



POLICY

Gold Supply Chain Policy

Our commitment to responsible sourcing of gold from conflict-affected and high-risk areas

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Classification: Public

RBM Mineral Resources DMCC

A member of RBM Group · Licence DMCC-912115 · Dubai, United Arab Emirates

Document control

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Related documents	RBM-DMCC-PRO-008 Responsible Sourcing Due Diligence Procedure; RBM-DMCC-POL-009 Supplier Code of Conduct; RBM-DMCC-POL-013 Whistleblowing and Grievance Mechanism Policy

Version history

Version	Date	Change
1.0	21 September 2026	First issue. Written for UAE law in force at the effective date, including Federal Decree-Law No. (10) of 2025 and Cabinet Resolution No. (134) of 2025.

Approval

This document is approved by Senior Management of RBM Mineral Resources DMCC and takes effect on the effective date above. It is reviewed at least annually, and sooner if the law, the business or its risk profile changes.

Rashaad Haroun Rayman
Director — Senior Management
Date: _____

Laura Alina Dragu
Compliance Officer (management level)
Date: _____

1. Our commitment

RBM Mineral Resources DMCC, a member of RBM Group, imports and trades gold, including doré from mines around the world. We recognise that gold extracted in or traded through conflict-affected and high-risk areas can finance conflict, and can be linked to serious human rights abuses, bribery, money laundering and environmental harm.

We are committed to respecting human rights, to not contributing to conflict, and to sourcing gold responsibly. We adopt this policy in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Supplement on Gold, and with the UAE Due Diligence Regulations for Responsible Sourcing of Gold made binding on UAE gold traders and importers by Ministerial Decree No. (68) of 2024.

This policy applies to all gold we buy, from any source and any country, and to everyone who works for us or supplies us. We make it available to our suppliers, refiners, customers and the public, and we incorporate it into our supplier contracts.

2. Serious abuses we will not tolerate

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- any form of torture, cruel, inhuman or degrading treatment;
- any form of forced or compulsory labour;
- the worst forms of child labour;
- other gross human rights violations and abuses, such as widespread sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

We will immediately suspend or discontinue engagement with any upstream supplier where we identify a reasonable risk that it is sourcing from, or linked to, any party committing these abuses.

3. Support to non-state armed groups

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of gold. Direct or indirect support includes procuring gold from, making payments to, or providing logistical assistance or equipment to armed groups or their affiliates who illegally control mine sites, transport routes or points of trade, or who illegally tax or extort money or gold from them.

We will immediately suspend or discontinue engagement with any upstream supplier where we identify a reasonable risk that it is providing such support.

4. Public or private security forces

We will eliminate direct or indirect support to public or private security forces who illegally control mine sites, transport routes and upstream actors, illegally tax or extort money or gold, or commit the abuses described above. We recognise that the role of public or private security forces at mine sites should be to maintain the rule of law, protect human rights and provide security to workers, equipment and facilities. Where we or a supplier contracts security forces, we expect them to be engaged in line with the Voluntary Principles on Security and Human Rights.

Where we identify a reasonable risk of such support, we will suspend or discontinue engagement, or adopt a risk management plan with measurable improvement where suspension is not required.

5. Bribery, fraudulent misrepresentation and money laundering

We will not offer, promise, give or demand any bribe, and we will resist the solicitation of bribes, to conceal or disguise the origin of gold, to misrepresent taxes, fees and royalties paid to governments, or for any other purpose. We will support efforts to contribute to the effective elimination of money laundering where we identify a reasonable risk of it resulting from, or connected to, the extraction, trade, handling, transport or export of gold.

6. Taxes, fees and royalties

We will ensure that all taxes, fees and royalties related to the extraction, trade and export of gold from conflict-affected and high-risk areas are paid to governments, and we will seek evidence of those payments as part of our due diligence. We support disclosure of such payments in line with the principles of the Extractive Industries Transparency Initiative.

7. Artisanal and small-scale mining

We recognise that artisanal and small-scale mining supports millions of livelihoods and that disengaging from it can cause harm. We will source from legitimate artisanal and small-scale producers only where their legitimacy, the mine sites and the chain of custody can be established, and we will engage constructively to support improvement rather than disengage where the risks can be mitigated. We will not source from artisanal and small-scale mining where any abuse described in sections 2 to 4 is present.

8. How we carry out due diligence

We implement the OECD five-step framework, and at a minimum the first three steps required of UAE gold traders:

- (a) **Strong management systems.** Senior Management approves this policy; a Compliance Officer with authority and independence runs the programme; we keep chain-of-custody records for every shipment, including official proof of mine origin, export authorisation, weight and assay, and a unique reference number; we bind our suppliers to this policy in contract; and we operate a grievance mechanism open to anyone.
- (b) **Identifying and assessing risk.** We know every supplier and its beneficial owners; we identify the mine, country of origin, transit route and every intermediary; we determine whether gold comes from or through a conflict-affected or high-risk area or from artisanal and small-scale mining; and we apply enhanced due diligence, including on-the-ground assessment, where red flags appear.
- (c) **Responding to identified risk.** We report findings to Senior Management; adopt a risk management plan; and continue with measurable improvement within six months, suspend, or disengage, depending on the risk.
- (d) **Independent assurance.** We cooperate with the independent reviews carried out by our refiners and their auditors, and give them access to our records.
- (e) **Reporting.** We report on our supply chain due diligence to our refiners and to the Ministry of Economy and Tourism when required, and make a summary available on request.

9. Raising a concern

Anyone may raise a concern about the circumstances of gold extraction, trade, handling or export in our supply chain, including anonymously, by writing to compliance@rbmgroup.ae or through the grievance channel described in our Whistleblowing and Grievance Mechanism Policy at www.rbmgroup.ae. We will not retaliate against anyone who raises a concern in good faith.

10. Review

Senior Management reviews this policy at least annually and whenever the law, the OECD Guidance or our supply chain changes.