responsible and resilient supply chain. The policy outlines our approach to identifying, assessing, and mitigating supply chain risks that can affect our business, employees, communities, and the environment. We aim to collaborate with suppliers, business partners, and other stakeholders, including governments, regulators, industry organisations, and civil society, to promote responsible sourcing.

Responsible Sourcing Policy

Our Responsible Sourcing Policy focuses on preventing contributions to conflicts, securing vulnerable groups from human rights abuses, protecting the health and safety of supply chain workers and communities, preventing environmental degradation, and promoting better governance. We adhere to Organisation for Economic Co-operation and Development (OECD), Emirates Bullion Market Committee (EBC), Ministry of Economy (MoE), London Bullion Market Association (LBMA), Responsible Mineral Initiative (RMI), Extractive Industries Transparency Initiative (EITI) standards, and guidelines.

Scope

This Policy establishes the framework for implementing risk-based due diligence across Emirates Gold's supply chain. It governs all activities related to the sourcing, trading, handling, and export of gold, including oversight of upstream and downstream supply chain actors, counterparties, and strategic partners. The Policy applies to all Emirates Gold's employees, affiliates, and third-party contractors whose actions may expose the company to legal, ethical, environmental, social, or reputational risks associated with the gold sector, particularly in Conflict-Affected and High-Risk Areas (CAHRAs).

Key Principles and Commitments

1. Protection of Human Rights

We accord paramount importance to the protection of human rights like, torture, physical abuse, unpaid labor, etc. throughout our supply chain. We maintain a Policy of zero tolerance towards all forms of forced or child labour, discrimination, harassment, and the abuse of women and children. Our operations are anchored in the principles of equitable treatment, gender equality, and the inherent dignity and respect owed to all workers and surrounding communities.

2. Assurance of Health and Safety

We are resolutely committed to upholding the highest attainable standards of occupational health and safety for both our workforce and host communities. This entails the proactive identification and mitigation of hazards, the maintenance of safe working environments, and the promotion of the physical and mental well-being of all stakeholders.

3. Environmental Stewardship

We undertake to exercise responsible environmental stewardship through the adoption of sustainable operational practices. This encompasses the judicious management of waste, the prevention of environmental degradation, the conservation of biodiversity, the prudent use of water and energy resources, and the systematic reduction of greenhouse gas emissions.

4. Conflict-Free Sourcing

We affirm our unwavering commitment to full traceability and transparency within our supply chain, ensuring that no link in our sourcing process contributes, either directly or indirectly, to armed conflict or crimes perpetrated by non-state armed groups or unauthorised security forces. We categorically avoid engagement with entities implicated in war crimes, grave human rights violations, or other illicit conduct.

5. Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT)

We are firmly committed to the prevention of money laundering and the financing of terrorism. Our internal frameworks are designed to adhere to the AML-CFT and responsible sourcing guidance, ensuring that our commercial activities remain lawful, ethical, and transparent.

6. Governance and Ethical Integrity

We endeavor to uphold exemplary standards of corporate governance by maintaining strict adherence to all legal obligations, fostering ethical business conduct, preventing corruption and bribery, and

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ensuring operational transparency. We are equally committed to providing accessible, accountable mechanisms for the resolution of grievances and disputes.

Implementation Framework

We have integrated the OECD's five-step framework for risk-based due diligence into our management systems:

- 1. Establish Strong Management Systems:** We implement clear policies and procedures to ensure responsible sourcing, in line with international standards. Following the Emirates Bullion Market Committee (EBC) and Ministry of Economy (MoE) Guidelines, we designate a dedicated MLRO and supply chain officer to manage our due diligence processes. The officer is responsible for ensuring accountability, leading implementation, and organizing training and internal controls across our supply chain.
- 2. Identify and Assess Risks:** We conduct thorough risk assessments across our supply chain to identify potential issues, particularly in conflict-affected and high-risk areas. This includes mapping our suppliers, evaluating sourcing origins, and analysing key risk indicators such as human rights violations, environmental and governance concerns.
- 3. Design and Implement Risk Management Strategies:** We develop targeted strategies to mitigate identified risks. This may involve working with suppliers on corrective actions, setting clear timelines for improvement, or disengaging when necessary. Ongoing monitoring helps ensure risks are effectively managed.
- 4. Independent Third-Party Audits:** We engage qualified and EBC approved third-party auditors to review our due diligence practices. These independent assessments help identify gaps, validate our efforts, and reinforce transparency and accountability across our operations.
- 5. Annual Reporting:** We publish regular reports detailing our due diligence activities, risk findings, and mitigation measures. This transparent reporting reflects our commitment to ethical sourcing and allows stakeholders to track our progress and impact.

Roles and Expectations

We expect all employees to adhere strictly to our Responsible Supply Chain Policy, as well as to all applicable national and international laws and regulations. They are also expected to contribute to the continuous improvement of compliance across our gold supply chain.

The Management is responsible for implementing this Policy within their departments, overseeing and supporting due diligence processes, escalating high-risk issues to senior leadership or the compliance function and ensuring proper documentation of all risk assessments and mitigation measures.

The Board of Directors is responsible for providing strategic oversight of this Policy and approving any key updates to ensure its continued relevance and effectiveness. The Board shall review periodic reports on compliance, audit findings, and material risk exposures, and shall hold management accountable for the proper implementation, enforcement, and performance of risk mitigation measures across the organisation.

Contact Information

If you have any questions regarding the content of this policy or if you have any comments, concerns or grievances in relation to responsible sourcing please contact:

Email: compliance@emiratesgold.ae

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

Supplier Expectations

We expect our suppliers to:

- Comply with our Responsible Sourcing Policy and all applicable laws and regulations.
- Collaborate with us in identifying, assessing, and mitigating supply chain risks.

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- Ensure that their practices do not contribute to conflicts, human rights abuses, or environmental harm.
- Participate in training and capacity-building programmes to enhance compliance with our standards.

Customer Due Diligence

We conduct identity verification and beneficial ownership screening for all counterparties involved in our supply chain. We screen them against international sanctions (UN, EU, UK, US and UAE) lists, watchlists, and Politically Exposed Person (PEP) databases. We also assess their history in terms of legal, financial, environmental, and ethical compliance. Based on factors such as geographic location, sector, and transaction volume, we develop risk profiles to guide our due diligence efforts.

Supply Chain Risk Management and Mitigation

We map our supply chains to identify upstream and downstream actors. Our risk assessments focus on key areas, including Conflict-Affected and High-Risk Areas (CAHRAs), human rights violations, environmental degradation, and instances of corruption and bribery. Where risks are identified, we implement mitigation strategies such as engaging with suppliers for corrective action, suspending or terminating high-risk relationships, and collaborating with stakeholders to promote improved industry practices.

Ongoing Monitoring Measures

We maintain ongoing monitoring processes that include transaction-level screening, periodic reassessment of suppliers and counterparties, and tracking of red flag and alerts.

Independent Audit Mechanism

We conduct independent audits of our due diligence systems at least once every year. These audits are carried out by qualified third-party experts with experience in compliance and ethical sourcing. The audits assess our adherence to this Policy, the effectiveness of our risk mitigation measures, and the completeness and accuracy of our due diligence records.

Stakeholder Engagement

We actively engage with stakeholders, including employees, suppliers, local communities, and regulatory bodies, to promote responsible sourcing. We encourage open communication and collaboration to address supply chain challenges and improve practices continuously.

Record Retention

We retain all documentation related to KYC, risk assessments, and monitoring activities for a minimum of five (5) years. These records are stored securely and by data protection regulations. Access to sensitive information is strictly restricted and accessed only by designed staff.

Training Programme

We provide training to all applicable employees on key topics, including risk-based due diligence, KYC requirements, and responsible sourcing and human rights practices within the supply chain. We track training completion and actively address any knowledge gaps to ensure continuous improvement in compliance performance.

Monitoring and Continuous Improvement



We look forward to continuously monitoring our supply chain to ensure compliance with our Policy and adapting to evolving risks and regulatory requirements. We commit to regularly reviewing and updating our Policy to reflect best practices and emerging standards in responsible sourcing.

By adhering to these principles and commitments, **Emirates Gold FZCO** aims to build a responsible and sustainable supply chain for precious metals, contributing positively to the environment and society.

Abhijit Shah
CEO and Board Member
Emirates Gold FZCO

