



**AL ETIHAD GOLD**  
Grievances and Whistleblowing Policy

No.	EG/POL/COM/04
Rev No.	01
Date	31-07-2025

**Revision History Record**

Doc Rev. No.	Ed. No	Page No. Affected	Originator	Date	Details of Changes
00	00	-	Jamie Belino	30 Dec 2022	Review and replaced AEG-REF-10 Grievances and Whistleblowing Policy
00	00	-	Rhyna Lee	30 Dec 2023	Review
00	00	-	Rhyna Lee	30 Dec 2024	Review
00	01	1-2	Rhyna Lee	31 Jul 2025	<ul style="list-style-type: none"><li>-Replacing “employees” with “workers”</li><li>-Included management@aletihadgold.com as one of the designated contacts for reporting</li><li>-Included telephone number as an additional channel for reporting</li><li>-Included RJC COP as one of the guiding frameworks for due diligence and compliance.</li></ul>

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Issued	Name		Signature		
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Al Etihad Gold is fully committed in providing high quality products and services while meeting the highest ethical and moral standards.

We are fully committed to:

- Follow the rules and law that regulates our business activities
- Follow international best practices and market standard applicable to our business.
- Operate in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Supplement on Gold; EBC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain; and Responsible Jewellery Council Code of Practices

Guideline for Reporting:

### 1. Who can report?

Workers, clients and customers, end-users and other affected stakeholders can use the Grievances and Whistleblowing Policy.

### 2. What can be reported?

We encourage stakeholder to raise concerns and disclose information about a suspicion or knowledge of a wrongdoing which may include but not limited to:

- (a) Financial malpractice, impropriety or fraud; bribery and corruption
- (b) Failure to comply with a legal obligation or applicable laws;
- (c) Human rights abuses (including dangers to health and safety or environment);
- (d) Criminal activity;
- (e) Improper conduct or unethical behavior;
- (f) Attempts to conceal any violations of the EBC Rules and Regulations or the EBC Anti Money Laundering/ Counter Financing of Terrorism (AML / CFT) Policy or EBC Rules for RBD-GSC;
- (g) Falsification of documents or fraudulent suppliers; and
- (h) Direct or indirect violations of the EBC Rules and Regulations or the EBC AML/CFT Policy or EBC Rules for RBD-GSC...etc.

### 3. How should the report be made?

The reporting person may choose to remain anonymous when disclosing information or claim. The reports can be submitted to the following email addresses: [compliance@aletihadgold.com](mailto:compliance@aletihadgold.com) and/ or [management@aletihadgold.com](mailto:management@aletihadgold.com) or via telephone at +971 4 242 4813. We encourage that the report be evidenced based and provide as much information as possible to aid the investigation. If substantiated, appropriate action and communication will be done to concerned parties and may be reported to the regulators.

Access to anonymous reporting can be found here: <http://www.aletihadgold.com/en-US/contactus/grievances> and click the link “**Report here**”.

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#### 4. How we are addressing reports?

If the reporting person chose to report with his identity, we guarantee to keep the identity confidential and process any personal data collected through the report fairly and lawfully for the sole purpose of identifying and investigating allegations of illegal activities or non-compliances to Al Etihad Gold policies.

Al Etihad Gold Guarantees that the reporting person shall not in any way be prejudiced, reprimanded and will not tolerate any form of retribution against a person for raising a concern. For workers of Al Etihad Gold, the HR and the Managing Director shall adequately instruct and supervise sanctions against worker retaliation.

All reports shall be acknowledged, recorded and investigated without undue delay, provided that the report is considered to be made in good faith. Where possible, the reporting person shall be kept updated on the progress of the investigation. The reporting person will be informed to whom the complaint is referred to, the timeline and outcome of the investigation.

#### 5. Evaluation, Review and Lessons Learned:

Al Etihad Gold shall conduct periodic audits of the Grievances and Whistleblowing mechanism. The review shall include records of the numbers, type and outcome of complaints, and appropriate corrective actions made, if necessary.