



AL ETIHAD GOLD

SUPPLY CHAIN POLICY

Gold as one of the few minerals are essential for the operations of Al Etihad Gold. These minerals come from mines that are mainly located in or near the conflict affected and high risk areas.

Profits from some mine support groups that are engaged in serious violence and abuse of human rights are the reason that these minerals are considered to be conflict minerals. Although whether or not they come from high risk and conflict affected areas, these minerals are always conflict minerals.

In January 2013, the Dubai Multi Commodities Centre had announced that all Dubai Good Delivery accredited refiners must comply with the “DMCC Guidance” or the Practical Guidance for Market Participants in the Gold and Precious Metals Industry that incorporates the OECD Due Diligence for Responsible Supply Chain of Minerals from Conflict – Affected and High – Risk Areas (Supplement on Gold).

Al Etihad Gold is fully committed in providing high quality products and services while meeting the high ethical and moral standards to its supply chain. The company and its suppliers which are all locally registered companies are mutually bound to be responsible and act to attain a conflict free supply chain.

Al Etihad Gold, a service provider of precious metals refining does not source its supply directly from mines or smelter and is strictly compliant and strongly recommends its suppliers to operate in accordance with OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict – Affected and High Risk Areas and the Supplement on Gold, the DMCC Practical Guidance for Market Participants in the Gold and Precious Metals Industry and 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 locally registered 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.