



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

STATEMENT

The policy of Emirates Gold DMCC (“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:

- 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, money laundering, terrorism, abuse of human rights, bribery, corruption, financial abuse or any other activities which do not meet the highest ethical and moral standards.
- The adoption, implementation, and maintenance of a compliance and risk-based supply chain management system to achieve our goals and which will also comply with the responsible supply chain guidance issued by the Organisation for Economic Co-operation and Development (OECD), and relevant industry standards such as that of the London Bullion Market Association (LBMA), the Dubai Multi Commodities Centre (DMCC) and the Responsible Minerals Initiative (RMI).

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, 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.

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.

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.

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



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 a) and b) 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, handing, 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. 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.
6. 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.

MANAGEMENT SYSTEM

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

- 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 above policy is approved by Senior Management and is an integral part of our activity, 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. 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 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.

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.