

IPMR compliance report



INTERNATIONAL
PRECIOUS METAL
REFINERS

Company Name:	INTERNATIONAL PRECIOUS METAL REFINERS
Address :	
Location:	SAIF ZONE
Reporting year-end:	1 ST January 2025 till 31 st December 2025
Date of Report	
Senior management responsible for this report	Name: Dalia Toema El Garf Title: Executive Vice President Contact details: 056 501 2426

Audit Team	
Team Leader:	Team Member:
Jhenalyn Balincon	George Josheph

IPMR's evaluation

The following table lists the minimum requirements that must be satisfied by Refiners in accordance with the MOE_Due Diligence Regulations for Responsible sourcing of Gold V1 requirements to demonstrate compliance. Refiners should complete the table and provide reasons for their responses in the space provided.

Summarized conclusion: *IPMR is implements strictly the MOE regulations which is based on the OECD due diligence for esponsible sourcing for metals from CAHRAs.*

Evaluation

Disclosure on the individual rating of the level of compliance or non-compliance for the sub-points of each Step 1 -5 of the MOE Regulations

STEP 1: ESTABLISHING AN EFFECTIVE GOVERNANCE FRAMEWORK

Compliance statement:

IPMR has established an effective governance framework in compliance with the prevailing regulations and demonstrated as below

Demonstration of Compliance:**1.1. Adopt and commit to a policy for managing risks in gold from CAHRAs**

Regulated Entities must adopt a documented gold Supply Chain policy that incorporates the risks and risk mitigation measures. The policy and any supporting procedures should include details on the gold Supply Chain Due Diligence which the company will assess itself and the activities and relationships of suppliers.

The policy should at least contain the following elements, which are consistent with OECD model Supply Chain policy as listed in Annex II of OECD Guidance.

- a) Scope
- b) Roles and responsibilities of employees, management and Board of Directors
- c) Know Your Counterparty (KYC) and Customer Due Diligence measures
- d) Supply Chain risk assessment and risk mitigation process
- e) Ongoing monitoring measures
- f) independent audit mechanism
- g) Record retention requirements
- h) Training program

IPMR implements an effective policy for managing risks in sourcing gold from CAHRAs. A comprehensive risk control policy is implemented, the subject policy covers all processes that are related to compliance, AML, ...etc and all related topics. It is endorsed by senior management, and its implementation is closely monitored by the compliance team at IPMR. The risk control policy at IPMR is in alignment with the OECD due diligence guidance for responsible supply chain of minerals from CAHRAs, due diligence regulations for responsible sourcing of gold by the MOE, emirates bullion market committee rules for risk based due diligence in the gold supply chain, RJC COP & CoC related requirements and other international business best practices that regulates the industry. , EBC, RJC and international business best practices that govern the industry. The subject policy is subject to an annual review and update and/ or whenever required by business and/ or compliance to ensure that it is always in compliance with updated related rules and regulations. It explicitly includes:

- IPMR statement with regards to gold supply Chain.
- Roles and responsibilities for compliance, employees, senior management.
- Minimum requirements of KYC, it explicitly elaborates the KYC, and KYCC requirements and process.
- Identify supply chain risk assessment and mitigation process in IPMR and different actions to be taken by IPMR.
- Ongoing monitoring to the risk management system in IPMR (daily transactions monitoring, review and update of accounts frequently, review and update of all policies and procedures... etc).
- IPMR independent audit mechanism, which applies on an annual basis as mandated by the MOE, and to always ensure the prompt renewal of certificates granted to IPMR (RJC COP & CoC). In addition to the above-mentioned IPMR is subject to an annual inspection conducted by SAIF zone.
- Record retention is clearly reflected in the mentioned document where all records are



	<p>retained for a period of five (5) years as mandated by prevailing rules and regulations.</p> <ul style="list-style-type: none"> - Training program is always in place in IPMR, and it is conducted on annual basis.
<p>1.2.1 The board of directors, or equivalent, should acquire the necessary knowledge and experience, or utilise external expert advisors, to:</p> <p>a. provides oversight of the Supply Chain Due Diligence framework and outcomes.</p> <p>b. ensure that effective structures and communication processes are in place for critical information sharing.</p> <p>c. assesses the effectiveness of the Supply Chain Due Diligence policies and processes on an ongoing basis.</p> <p>d. ensure that the compliance officer's responsibilities include gold Supply Chain Due Diligence matters.</p> <p>e. ensures the availability of required resources to manage the Supply Chain Due Diligence process.</p> <p>f. delegate authority and assign responsibility to staff who are equipped with the necessary competence, knowledge and experience to manage the Supply Chain Due Diligence process; and put in place an organizational structure that can effectively communicate critical information, including the Supply Chain Due Diligence policies and procedures, to relevant employees</p>	<p>IPMR's board of directors, or equivalent maintains the necessary knowledge and experience that qualifies them to oversee the supply chain DD framework and outcomes, they maintain the knowledge and again maintain the experience not only with the industry however with IPMR. The President and the Executive Vice President maintain a strong, long banking history as well that assist in building a strong organized and compliance culture in IPMR. The compliance team at IPMR comprises of two employees collectively maintain legal and compliance experience, related skills and experience, the team is reporting to the senior management that enables it to have freely, open access for sharing information with the board, IPMR compliance is handled by the internal team however, in some cases we may request more checks, and enhanced due diligence reports from our third-party service provider (whenever required). Policies and procedures in IPMR are a crucial pillar in the IPMR risk management system, the whole system is subject to a full review and update annually, and/ or whenever requested by compliance and/ or business to ensure that the implemented system is in alignment with the dynamic regulatory infrastructure, prevailing rules and regulations that are mentioned above. And to ensure the effectiveness of controls in place.</p>
<p>1.2.2 Regulated Entities must appoint a compliance officer, who must be a senior person in the organization, reporting directly to the Chief Executive Officer (CEO) (or equivalent) and has access to the board of directors, or equivalent.</p>	<p>Jhenalyn B. is assigned to hold the position and related roles and functions, she is a senior person reporting directly to the IPMR President, she has access to directors, and senior management. She has been working at IPMR since four years, she is well trained to handle the position as required. She is assisted with another compliance staff to strengthen the compliance function and ensure all related roles and functions are conducted with high level of efficiency.</p>



<p>The compliance officer should be responsible for the overall management of the Supply Chain Due Diligence process, including:</p> <ol style="list-style-type: none"> a. Monitor the Supply Chain Due Diligence process. b. improves the Supply Chain Due Diligence framework including by reviewing and updating the Supply Chain policy and procedures. c. manages and implement a training and awareness program with regard to due diligence; d. collaborate with the relevant Supervisory Authority and the FIU by providing all requested data, and allow their authorised employees to view the necessary records and documents that will allow them to perform their duties 	<p>The Compliance office in coordination with the compliance team are responsible for handling all compliance and AMLRO related functions</p> <ul style="list-style-type: none"> - Monitor the Supply Chain Due Diligence process as elaborated in the Risk Control Policy. - improve the Supply Chain Due Diligence framework including by reviewing and updating the Supply Chain policy and procedures. - manage and implement a training and awareness program regarding due diligence. - IPMR cooperates with all regulatory and supervisory authorities whenever required, the compliance team collaborate with the relevant supervisory authorities, FIU, RJC, SAIF Zone auditors ...etc by providing all requested data, information, allow their authorised employees to view the necessary records and documents that will allow them to perform their duties.
<p>1.2.3 Regulated Entities shall perform a fit & proper test and conduct KYC checks of the compliance officer, and other employees involved in the procurement process, during recruitment and on annual basis</p>	<p>IPMR conducts a fit & proper test, KYC checks for the compliance team and all IPMR employees with no exception on a semi-annual basis. Each member of staff in IPMR maintains a file where all necessary documents and compliance checks results are properly updated and filed.</p>

1.2.4 Regulated Entities must develop and implement a training program for all persons involved in the responsible Supply Chain Due Diligence process.

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The training program:

- a. Should be provided during staff recruitment and on an ongoing basis.
- b. includes a mixture of topics between generic Supply Chain Due Diligence training and role-specific matters.

IPMR develops and implements a training program as stipulated in the Risk Control Policy, then training program:

- is given during staff recruitment and on a frequent basis, at least semi-annual.
- It includes different topics related to supply chain, AML, compliance and others.



<p>c. should be provided at least on bi-annual basis via face-to-face or digital channels.</p> <p>d. effectiveness should be assessed through questionnaires and feedback forms; and</p> <p>e. records related to the training and subsequent assessments should be kept as part of the overall record keeping mechanism of the Regulated Entity and should be available upon request by the Supervisory Authority</p>	<ul style="list-style-type: none"> - Health and safety related trainings are conducted as well on an annual basis. - Effectiveness is assessed through a simple feedback form and sometimes verbally. - All related training records are appropriately retained in accordance with our internal policy.
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1.3 Establish a system for transparency, information sharing, and control on gold Supply Chain:

Regulated Entities must document the Supply Chain Due Diligence findings and information in a systematic way which ensures visibility on the entire Supply Chain of gold.

Regulated Entities should conduct Due Diligence on immediate counterparty in all cases and should extend this till the origin of the gold in case of any risk identified in the supply chain.

This process must document the information as detailed below:

<p>1.3.1 For natural persons, the name, as in the identification card or travel document, nationality, address, attaching a copy of a valid identification card or travel document, and approval needs to be obtained from the senior management, if the supplier or any of the Beneficial Owner is identified as a PEP</p>	<p>IPMR does not conduct business with individuals.</p>
<p>1.3.2 For legal persons and legal arrangements:</p> <p>a. the name.</p> <p>b. legal form.</p> <p>c. memorandum of association or equivalent constitutional document.</p> <p>d. commercial license.</p> <p>e. country of incorporation.</p> <p>f. countries of operations.</p> <p>g. headquarters office address or the principal place of business; and</p> <p>h. names of relevant persons holding senior management positions and acting as authorised representatives in the legal person or legal arrangement, including authorisation letters.</p>	<p>For Companies minimum requirements are established which includes:</p> <ul style="list-style-type: none"> - The name, legal form, MoA or equivalent, commercial/ trade license, country of incorporation, countries of operations, any subsidiaries or branches, names of UBOs, authorized signatories, including authorization letters.



<p>1.3.3 Regulated Entities are required to verify that any person purporting to act on behalf of the supplier is authorized through official documents such as power of attorneys, and verify the identity of that person as prescribed in section (1.3.1) and (1.3.2) above</p>	<p>IPMR verifies that any person purporting to act on behalf of the supplier is authorized through official documents such as power of attorneys and verifies the identity of that person by collecting related documents (valid ID, Passport).</p>
<p>1.3.4 Regulated Entities are exempted from identifying and verifying the identity of any shareholder, partner, or the Beneficial Owner, if such information is obtainable from reliable sources where the supplier or the owner holding the controlling interest are a company listed on a regulated stock exchange subject to disclosure requirements through any means that require adequate transparency requirements for the Beneficial Owner or a subsidiary whose majority shares or stocks are held by the shareholders of a holding company.</p>	<p>The rules mentioned in point 1.3.4 are stipulated in the IPMR risk control policy.</p>
<p>1.3.5 For gold supplied from ASM, the policy should provide for gathering additional information, including:</p> <ul style="list-style-type: none"> a. Identification and verification of the local exporter through documents such as export licenses. b. mine location and ASM's legal existence and conformity to legal framework (if available) or their willingness to formalize the legal framework 	<p>IPMR stipulates the process of onboarding, procession and transacting with gold sourced by ASM, however during the year 2025 IPMR did not receive any mined gold.</p> <p>In case gold is supplied by mines the following are mandated:</p> <ul style="list-style-type: none"> - Identification and verification of the local exporter through documents such as export licenses. - The mine location and ASM's legal existence and conformity to legal framework (if available) or their willingness to formalize the legal framework. - Onsite visits to the supplier to strengthen the KYC IPMR has introduced an onsite visit checklist to be satisfied, the checklist is in alignment with LBMA standards. - Enhanced due diligence reports are mandated and the relationship is rated as high risk by default. - high-risk relationships is dually approved by both the compliance as well as the senior management, and they are subject to frequent review and update every six (6) months.



<p>1.3.6 Regulated Entities shall cease establishing or maintaining a business relationship or executing any transaction should they be unable to undertake CDD measures towards the supplier and should consider reporting such instances to FIU through Suspicious Activity Reports/ Suspicious Transactions Reports.</p>	<p>IPMR and in case is unable to undertake CC measures towards a supplier, it rejects the potential relationship and considers reporting to FIU in accordance with prevailing rules and regulations, one SAR was reported to FIU in August 2025 with regards to a potential customer, and the relationship was rejected accordingly.</p>
<p>1.3.7 Regulated Entities shall create and maintain documents inventory related to Supply Chain Due Diligence carried out by the entity which should be accessible for the entity as well as the regulatory on a timely manner.</p> <p>The records inventory shall include, at least:</p> <ol style="list-style-type: none"> Information regarding the form, type and physical description of gold/gold bearing material; proof of origin of mined gold through official government issued certificate of origin or equivalent document and invoices and packing list; information regarding the weight and assay of gold as provided by supplier; KYC information of suppliers including identification and verification of entities and ultimate Beneficial Owners who own 25% and above directly and indirectly. unique reference numbers for each input and output of gold. dates of input and output, purchases and sales. shipping/transportation documents (such as waybill/airway bill, pro forma invoice, and bill of lading) to establish Chain of custody from origin to refinery. date of arrival at the refinery and date of assay finalization and financial transactions details including amount, method of payment, currency, and banking information 	<p>IPMR maintains an appropriate inventory system related to supply chain, and it is accessible for IPMR and as requested by regulatory bodies, the inventory system includes:</p> <ul style="list-style-type: none"> - The form, type and physical description of gold/gold bearing material. - proof of origin of mined gold through official government issued certificate of origin or equivalent document and invoices and packing list. - information regarding the weight and assay of gold as provided by supplier. - KYC information of supplier including identification and verification of entities and ultimate beneficial owners as defined UBOs who own 25% and above directly and indirectly. - unique reference numbers for each input and output of gold enables IPMR to track and trace any transaction. - dates of input and output, purchases and sales. - shipping/transportation documents (such as waybill/airway bill, pro forma invoice, and bill of lading) to establish Chain of custody from origin to refinery. - date of arrival at the refinery and date of assay finalization and financial transactions details including amount, method of payment, currency, and banking information. <p>IPMR and after been RJC CoC accredited has commenced to issue CoC declaration as mandated along transactions conducted and provided to the customer whenever requested.</p>



<p>1.3.8 Regulated Entities should make and receive payments for gold through official banking channels where possible and for unavoidable cash transactions there should be proper verification of origin of cash and should be reported to the FIU where applicable.</p>	<p>IPMR and as stipulated in the risk control policy make and receive payments through official banking channels and is avoiding cash transactions as possible. Details of supplier's bank is one of the mandatory fields in the IPMR account opening form that is to be provided during the onboarding process. IPMR report transactions to FIU in accordance with the prevailing requirements.</p>
<p>1.3.9 Regulated Entities should cooperate fully with regulators and law enforcement agencies in the UAE regarding gold transactions. Regulated Entities should provide access to complete information regarding all shipments and transactions carried out regarding gold refining.</p>	<p>IPMR cooperates fully with regulators and law enforcements agencies in the UAE regarding gold transactions (MOE, FIU, external auditors, both in the saif zone where its refinery is located or outside the saif zone). It provides them with all necessary information and documents whenever necessary and required.</p>
<p>1.3.10 All records, documents, data and information collected as part of Supply Chain Due Diligence of an actual and potential relationships should be kept, preferably, on a computerized database for not less than five years from completion of a transaction or termination of the business relationship with the supplier. The records, documents and data kept shall be organized so as to permit data analysis and tracking of financial transactions. All records, documents, data and information should be immediately available to regulators and law enforcement agencies upon request</p>	<p>IPMR implements a record retention policy as stipulated in the risk control policy which is alignment with the OEDC DD guidance for responsible supply chain of minerals from CAHRAs, MOE DD regulations for responsible sourcing, EBMC rules for risk-based DD in the gold supply chain, RJC COP, RJC CoC and best international practices. Records, documents, data and information collected as part of supply chain due diligence of an actual and potential relationships are kept for not less than five years from completion of a transaction or termination of the business relationship with the supplier. The records, documents and data are well organized, which permits data analysis and tracking of financial transactions. All records, documents, data and information are always available to regulators and law enforcement agencies whenever requested.</p>
<p>1.3.11 Regulated Entity's policy must include adequate security requirements to ensure compliance with the Regulations in relation to material sourced from LSM or ASM mining entities. These requirements shall include the following measures:</p> <p>a.</p> <p>b. b. physically segregating different shipments until verification is adequately completed and confirmed in accordance with Step 1.3.7;</p> <p>c. c. reporting any inconsistencies to senior management or the Compliance Officer (as appropriate);</p>	<p>IPMR implements an adequate security requirement to ensure compliance with the regulations in relation to material sourced from LSM or ASM mining entities.</p> <p>However, IPMR did not source any mined gold for the year 2025, all measures are in place.</p> <p>Transguard (TG) is responsible for all security measures in IPMR, that covers the gold metal receipt, delivery, movement, handling inside the refinery, the vault in IPMR is under the custodian of TG as well.</p>



<p>d. d. ensuring that any assessor of a shipment is independent from any conflict of interest; and</p> <p>e. e. if applicable, verify a supplier's participation in the Extractive Industry Transparency Initiative</p>	<p>The following measures are stipulated in the IPMR risk control policy:</p> <ul style="list-style-type: none"> - The use of identifiable sealed security boxes for each shipment to avoid any tampering or removal of content. - physically segregating different shipments until verification is adequately completed. - reporting any inconsistencies to senior management and the compliance officer for proper decision. - ensuring that any assessor of a shipment is independent from any conflict of interest.
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1.4. Strengthen company engagement with gold supplying counterparties

Regulated Entities should build long-term relationships with suppliers and should make their suppliers commit to a Supply Chain policy consistent with the Regulations and Appendix II of the OECD Guidance. This should be achieved by the following:

<p>1.4.1 Communicating the expectations of the refiners to the supplier on due diligence for responsible Supply Chains of gold from CAHRA. This should be done by requiring the supplier to commit to refiner's gold Supply Chain policy (as per section 1.1 of the Regulations); or through supplier's own policy.</p>	<p>IPMR exerts best efforts to maintain the momentum with suppliers and communicate our IPMR to commit to a supply chain policy consistent with the regulations as included in the OECD DD guidance:</p> <ul style="list-style-type: none"> - Account opening form includes a declaration of the supplier being in full awareness and implementation of the mentioned regulations, the declaration is an integral part of the account opening. - IPMR provides a copy of the mentioned regulations during the onboarding process, and it is discussed with the customer. - Suppliers code of conduct is an integral part of the account opening form with IPMR and it includes the minimum behavior expected from our suppliers during our business relationship, the document stipulates the full awareness and implementation of the mentioned regulations. <p>All suppliers are mandated to read, understand, and abide with the contents of the IPMR Supplier code of conduct that stipulates full awareness and implementation of the subject regulations.</p>
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	<ul style="list-style-type: none"> - Frequent meetings are held between IPMR RMs and their suppliers where several topics are always discussed, which include the OECD DD guidelines and many other related initiatives that govern and/ or regulate the industry.
1.4.2 Sharing the AML/CFT Legislation, the Regulations, OECD Guidance, and Gold Supplement with all suppliers.	<p>IPMR provides all its suppliers with the:</p> <ul style="list-style-type: none"> - OECD due diligence for responsible supply chain of minerals from CAHRAs. - Supply chain policy in IPMR. - AML/CFT POLICY in IPMR
1.4.3 Incorporating the Supply Chain policy in line with this Regulations into commercial contracts and/or written agreements with suppliers which will be legally binding.	<p>IPMR incorporates the supply chain policy in line with the subject regulations into its account opening which serves as the commercial contract between IPMR and its suppliers which is legally binding.</p> <ul style="list-style-type: none"> - Account opening form includes a declaration of the supplier being in full awareness and implementation of the mentioned regulations, the declaration is an integral part of the account opening. - IPMR provides a copy of the mentioned regulations during the onboarding process, and it is discussed with the customer. - Suppliers code of conduct is an integral part of the account opening form with IPMR and it includes the minimum behavior expected from our suppliers during our business relationship, the documents stipulate the full awareness and implementation of the mentioned regulations. <p>All suppliers are mandated to read, understand, and abide with the contents of the IPMR Supplier code of conduct that stipulates full awareness and implementation of the subject regulations</p>



1.4.4 Supporting suppliers through capacity building measures and information sharing to improve Supply Chain practices of suppliers and other parties in the Supply Chain

IPMR exerts best efforts to support its Suppliers with information sharing as below:

- Account opening form includes a declaration of the supplier being in full awareness and implementation of the mentioned regulations, the declaration is an integral part of the account opening.
- IPMR provides a copy of the mentioned regulations during the onboarding process, and it is discussed with the customer.
- Suppliers code of conduct is an integral part of the account opening form with IPMR and it includes the minimum behavior expected from our suppliers during our business relationship, the documents stipulate the full awareness and implementation of the mentioned regulations. All suppliers are mandated to read, understand, and abide with the contents of the IPMR Supplier code of conduct that stipulates full awareness and implementation of the subject regulations.
- Frequent meetings are held between IPMR RMs and their suppliers where several topics are always discussed, which include the OECD DD guidelines and many other initiatives that govern the industry.
- Main regulations that are always covered at our meetings and discussions with our suppliers:
 - 1- OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.
 - 2- Due diligence for responsible sourcing of gold by the MOE.
 - 3- EBMC rules for risk based due diligence in the gold supply chain.
 - 4- Being an RJC accredited the RJC COP & CoC requirements.
- All the above in addition to market conditions and analysis.



1.5. Establish a confidential grievance mechanism

Regulated Entities must implement a grievance mechanism through which the employees or other stakeholders in the Supply Chain should be able to raise concerns related to sourcing or trading of gold from a CAHRA.

The mechanism should ensure that:

- a. employees or other stakeholders are enabled to report any misconduct, or an improper state of affairs or circumstances in a secured way that protects the identity and from criminal and administrative liabilities;
- b. it acts as a warning system in addition to refiners own system for risk assessments;
- c. all relevant parties should know the presence of such mechanism through appropriate communication channels such as policy and newsletters or through websites
- d. it encourages users to submit such concerns without fear of reprisal;
- e. all submitted concerns be evaluated independently to ensure no undue influence of parties in the entity;
- f. ensure that all submissions should be treated fairly without prejudices and there should be documented procedures to share information on the status to stakeholders in a transparent manner; and
- g. all such submission should be utilized in improving the Supply Chain mechanism and should be utilized in the risk assessment process.

Regulated Entities should use their own KYC tools and/or independent audit, assurance reports or certification of conformance with recognized responsible sourcing standards (other initiatives) can be considered as supporting evidence

IPMR implements a strong grievance mechanism that it is open to all staff and other stakeholders, through the implementation of the below.

- The grievance policy is properly implemented, communicated to all staff, and everyone is encouraged to submit their complaints freely and openly.
- IPMR grievance policy is published on IPMR website for easy accessibility by all related stakeholders.
- IPMR implements a whistleblower policy to encourage all staff to communicate their concerns unanimously if required, the subject policy stipulates the mechanism of highlighting any conflict, incident, complaints, ...etc and its handling process.
- IPMR has fixed a suggestions and complaints box at IPMR premises of T5-005, and all staff are always encouraged to use any of the above means to communicate any complaints, concerns... etc that will be treated fairly in accordance with the mentioned policies above.
- IPMR has in place a stringent human resources policy that covers and governs all staff related issues, the subject policy is aligned with the UAE labour law (federal decree-law No. 33 of 2021), HR manager is always available to attend to any staff's concern as per his/ her request.
- In addition to all mentioned above IPMR maintain an open-door policy, where the management are always available and open to any suggestions, complaints raised by any of the staff and/ or stakeholders.
- All such submissions are utilized in improving the supply chain mechanism and should be utilized in the risk assessment process, if found related.

**STEP 2: IDENTIFICATION AND ASSESSMENT OF THE SUPPLY CHAIN RISK*****Compliance statement:******Demonstration of Compliance:*****2.1 Conduct Supply Chain Due Diligence to identify potential risks**

Regulated Entities must identify and assess the risks in the Supply Chain to carry out required due diligence.

Due diligence must be undertaken before entering a new business relationship with a supplier and should be carried out on an ongoing basis. Conducting risk assessment will help to tailor the due diligence according to the risks identified.

Where high risk Supply Chain is identified, enhanced due diligence measures should be taken in order to mitigate the risks.

Regulated Entities should use the management system put in place under Step 1 of the Regulations in order to effectively identify and assess risks through their Supply Chain.

If a Regulated Entity can reasonably determine on the basis of the information collected under Step 1 of the Regulations that it does not deal in gold mined, transported or traded in a CAHRA, no additional due diligence is required.

The management systems established under Step 1 should be maintained and regularly reviewed. However, Regulated Entities should ensure that the applicable AML/CFT measures in line with AML/CFT Legislation and other Applicable Laws and Regulations are complied with which are applicable to Regulated Entities being DNFBPs.

The risk assessment should be carried out using risk factors broadly categorized in 2.1.1 to 2.1.5.

IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management process in IPMR identifies identifying potential risks as the following:

- Minimum KYC and KYCC measures are stipulated, its implementation is monitored by the compliance team in IPMR.
- Compliance checks that cover sanctions screening, adverse media.
- Risk assessment for every business relationship including several risk parameters (counterparty related, geographical related, product related and delivery related).
- Risk classification (Low, Medium, and High) commensurate with the level of risk involved.
- Frequency review and update to every business relationship based on the risk rating (Low risk relationships are reviewed every two years, medium risk relationships are reviewed every one-year while the high-risk relationships are reviewed every six (6) months).
- Approval matrix also depends on the level of risk involved, where high risk relationships must be approved by the senior management in IPMR in addition to the compliance approval.
- Ongoing monitoring to daily transactions conducted with IPMR.
- The daily review of all transactions conducted with IPMR, in some cases



	<p>compliance checks are conducted on transaction level as well.</p> <ul style="list-style-type: none"> - IPMR follows the AML CFT TFS legislation mandated by the MOE and other applicable laws and egulations, as stipulated in our policies, implemented processes and the regulatorty mapping LOG. - IPMR implements stringent AML/CFT/TFS policy that in compliance with the subject regulations, the subject policy is a pillar in IPMR's risk management system, it is subject to an annual review and update or whenever required by eithet the business and / or the compliance to incorporate any amendments and / or update.
<p>2.1.1 Counterparty Risk Factors</p> <p>a. KYC information of the Regulated Entity's suppliers as identified under Step 1 of the Regulations (including information about the origin and transportation of the gold).</p> <p>b. Identified Red Flags (as defined in Step 2.2 of the Regulations) in the Supply Chain.</p> <p>c. Number of participants in the Supply Chain.</p> <p>d. Extent and effectiveness of due diligence practices of a counterparty.</p> <p>e. Counterparty's conformance with OECD Guidance while engaging in sourcing of gold.</p> <p>f. Whether a counterparty's due diligence practices have been audited by a qualified third-party auditor in line with applicable responsible sourcing mechanism.</p> <p>g. Length of establishment of supplier or other counterparties in the Supply Chain.</p> <p>h. Complexity in the ownership structure of the counterparties such as presence multiple layers of ownership and involvement of trust and similar vehicles apparently for purpose of anonymity.</p> <p>i. Size of mining operations of a supplier (ASM or LSM), if applicable</p> <p>j. Involvement of any PEPs that have been entrusted with prominent public functions or individuals who are closely related to such individuals.</p>	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management process in IPMR identifies identifying potential risks related to the involved counterparty as the following:</p> <ul style="list-style-type: none"> - IPMR identifies red flags that may be encountered during our business conduct, red flag list is a dynamic list that is updated whenever required, it is undergoing review, update and its is always circulated to all staff in IPMR. - The red flag list is communicated to staff to ensure that all staff in IPMR are on the same page. - The red flag list includes all the below factors, however the below are not an exhaustive list it is an indicative list. - Number of participants in the Supply Chain. - Extent and effectiveness of due diligence practices of a counterparty. - Counterparty's conformance with OECD Guidance while engaging in sourcing of gold. - Whether a counterparty's due diligence practices have been audited by a qualified



<p>k. Adverse media/Sanctions listing findings through the screening the suppliers and other actors in the supply chain.</p>	<p>third-party auditor in line with applicable responsible sourcing mechanism.</p> <ul style="list-style-type: none"> - Length of establishment of supplier or other counterparties in the Supply Chain. - Complexity in the ownership structure of the counterparties such as presence multiple layers of ownership and involvement of trust and similar vehicles apparently for purpose of anonymity. - Size of mining operations of a supplier (ASM or LSM), if applicable. - Involvement of any FPEPs that have been entrusted with prominent public functions or individuals who are closely related to such individuals. - Adverse media/Sanctions listing findings through the screening the suppliers and other actors in the supply chain along with worldcheck, OFAC, and in some cases Dow Jones, and FACTIVA.
<p>2.1.2 Geographical Risk Factors</p> <p>Regulated Entities should be able to identify the location and origin of the gold sourced by them using reasonable efforts. Different origins have different risks and require different treatments. Identification of gold origin should be evidence based and collected through suppliers and entity's own research.</p> <p>a. Mined Gold: The origin of mined gold is the mine itself except in cases of a mining by-product such as gold obtained through mining of copper. A refiner should be able to identify misrepresentation of mined gold as by-product through appropriate due diligence.</p> <p>b. Recyclable Gold: The origin of recycled gold is the point at which it becomes recyclable such as when it is first sold back to a gold recycler/Refiner. A refiner's due diligence should include measures to identify attempts to misrepresent the origin of newly mined gold through recycled gold.</p> <p>c. Grandfathered Stocks: If a verifiable date from prior to 1 January 2012, no determination of origin is required. However, if red flags (refer to Section 2.2) are identified with regard to violation of AML regulations or</p>	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management process in IPMR identifies identifying potential risks related to the geographical factors involved as the following:</p> <ul style="list-style-type: none"> -IPMR is capable of identifying the origin of gold sourced several risks may be encountered, risk identification, assessment, and mitigation are evidenced based. <p><u>No mined gold was sourced during 2025 however in case of mined gold, IPMR:</u></p> <ul style="list-style-type: none"> - identifies the origin of mined gold as the mine itself, IPMR does not source mining-by product. - Recyclable gold: IPMR determines the origin of recycled gold as IPMR's suppliers identify their suppliers as well, which enables IPMR to identify the origin of metal sourced. All are evidenced by documents and invoices.



<p>international sanctions, further scrutiny of the Supply Chain is warranted.</p> <p>Location-based risk identification should be carried out using reasonable efforts and recognized sources of information. At a minimum, following risk factors should be utilized for risk identification.</p> <ol style="list-style-type: none"> The AML/CFT and other regulatory environment in the supplier's jurisdiction or location which is part of Supply Chain. Level of conflicts or human rights abuses in any location comprising part of the Supply Chain through reliable resources. Level of involvement of wide spread bribery and corruption through reliable resources. The level of involvement or potential involvement of any criminal organization. The level of access from a location comprising part of the Supply Chain to nearby markets or processing operations that are termed as CAHRA. The level of enforcement of laws addressing significant criminal activity. Payment mechanism used (e.g. formal banking system vs. non-banking system). The existence of international sanctions and/or embargoes that have been directed against the country and/or individuals/entities in that country by UN Security Council and/or UAE from time to time. Involvement of countries identified as CAHRA. 	<p>- No grandfathered stocks have been forced to IPMR.</p> <p>- Location- based risk identification is conducted during IPMR risk assessment taking into considerations at least the below:</p> <p>- AML/CFT regulatory environment in the supplier's jurisdictions and in other related countries if any (through Know Your Country platform, Google, and other media tools).</p> <p>- Level of conflicts or human right abuses in any location comprising a part of the supply chain screening covers all aspects of breaches and related incidents that cover human rights, environmental management and health and safety.</p> <p>- Identification of level of corruption and transparency, level of involvement of any criminal organization, Level of access from a location comprising part of the supply chain in nearby markets from CAHRAs, level of enforcements of laws, payment mechanism, existence of sanctions (screening along worldcheck, OFAC, Dow Jones, FACTIVA, KYC platform and several media platforms).</p> <p>- Sanctions screening is conducted along the UN consolidated sanctions list, the UAE local sanctions list, EU sanctions list, and many other sanctions list exceeding the requirements.</p>
<p>2.1.3 Transactions Risk Factors</p> <ol style="list-style-type: none"> Inconsistency of transaction with the local or market practices (amount, quality, potential profit, etc.). Inconsistency of volumes, types and concentrations of material compared with previous shipments with the same client. Use of excessive cash in transactions. 	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management</p>



<p>d. Attempted structuring of transactions to make payments to avoid government thresholds.</p> <p>e. Identified risks and severability and probability of adverse impacts of the applicable transaction.</p> <p>f. Gold that are transported which are not reasonably reconciled with the declared location of the origin</p> <p>g. Unexplained geographic distance in the Supply Chain</p>	<p>process in IPMR identifies identifying potential risks related to the transactional factors involved as the following:</p> <ul style="list-style-type: none"> - Inconsistency of transaction with the local or market practices (amount, quality, potential profit, etc.). - Inconsistency of volumes, types and concentrations of material sourced in accordance with the customer profile with IPMR. - Attempt to use excessive cash in transactions, as cash transactions are not allowed in IPMR, all settlements are conducted through official banking channels. - Attempted structuring of transactions to make payments to avoid government thresholds. - Identified risks and severability and probability of adverse impacts of the applicable transaction. - Gold that are transported which are not reasonably reconciled with the declared location of the origin - Unexplained geographic distance in the Supply Chain. <p>All the above are monitored by the daily review of transactions conducted in IPMR.</p>
<p>2.1.4 Product Risk Factors:</p> <p>a. The nature of the gold supplied such as, ASM or LSM gold, gold by-product, melted recyclable gold and unprocessed recyclable gold. The risk may vary from product to product.</p> <p>b. Level of concentration of gold in the supplied gold.</p>	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management process in IPMR identifies identifying potential risks related to the product factors involved as the following:</p> <p>Product risk-related factors are taken into consideration while the conduct of the risk assessment in IPMR as stipulated in the Risk Control Policy. The following factors are included:</p> <ul style="list-style-type: none"> - Nature of gold supplies.



	<ul style="list-style-type: none"> - Level of concentration of gold and its alignment with the supplier profile with IPMR.
2.1.5 Delivery Channel Risk Factors: a. Physical delivery of gold to unrelated third parties which is not consistent with normal business practices. b. Courier/transport related risk factors including physical security practices such as sealed security boxes for shipment in which the tampering or removal of content during transport is likely. c. Extent of reliability and KYC information of third-party transportation companies validated through accepted standards	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. The risk management process in IPMR identifies identifying potential risks related to the delivery channels factors involved as the following:</p> <ul style="list-style-type: none"> - Physical delivery of gold to third parties or not in alignment with the supplier profile with IPMR. - Physical delivery in IPMR is executed by Transguard ensuring appropriate measures are in place. - TG is a leading security and logistics company in the UAE and clearly dominates the local market.

2.2 Identify Red Flags/ High Risk Indicators in the gold Supply Chain

<p>Based on the information on origin of gold as stipulated in Section 2.1, and information generated through Step 1, Regulated Entities should identify the potential red flags in a Supply Chain of gold. Red flags can be broadly categorized as below</p>	<p>IPMR implements a stringent risk control policy that explicitly stipulates the risk-based management process in IPMR. The risk management system in IPMR is designed to effectively identify potential risk, evaluate, rating commensurate to the level of risks, and set controls to mitigate such risk, finally by a frequent monitoring and update. Red flags identification and handling process is one of the crucial pillars of the risk management process in IPMR.</p> <p>Red flags identification and handling process is properly stipulated and implemented in IPMR in</p>
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	<p>accordance with prevailing rules and regulations. Red flag list is prepared, reviewed, and updated frequently ensuring the continuous incorporation of any update, or red flag identified during the conduct of the business.</p> <p>The red flag list is updated and communicated to all staff to enhance the level of awareness among all staff.</p>
<p>2.2.1 Location Based Red Flags</p> <p>a. The gold originates from, or has been transported through, a CAHRA or countries subject to international sanctions.</p> <p>b. The gold originates from a country known to have limited discovered reserves and expected production levels.</p> <p>c. The gold originates from a country through which gold from CAHRAs is known or reasonably suspected to transit.</p> <p>d. The gold is claimed to originate from recyclable/scrap or mixed sources and has been refined in a country where gold from CAHRAs is known or reasonably suspected to transit.</p> <p>e. The gold originated or transported through countries known to have weak oversight of Money Laundering, corruption, bribery, presence of informal banking systems, and known cash intensiveness in the economy</p>	<p>In accordance with the:</p> <ul style="list-style-type: none"> - OECD due diligence guidance for responsible supply chain of minerals from CAHRAs. - Due diligence regulations for responsible sourcing of gold. - EBMC rules for risk based due diligence in the gold supply chain. - RJC COP & RJC CoC related requirements. <p>The red flag list in IPMR considers location based red flags as the following:</p> <ul style="list-style-type: none"> - The gold originates from, or has been transported through, CAHRAs or countries subject to international sanctions. - The gold originates from a country known to have limited discovered reserves and expected production levels. - The gold originates from a country through which gold from CAHRAs is known or reasonably suspected to transit. - The gold is claimed to originate from recyclable/scrap or mixed sources and has been refined in a country where gold from CAHRAs is known or reasonably suspected to transit. - The gold originated or transported through countries known to have weak oversight of Money Laundering, corruption, bribery, presence of informal banking systems, and known cash intensiveness in the economy
<p>2.2.2 Supplier Red Flags</p> <p>a. Suppliers or other known upstream entities operate in one of the red flag locations, referred to in 2.2.1, of gold origin and transit, or have shareholder or other interests in suppliers of gold from one of the red flag locations of gold origin and transit, referred to in 2.2.1.</p>	<p>In accordance with the:</p> <ul style="list-style-type: none"> - OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.



b. Suppliers or other known upstream entities are known to have sourced gold from a red flag location of gold origin and transit in the last 12 months.

c. Discrepant or inconsistent KYC information obtained through Identification and verification process of suppliers or refused to provide requested documentation.

d. Supplier or Beneficial Owners are listed in any government lists for Money Laundering, fraud or terrorism or that are listed under international sanctions regulations.

e. Supplier does not have policies and practices related to ethics, integrity, and combatting Money Laundering, bribery, and corruption.

f. Lack of effective assessment of supplier's counterparties risk assessment framework to identify risks in the upstream Supply Chains.

Refiners with ASM gold should also consider the following aspects while identifying and assessing risk

a. Suppliers of ASM gold sources, gold ore processing plant, traders and local exporters.

b. Whether the mining project can be considered legitimate ASM (i.e., legally registered, cooperative-based and/or government-recognized, or central bank supported initiative).

c. Whether the mining practice is subject to standards and best practices.

d. Whether the ASM gold source consider ethical and environmental elements while handling and processing gold.

- Due diligence regulations responsible sourcing of gold.
- EBMC rules for risk based due diligence in the gold supply chain.
- RJC COP & RJC CoC related requirements.

The red flag list in IPMR considers supplier based red flags as the following:

Suppliers or other known upstream entities operate in one of the red flag locations, referred to in 2.2.1, of gold origin and transit, or have shareholder or other interests in suppliers of gold from one of the red flag locations of gold origin and transit, referred to in 2.2.1.

b. Suppliers or other known upstream entities are known to have sourced gold from a red flag location of gold origin and transit in the last 12 months.

c. Discrepant or inconsistent KYC information obtained through Identification and verification process of suppliers or refused to provide requested documentation.

d. Supplier or Beneficial Owners are listed in any government lists for Money Laundering, fraud or terrorism or that are listed under international sanctions regulations.

e. Supplier does not have policies and practices related to ethics, integrity, and combatting Money Laundering, bribery, and corruption.

f. Lack of effective assessment of supplier's counterparties risk assessment framework to identify risks in the upstream Supply Chains.

In case of dealing with with ASM gold should also consider the following aspects while identifying and assessing risk

a. Suppliers of ASM gold sources, gold ore processing plant, traders and local exporters.

b. Whether the mining project can be considered legitimate ASM (i.e., legally registered, cooperative-based and/or government-recognized, or central bank supported initiative).

c. Whether the mining practice is subject to standards and best practices.



	d. Whether the ASM gold source considers ethical and environmental elements while handling and processing gold.
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2.3 Undertake Enhanced Due Diligence Measures for High-Risk Supply Chains

<p>If there are high-risk elements or red flags identified in the Supply Chain or unknown information, Regulated Entities should conduct EDD measures prior to engaging with such suppliers.</p> <p>If the Regulated Entity can reasonably determine that there are no high-risk elements or red flags as assessed through Step 2.2 in that Supply Chain, no additional due diligence is required for that Supply Chain. The management systems established under Step 1 should be continued and reviewed on an ongoing basis.</p> <p>EDD consists of site visits, desk-based reviews, and reviewing sample transactions of suppliers on an ongoing basis. EDD for high-risk relationships should be carried out during the establishment of relationship and on an ongoing basis (at least on bi-annual basis).</p>	<p>If there are high risk elements or red flags identified in the supply chain, IPMR conducts an enhanced due diligence in coordination with a third-party compliance service provider, who prepares a comprehensive EDD report using different compliance platforms and sites.</p> <p>The EDD report is so wide it covers all possible risk parameters and provides IPMR with assistance to reach an appropriate decision.</p> <p>Besides this report, IPMR conducts a site -visit a well -developed onsite report guided by the LBMA parameters which is currently initiated and implemented in IPMR. In addition to that, as well as desk-based reviews are conducted to ensure close monitoring.</p> <p>All the above is stipulated in the Risk Control Policy and is effectively monitored by the compliance team. High-risk accounts with IPMR is under frequent review and update every six months however nowadays IPMR does not maintain any High-risk relationships. As defined by the OECD.</p>
<p>2.3.1 Conduct onsite visits to gold suppliers individually or through joint on-the-ground assessment teams or an industry mechanism using competent, suitably qualified, knowledgeable, and independent assessors, to generate and maintain information on the circumstances and processes of the supplier's activities. Regulated Entities can establish such teams independently or jointly with other entities in the upstream Supply Chain. Onsite inspections should be aimed at substantiating the documented KYC information. Irrespective of whether the onsite visit was conducted by way of an assessment team or independently by the Regulated Entity, the factors in</p>	<p>In case onsite visit is requested as stipulated in the risk Ccontrol policy, IPMR conducts oonsite visits to gold suppliers using competent internally or externally assessors to gather information, data and documents.</p> <p>IPMR in 2025 initiated an updated onsite visist report that is guided by the LBMA initiatives regarding the onsite visit obligations.</p> <p>The subject template is a comprehensive report that assists to gather as much as possible information and data regarding the involved</p>



<p>2.3.2 and 2.3.3 must be considered during the onsite visit. The responsibility remains with the Regulated Entity irrespective of whether the on-site carried independently or jointly,</p> <p>2.3.2 : Determine if the Mined Gold is LSM Gold or ASM Gold</p>	<p>customer and assists management to take appropriate and effective decisions.</p>
<p>2.3.3 Gather information/document such as, without limitation:</p> <ul style="list-style-type: none"> a. Identification and verification of each entity in the Supply Chain through operating licenses or similar document; b. identification and verification of the ownership of each entity (direct or indirect ownership up to 25% and above) and connected parties (board of directors and senior management); c. identifying the mines of origin, the transportation routes, and points where gold is traded; d. for ASM, identify whether the mine is involved in a legitimate ASM; e. details of Beneficial Owners and controllers of ASM; f. the methods of gold processing and transportation; g. identification of the related businesses (subsidiaries, parents, and affiliates); h. verification of the identity of the entities using reliable, independent source documents, data or information (e.g. business registers, extract, certificate of incorporation); i. identification of any nexus with the government, political parties, military, criminal networks, or non-state armed groups through screening or publicly available data and research; j. evidence of any serious abuses committed by any party in mines, transportation routes and points where gold is traded and/or processed through the public domain findings or through screening process; k. information on any direct or indirect support to non-state armed groups or public or private security; and l. screening the entity name, ownership including ultimate Beneficial Owners and connected parties through 	<p>IPMR and during onboarding it collects as much as possible of information and documents that includes:</p> <ul style="list-style-type: none"> - The identification and verification of each entity in the supply chain through operating licenses or a similar document. - The identification and verification of the ownership of each entity (direct or indirect ownership up to 25% and above) and connected parties (board of directors and senior management). <p>IPMR did not source any mined gold for the period from 1st January 2024 till 31st december 2025.</p> <p>However, IPMR exerts best effort to identify the mines of origin, the transportation routes, and points where gold is traded.</p> <p>for ASM, identify whether the mine is involved in a legitimate ASM.</p> <p>details of eneficial wners and controllers of ASM as defined above.</p> <p>The methods of gold processing and transportation.</p> <p>The identification of the related businesses (subsidiaries, parents, and affiliates);</p> <p>The verification of the identity of the entities using reliable, independent source documents, data or information (e.g. business registers, extract, certificate of incorporation);</p> <p>The identification of any nexus with the government, political parties, military, criminal networks, or non-state armed groups through screening or publicly available data and research.</p>



government watch lists for finding any sanction listings or adverse media (at a minimum United Nations sanction lists and the UAE local terrorist list should be utilized);

m. current production and capacity of mine(s), a comparative analysis of mine capacity against recorded mine production if possible, and record any discrepancies;

n. current processing production and processing capacity of mine smelt house(s), and a comparative analysis of processing capacity against recorded processing production if possible, and record of any discrepancies;

o. documents related to payments to government or other regulatory agencies related royalties, taxes or fees.

p. all payments made to public or private security forces or other armed groups at all points in the Supply Chain from extraction onwards, unless prohibited under applicable law;

q. militarization of mine sites, transportation routes, and points where gold is traded and exported;

r. KYC information of the gold exporter and all actors in the Supply Chain, including international gold traders and all third party service providers handling the gold (e.g. logistics, processors and transportation entities) or providing security at mine sites and along transportation routes. KYC should consist of the below; and

s. verification of sample documents related to transactions carried out by the supplier.

The evidence of any serious abuses documented by any party in mines, transportation routes and points where gold is traded and/or processed through the public domain findings or through screening process.

The information on any direct or indirect support to non-state armed groups or public or private security; and

The screening the entity name, ownership including ultimate beneficial owners and connected parties through government watch lists for finding any sanction listings or adverse media (at a minimum United Nations sanction lists and the UAE local terrorist list should be utilized);

The current production and capacity of mine(s), a comparative analysis of mine capacity against recorded mine production if possible and record any discrepancies.

The current processing production and processing capacity of mine smelt house(s), and a comparative analysis of processing capacity against recorded processing production if possible, and record of any discrepancies.

Any kind of document that is related to payments to government or other regulatory agencies related to royalties, taxes or fees.

Proof of payments made to public or private security forces or other armed groups at all points in the Supply Chain from extraction onwards, unless prohibited under applicable law.

q. militarization of mine sites, transportation routes, and points where gold is traded and exported.

r. KYC information of the gold exporter and all actors in the Supply Chain, including international gold traders and all third- party service providers handling the gold (e.g. logistics, processors and transportation entities) or providing security at mine sites and along transportation routes. KYC should consist of the below; and

The verification of sample documents related to transactions carried out by the supplier.



	<p>IPMR conducts name screening along with OFAC, and in some cases and in addition to previously mentioned IPMR conducts screening along with Dow Jones, and FACTIVA, In addition to several media platforms, in case of mined gold EDD is mandated, the EDD report expands to cover several compliance databases that generates a comprehensive report and risk rating for the subject customer, onsite visit is also mandated in the case as stipulated in the risk control policy, the onsite visit report has been dramatically improved after been reviewed and updated in guidance with the LBMA onsite report, to ensure effective gathering of all possible information, data, which assists IPMR management of taking appropriate decisions.</p>
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STEP 3: MANAGEMENT OF THE SUPPLY CHAIN RISK

Compliance statement:

IPMR implements a stringent Risk Management system that is demonstrated as below

Demonstration of Compliance:

Management of the Supply Chain Risk

Regulated Entities should evaluate and respond to identified risks through EDD in order to mitigate the identified risks. The following steps are minimum expected in order to mitigate the risks identified. Regulated Entities are encouraged to take into account the potential social and economic impacts of risk mitigation measures adopted by them.

A risk management plan should be subject to continuous review based on changes in circumstances related to business, operations or supply base, risk nature, or a major change in applicable Steps and regulations

IPMR evaluates every relationship initiated, taking into consideration several risk parameters, identifying potential risks related to location, product, transactional, and delivery channels in addition to many other risk parameters.

The risk management system in IPMR is tailored in accordance with:

- OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.
- Due diligence regulations for responsible sourcing of gold.
- EBMC rules for risk based due diligence in the gold supply chain.
- RJCCOP & RJC CoC requirements.

The above-mentioned rules and regulations govern other risk parameters like, for example, human rights, health & safety and environmental management.



3.1 Devise a risk management strategy for the identified risk

According to the risks identified as per procedures in Step 2 of this document, Regulated Entities should adopt risk appetite approach which should establish the methods of risk treatment as below. Risk appetite policy should be part of the overall Supply Chain risk policy.

a. Establish or continue: Based on the documents and information gathered through EDD (Step 2.3), Regulated Entities may establish or continue existing relationships if it assesses that the supplier is managing the risks to a reasonable extent. This should be subject to remedial actions for improvement of suppliers due diligence program in agreement with the Regulated Entity. The Regulated Entity should measure the improvement through quantitative/qualitative analysis. The plan should be approved by senior management and Compliance officer. Regulated Entity should seek significant improvement within 6 months of adoption of the plan. After failed attempts of risk mitigation, in conformity with the recommended risk management plan, Regulated Entities should suspend or terminate the relationship.

b. Suspend: If EDD concludes that there is a founded suspicion of Money Laundering, Terrorist Financing, human rights abuses, environmental degradation direct or indirect support to illegitimate non state armed groups, fraudulent misrepresentation of origin of goods, the Regulated Entity should suspend engagement with such supply chain till risk mitigation measures are adequately completed

c. Terminate: Upon identifying instances of Money Laundering and Terrorist financing, human rights abuse and support to armed conflicts, Regulated Entities should immediately terminate its relationship with the supplier. During such instances, the Regulated Entity should submit an appropriate report to the FIU.

IPMR implements a risk management process that identifies, assesses, risks and incorporates mitigation methods, risk management process is well elaborated in the risk control policy, where based on risk involved risk rating is assigned to each relationship.

Risk appetite is stipulated in the mentioned policy where IPMR implements three scenarios upon the outcome of an EDD report, these scenarios are as below:

Establish controls and continue with the business relationship.

Suspend the relationship with immediate effect, till risk mitigation measures are adequately implemented and reassessed.

Terminate the relationship upon the identifying of instances related to money laundry and terrorist financing, human rights abuse, and support to armed conflicts.

IPMR risk management system follows:

- OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.
- Due diligence regulations for responsible sourcing of gold.
- EBMC rules for risk based due diligence in the gold supply chain.
- RJCCOP & RJC CoC requirements

IPMR in accordance with the MOE Due Diligence in relation to above IPMR considers the immediate termination and the reporting within five working days to the FIU through the GoAML platform.

EDD on transaction level checklist is mandated to be completed whenever required.

3.2 Risk Control Plan

Regulated Entities that adopt an 'Establish/Continue' or 'Suspend' approach, shall adopt a Risk Control Plan which should include, at minimum:

a. reporting mechanisms for identified risks to the senior management;

b. enhanced engagement with suppliers through establishing a Chain of Custody and/or traceability system

IPMR implements a comprehensive risk control policy that follows the following:

- OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.
- Due diligence regulations for responsible sourcing of gold by the MOE.
- EBMC rules for risk based due diligence in the gold supply chain.



<p>where a red flag has been identified c. enhancement of the physical security practices;</p> <p>d. physical segregation and security of shipments where a red flag has been identified;</p> <p>e. an agreement with the supplier which facilitates timely and accurate provision of additional information related to supply chain with identified risks.</p> <p>f. disengaging with suppliers for at least 3 months, when they fail to comply with the mitigating controls within a period of 6 months, and/or disengaging entirely if such controls are not feasible and/or unacceptable in light of the cost-benefit analysis and the capabilities of the Regulated Entities conducting the due diligence.</p> <p>g. reviewing on a regular basis the results of the mitigation measures, undertaking additional fact & risk assessments for identified risks requiring mitigation or after a change of circumstances.</p>	<p>- RJC COP & RJC CoC requirements</p> <p>The risk management system in IPMR is risk based and it considers all possible risk factors, red flag identification and handling process are crucial factors in the system. Based on the evaluation of the identified red flag IPMR may apply any of the three following scenarios (based on the case).</p> <ul style="list-style-type: none"> a- Either to continue with the relationship b- Suspend and impose controls. c- Terminate and regulatory reporting. <p>The above -mentioned scenarios are based on the outcome of the red flag investigation and conclusion.</p>
<p>3.3 Continuous Monitoring</p> <p>Supply Chain Due Diligence is a dynamic process and requires ongoing risk monitoring. After implementing a Risk Control Plan, Regulated Entities should assess if Step 2 should be repeated or, any further enhanced measures are required. Any changes in the Supply Chain may require the Regulated Entity to repeat some due diligence steps to ensure effective monitoring of risk</p>	<p>Supply Chain Due Diligence in IPMR is a dynamic process and is under ongoing risk monitoring.</p> <p>IPMR is registered with the ongoing monitoring feature with worldcheck, hence receives alerts whenever any update is done on any of our customers database.</p> <p>IPMR is registered with the EOCN- notification center hence it receives all updates to the consolidated UN sanctions.</p> <p>All relationships with IPMR are under ongoing monitoring based on the risk rating assigned to each relationship where low risk rated relationships are reviewed every two years, medium risk rated relationships are reviewed every one year, while high risk rated relationships are reviewed every six months.</p> <p>Daily transactions are monitored to ensure they are genuine, supported with sufficient documents, Screening is also mandated along worldcheck on the transaction level.</p> <p>Risk -Management process is under review at least on an annual basis or whenever required by the business and/ or compliance to ensure that the risk management system is always in compliance with the prevailing rules, regulations, and international business best practices.</p>



EDD on transaction level checks is mandated to be completed whenever required.

STEP 4: INDEPENDENT THIRD-PARTY AUDIT OF DUE DILIGENCE MEASURES

Compliance statement:

IPMR is subject to third-party independent audit as mandated by the MOE and SAIF Zone, in addition to RJC COP and CoC audits. The thirdparty auditor is a well-known professional independent audit firm that applies highest standards in their audits.

Demonstration of Compliance:

Regulated Entity's compliance with the Regulations will be subject to annual independent third-party audit by an accredited Reviewer as stipulated in the Review Protocol (ANNEX I).

Review of a Regulated Entity's Supply Chain Due Diligence framework should be carried out by an approved Reviewer and should be arranged at the Regulated Entity's own cost. The recommendations in this section shall not be considered as an audit standard; however, they outline some basic principles, scope, criteria, and other basic information for consideration by entities.

The Review Protocol sets principles to be followed by Reviewers while conducting independent third party audit of a Regulated Entity which is mentioned in ANNEX I of this Regulations

- In accordance with the due diligence for responsible sourcing of gold by the MOE, IPMR is subject to an annual thorough audit.
- IPMR has undergone the first audit in 2024, where it has been assigned as low risk, and was submitted to MOE.
- IPMR will undergo the audit of the year 2025 by the end of January 2026.
- In relation to above, IPMR is subject to an audit conducted by SAIF being located there on an annual basis.
- IPMR is certified by the RJC COP & CoC, hereby it is subject to continuous audits to renew the related accreditations. The coming audit is scheduled by end of January 2026.
- All the above audits are conducted by an independent thirdparty auditor, who maintains the expertise, knowledge, and independency.



4.1 Audit Plan

Regulated Entities should plan the audit in line with the Regulations and consider the below elements.

4.1.1 Audit scope: the audit scope should include all the major elements of a Supply Chain Due Diligence framework as outlined in the Regulations. These are Supply Chain Due Diligence policy and procedures, the processes and systems, Supply Chain risk assessment and risk mitigating measures, supplier engagement details, chain of custody, and other traceability information.

4.1.2 Audit criteria: The audit should determine the conformity of the implementation of a Regulated Entity's Supply Chain Due Diligence framework against an audit standard that is based on the Regulations. This should also determine conformity to and compliance with the Regulations in all communications with participants across the entire Supply Chain.

4.1.3 Audit principles:

a. Independence: The Reviewer organization and all of its members must be independent from the Regulated Entity as well as from the Regulated Entity's subsidiaries, licensees, contractors, and suppliers. The auditors must not have conflicts of interests with the Regulated Entity, including business or financial relationships with the Regulated Entity. The Reviewer also should not have provided compliance consultancy (such as setting up a compliance framework or drafting compliance policies) services during the past 12 months.

b. Competence: Reviewers should be competent enough to conduct the review efficiently. The review should be carried out in accordance with accepted auditing standards. Reviewers should also have personal attributes such as integrity, confidentiality and professionalism. The Reviewers should also have specialist skill-set related to Supply Chain due diligence principles, procedures and techniques and internationally accepted guidelines i.e. OECD Guidelines. The knowledge of gold procurement practices, geographical context etc. are a prerequisite for reviewers.

c. Accountability: List of accredited Reviewers shall be published on the MoE's website.

4.1.4 The audit activities:

IPMR related audits are conducted by a competent third party independent auditors that maintain competence, knowledge, and experience.

Audits are in alignment with Scope, Criteria and principles as mentioned.

The audit visit includes desk research, documentation, onsite visits and follows criteria requested.

The auditors mentioned follow the rules mandated by MOE as follows:

Audit plan:

IPMR coordinates with the audit to schedule and plan the audit in line with the Regulations and consider the below elements.

Audit scope: the audit scope includes all the major elements of the supply chain due diligence framework as outlined in the MOE related regulations. These are Supply Chain Due Diligence policy and procedures, the processes and systems, Supply Chain risk assessment and risk mitigating measures, supplier engagement details, chain of custody, and other traceability information.

Audit criteria: The audit should determine the conformity of the implementation of IPMR's supply chain due diligence framework against an audit standard that is based on the MOE regulations. The auditors exert best efforts to appropriately determine the conformity of IPMR to the compliance with the Regulations in all communications with participants across the entire Supply Chain.

Audit principles: the following are in place with regards to our auditors:

a. Independence: The Reviewer organization and all its members are independent from IPMR as well as from our subsidiaries, licenses, contractors, and suppliers. The auditors do not maintain any conflicts of interest with the IPMR, including business or financial relationships with us.



a. Audit Preparation: The objectives, scope, language, and criteria for the audit should be clearly communicated to the Reviewers with any ambiguities clarified between the auditee and Reviewers before the initiation of the audit.

b. Onsite Investigation: The reviewers must conduct onsite investigations and gather evidence and verify information by conducting interviews with management, making observations; and reviewing documents. The review should include visits of all sites where the Regulated Entity carries out business and should thoroughly review sample from suppliers of Regulated Entities.

c. Document Review: Sample documents gathered during the review i.e., documents retained as part of a Regulated Entity's Supply Chain Due Diligence framework, sample documents related to the Regulated

The Reviewer did not provide any compliance consultancy (such as setting up a compliance framework or drafting compliance policies) services during the past 12 months.

b. Competence: The reviewers are competent enough to conduct the review efficiently. The review is always carried out in accordance with accepted auditing standards. Reviewers have personal attributes such as integrity, confidentiality and professionalism. The Reviewers have specialist skill set related to supply chain due diligence principles, procedures and techniques and internationally accepted guidelines i.e. OECD Guidelines. The knowledge of gold procurement practices, geographical context etc. are a prerequisite for reviewers.

c. Accountability: the selected reviewer is one of the accredited reviewers by the MOE.

4.1.4 The audit activities:

a. Audit Preparation: The objectives, scope, language, and criteria for the audit are clearly communicated to IPMR with any ambiguities clarified.

b. Onsite Investigation: The reviewers conduct onsite investigations and gather evidence and verify information by conducting interviews with management, making observations; and reviewing documents. The review should include visits to all sites where IPMR carries out business and should thoroughly review sample suppliers of IPMR.

IPMR has an operating site which is in Sharjah Airport International Free Zone, it conducts a refining activity to precious metals (gold and silver), no other activity is conducted.

A representative office is in Dubai gold souk, no refining process is conducted there, DXB office is an administrative office, to ensure IPMR's presence in the market, meeting customers, and paperwork, the site is always visited by the auditors.

c. Document Review: Sample documents are gathered during the review i.e., documents



	<p>retained as part of IPMR's supply chain due diligence framework, sample documents related to IPMR as an organization.</p>
<p>4.2 Audit implementation: Audit should be implemented in accordance with the audit scope, criteria, principles and activities as documented in Step 4 of the Regulations. Regulated Entities should co-ordinate the relevant stakeholders to carry out audits in line with recommended audit standard as set out in this document</p>	<p>Being a regulated entity in SAIF and is accredited by the RJC for the COP& CoC requirements. Audits conducted are in alignment with:</p> <ul style="list-style-type: none"> - OECD due diligence guidance for responsible supply chain of minerals from CAHRAs. - Due diligence regulations for responsible sourcing of gold by the MOE. - EBMC rules for risk based due diligence in the gold supply chain. - RJC COP & RJC CoC requirements

STEP 5: ANNUAL REPORTING ON DUE DILIGENCE MEASURES

Compliance statement: The subject report is to be published on IPMR website, in addition to many other related policies related to IPMR's supply chain, AML, compliance policies. To ensure the utmost transparency among its stakeholders.

Demonstration of Compliance: IPMR publishes the DD report, supply chain policy, the management report issued by the auditors and many other policies on its website for easy access to all its stakeholders, in addition IPMR communicates all data and information to its regulators whenever requested.



5.1 Management Systems

The Regulated Entities Comprehensive Management Report should include the management systems requirements as set out in Step 1 of the Regulations.

<p>Management Systems</p> <p>The Comprehensive Management Report should include:</p> <ol style="list-style-type: none"> the Regulated Entity's management structure, roles and responsibilities with regard to Supply Chain Due Diligence; policy & procedures; KYC & information collection procedures; database & record keeping system; and procedures for identification and verification of all counterparties in the Supply Chain system 	<p>The comprehensive management report includes:</p> <ul style="list-style-type: none"> - IPMR managements structure. - IPMR's updated policies and procedures. - KYC & KYCC requirements and implementation. - Data base and record keeping. - Procedures for identification and verification of counterparties.
<p>5.2 Risk assessment</p> <p>Regulated Entities should include in their Comprehensive Management Report the risk assessment procedures (Step 2). In particular, Regulated Entities should include:</p> <ol style="list-style-type: none"> how the red flags are identified; details of the red flags identified; describe the steps taken to map the factual circumstances of those red flag operations and red flagged Supply Chains; methods of assessment teams including collaboration with other stakeholders in the Supply Chain; and actual or potential risks identified. 	<p>IPMR implements a comprehensive risk control policy that follows the following:</p> <ul style="list-style-type: none"> - OECD due diligence guidance for responsible supply chain of minerals from CAHRAs. - Due diligence regulations for responsible sourcing of gold by the MOE. - EBMC rules for risk based due diligence in the gold supply chain. - RJCCOP & RJC CoC requirements <p>Red flag identification process and handling, steps to be taken regarding any identified red flag are clearly elaborated in the risk control policy, it is endorsed by senior management, and its implementation is closely monitored by eth compliance team in IPMR.</p> <p>Red flag list in IPMR is a dynamic document, it is prepared and frequently reviewed and updated to ensure the accommodation if any concern is raised.</p> <p>The updated red flag list is communicated to all staff to enhance their awareneess and to ensure that ll employees ae on the same page and direction.</p> <p>It includes the process of Risk Assessment in IPMR as mandated.</p>
<p>5.3 Risk Management</p> <p>Regulated Entities should include, in their Comprehensive Management Report, the risk management procedures (Step 3). In particular, Regulated Entities should include:</p>	<p>IPMR implements a comprehensive risk control policy that follows the following:</p> <ul style="list-style-type: none"> - OECD due diligence guidance for responsible supply chain of minerals from CAHRAs.



- a. the internal controls that would have assisted in gathering required information on red flagged Supply Chain;
- b. describe the steps taken to manage risks, including a risk strategy for risk mitigation, procedures and mechanism in place to monitor remediation activities; and
- c. details of actions taken as part of risk mitigation (number of instances where a Regulated Entity has decided to continue, suspend or terminate relationships) without disclosing the identity of those suppliers, except where law allows to do so.

- Due diligence regulations responsible sourcing of gold by the MOE.
- EBMC rules for risk based due diligence in the gold supply chain.
- RJC COP & RJC CoC requirements

The risk management system in IPMR is dynamic and is subject to review, update on an annual basis, or whenever required as per the business and/ or compliance requirements.

The risk management system is designed in compliance with all above related regulations, in addition to the best international business practices.

The risk management system in IPMR is endorsed by the senior management, its implementation is closely monitored by the compliance team in IPMR.

The risk management process in IPMR covers several risk parameters such as, for example:

- Location, product, transactional, counterparty, and delivery channels and others.
- All relationships are assessed and assigned a risk rating commensurate with the level of risk involved, where frequency of review and approval matrix in relation on risk rating assigned.

The IPMR Comprehensive report includes risk management process in IPMR and describes the steps taken to mitigate identified risks (scenarios to be followed by IPMR once risks are identified). As all elaborated in the risk control policy

All stipulated in the risk control policy.

AN OVERVIEW OF THE MANAGEMENT ASSESSMENT FOR ALL THE REQUIREMENTS OF THE MOE REGULATIONS
FOR RBDG

FRAMEWORK STEPS	RATING
STEP 1: ESTABLISHING AN EFFECTIVE GOVERNANCE FRAMEWORK	<input type="checkbox"/> <i>Fully compliant</i> <input type="checkbox"/> <i>Compliant with Low-Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: Medium Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: High Risk Deviations</i>
STEP 2: IDENTIFICATION AND ASSESSMENT OF THE SUPPLY CHAIN RISK	<input type="checkbox"/> <i>Fully compliant</i> <input type="checkbox"/> <i>Compliant with Low-Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: Medium Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: High Risk Deviations</i>
STEP 3: MANAGEMENT OF THE SUPPLY CHAIN RISK	<input type="checkbox"/> <i>Fully compliant</i> <input type="checkbox"/> <i>Compliant with Low-Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: Medium Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: High Risk Deviations</i>
STEP 4: INDEPENDENT THIRD-PARTY AUDIT OF DUE DILIGENCE MEASURES	<input type="checkbox"/> <i>Fully compliant</i> <input type="checkbox"/> <i>Compliant with Low-Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: Medium Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: High Risk Deviations</i>
STEP 5: ANNUAL REPORTING ON DUE DILIGENCE MEASURES	<input type="checkbox"/> <i>Fully compliant</i> <input type="checkbox"/> <i>Compliant with Low-Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: Medium Risk Deviations</i> <input type="checkbox"/> <i>Non-compliance: High Risk Deviations</i>

Table 3: Management conclusion

Is the Refiner in compliance with the requirements of the MOE_Due Diligence Regulations for Responsible sourcing of Gold V1" Version 1/2022, for the reporting period?	
[Yes/No]	<p>YES</p> <p>In conclusion, IPMR implemented effective management systems, procedures, processes and practices to conform to the requirements of the MOE_Due Diligence Regulations for Responsible sourcing of Gold V1" Version 1/2022, as explained above in Table 2, for the reporting year ended 31 December 2025.</p> <p>IPMR is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. Corrective Action Plans are communicated separately to the MOE Executive, in its role as administrator of the MOE_Due Diligence Regulations for Responsible sourcing of Gold V1" Version 1/2022</p>

Table 4: Other report comments

Based on above IPMR is found in full compliance with the Due Diligence Regulations for responsible sourcing of metals from CAHRAs

Location: SAIF ZONE

Date: 13th January 2026

Sign and Company Stamp:


