

AL ETIHAD GOLD

SUPPLY CHAIN POLICY



Al Etihad Gold, a gold and silver refinery service provider, is fully committed in providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing.

Our reputation is a product of quality service provided to our clients from across the globe. We are fully committed to follow best practices, market standards and business ethics to attain a responsible supply chain.

Al Etihad Gold understands that Gold, originating from the Democratic Republic of the Congo and adjoining countries are sometimes mined and sold by armed groups to finance unfair labor practices or human rights violations. Some of these materials can make their way into the supply chains of the products used around the world. It is the policy of Al Etihad Gold to avoid processing gold that directly or indirectly finance or benefit armed groups from conflict-affected regions.

We strongly recommend our suppliers to operate in accordance with the OECD, the DMCC Practical Guidance for Market Participants in the Gold and Precious Metals Industry and the LBMA Responsible Gold Guidance.

*As a part of our responsibility, **AL ETIHAD GOLD** is committed to:*

1. Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities.

- Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source are from, or linked to, any party committing serious abuses as defined above.

2. Not tolerate any of its suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i) Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) Illegally tax or extort intermediaries, export companies or international traders.

- Not to accept and directly discontinue transactions with upstream suppliers which were identified as high risk due to involvement and or participation in any of the above-mentioned points.

3. Contribute and participate in the promotion of Responsible Sourcing of Precious Metals to our suppliers by:

i) Creating a long-term association with suppliers and established strong relationship with our customers.

ii) Supporting our suppliers of gold to adhere with the provision of this policy and encourage them to impart or convey it to its staff and their supply chain.

iii) Disseminating the precious metal gold guidance by local and international bodies in which this policy was created such as the DMCC, LBMA and OECD.

4. Not to offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.

5. Play a part and contribute in elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti - Money Laundering and Combating Financing Terrorism.

- To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.

6. Ensure that effective Due Diligence on a risk based approach is carried before starting any transactions and continuous monitoring to existing clients to assess the level of risk and plan to mitigate the risk identified.

7. Create and keep proper and adequate records of all precious metals transaction and activities that demonstrates the due diligence has been strictly followed.

8. Train relevant staff and educate its employees through formal education, trainings or seminars and conferences with the provision of this policy and the responsible sourcing of precious metals.

Al Etihad Gold requires all its staff involved in the gold supply chain to strictly comply with this policy and implement it in the management system.

Contact Details:

For questions and/or concerns related to the supply chain policy, employees, stakeholders, and counterparties can send an email to compliance@aletihadgold.com.

Acknowledgment:

We would like to thank the OECD for the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict – Affected and High Risk Areas to which parts of this policy is adapted.

Policy Established: 30 April 2013

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