



POLICY

Whistleblowing and Grievance Mechanism Policy

How anyone can raise a concern, safely and in confidence

RBM-DMCC-POL-013 · 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-005 STR 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. Who can raise a concern

Anyone: employees, directors, contractors, suppliers, customers, miners and communities affected by our supply chain, and members of the public. This policy is the grievance mechanism required by the UAE Due Diligence Regulations for Responsible Sourcing of Gold and the OECD Due Diligence Guidance, and the internal whistleblowing channel of RBM Mineral Resources DMCC.

2. What you can raise

- money laundering, terrorist financing, sanctions breaches, fraud, bribery or corruption;
- concerns about how gold in our supply chain is mined, traded, transported or exported, including human rights abuses, child or forced labour, support to armed groups or security forces, and misrepresentation of origin;
- breaches of our policies or of the law;
- retaliation against anyone who has raised a concern.

3. How to raise it

Email	compliance@rbmgroup.ae
Post	Compliance Officer (confidential), RBM Mineral Resources DMCC, Unit 5430, Level 54, Almas Tower, Jumeirah Lakes Towers, Dubai, United Arab Emirates
Online	The confidential form at www.rbmgroup.ae
In person	The Compliance Officer at our office, or the Director if the concern involves the Compliance Officer
Phone	+971 4 383 5576

You can report anonymously. If you give your name, we will keep your identity confidential and share it only where the law requires. You may report in English or Arabic, or in another language, and we will arrange translation.

4. What happens next

- We acknowledge your report within five working days where we have a way to contact you.
- The Compliance Officer, or the Director where the Compliance Officer is involved, assesses it and decides how to investigate. Nobody who is the subject of the concern takes part.
- We aim to complete the assessment within 30 days and tell you the outcome as far as confidentiality and the law allow.
- Where a concern about the supply chain is substantiated, it is treated as a red flag and handled under our Responsible Sourcing Due Diligence Procedure, which may lead to suspension or disengagement from a supplier.
- Where a concern suggests a crime, we report it to the competent authorities.

We keep a register of all concerns and their outcomes, and report a summary to Senior Management every quarter.

5. Protection from retaliation

We will not dismiss, disadvantage or take any action against anyone for raising a concern in good faith, even if it turns out to be mistaken. Retaliation is a disciplinary offence. Under Article 37 of Federal Decree-Law No. (10) of 2025, a person who reports suspected money laundering or terrorist financing in good faith is protected from criminal, civil and administrative liability. Deliberately false reports made in bad faith may lead to disciplinary action.

6. External reporting

Nothing in this policy prevents anyone from reporting directly to the UAE Financial Intelligence Unit, the Ministry of Economy and Tourism, or the police.