



## Independent 'Limited Assurance Statement

### 1. Introduction and objectives of work

BUREAU VERITAS has been engaged by Al Etihad Gold LLC, in accordance with the terms of engagement dated 09/09/2014 contained in contract attached as in appendix A, to conduct an independent assurance of its Auditee's Compliance Report. This Assurance Statement applies to the related information included within the scope of work described below.

This information, its presentation in the Auditee's Compliance Report, and public disclosure of the document, are the responsibility of the management of Al Etihad Gold LLC. Our sole responsibility was to provide independent assurance on its content.

Bureau Veritas Company has conducted engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 and with DMCC Practical Guidance for market participants in the gold and precious metals industry and in accordance with the DMCC Review Protocol. Assurance is commensurate with 'Limited' assurance as defined in the ISAE 3000 assurance standard.

Our report must not be recited or referred to in whole or in part in any other document nor made available, copied or recited to any other party, in any circumstances, without our express prior written permission. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the **Al Etihad Gold LLC** for our work, for this report or for the opinions we have formed.

### 2. Subject matter

The objective of engagement is to conduct an independent assurance to a "limited" level as defined in the ISAE 3000 assurance standard, of the Auditee's Compliance Report as at 26/1/2015, to determine to a limited level, whether the report provides a fair representation of Al Etihad Gold LLC activities, during the reporting period, to demonstrate level of compliance with the DMCC Practical Guidance for market participants in the gold and precious metals industry and in accordance with the DMCC Review Protocol

### 3. Scope of work based on 'Limited' level of assurance:

Al Etihad Gold LLC requested Bureau Veritas to review and include in its independent assurance the following data and information reported in Auditee's Compliance Report issued by Al Etihad Gold for the period 16 September 2014 to 15 September 2015 covering:



- Activities undertaken by **AI Etihad Gold LLC** to establish robust sustainable supply chain management systems as detailed in and referring to step 1 of the DMCC guidance and in accordance with DMCC Review Protocol.
- Activities undertaken by **AI Etihad Gold LLC** to identify and assess the risks in the supply chain as detailed in and referring to step 2 of the DMCC guidance and in accordance with DMCC Review Protocol.
- Activities undertaken by **AI Etihad Gold LLC** for development and implementation of a risk mitigation and/or control plan as detailed in and referring to step 3 of the DMCC guidance and in accordance with DMCC Review Protocol.
- Activities undertaken by **AI Etihad Gold LLC** for annual reporting on its measures implemented for responsible supply chain due diligence for the period 16 September 2014 to 15 September 2015 as detailed in and referring to step 5 of the DMCC guidance and in accordance with DMCC Review Protocol.
- Activities undertaken by **AI Etihad Gold LLC** and reported in the Auditee's compliance report related to conducting due diligence for adherence to DMCC's Anti-Money Laundering and Combating Financing of Terrorism Policy (as the minimum acceptable standard for AML/CFT due diligence policy) and in accordance with DMCC Review Protocol.

#### 4. Methodology

*The assurance performed has been a Limited Assurance in accordance to the ISAE 3000 standard, through sample application of audit techniques, including:*

1. Interviews with relevant personnel of AI Etihad Gold LLC
2. Review of documentary evidence produced by AI Etihad Gold LLC
3. Site visits to the auditee's premises.
4. All steps of the DMCC Responsible Gold Guidance were verified by documentation review and Management/employee interviews, as well as observation during the facility tour. The evidence reviewed included: Documented policy, Procedures for Due diligence, for Risk assessment, for Hotline, for Compliance, for Ethical standard, for Supplier evaluation, for Sales & contract; Records of Transactions, Training, Risk assessment results, Internal audits, Production, Material receiving; lot traceability computer system.
5. Review also included testing, corresponding to a limited level of assurance on sampling basis, of account opening procedures and due diligence performed before engaging with a counterparty supplier.
6. Testing, corresponding to a limited level of assurance on a sampling basis, of transactions monitoring and due diligence.

#### 5. Conclusion

In our opinion, in all material respects:





i. The accompanying report by the directors describes fairly the level of general compliance of Al Etihad Gold LLC with DMCC Practical Guidance for Market Participants in the Gold and Precious metals Industry and DMCC Review Protocol for the period from 16 September 2014 to 15 September 2015.

ii. Based on our review, nothing has come to our attention that causes us to believe that the Al Etihad Gold LLC relevant structure, policies, procedures, processes, activities, due diligence and KYC/AML/CFT activities, do not generally conform to DMCC Practical Guidance for Market Participants in the Gold and Precious metals Industry

iii. The compliance controls that were tested, as set out in the attachment to this report, were operating with sufficient effectiveness for us to obtain 'Limited', but not absolute, assurance that the related level of compliance were achieved in the period **16<sup>th</sup> September 2014 to 15<sup>th</sup> September 2015**.

## **6. Statement of independence, impartiality and competence**

Bureau Veritas is an independent professional services company that specialises in Quality, Health, Safety, Social and Environmental management with almost 180 years history in providing independent assurance services.

No member of the assurance team has a business relationship with Al Etihad Gold LLC its Directors or Managers beyond that required of this assignment. We have conducted this verification independently, and there has been no conflict of interest.

Bureau Veritas has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day to day business activities.

**Bureau Veritas**

**Location: Dubai**

**Date: 29/11/2015**

**Sign and Company Stamp:**

