1. INTRODUCTION

IGR Metals Trading FZCO (IGR FZCO) operates in the precious metals trading sector within the United Arab Emirates (UAE) and is to ensure that all precious metals sourced, traded, and supplied are obtained in a responsible, ethical, and conflict-free manner and minimizes negative environmental and social impacts along the supply chain. The policy is aligned with international best practices, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) and UAE regulatory expectations.

The precious metals supply chain is internationally recognized as a sector exposed to heightened risks related to conflict financing, human rights abuses, illicit trade, and unethical sourcing practices, particularly in Conflict-Affected and High-Risk Areas (CAHRAs). As a result, companies operating in this sector are required to implement robust due diligence frameworks to ensure that sourced materials are obtained responsibly and do not contribute to adverse impacts.

This Responsible Sourcing Policy establishes the principles, governance framework, and control mechanisms implemented by the Company to ensure that all precious metals sourced, traded, and supplied are:

- Responsibly sourced and conflict-free
- Fully traceable to the extent possible
- Compliant with applicable UAE regulations and international standards

2. OBJECTIVES

The objectives of this Policy are to:

- Ensure that all precious metals are sourced in a responsible, ethical, and conflict-free manner.
- Prevent the Company's supply chain from contributing to:
  - Conflict financing
  - Human rights abuses
  - Fraudulent misrepresentation of origin
  - Environmental and social harm
- Establish and maintain a risk-based supply chain due diligence framework in line with OECD guidance.
- Ensure full compliance with applicable UAE regulations and internationally recognized standards.
- Define clear procedures for identifying, assessing, mitigating, and monitoring supply chain risks.
- Promote transparency, accountability, and ethical conduct across all sourcing and trading activities.

This Policy applies to all employees, directors, officers, consultants, intermediaries, and business partners engaged in sourcing, trading, or handling precious metals on behalf of the Company.

3. LEGAL AND REGULATORY FRAMEWORK

IGR FZCO operates within the regulatory framework of the UAE and adheres to internationally recognized best practices governing responsible sourcing of precious metals.

UAE Regulatory Framework

IGR FZCO complies with all applicable UAE legislation and regulatory guidance relevant to responsible sourcing, AML/CFT, and precious metals trading, including:

Law / Regulation	Scope
UAE Ministry of Economy Due Diligence Regulations for Responsible Sourcing of Gold	Establishes mandatory supply chain due diligence requirements aligned with OECD, including risk identification, mitigation, audits, and reporting
Ministerial Decree No. (68) of 2024 on Responsible Sourcing of Gold	Mandates implementation of responsible sourcing frameworks, supplier risk assessment, and independent third-party audits
Federal Decree-Law No. 10 of 2025 on AML/CFT/CPF	Governs AML/CFT obligations including customer due diligence, transaction monitoring, and prevention of illicit gold trade
Cabinet Decision No. 10 of 2019	Provides detailed compliance requirements including enhanced due diligence for high-risk jurisdictions and sectors
Cabinet Resolution No. 134 of 2025	Executive Regulation governing AML/CFT compliance
Cabinet Decision No. 74 of 2020	UAE Terrorist List and sanctions framework
Cabinet Decision No. 24 of 2022	Amendments to AML implementing regulations
Cabinet Resolution No. 71 of 2024	Administrative penalties and enforcement framework
Cabinet Resolution No. 156 of 2025	Administrative violations and penalties in the AML/CFT/PF context
Ministry of Economy Guidance for DPMS	Compliance obligations for precious metals dealers
DMCC / UAE Good Delivery Rules	Covers due diligence ensuring metals are responsibly sourced, traceable, and free from conflict, illicit, or high-risk supply chains

As a Dealer in Precious Metals and Stones (DPMS), the Company is classified as a Designated Non-Financial Business and Profession (DNFBP) and is required regulatory supervision which conducted by:

- UAE Ministry of Economy
- UAE Financial Intelligence Unit (FIU)
- Central Bank of the UAE
- Relevant Free Zone Authorities, including Dubai Multi Commodities Centre

In addition to UAE legal requirements, the Company adheres to internationally recognized standards and guidance, including:

Law / Regulation	Scope
OECD Due Diligence Guidance for Responsible Supply Chains of Minerals	Provides global 5-step framework for identifying and mitigating risks in mineral supply chains, especially from conflict-affected areas
LBMA Responsible Gold Guidance (RGG)	Requires refiners to implement due diligence, independent audits, and responsible sourcing certification
FATF Recommendations	Establishes global AML/CFT standards impacting sourcing transparency and financial crime prevention
Responsible Jewellery Council (RJC) Code of Practices	Certification standard covering ethical sourcing, human rights, and supply chain integrity

These frameworks establish internationally accepted principles for responsible supply chain transparency within the precious metals industry.

4. SCOPE OF THE POLICY

This Policy applies to all sourcing, trading, and supply chain activities conducted by IGR FZCO, including:

- Procurement and sourcing of precious metals
- Trading and distribution activities

- Relationships with suppliers, and counterparties
- Transportation and logistics of precious metals
- Financial flows associated with sourcing transactions

This Policy applies to:
- All employees, directors, and the management
- Third parties, including:
  - Suppliers (artisanal, small-scale, or industrial)
  - Refiners and processors
  - Brokers and agents
  - Logistics and transportation providers
  - Group of companies

This Policy applies globally, including sourcing from Conflict-Affected and High-Risk Areas (CAHRAs), and covers all activities where the Company exercises control or influence, including those subject to UAE jurisdiction.

5. COMMITMENT

IGR FZCO is committed to:
- Avoid contributing to conflict financing
- Prevent human rights abuses in the supply chain
- Ensure compliance with applicable UAE AML/CFT laws and international sanctions
- Promote transparency and integrity in all sourcing activities

6. GOVERNANCE STRUCTURE

IGR FZCO maintains a robust governance framework for responsible sourcing:
- Board of Directors / Senior Management
  - Approve and oversee implementation of this policy
  - Ensure adequate resources are allocated
- Compliance Function
  - Conduct due diligence and risk assessments
  - Monitor supplier compliance
  - Maintain records and reporting
- Procurement / Trading Team and Other Employees
  - Ensure onboarding only after compliance approval
  - Escalate red flags and suspicious activities

7. RISK-BASED DUE DILIGENCE FRAMEWORK

IGR FZCO adopts a five-step risk-based due diligence framework:

Step 1: Establish Strong Company Management Systems
- Maintain internal policies, procedures, and controls
- Maintain supplier database and documentation
- Establish grievance mechanisms

Step 2: Identify and Assess Risks
- Conduct Know Your Customer (KYC) and Enhanced Due Diligence (EDD)
- Screen against sanctions lists (OFAC, UN, UAE, EU)
- Identify country risk (CAHRAs, High Risk Areas)
- Assess risks related to:
  - Conflict financing
  - Human rights abuses
  - Child labour
  - Environmental harm
  - Corruption and bribery
  - Money laundering

Step 3: Design and Implement Risk Mitigation Measures
- Apply risk-based controls depending on risk level
- Require additional documentation for high-risk suppliers
- Suspend or terminate relationships where risks cannot be mitigated

Step 4: Independent Third-Party Audit
- Facilitate independent audits where required
- Cooperate with regulatory inspections and certifications

Step 5: Report annually on supply chain due diligence
- Maintain transparency through internal reporting and disclosures where applicable

8. RISK IDENTIFICATION AND ASSESSMENT

IGR FZCO categorizes suppliers, sourcing regions, and transactions to apply appropriate due diligence based on risk levels.

Risk Category	Definition	Due Diligence to be Applied
Low Risk	Suppliers or regions with stable operations, no history of conflict, human rights violations, or regulatory non-compliance. Reliable reporting and documentation available.	▪ Standard KYC and AML/CFT checks. ▪ Verification of supplier documents, licenses, and permits. ▪ Basic supplier declarations confirming compliance with policy and ESG practices. ▪ Maintain records for regulatory review
Medium Risk	Suppliers or regions with limited reporting, minor regulatory issues, or low-level social/environmental concerns. Possible indirect exposure to higher-risk activities.	▪ Enhanced Due Diligence (EDD). ▪ Verification of origin and certifications. ▪ Cross-check against UAE and international sanctions lists (OFAC, UN, EU, UAE). ▪ Site visits or remote verification where feasible. ▪ Document mitigation measures and review practices regularly

High Risk	Suppliers or regions located in Conflict-Affected or High-Risk Areas (CAHRAs). History of human rights violations, environmental breaches, or association with non-state armed groups. Complex supply chains with limited transparency.	▪ Full EDD with senior management approval. ▪ Independent third-party audits. ▪ Verification of mine of origin, transportation routes, and export permits. ▪ ESG risk assessment and compliance checks. ▪ Ongoing monitoring of transactions, logistics, and supplier behaviour.
Critical / Zero Tolerance	Suppliers, regions, or activities directly linked to armed conflict, forced or child labour, severe human rights violations, fraud, money laundering, terrorist financing, or illicit trade. Represents immediate reputational, legal, or regulatory risk.	▪ Immediate suspension or termination of supplier/transaction. ▪ Mandatory reporting to UAE authorities and regulators. ▪ Full investigation and implementation of corrective actions. ▪ Documentation maintained for regulatory and audit purposes

9. SUPPLIER REQUIREMENTS

All suppliers must:

- Comply with this policy
- Provide full transparency of source of metals
- Declare origin of materials
- Confirm absence of involvement in conflict or illegal activities
- Agree to audits and inspections

10. HIGH-RISK SOURCING (CAHRAs)

For sourcing from CAHRAs:

- Mandatory Enhanced Due Diligence (EDD)
- Verification of mine of origin
- Transportation route validation
- Additional documentation (export permits, licenses)
- Senior management approval prior to onboarding

11. ZERO TOLERANCE ACTIVITIES

The Company adopts zero tolerance for:

- Direct or indirect support to non-state armed groups
- Forced labour or child labour
- Gross human rights violations
- Money laundering or terrorist financing
- Fraudulent misrepresentation of origin

Any supplier/customer found engaged in such activities will be immediately terminated and reported where required.

