



ACE Gold Refinery FZE

Policy for a Responsible Global Supply Chain of Minerals

AL RAWAIS GOLD FZC, an integrated precious metal refinery and trading solutions in the United Arab Emirates, is fully committed in providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing.

The Company recognizes that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRA) and other areas, and we recognize that we have the responsibility to respect human rights and not contribute to conflict and environmental degradation, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from CAHRA and Non-CAHRA, 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:

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:** The Company does not indulge in any form of discrimination; does not support or engage in any form of harassment or abuse; and wants its employees, suppliers and security personnel not to indulge in any forms of torture, cruel, inhuman, and degrading treatment; and other gross human rights violations.
- 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:** The Company wants its supply chain actors to abolish any practice that appears to be slavery/forced labour and not to engage their workers in any kind of involuntary work and protect them from any such practice.
- iii) **The worst forms of child labour:** The Company refrains from employing any child labour and urges its suppliers to ensure that they do not hire any child labour as required under ILO Convention No. 182 that clearly defines the 'child' to be all persons below the age of 18, and 'worst forms of child labour' to prohibit and eliminate work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children, push them into slavery and illicit activities.
- iv) **Other gross human rights violations and abuses such as widespread sexual violence:** The Company is committed to fair treatment of women workers and children and want to ensure that they are not pushed towards sexual abuse due to the nature or the circumstances in which the



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business activity is executed across our supply chain. The Company expects all its employees and suppliers to respect these basic human rights.

- v) **War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide:** The Company does not tolerate and urges its suppliers not to contribute to, assist with, or facilitate the commission by any party of war crimes or other serious violations of international humanitarian law; and crimes against humanity or genocide.

Regarding risk management of serious abuses:

The Company 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 the section above.

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

The Company 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 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.

The Company urges its upstream suppliers to identify and eliminate any risk that associates them directly or indirectly with any non-state armed groups.

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

The Company 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 the section above.



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Regarding public or private security forces:

The Company agrees to eliminate, in accordance with the section below (on risk management of public and private security forces), 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.

The Company recognises 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.

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, the Company 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. Thorough background checks will be conducted prior to engaging any individuals or service provider.

The Company 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.

The Company 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 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:

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 the first paragraph of the section above, 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 the second last and last paragraphs of the section above, we will respond in the same vein.



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The Company urges its upstream suppliers to identify and eliminate any risk that associates them directly or indirectly with any public and private security forces that illegally control mines, supply chain actors and transport routes and engage in extortion.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

The Company 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:

The Company 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. Read this section along with our AML/CFT Policy.

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

The Company 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:

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 organisations, 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.

Regarding environment, health and safety (EHS):

The Company has an EHS Policy and Manual and is committed to excellence in environmental, health, and safety standards in its gold refining operations. Dedication to these principles is integral to the Company's business ethos, ensuring a safe, healthy, and sustainable future of its employees, stakeholders, and the



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environment. The Company urges its suppliers to ensure the health and safety of their workers and care for the environment and comply with the EHS regulations of their respective countries.

Health and Safety: Our foremost priority is the safety and well-being of our workforce and visitors. We strive to prevent occupational hazards through rigorous safety protocols, continuous training, and a proactive approach to risk management.

Environmental Stewardship: We are dedicated to minimizing our ecological footprint. This commitment involves responsible resource management, reducing emissions, and implementing sustainable practices in every aspect of our operations.

Compliance and Continuous Improvement: Adhering to the highest industry standards and regulatory requirements, we continuously seek to improve our EHS performance. This is achieved through regular policy reviews, setting measurable objectives, and fostering a culture of safety and environmental responsibility.

Collective Responsibility: EHS is a collective responsibility at Al Rawais Gold FZC. We encourage active participation and open communication among all employees to enhance our EHS practices.

Our EHS Policy is a testament to our unwavering commitment to safety, health, and environmental excellence, guiding our operations and ensuring a safer, greener future.

The Company encourages all its suppliers to ensure the health and safety of the workers in the supply chain and to protect the environment.

Regarding risk management of environment, health and safety (EHS):

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 organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts on the health and well-being of workers and host communities and on environment, through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Regarding overall management system:

The Company has a 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



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- Know-Your-Customer (KYC) process
- Monitoring and surveillance of transactions
- Mandatory trainings for relevant staff who are exposed directly in the supply chain

AL RAWAIS GOLD FZC requires all its staff involved in the gold supply chain to strictly comply with this policy and implement it in the management system. The Company encourages its suppliers to structure internal management to support supply chain due diligence and establish a system of controls and transparency over their mineral supply chain to ensure compliance, implement, monitor, communicate, and report performance.

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

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 from which this policy is adapted.

Policy Acknowledgement:

By signing this document, we acknowledge that we have received a copy of AL RAWAIS GOLD FZC Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas. We hereby undertake to commit to compliance with the supply chain policy for all interactions with the refinery. We also understand that AL RAWAIS GOLD FZC is open on considering ways to support or assist in establishing processes to promote and improve our responsible sourcing practices, if necessary.