

Auriz Gold Refinery Supply Chain Policy – V.2 – August 2024

Auriz Gold Refinery FZC, an established company for Gold and Silver Refinery providers, is fully committed to providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing.

AURIZ GOLD REFINERY (FZC) recognizes that the extraction, trading, handling, and exporting of minerals from conflict-affected and high-risk areas may pose risks of significant adverse impacts. We acknowledge our responsibility to respect human rights and to avoid contributing to conflict. To this end, we commit to adopting, widely disseminating, and incorporating into contracts and agreements with suppliers the following policy on the responsible sourcing of minerals from conflict-affected and high-risk areas. This policy serves as a common reference for conflict-sensitive sourcing practices and supplier risk awareness, from the point of extraction to the end user. We pledge to refrain from any actions that contribute to the financing of conflict and commit to complying with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

This policy is an integral part of our contracts and agreements with suppliers and business partners. It aims to raise awareness of the requirements for responsible sourcing and to ensure its understanding and implementation throughout the supply chain.

1. Prohibition of Serious Abuses:

When sourcing from or operating in CAHRA, we will neither tolerate nor profit from, contribute to, assist with, or facilitate the commission of the following abuse by any party:

- Torture, cruel, inhuman, and degrading treatment.
- Forced or compulsory labor.
- The worst forms of child labor.
- Other gross human rights violations and abuses, such as widespread sexual violence.
- War crimes, other serious violations of international humanitarian law, crimes against humanity, or genocide.

2. Risk Management of Serious Abuses:

We will immediately suspend or discontinue engagement with upstream suppliers if we identify a reasonable risk that they are sourcing from or linked to any party committing the serious abuses defined in paragraph 1.

3. Prohibition of 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 minerals. "Direct or indirect support" includes, but is not limited to:

Procuring minerals from, making payments to, or providing logistical assistance or equipment to non-state armed groups or their affiliates who:

- Illegally control mine sites, transportation routes, or upstream actors.
- Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes, or at trading points.
- Illegally tax or extort intermediaries, export companies, or international traders.

4. Risk Management of Support to Non-State Armed Groups:

We will immediately suspend or discontinue engagement with upstream suppliers if 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 3.

5. Prohibition of Support to Security Forces:

We will eliminate direct or indirect support to public or private security forces who:

- Illegally control mine sites, transportation routes, or upstream actors.
- Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes, or at trading points.
- Illegally tax or extort intermediaries, export companies, or international traders.

6. Role of Security Forces:

We recognize that the role of public or private security forces at mine sites, surrounding areas, and 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 against interference with legitimate extraction and trade.

7. Engagement of Security Forces:

Where we or any company in our supply chain contract public or private security forces, we commit to or will require that such security forces are engaged in accordance with the Voluntary Principles on Security and Human Rights. We will support or take steps to adopt screening policies to ensure that individuals or units known to have been responsible for gross human rights abuses are not hired.

8. Transparency and Accountability of Payments to Security Forces:

We will support efforts or take steps to engage with authorities, international organizations, and civil society to contribute to workable solutions on improving transparency, proportionality, and accountability in payments made to public security forces for security provision.

9. Protection of Vulnerable Groups:

We will support efforts or take steps to engage with local authorities, international organizations, and civil society to avoid or minimize the exposure of vulnerable groups, particularly artisanal miners, to adverse impacts associated with the presence of security forces at mine sites.

10. Risk Management of Security Forces:

We will immediately devise, adopt, and implement a risk management plan with the upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to security forces, as identified in paragraph 5, where we identify such a reasonable risk. We will suspend or discontinue engagement with upstream suppliers after failed mitigation attempts within six months of the risk management plan's adoption. We will respond similarly to identified risks of activities inconsistent with paragraphs 8 and 9.

11. Prohibition of Bribery and Fraudulent Misrepresentation:

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 or to misrepresent taxes, fees, and royalties paid to governments.

12. 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 connected to the extraction, trade, handling, transport, or export of minerals derived from illegal taxation or extortion.

13. Payment Transparency:

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade, and export from CAHRA are paid to governments. In accordance with our position in the supply chain, we will disclose such payments in accordance with the Extractive Industry Transparency Initiative (EITI) principles.

Auriz Gold Refinery has established a management system to ensure due diligence and risk control. We require all staff involved in the gold supply chain to strictly comply with this policy and integrate it into the management system. This includes:

- Supply chain due diligence criteria
- Know-Your-Customer (KYC) processes
- Risk management
- Monitoring and surveillance
- Training programs
- Development and approval of long-term supply chain strategic plans
- Periodic review and update of the long-term supply chain strategic plans

Anti-Money Laundering and Combatting of Financing of Terrorism Policy

Auriz Gold Refinery FZC has established and maintained policies and procedures in accordance with UAE Federal AML legislation.

- Identifying and assessing ML/FT risks
- Establishing, documenting, and updating policies and procedures to mitigate the identified ML/FT risks
- Maintaining adequate risk-based customer due diligence, enhanced due diligence, and ongoing monitoring procedures
- Identifying and reporting suspicious transactions
- Implementing an adequate governance framework for AML/CFT, including appointing an AML/CFT compliance officer and ensuring proper screening and training
- Maintaining adequate records related to all the above, and
- Complying with directives from competent authorities of the state regarding United Nations Security Council resolutions and UAE authorities' decisions

Additionally, the company's AML-CFT policies and procedures must ensure that sanctions list issued by the UAE Government and the United Nations Security Council are screened against; any associated instructions, asset freezing, etc., must also be complied with according to TFS Decisions.

If you have any questions or concerns regarding these policies, please send an email to compliance@aurizrefinery.com.