


PRESTIGE PRECIOUS METALS DMCC

RESPONSIBLE SUPPLY CHAIN POLICY

Prepared by :	Legal and Compliance Officer 		
Approved by:	Managing Director		
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Revision History

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27 July 2023	01	Legal and Compliance Officer	Designed to meet the UAE Regulations and OECD Guidelines for Responsible Sourcing of Gold
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Approved by:

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RESPONSIBLE SUPPLY CHAIN MANAGEMENT POLICY

PRESTIGE PRECIOUS METALS DMCC acknowledges that extraction, trade, handling, and export of minerals from conflict-affected and high-risk regions carry potential risks of significant adverse impacts. We are fully aware of our obligation to uphold human rights and avoid any involvement in conflicts. Consequently, we pledge to embrace and widely circulate the subsequent responsible mineral-sourcing policy in our contracts and arrangements with suppliers. Our commitment involves abstaining from actions that aid conflict financing and adhering to pertinent United Nations sanctions resolutions or, when relevant, the national laws that implement these resolutions.

PRESTIGE PRECIOUS METALS DMCC commits to following the OECD's comprehensive due diligence framework as a fundamental reference for the responsible management of global mineral supply chain. They pledge to uphold human rights and make sourcing decisions that do not contribute to conflicts, which includes carefully selecting its suppliers. We also strongly encourage our suppliers to align their operations with guidelines such as those provided by the OECD, DMCC Practical Guidance for Market Participants in the gold and precious metals sector, and the LBMA Responsible Gold Guidance.

FRAMEWORK

a. Regarding serious abuses linked to the extraction, trade and transport of minerals

When sourcing from or operating in conflict-affected and high-risk regions, Prestige will absolutely not condone, gain from, support, or facilitate in any way, the commission of the following acts by any party:

- i. Any forms of forced or compulsory labor, which entails work or service extracted from an individual under the threat of punishment, and to which the individual has not voluntarily consented
- ii. Any instances of torture, cruel, inhuman or degrading treatment
- iii. War crimes, serious breaches of international humanitarian law, crimes against humanity, or genocide
- iv. Most severe forms of child labor
- v. Other severe violations and abuses of human rights, including the widespread occurrence of sexual violence

b. Regarding risk management of serious abuses

PRESTIGE PRECIOUS METALS DMCC will promptly halt or terminate its involvement with upstream suppliers if there is a valid suspicion that these suppliers are obtaining their materials from or have associations with any entity engaged in significant wrongdoing, as described in paragraph a. above.

c. Regarding direct or indirect support to non-state armed groups

PRESTIGE PRECIOUS METALS DMCC will not permit any form of direct or indirect backing for non-state armed groups through the activities related to minerals, which encompass extraction, transportation, trading, handling, or export. This includes but is not restricted to the acquisition of minerals from, the disbursing of funds



to, or the provision of logistical support or equipment to non-state armed groups or their affiliated entities that fall under the following criteria:

- i. Illegally exert authority over mine locations or otherwise control transportation paths, locations where minerals are traded, and those actors situated further up the supply chain;
- ii. Illegally impose levies or forcibly acquire money or minerals at entry points to mine sites, along transport routes, or at locations where minerals are exchanged;
- iii. Illegally impose levies or extract resources from intermediaries, export businesses or international traders

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

PRESTIGE PRECIOUS METALS DMCC will promptly halt or terminate its association with upstream suppliers in cases where there is a credible concern that these suppliers are either procuring from or connected to any party offering direct or indirect assistance to non-state armed groups, as defined in paragraph c.

e. Regarding public or private security forces

As outlined in paragraph f., PRESTIGE PRECIOUS METALS DMCC pledges to eliminate any form of support, whether direct or indirect, to public or private security forces that engage in unlawful control over mine sites, transportation routes, and actors upstream in the supply chain. This includes their illegal practices of taxing or extorting money or minerals at entry point to mine sites, along transportation routes, or at mineral trading locations, as well as their imposition of taxes or extortion on intermediaries, export companies, or international traders.

PRESTIGE PRECIOUS METALS DMCC acknowledges that the primary role of public or private security forces operating at mine sites, their vicinity, or along transportation routes should be strictly related to upholding the rule of law. This includes ensuring the protection of human rights, providing security for mine workers, equipment, and facilities, and safeguarding mine sites and transportation routes against interference with legitimate extraction and trade.