12. TRANSACTION MONITORING

The Company performs ongoing monitoring of transactions to identify:

- Unusual trading patterns
- Pricing anomalies
- Suspicious routing or logistics
- Structuring or AML red flags

13. RISK MITIGATION STRATEGY

IGR FZCO applies a risk-based approach to ensure all metals are responsibly sourced.

- Supplier Due Diligence: Conduct standard and enhanced checks based on risk level.
- Documentation Verification: Require and verify origin, permits, and transport records.
- High-Risk Controls: Apply extra measures for CAHRA sourcing, including senior approval.
- Transaction Monitoring: Identify anomalies or suspicious activities in sourcing and logistics.
- Audit & Inspection: Conduct internal and third-party audits of suppliers and processes.
- Corrective Action: Remediate issues promptly; non-compliance may lead to termination.
- Continuous Improvement: Update mitigation measures in line with regulations and best practices.

14. TRANSPORTATION & LOGISTICS

IGR FZCO ensures that all transportation and logistics of precious metals are secure, transparent, and compliant with UAE laws and international standards.

- Secure Handling: Metals must be packaged and transported securely to prevent theft, tampering, or diversion.
- Approved Providers: Only vetted logistics partners complying with AML/CFT and responsible sourcing requirements may be used.
- Traceability: Shipments must include verifiable documentation (certificates of origin, permits) and maintain chain-of-custody records.
- High-Risk Areas (CAHRAs): Special risk assessments, route validation, and senior management approval are required for CAHRA shipments.
- Compliance: All transportation activities must follow UAE regulations and international best practices.
- Monitoring & Reporting: Irregularities or suspicious activities must be promptly reported to the Compliance Department.
- Audit Access: Logistics providers must allow audits or inspections; non-compliance may lead to contract termination.

15. MONITORING AND AUDITING

IGR FZCO maintains ongoing monitoring and auditing to ensure compliance with this Responsible Sourcing Policy and applicable laws:

- Continuous Monitoring: All sourcing, trading, and logistics activities are regularly monitored for irregularities, suspicious behaviour, or risk indicators.
- Internal Audits: Periodic internal audits are conducted to verify adherence to policies, procedures, and regulatory requirements.
- Third-Party Audits: Independent audits or inspections may be carried out on suppliers, logistics providers, and internal processes.
- Corrective Actions: Any identified non-compliance is addressed promptly, including remediation plans or supplier termination if required.
- Record Maintenance: Monitoring and audit records are securely maintained and available for regulatory review.

16. RECORD KEEPING & RETENTION

IGR FZCO shall retain all due diligence records, supplier documents, and transaction data for a minimum of ten (10) years as per UAE laws and regulations. Records are secure, retrievable, and accessible for regulatory review. Upon expiration, records shall be disposed of securely unless otherwise required by law.

17. TRAINING

Employees shall receive regular training on:

- Responsible sourcing principles
- AML/CFT requirements
- Identification of red flags

18. REPORTING AND ESCALATION

Employees, customers, suppliers and all other related must report any concerns through internal channels as mentioned below. IGR FZCO maintains a confidential whistleblowing mechanism.

19. POLICY REVIEW AND UPDATES

This policy is reviewed periodically to ensure continued alignment with regulatory developments and industry's best practices.
Updates may be required:

- Changes in legislation.
- Regulatory guidance updates.
- Internal audit findings.
- Significant changes in business operations

The Compliance Department along with the Board reserves the right to change this Policy from time to time as it considers necessary.

POLICY APPROVAL

This policy has been approved by the Senior Management of IGR FZCO and is effective from the date of approval.

Effective Date: April 10, 2026
Next Review: November 20, 2026

Ganna Dinzler
Managing Director

Vishmi Nayanika
Compliance Executive

License No : DMCC34175
DUBAI - U.A.E.
IGR METALS TRADING FZCO

Communication Details:
For questions and/or concerns related to above policy, please send an email to compliance@igrglobal.me
For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through the following link: https://www.igrglobal.com/contact/

Policy Acknowledgement:
By signing this document, we acknowledge that we have received, read and understand the Responsible Sourcing policy.

We hereby undertake to commit to compliance with the Policy.
We also understand that IGR FZCO is open to considering ways to support and assist in establishing processes to promote, improve and develop our practices, if necessary.

Name:
Designation: