



CODE OF CONDUCT

Supplier Code of Conduct

What we require of every supplier of gold

RBM-DMCC-POL-009 · Version 1.0 · 21 September 2026
Classification: Public

RBM Mineral Resources DMCC

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

Document control

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Approved by	Senior Management — Rashaad Haroun Rayman, Director
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Related documents	RBM-DMCC-POL-007 Gold Supply Chain Policy; RBM-DMCC-PRO-008 Responsible Sourcing Due Diligence Procedure

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. Application

This Code applies to every person that supplies gold to RBM Mineral Resources DMCC, including mine operators, exporters, aggregators, traders and refiners, and to their own suppliers, contractors and agents in the supply chain. Signing this Code is a condition of doing business with us, and it forms part of every supply agreement.

2. Legal compliance

You comply with all applicable laws where you operate, including mining, export, customs, tax, anti-money laundering, sanctions, anti-bribery, labour, health and safety and environmental laws. You hold, and keep current, every licence and permit required to mine, buy, process, transport and export gold.

3. Human rights and conflict

You do not tolerate, profit from, contribute to, assist with or facilitate:

- torture or cruel, inhuman or degrading treatment;
- forced or compulsory labour, including bonded and trafficked labour;
- the worst forms of child labour, or employment of any person below the minimum working age;
- widespread sexual violence or other gross human rights abuses;
- war crimes, crimes against humanity or genocide.

You give no direct or indirect support to non-state armed groups, or to public or private security forces that illegally control, tax or extort mine sites, routes or traders. Any security arrangements you make follow the Voluntary Principles on Security and Human Rights.

4. Integrity

- You do not offer, pay, request or accept bribes or facilitation payments, and you do not misrepresent the origin of gold or the taxes, fees and royalties paid on it.
- You pay all taxes, fees and royalties due to governments on the extraction, trade and export of gold, and provide evidence on request.
- You do not engage in money laundering, terrorist financing or sanctions evasion, and you do not deal with any person on a UN or UAE sanctions list.
- You accept and make payments only through bank accounts in your own name. No cash, no third-party payments.

5. Traceability and transparency

- You identify the mine of origin of all gold you supply, and every intermediary and country it passes through.
- You provide, for each shipment, official proof of origin, the export permit, the assay certificate and all shipping documents, and they are accurate and complete.
- You do not mix gold of undocumented or different origin into a shipment, and you do not re-melt gold to disguise its origin.
- You tell us within five working days of any change in your ownership, licences, sources, route or transporters, and at once of any incident involving the risks in this Code.

6. Artisanal and small-scale mining

If you source from artisanal and small-scale miners, you identify the sites and producers, confirm that they operate legitimately, pay them fairly and through traceable means where possible, and support safe working conditions and progressive improvement.

7. Environment, health and safety

You operate safely, minimise environmental harm, manage waste and chemicals responsibly, and work to eliminate the use of mercury in line with the Minamata Convention.

8. Due diligence cooperation

You complete our Supplier Due Diligence Questionnaire, provide the documents we request, and allow us, our refiners and independent assessors to visit your sites and review your records. You maintain your own supply chain due diligence consistent with the OECD Due Diligence Guidance.

9. Breach

If we identify a reasonable risk that you have breached this Code, we will suspend purchases, require a corrective action plan, or terminate the relationship, depending on the seriousness of the breach, and we may report it to the authorities. Breaches involving the abuses in section 3, money laundering or terrorist financing lead to immediate termination.

10. Raising concerns

Anyone may report a concern about our supply chain, anonymously if they wish, to compliance@rbmgroupp.ae. We do not tolerate retaliation against anyone who reports in good faith.

11. Supplier acknowledgement

We have read and accept this Supplier Code of Conduct and will comply with it.

Supplier legal name

Registration number and country

Name of authorised signatory

Position

Signature and company stamp

Date