In instances where PRESTIGE PRECIOUS METALS DMCC or any company within our supply chain engages public or private security forces,

PRESTIGE PRECIOUS METALS DMCC commits to or will demand that these security forces adhere to the Voluntary Principles on Security and Human Rights. Specifically, PRESTIGE PRECIOUS METALS DMCC will actively support or take measures to implement screening policies that prevent the hiring of individuals or units within security forces known to be responsible for severe human rights violations.

PRESTIGE PRECIOUS METALS DMCC will actively participate in or initiate initiatives aimed at collaborating with central or local government authorities, international organizations, and civil society groups to contribute to viable solutions for enhancing transparency, fairness, and accountability in the payments made to public security forces for security services.

PRESTIGE PRECIOUS METALS DMCC will take measures to engage with local authorities, international organizations, and civil society groups to prevent or reduce the vulnerability of marginalized communities,



especially artisanal miners in cases where minerals in the supply chain are extracted through artisanal or small-scale mining. The goal is to mitigate the adverse impacts that may arise from the presence of security forces, whether public or private, at mine sites.

f. Regarding risk management of public or private security forces

PRESTIGE PRECIOUS METALS DMCC formulates, embraces, and enforces a risk management strategy in collaboration with upstream suppliers and relevant parties to prevent or alleviate the risk of providing direct or indirect support to public or private security forces, as specified in paragraph e., when we ascertain that a valid risk is present. In such situations, we will halt or terminate our association with upstream suppliers if mitigation efforts prove unsuccessful within six months from the adoption of the risk management plan. We will adopt a similar approach when we detect a reasonable risk of activities that are not in compliance with the principles outlined in the last two sub paragraphs of paragraph e.

g. Regarding bribery and fraudulent misrepresentation of the origin of minerals

PRESTIGE PRECIOUS METALS DMCC and its personnel shall refrain from providing, committing to, providing, or requesting any form of bribery. They will also resist any attempts to solicit bribes with the intention of concealing or disguising the source of minerals or representing the payments of taxes, fees, and royalties to governments in the context of mineral extraction, trade, handling, transportation, and export.

h. Regarding money laundering

PRESTIGE PRECIOUS METALS DMCC will actively participate in or initiate actions to aid in the successful eradication of money laundering when it detects a credible risk of money laundering arising from or linked to the extraction, trade, handling, transportation, or export of mineral acquired through the unlawful taxation or extortion of minerals at entry points to mine sites, along transportation routes, or at mineral trading locations by upstream suppliers.

i. Regarding the payment of taxes, royalties, and fees payable to the government

PRESTIGE PRECIOUS METALS DMCC will verify that all financial obligations, encompassing taxes, fees, and royalties linked to mineral extraction, trade, and export from regions afflicted by conflict and high-risk factors, are remitted to the respective governments. Additionally, PRESTIGE PRECIOUS METALS DMCC pledges to divulge these payments following the guidelines outlined by the Extractive Industry Transparency Initiative (EITI).

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

PRESTIGE PRECIOUS METALS DMCC is dedicated to collaborating with suppliers, both government authorities at central and local levels, international organizations, civil society, and affected third parties, where applicable, to enhance and monitor performance. This aims to proactively prevent or alleviate the likelihood of adverse consequences through the implementation of measurable actions within reasonable timeframes. In cases where mitigation efforts prove unsuccessful, PRESTIGE PRECIOUS METALS DMCC will suspend or terminate the association with upstream suppliers.



MANAGEMENT SYSTEM

We pledge to establish, communicate, monitor, amend and improve a strong due diligence management system which includes the following elements:

- Clearly defined roles and responsibilities, and efficient communication channels for both internal employees and external stakeholders
- Strong KYC framework applicable to all our (potential) suppliers
- An evaluative framework for assessing supply chain risks and identifying Conflict-Affected and High-Risk Areas
- Continuous transaction monitoring
- Development and implementation of risk mitigation measures based on supplier risk assessments
- Meticulous record-keeping
- Training for all relevant employees, based on their role and responsibilities

The above policy is approved by Senior Management and is an integral part of our business. We mandate full compliance from each employee and expect a commitment to compliance from every supplier.