

PLEASE READ CAREFULLY AND ACKNOWLEDGE THE EMIRATES GOLD POLICY BY SIGNING EACH PAGE

Compliance, Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT), Countering Proliferation Financing (CPF), Anti-Bribery and Corruption (ABC), and Supply Chain Management Policy

STATEMENT

The policy of Emirates Gold FZCO ("we") is to (i) engage only in legitimate business abiding by all relevant rules and regulations which apply to our activities, (ii) maintain the highest ethical and moral standards, (iii) operate always under best practice exercising due-care and all necessary due-diligence, and (iv) aim to establish long-term relationships with our clients. In particular, we commit to:

- Complying with all laws and regulations governing our activities.
- Upholding and communicating the highest ethical standards to all stakeholders.
- Refraining, rejecting or disengaging from any action which we believe may support directly or indirectly criminal activity, money laundering, terrorism, proliferation of weapons for mass destruction, abuse of human rights, bribery, corruption, financial abuse, threat financing, sanctions or any other activities which do not meet the highest ethical and moral standards.
- Adhere to the directives of the competent authorities in relation to Targeted Financial Sanctions (TFS), including screening, freezing, and reporting obligations, and comply with all relevant sanctions lists issued by the UAE Government, the United Nations Security Council, and applicable global sanctions lists such as OFAC (US), EU, UK and others.
- Implementing and maintaining a risk-based compliance and supply-chain management system aligned with the Organisation for Economic Co-operation and Development (OECD), and relevant industry standards including London Bullion Market Association (LBMA), the Emirates Bullion Market Committee (EBC), Ministry of Economy of the United Arab Emirates (MOEC) and the Responsible Minerals Initiative (RMI).

SPECIFICS

1. Zero Tolerance for Human Rights Violations

We do not tolerate, profit from, assist, facilitate, or contribute to:

- a) Torture, cruel, inhumane, or degrading treatment.
- 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, threat financing, 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.

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

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2. Non-State Armed Groups

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.

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. Public or Private Security Forces

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 a) and b) of paragraph 2 above.

4. Anti-Bribery and Anti-Corruption

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.

In fact, we have a zero-tolerance policy towards any type of bribery or corruption. Under no circumstances shall any employee or anyone acting on behalf of an employee give, pay, offer, promise to pay, or authorize the giving or payment of money or any other thing of value to any foreign government official or client, vendor or other business partner for any improper purpose or in violation of applicable laws.

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. AML/CFT/CPF Compliance

We support global efforts to eliminate money laundering, terrorism financing, and proliferation financing. We will reject or disengage from any counterparty where a reasonable risk of such activity exists.

6. Compliance with UAE Law

We commit to comply with Federal Decree-Law No. 10 of 2025 on Anti-Money Laundering, Combating the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF), and Cabinet Decision No. 134 of 2025 issuing its Executive Regulations, as amended.

7. Targeted Financial Sanctions (TFS)

We will ensure full compliance with Targeted Financial Sanctions (TFS) obligations, including screening, freezing, prohibitions, and reporting requirements as mandated by the UAE competent authorities. We will screen all potential and existing counterparties against sanctions lists issued by the UAE Government, the United Nations Security Council, and all applicable global sanctions lists such as OFAC (US), EU, UK and others, and take immediate action in accordance with TFS requirements.

8. Environmental Protection

We will uphold high standards of environmental protection and sustainability. We commit to minimize the impact of our processes on the environment and to follow all emissions and other regulations that govern our activity. We also commit to investigate the sustainability and environmental impact of our suppliers.

9. Threat Financing and Sanctions-Related Risks

We will commit to refrain sourcing from regions, operations and entities which contribute to the threat financing and sanctions and further commits itself to complying with the relevant sanctions, recommendations, and guidance from applicable regulatory bodies in this regard.

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10. Environmental, Health, Safety, and Labour Compliance

We will refrain sourcing material that is not in compliance with environmental, health, safety and labour regulations in the country of operation and or company policy. We will commit not to source material from entities that fail to perform environmental management as regards air, water and land pollution. We will not source material from the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Sites and protected areas.

11. Hazardous Chemicals and Ethical Conduct

We will encourage client for the appropriate storage, handling and disposal of hazardous chemicals and will engage with upstream participants to encourage them to comply with the International Cyanide Management Code. We will encourage the management of business integrity and ethical conduct, and support the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).

12. Supply Chain Traceability

To the extent possible, we will develop and maintain systems that allow full supply-chain traceability. Suppliers providing recycled gold bars are expected to ensure that the recycled origin of the material is supported by appropriate documentation and that the supply chain has been independently reviewed in accordance with MD-68/2024, including identifying the recycler from whom the material originated.

MANAGEMENT SYSTEM

We commit to implementing, centralizing, communicating, monitoring, and continuously improving a robust due-diligence management system that includes:

- Clear responsibilities and escalation channels for all relevant employees or external stakeholders.
- A framework that assesses risk in the supply chain and identifies Conflict-Affected and High-Risk Areas (CAHRA).
- 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 full policy is available on our website - <https://emiratesgold.ae/policies-and-procedures/>

This policy has been approved by Senior Management and forms an integral part of our activity/operations, and we require every employee to fully comply and every supplier to commit with it. We also reserve the right to reject or suspend any counterparty which does not abide by this policy.

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 (ask for the 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.

DECLARATION

I/We hereby declare that we have read and understood the details outlined in the above policy and commit to fully abide by its requirements.

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