	AL BAHRAIN BULLION DMCC Responsible Supply Chain, Bribery and Anti-Money Laundering and Combatting the Financing of Terrorism Policy	No.	EG/POL/COM/01
		Rev No.	01
		Date	08-03-2023

Al Bahrain Bullion DMCC, a non-manufactured precious metals trader, is fully committed in providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing.

Al Bahrain Bullion DMCC recognizes that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and we recognize that we have the responsibility to respect human rights and not contribute to conflict, and protect the environment. We commit to adopt, widely disseminate and incorporate in contracts and/or agreements, with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, and also the ABB’s supplier’s code of conduct as representing a common reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Regarding serious abuses associated with the extraction, transport or trade of minerals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:


- i) any forms of torture, cruel, inhuman and degrading treatment;
- ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- iii) the worst forms of child labour;
- iv) other gross human rights violations and abuses such as widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups:

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals

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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.

Regarding risk management of direct or indirect support to non-state armed groups:

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:


5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through

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artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:


12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

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Al Bahrain Bullion DMCC has existing management system to ensure consistent implementation of the due diligence and risk control requirements of the policy which includes but not limited to:

- Scope, clear responsibilities and escalation channels
- Identification, assessment and criteria for high-risk gold supply chain
- Know-Your-Customer (KYC) process
- Monitoring and surveillance of transactions
- Mandatory trainings for relevant staff whom are exposed directly in the supply chain

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

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 this policy is adapted.


Al Bahrain Bullion DMCC Anti-Money Laundering and Combatting the Financing of Terrorism Policy

In accordance with the UAE Federal AML legislation the Company established and maintain policies and procedures for the following:

1. Identifying and assessing ML/FT risks;
2. Establishing, documenting, and updating policies and procedures to mitigate the identified ML/FT risks;
3. Maintaining adequate risk-based customer due-diligence (CDD), enhanced due-diligence (EDD) and ongoing monitoring procedures;
4. Identifying and reporting suspicious transactions;
5. Putting in place an adequate governance framework for AML/CFT, including appointing an AML/CFT Compliance Officer, and ensuring adequate staff screening and training;
6. Maintaining adequate records related to all of the above; and
7. Complying with the directives of the Competent Authorities of the State in relation to the United Nations Security Council resolutions and UAE Authorities decisions.

In addition, the Company's AML-CFT policies and procedures must also ensure that sanctions lists issued by the UAE Government, as well as the United Nations Security Council, are screened against; any associated instructions on prohibited transactions, asset freezing, etc., must also be complied with in accordance with TFS Decision.

Contact Details: For questions and/or concerns related to the policy, employees, stakeholders, and counterparties can send an email to compliance@albahrainbullion.com.

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Policy Acknowledgement:

By signing this document, we acknowledge that we have received a copy of Al Bahrain Bullion DMCC Supply Chain Policy, Bribery and Anti-Money Laundering and Combatting the Financing of Terrorism Policy. We hereby undertake to commit to compliance with the policy for all interactions with the company. We also understand that Al Bahrain Bullion DMCC is open on considering ways to support or assist in establishing processes to promote and improve our responsible sourcing practices, if necessary.

Signature:

Name:

Designation:

Company Name:

Date:

Place: