

Introduction

Al Etihad Gold is strongly committed in observing the highest ethical standards in all its business activities. As an external obligation, this Code of Conduct constitutes the interface between the company's own sustainability values and goals, and the behaviour it wishes its suppliers to exhibit. We strive to continually optimise the sustainability of our business, and we ask our business partners to contribute to these efforts in the spirit of an integrated approach. The code defines our minimum expectations.

The CoC is based on national laws and regulations as well as international conventions such as the United Nations' Universal Declaration of Human Rights, guiding principles about children's rights and child labour, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's international labour standards, and the Global Compact of the United Nations. We expect our suppliers to adhere to all relevant laws and regulations as well as to the requirements of standards.

Matters to be Observed

Compliance with Various Business Laws and Regulation

All suppliers must, comply with all applicable international, national, state and local laws and regulations; including, but not limited to, those related to labour, customs, immigration, health and safety and the environment.

Respect Human Rights and Refrain from Any Form of Discrimination and Harassment

Prohibition of Child Labour - Child labour is forbidden at every phase of production. The suppliers are called upon to adhere to ILO conventions recommended minimum age for the employment of children. According to these recommendations, the age should not be lower than the age at which compulsory school attendance ends, and should in no case be lower than 15. The rights of young workers are to be protected and special protective provisions for them are to be complied with.

Prohibition of Hazardous Work for Minors - Any type of work that may harm the health, safety, or morals of individuals under the age of 18 is strictly prohibited.

Elimination of Forced Labour - No forced labour, slave labour or similar form of labour may be used. All work must be done by choice, and workers must be able to end the work or the employment relationship at any time. Furthermore, no worker may be subjected to unacceptable treatment such as psychological cruelty or sexual or other personal harassment.

Fair wages - The wage for regular working hours and overtime must comply with at least the statutory national minimum wage or the customary minimum wage for the industry, whichever is higher. In every case, the wage for overtime hours must be higher than the wage for regular hours. All legally mandated benefits are to be provided to workers. Wage deductions as a punitive measure are not permitted. The supplier must ensure that the workers receive clear, detailed and regular written information about the composition of their pay.

Fair working hours - The working hours must comply with the applicable laws and industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week. After six consecutive working days, an worker is to be provided with at least one day off. The total weekly working hours cannot regularly exceed 48 hours.

Freedom of association - The right of workers to form and join organisations of their own choosing and to engage in collective bargaining is to be respected. In cases in which freedom of association and the right to hold collective meetings are legally restricted, alternative possibilities for an independent association of workers for the purpose of collective bargaining are to be permitted. It must be possible for workers to communicate openly and without fear of reprisals or harassment.

Prohibition of Discrimination - Discrimination against workers in any form is prohibited. This applies, for example, to discrimination on the basis of gender, race, caste, skin colour, disability, political convictions, family background, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of every individual shall be respected.

Anti-Money Laundering and Combatting the Financing of Terrorism and Illegal Organizations

Al Etihad Gold is committed to strictly complying with all applicable Anti-Money Laundering and Combatting the Financing of Terrorism and Illegal Organizations Laws; hence we expect our Business Partners to do the same. We expect our business partners to not engage or attempt to engage any transaction involving illicit funds or activity. We also require all our business partner to report in good faith any suspicious transactions or activity to their Regulators. We require our Business Partners not to transact with designated entities or individuals in the United Nations and UAE Sanctions Lists.

Due Diligence for Responsible Sourcing from Conflict-Affected and High Risk-Areas (this is Applicable to Suppliers of Precious Metals only)

All precious metals suppliers are obliged to comply with Al Etihad Gold Supply Chain Policy for Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas. Precious metals suppliers are also expected to commit and adopt to responsible sourcing practices and conduct supply chain due diligence with their suppliers. We expect the cooperation of our suppliers to ensure that the materials we process are free from conflict-financing and human-rights abuses.

Bribery and Corruption

We expect our Business Partners to comply with applicable Anti-Bribery and Corruption Laws. Business Partners are not allowed to give anything of value, directly or indirectly to anyone especially any government official, government workers, company and workers of any company in order to influence or obtain improper benefit or advantage in connection with any transaction that involves Al Etihad Gold. Also, suppliers shall not, directly or indirectly, offer to any Al Etihad Gold staff money, goods or a service as a consideration or in expectation of a favourable decision, information, opinion, recommendation, vote or any other form of favouritism which qualifies as a corruption; and shall not directly or indirectly,

offer, give or agree or promise to give to any Al Etihad Gold staff any gratuity for the benefit of/or at the direction or request of any Staff of Al Etihad Gold;

Environmental Protection

Suppliers are to manage the minimisation of their environmental impact in the course of doing business, and to support and encourage others where it can meaningfully do so. All required environmental permits and registrations are to be obtained, maintained and kept current. Suppliers shall commit to maximising the reuse and recycling of materials while minimising waste volumes and commit to utilizing resources for maximum lifecycle, and to only use what is needed. Wherever possible, Suppliers will make a positive contribution on biodiversity, in relation to the products and services they provide.

Healthy, Safe and Secure Workplace

Suppliers are responsible for a safe and healthy working environment. Through the construction and use of suitable workplace safety systems, the necessary preventive measures are taken against accidents and injuries to health that could occur in connection with workplace activities. The workers are also informed regularly about the applicable health protection and safety norms and measures, and receive training about them. The workers are provided access to adequate quantities of drinking water and to clean sanitary facilities.

Community Involvement and Development

The supplier will commit to contribute to the local communities which the Supplier impacts, and support their sustainable development.

Reporting Concerns

The standards of conduct described in these guidelines are critical to the ongoing success of Al Etihad Gold. If you have any concerns about compliance or ethics issues while working for or with Al Etihad Gold or want to report illegal or unethical activities, you can Email: compliance@aletihadgold.com and/or management@aletihadgold.com or via telephone at +971 4 242 4813 or alternatively report using the company's Grievances and Whistleblowing Policy (allows anonymous reporting) through the company's website, <http://www.aletihadgold.com/en-US/contactus/grievances>.

All matters raised in good faith through these reporting lines will be handled in a confidential and nonretaliatory basis

Information and Consent of the Supplier

By signing this document, the supplier commits to act responsibly and adhere to the principles and requirements specified herein. The supplier commits to communicate the content of this Code in a comprehensible manner to workers, contractors and subcontractors and to make all necessary arrangements to meet the requirements

Signature:

Name:

Designation:

Company Name:

Date:

Place: