



Motiwala Gold Refinery
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SUPPLY CHAIN POLICY FOR RESPONSIBLE SOURCING

Version 1.3

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Version	Details	Approved by Management
1.0 (18/11/2022)	Initial issue at the time of introduction of this manual	
1.1 (16/07/2023)	Updates as per MOE Guidelines	
1.2 (17/12/2024)	Updates as per MOE Guidelines	
1.3 (12/03/2025)	Updates as per Auditor Guidelines	

Signed copy of this policy is available on demand.

1. Introduction

1.1 Purpose and Scope

This Supply Chain Policy establishes a comprehensive framework to guide our organization in sourcing, procuring, and transporting gold and other precious metals responsibly. The policy ensures adherence to ethical standards, transparency, and strict compliance with applicable legal and regulatory requirements throughout all stages of our supply chain activities.

Specifically, the policy defines clear guidelines and robust due diligence procedures aimed at identifying, assessing, mitigating, and managing potential risks associated with the procurement of precious metals. These risks include, but are not limited to, conflict financing, money laundering, corruption, human rights abuses, child labor, environmental harm, and other illicit practices.

This Supply Chain Policy is developed in alignment with two primary regulatory frameworks:

- **Ministry of Economy Due Diligence Regulations (V9)**, which provide mandatory compliance standards for due diligence within the gold and precious metals industry, reflecting national requirements.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, an internationally recognized standard providing best practices to ensure responsible sourcing, especially in areas prone to conflict or instability.

By following this policy, we recognize the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. We also recognize that we have the responsibility to respect human rights and not contribute to conflict.

We commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, 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.

Our organization commits to proactive due diligence, enhanced transparency, and accountability, ultimately promoting responsible corporate conduct and contributing positively to ethical business practices within the precious metals sector.

1.2 Applicability

This Supply Chain Policy applies comprehensively to all parties associated with **Motiwala Gold And Precious Stones Industry FZC ("MGPSI")**, including but not limited to suppliers, contractors, subcontractors, employees, partners, agents, and other stakeholders who engage directly or indirectly in activities related to the procurement, refining, processing, transportation, handling, storage, and distribution of gold and other precious metals.

Compliance with this policy is mandatory for every individual and entity operating within the MGPSI supply chain. All stakeholders are expected to understand, uphold, and actively contribute to the principles of ethical conduct, transparency, and integrity as outlined herein. MGPSI reserves the right to perform regular

assessments and audits to verify adherence to this policy, and non-compliance may lead to corrective actions, contractual penalties, or termination of business relationships.

1.3 Legal Compliance

MGPSI is committed to strict compliance with all applicable local, national, and international laws, regulations, and standards governing responsible sourcing and the management of gold and precious metals. This commitment encompasses, but is not limited to, adherence with the following regulatory frameworks:

- **Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) legislation**, ensuring proactive identification, prevention, and reporting of suspicious activities or transactions potentially linked to money laundering or terrorist financing.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, adhering to internationally recognized practices to mitigate risks associated with conflict minerals and unethical sourcing.
- **Applicable National and International Trade Laws**, specifically governing the import, export, transit, and handling of bullion and precious metals, including customs regulations, export controls, and sanctions compliance.
- **United Arab Emirates (UAE) Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering and Counter-Terrorism Financing**, which outlines mandatory compliance requirements for combating money laundering and terrorist financing within the UAE jurisdiction.
- **Cabinet Decision No. (10) of 2019 concerning the Executive Regulations for Federal Decree-Law No. 20 of 2018**, specifying detailed procedures and guidelines for implementing robust AML/CFT controls in line with UAE regulatory expectations.

MGPSI actively monitors regulatory updates and amendments to ensure ongoing compliance. Employees, contractors, and suppliers are obligated to remain informed and abide by these laws and regulations at all times. Non-compliance with applicable legal obligations can lead to serious regulatory penalties, financial losses, reputational damage, and legal action, which MGPSI seeks to prevent through strict adherence and ongoing vigilance.

2. Supply Chain Governance Framework

2.1 Adoption of Responsible Sourcing Policy

MGPSI is committed to implementing a robust and comprehensive responsible sourcing policy designed to maintain the highest ethical standards throughout its supply chain. 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:

- **Ethical and Transparent Sourcing:** Procuring gold and precious metals responsibly, ensuring transparency at every step—from mining and refining to transportation and distribution. 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:
 - any forms of torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labor, 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 worst forms of child labor;

- 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.
- **Prevention of Money Laundering, Terrorist Financing, and Human Rights Abuses:** Actively identifying and mitigating risks associated with money laundering, terrorism financing, forced labor, child labor, human rights violations, and corruption, ensuring these practices are rigorously excluded from our supply chains. We 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 paragraph.
- **Avoidance of Conflict-Affected and High-Risk Areas (CAHRA):** Implementing rigorous measures to ensure that gold sourced, traded, or refined by MGPSI does not originate from regions associated with conflict, instability, or elevated risks of human rights abuses.
 - We 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.
- **Know Your Customer (KYC) and Customer Due Diligence (CDD) Compliance:** Adhering strictly to regulatory standards for customer identification, verification, and monitoring processes, ensuring all business relationships are transparent, documented, and free from suspicious or illicit activities. We 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 paragraph.

2.2 Management Structure for Compliance

To effectively oversee and maintain compliance with our responsible sourcing commitments, MGPSI has established a clear and structured management governance framework, including:

- **Compliance Officer:** A dedicated senior-level Compliance Officer is responsible for the day-to-day management and oversight of supply chain due diligence processes. Their duties include conducting supplier risk assessments, ensuring adherence to compliance protocols, coordinating audits, and promptly addressing any compliance issues or violations identified.
- **Board-Level Compliance Committee:** A high-level Compliance Committee, comprising senior executives and board members, oversees strategic aspects of MGPSI’s responsible sourcing policy. The Committee is responsible for regular reviews of the risk assessment framework, evaluating effectiveness of compliance controls, providing strategic guidance, and ensuring compliance issues are reported, escalated, and addressed in a timely manner.
- **Dedicated Supply Chain Analysts:** Qualified supply chain analysts are assigned to continuously monitor, analyze, and manage potential risks within our sourcing and trading processes. These analysts provide detailed reports, insights, and recommendations to support transparent and informed decision-making and to proactively mitigate emerging supply chain risks.

2.3 Transparency and Record-Keeping

MGPSI emphasizes the importance of full transparency in its supply chain activities. To ensure accountability, traceability, and verifiable compliance, MGPSI maintains detailed and comprehensive

documentation that clearly demonstrates the full chain of custody for all gold transactions. Records kept include, but are not limited to:

- **Supplier Information and Licensing Documentation:** Detailed records and verification documents of supplier identities, licensing, certifications, and authorization to trade precious metals.
- **Proof of Gold Origin:** Authentic and reliable documentation such as mining certificates, refinery reports, assay certificates, customs declarations, and other official documents confirming the precise origin and legitimacy of the sourced gold.
- **Shipping and Transportation Records:** Comprehensive shipping documents, waybills, logistics and customs clearance information, security documentation, and evidence of secure handling during transit and storage.
- **Financial Transaction Details:** Transparent and well-documented financial records, including payment methods, invoices, banking transaction evidence, and associated financial compliance documentation that support auditability and traceability.

MGPSI retains all transaction records securely for the duration required by applicable law or for a minimum period defined internally (whichever is longer), facilitating thorough internal audits, external regulatory inspections, and third-party audits to ensure continual compliance with responsible sourcing standards and regulatory requirements.

3. Risk Identification and Due Diligence Measures

MGPSI maintains a rigorous and systematic process for identifying, assessing, and managing risks associated with the sourcing of gold and precious metals, ensuring compliance with ethical, legal, and regulatory standards.

3.1 Risk Assessment Criteria

Our due diligence approach includes a thorough assessment of suppliers and transactions, guided by specific risk criteria, including but not limited to:

- **Geographical Risks:** Evaluating risks associated with sourcing or transporting gold through Conflict-Affected and High-Risk Areas (CAHRA), regions known for conflict, human rights violations, corruption, illegal trade, or insufficient governance.
- **Supplier Risks:** Assessing the transparency, credibility, and legitimacy of suppliers, particularly those with unclear ownership structures, opaque beneficial ownership, insufficient licensing, or questionable compliance histories.
- **Transactional Risks:** Identifying potential concerns through analysis of transaction patterns, including unusually large cash transactions, frequent structuring of payments, unclear sources of funds, or overly complex ownership structures designed to obscure the true beneficiaries.
- **Product Risks:** Examining physical and documentary irregularities in gold supplied, such as inconsistencies in purity, quality, quantity, packaging, or documentation, and detecting potential signs of fraud or misrepresentation.

3.2 Red Flag Indicators

MGPSI maintains vigilance in identifying high-risk situations through established "red flag" indicators. The following circumstances trigger immediate heightened scrutiny and enhanced due diligence procedures:

- **Conflict Zone Origin:** Gold sourced from areas affected by armed conflict, instability, or where non-state armed groups or illicit actors are known to control or influence mining operations or transportation routes.
- **Suspicious Payment Methods:** Transactions involving unusual, unconventional, or suspicious payment methods, especially the excessive use of cash, structured payments, payments originating from unrelated third parties, or unclear financial arrangements.
- **Documentation Discrepancies:** Absence of proper documentation, lack of verifiable origin records, inconsistent paperwork, alterations, forgery, discrepancies in assay certificates, shipping documents, or financial transaction records.

The detection of any red flag immediately initiates a comprehensive and documented response to clarify, address, and mitigate potential risks before proceeding with transactions.

3.3 Enhanced Due Diligence (EDD)

When MGPSI identifies suppliers or transactions as high-risk based on the criteria outlined above, the organization engages in Enhanced Due Diligence (EDD) procedures. These additional controls provide an in-depth examination designed to verify compliance, integrity, and ethical sourcing, and include:

- **On-Site Visits and Inspections:** Conducting physical site visits, inspections, and interviews with suppliers and their personnel to validate the legitimacy of their sourcing practices, supply chains, and internal controls.
- **Independent Third-Party Audits:** Engaging qualified, independent third-party auditors to comprehensively evaluate the supplier's adherence to responsible sourcing standards, legal requirements, and international best practices, issuing detailed reports and recommendations to mitigate risks identified.
- **Transaction Monitoring and Analysis:** Establishing continuous transaction monitoring procedures to detect anomalies, irregularities, unusual patterns, or potential indicators of financial misconduct. This involves detailed analysis of payment histories, shipment data, and related documentation.

MGPSI systematically documents the findings from these enhanced due diligence activities, implementing corrective measures or discontinuing relationships with entities unwilling or unable to demonstrate compliance and ethical sourcing standards.

4. Supply Chain Risk Management

MGPSI proactively manages risks identified in our gold and precious metals supply chain through structured mitigation strategies, detailed risk control plans, and ongoing monitoring. Our risk management approach ensures the continuous integrity, transparency, and compliance of our sourcing activities.

4.1 Risk Mitigation Strategies

MGPSI adopts a systematic approach to addressing identified risks, employing tailored mitigation measures depending on the risk level:

Low Risk (No significant risks identified): Continue normal engagement with suppliers, ensuring standard compliance and regular oversight.

Moderate Risk (Identified manageable risks): Implement enhanced monitoring, targeted corrective actions, and structured engagement with suppliers to address identified compliance gaps or vulnerabilities. A clearly defined corrective action plan with specific timelines and responsibilities will be established and closely monitored until resolution.

High Risk (Significant or persistent risks): Suspend or terminate relationships with suppliers who present substantial risks or repeatedly fail to comply with corrective actions and due diligence measures. MGPSI maintains a zero-tolerance approach to suppliers involved in severe ethical breaches, human rights violations, or significant legal non-compliance.

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, 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, we will respond in the same vein.

Bribery and fraudulent misrepresentation of the origin of minerals: We 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.

Anti-Money Laundering: We 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.

Payment of taxes, fees and royalties due to governments: We 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).

Risk management of bribery and fraudulent misrepresentation of any documentation: 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 organizations, 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 measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

4.2 Risk Control Plan

When moderate or manageable risks are identified, MGPSI initiates a comprehensive Risk Control Plan, designed to ensure supplier compliance and mitigate potential threats effectively. Key elements of our risk control plan include:

- **Increased Frequency of Due Diligence Reviews:** Conduct detailed due diligence assessments at least twice per year (bi-annually) to continuously verify suppliers' compliance with sourcing standards, identify improvements, and promptly respond to emerging risks.
- **Enhanced Traceability and Provenance Verification:** Mandate comprehensive and verifiable documentation and processes to trace gold's origin clearly. Suppliers must provide reliable evidence, including sourcing certificates, chain of custody documentation, customs clearance records, and other verification tools to confirm gold provenance accurately.

- **Supplier Engagement and Training Programs:** Facilitate targeted compliance awareness and training initiatives with suppliers to enhance their understanding of responsible sourcing requirements, regulatory obligations, risk management, and ethical business practices, ensuring continuous improvement and capacity building.

4.3 Continuous Monitoring

MGPSI recognizes the importance of constant vigilance in the supply chain and maintains robust ongoing monitoring mechanisms, ensuring consistent adherence to responsible sourcing principles and rapid response to emerging risks. Continuous monitoring includes:

- **Real-Time Transaction Monitoring:** Implementing advanced real-time monitoring tools to detect irregularities, suspicious activities, or deviations from established procedures immediately. This real-time monitoring allows MGPSI to promptly investigate and rectify issues, safeguarding supply chain integrity.
- **Regular Audits and Independent Inspections:** Conducting routine internal audits, as well as periodic independent third-party audits, to evaluate compliance comprehensively, validate supplier claims, and provide unbiased verification of sourcing practices, record-keeping accuracy, and adherence to the Supply Chain Policy.
- **Quarterly Risk Assessments and Reporting:** Performing formal quarterly reviews of all risk factors, supplier performance metrics, transaction anomalies, and due diligence results. Regular risk assessment reports are prepared and presented to senior management and the Compliance Committee, ensuring oversight, accountability, and timely decision-making at the highest levels within MGPSI.

Through these continuous monitoring practices, MGPSI remains proactive, responsive, and fully committed to maintaining a secure, ethical, and compliant precious metals supply chain.

5. Independent Third-Party Audits

MGPSI emphasizes transparency, accountability, and continual compliance improvement through regular independent third-party audits. These audits objectively verify suppliers' adherence to our Supply Chain Policy and applicable regulatory standards, thereby ensuring the integrity and reliability of our supply chain practices.

5.1 Audit Requirements

To ensure consistent compliance and integrity within our supply chain, MGPSI mandates annual independent third-party audits for all suppliers involved in the sourcing, refining, transportation, and distribution of gold and precious metals.

These audits specifically evaluate compliance against:

- **MGPSI's Supply Chain Policy and internal due diligence procedures**, ensuring suppliers align with our ethical standards, responsible sourcing framework, and transparency measures.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, assessing adherence to internationally accepted best practices for identifying and mitigating sourcing risks related to conflict minerals.

- **UAE Ministry of Economy (MoE) Due Diligence Regulations (V9)**, verifying mandatory compliance with local regulatory requirements regarding supply chain management, documentation, and risk mitigation measures.
- **Applicable AML/CFT Legislation**, confirming that suppliers maintain rigorous anti-money laundering and counter-terrorism financing controls, including effective Know Your Customer (KYC) procedures, transaction monitoring, and risk-based due diligence practices.

5.2 Audit Reporting and Compliance Measures

To maintain transparency and regulatory compliance, MGPSI rigorously manages audit outcomes with clearly defined processes:

- **Corrective Actions for Non-compliance:** Any supplier found deficient in meeting MGPSI's compliance standards or regulatory requirements is obligated to implement corrective measures promptly. Suppliers will be required to submit clear corrective action plans addressing any identified deficiencies, including timelines and assigned responsibilities.
- **Annual Audits and Continuous Improvement:** Audits are conducted annually to ensure ongoing adherence and to measure improvement. MGPSI actively engages with suppliers throughout the corrective process, providing guidance, support, and oversight to achieve sustained compliance.
- **Reporting to Regulatory Authorities:** In line with UAE regulatory obligations, finalized audit reports detailing findings, corrective actions undertaken, and evidence of compliance are submitted to the **Ministry of Economy (MoE)**. MGPSI ensures complete transparency with regulatory authorities and supports governmental oversight through timely reporting.

Failure by suppliers to resolve audit findings adequately, demonstrate compliance effectively, or engage transparently with the audit process may lead to suspension or termination of contractual agreements and relationships with MGPSI.

Through these independent third-party audits, MGPSI demonstrates its unwavering commitment to upholding ethical standards, transparency, and regulatory compliance in its gold supply chain activities.

6. Annual Reporting and Compliance Documentation

MGPSI ensures transparency, accountability, and regulatory compliance through systematic documentation and regular reporting. We prepare detailed internal and external compliance reports to demonstrate our continued adherence to responsible sourcing standards and regulatory obligations, fostering trust with authorities, industry bodies, and stakeholders.

6.1 Internal Compliance Reporting

MGPSI maintains comprehensive internal compliance reporting practices. On an annual basis, MGPSI prepares detailed compliance reports for internal management review, containing:

- **Risk Assessment and Due Diligence Findings:** Comprehensive summaries and analyses of risks identified within the supply chain, including geographical, transactional, and supplier-specific risks, along with mitigation actions taken and their effectiveness.
- **Supplier Audits and Evaluations:** Documentation of all supplier audits, outcomes, identified non-compliances, corrective actions implemented, and follow-up measures. This includes tracking progress against corrective action plans.

- **Transaction Records and Monitoring Outcomes:** Transparent reporting of significant transactions, unusual patterns, or red flags identified through transaction monitoring and ongoing supplier interactions.
- **Training and Awareness Activities:** A summary of internal training initiatives, compliance awareness programs, and capacity-building efforts undertaken during the year, highlighting participation levels, training outcomes, and areas of improvement.

These internal compliance reports are reviewed by senior management and the Board-Level Compliance Committee to assess policy effectiveness, inform strategic decision-making, and drive continuous improvement of supply chain governance and compliance practices.

6.2 External Compliance Reporting

MGPSI is committed to transparency and accountability in its external compliance reporting obligations. Annually, MGPSI compiles and submits detailed compliance reports externally, ensuring transparency and compliance verification by relevant stakeholders, including:

- **Regulatory Authorities:**
 - **Ministry of Economy (MoE):** Submission of annual compliance reports in accordance with UAE due diligence regulations, detailing compliance with local sourcing requirements, due diligence activities, corrective actions taken, and audit outcomes.
 - **Financial Intelligence Unit (FIU):** Timely submission of relevant AML/CFT reports, including reporting of suspicious activities, unusual transactions, and summaries of due diligence measures implemented to mitigate financial crime risks.
- **Industry Watchdogs and Certification Bodies:**
 - Submission of compliance documentation to recognized industry organizations and certification bodies, ensuring MGPSI maintains international certifications and alignment with global standards, thereby reinforcing trust and credibility within international markets.

External reporting provides evidence of MGPSI's proactive approach to compliance, responsible sourcing, transparency, and continuous improvement. Accurate, timely reporting ensures continued regulatory compliance, supports stakeholder confidence, mitigates reputational risks, and maintains MGPSI's standing in both local and international markets.

7. Supply Chain Engagement and Grievance Mechanism

MGPSI is committed to fostering strong, ethical, and collaborative relationships with all suppliers and stakeholders, promoting compliance, transparency, and continuous improvement throughout our supply chain. Our supply chain and grievance policies are public documents and are posted on our website.

7.1 Supplier Capacity-Building and Support Programs

To support suppliers in achieving and maintaining high standards of responsible sourcing and compliance, MGPSI implements targeted capacity-building initiatives and support programs, including:

- **AML/CFT Compliance Training:** Regularly scheduled training sessions to educate suppliers on their responsibilities under Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT)

regulations, including risk assessment methodologies, customer due diligence processes, transaction monitoring techniques, and reporting obligations.

- **Responsible Gold Sourcing Training:** Specialized educational programs designed to enhance supplier understanding of ethical sourcing practices, compliance with international and national standards (including OECD guidance), and best practices for managing supply chain risks, especially in conflict-affected and high-risk areas.
- **Contractual Ethical Sourcing Clauses:** Incorporation of clear, legally binding ethical sourcing clauses into supplier contracts. These clauses clearly stipulate compliance obligations, transparency requirements, and the consequences for breaches, ensuring suppliers explicitly commit to MGPSI's responsible sourcing policy.

Through these proactive initiatives, MGPSI promotes capacity building, fosters mutual understanding, encourages compliance awareness, and drives continuous improvement among suppliers.

7.2 Confidential and Anonymous Grievance Mechanism

MGPSI implements and maintains a secure, accessible, and confidential grievance mechanism designed to encourage stakeholders—including employees, suppliers, contractors, business partners, and external parties—to report concerns or violations anonymously and without fear of retaliation. Key elements of this mechanism include:

- **Secure Reporting Channels:** Multiple confidential reporting channels, including anonymous hotlines, secure email platforms, and online reporting portals, to facilitate safe and effective communication of grievances and compliance concerns.
- **Protection and Anonymity:** Guaranteed anonymity and confidentiality for reporters, ensuring that individuals raising genuine concerns about ethical, compliance, human rights abuses, corruption, money laundering, terrorist financing, or other supply chain irregularities are fully protected against retaliation or adverse actions.
- **Prompt and Transparent Response:** Clearly defined protocols for investigating, addressing, and resolving reported grievances promptly, fairly, and transparently, including regular feedback and communication to stakeholders about the investigation outcomes and corrective actions taken.
- **Supplier Guidance and Engagement:** Active engagement with suppliers following reported grievances, supporting them in addressing concerns effectively, implementing corrective actions, and ensuring sustained improvement to prevent recurrence.

By integrating these mechanisms into our operations, MGPSI promotes accountability, transparency, and trust, empowering stakeholders to actively participate in safeguarding the integrity of our gold and precious metals supply chain. Our grievance policy is posted publicly on our website.

8. Training and Awareness

MGPSI prioritizes ongoing training and awareness initiatives, recognizing that a well-informed workforce and supply chain partners are critical for ensuring compliance, ethical conduct, and responsible sourcing throughout our operations.

8.1 Staff Training and Capacity Building

MGPSI provides comprehensive and regular training programs for all employees, tailored to their specific roles and responsibilities, to foster awareness and compliance with our responsible sourcing standards, policies, and regulatory obligations. Our training initiatives include:

- **AML/CFT Compliance Training:** Mandatory annual training for all employees covering Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT) obligations, customer identification procedures, suspicious activity detection, transaction monitoring, reporting protocols, and understanding relevant legal and regulatory requirements.
- **Responsible Sourcing and Ethical Conduct Training:** Regularly scheduled educational sessions designed to equip employees with the knowledge, skills, and awareness required to identify and manage ethical risks, uphold human rights standards, and ensure gold sourcing practices align with international best practices (e.g., OECD guidance).
- **Specialized Role-Specific Training:** Tailored training programs provided to staff involved in high-risk functions (such as procurement, compliance, logistics, and finance), ensuring they possess comprehensive knowledge and skills to manage specific risks related to gold sourcing, transaction management, and supply chain due diligence effectively.

8.2 Supplier Training and Awareness

MGPSI actively promotes responsible practices across its entire supply chain by supporting suppliers through targeted training and awareness initiatives:

- **Supplier Compliance Training:** Providing regular training sessions to suppliers on AML/CFT compliance, international and national regulatory requirements, OECD Due Diligence Guidance, ethical sourcing standards, and supply chain risk management.
- **Capacity-Building Programs:** Engaging suppliers through structured capacity-building programs aimed at improving their understanding of responsible sourcing obligations, enhancing their compliance frameworks, and elevating their overall operational standards.
- **Contractual Ethical Sourcing Clauses:** Integrating clear ethical and responsible sourcing clauses into supplier agreements, ensuring expectations and responsibilities are explicitly defined, communicated, and understood.

Through these targeted and continuous training and awareness initiatives, MGPSI ensures that staff and suppliers alike are empowered, well-informed, and fully equipped to uphold responsible sourcing practices, manage compliance obligations effectively, and maintain high standards of ethical business conduct.

9. Policy Review and Updates

MGPSI recognizes the dynamic nature of regulatory requirements, market conditions, and risk environments related to gold and precious metals sourcing. Therefore, the Supply Chain Policy is subject to periodic reviews and updates to ensure continued effectiveness, relevance, and compliance with emerging standards and best practices.

9.1 Policy Amendment Process

The policy amendment and review process involves:

- **Annual Comprehensive Reviews:** Conducting a thorough evaluation of the policy at least annually, incorporating insights from compliance audits, stakeholder feedback, internal reviews, and regulatory changes.
- **Stakeholder Engagement:** Actively seeking input from internal and external stakeholders, including employees, suppliers, regulatory authorities, auditors, and industry partners, to enhance policy effectiveness and relevance.

- **Board Approval:** Any proposed policy amendments undergo formal review and approval by MGPSI's Board-Level Compliance Committee to ensure governance oversight and organizational commitment.

9.2 Communication and Implementation of Updates

Upon finalization and approval of policy revisions, MGPSI commits to:

- Clearly communicating all updates to employees, suppliers, contractors, and other stakeholders through official channels.
- Providing necessary training and resources to ensure full understanding and compliance with the revised policy requirements.
- Ensuring effective implementation and consistent enforcement of policy updates across all business functions.

This structured policy review approach enables MGPSI to proactively manage supply chain risks, reinforce compliance culture, and continuously enhance our responsible sourcing practices in alignment with global and local regulatory standards.

10. Conclusion

Motiwala Gold And Precious Stones Industry FZC (MGPSI) remains firmly committed to the highest standards of ethical conduct, transparency, and responsible gold and precious metals sourcing. Our commitment reflects our dedication to integrity and accountability throughout every stage of our supply chain operations.

Specifically, MGPSI reiterates its unwavering commitment to:

- **Ethical and Transparent Gold Sourcing:** Ensuring complete transparency, traceability, and ethical business practices when procuring, refining, transporting, and distributing gold and other precious metals. We proactively work with suppliers and stakeholders to uphold the highest standards of ethical conduct, safeguard human rights, and eliminate the risks of conflict financing and related violations.
- **Strict Compliance with AML/CFT Laws:** Fully adhering to Anti-Money Laundering (AML) and Counter-Terrorism Financing (CFT) regulations and guidelines, rigorously implementing KYC (Know Your Customer), customer due diligence (CDD), transaction monitoring, reporting, and other regulatory obligations.
- **Continuous Improvement in Supply Chain Due Diligence:** Maintaining an ongoing commitment to enhancing our risk assessment processes, due diligence procedures, training initiatives, and internal controls. We regularly review and update our policies and practices to meet evolving legal, regulatory, and market requirements, thereby strengthening our capability to identify and mitigate risks proactively.

MGPSI emphasizes that adherence to this Supply Chain Policy is mandatory. Suppliers, contractors, and stakeholders are expected to fully comply with all aspects outlined herein. Failure to comply with the principles and standards established by this policy may result in corrective actions, immediate suspension, or termination of business relationships, as well as potential legal consequences.

By implementing and continuously improving this policy, MGPSI seeks to promote responsible business conduct, safeguard its reputation, and contribute positively to global efforts in promoting responsible and conflict-free sourcing of gold and precious metals.

Approved by:

Hamza Shahzad

Manager

Motiwala Gold And Precious Stones Industry

Date: 17/12/2024