

Document Title	WHISTLE-BLOWING Policy in IPMR
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Document Owner	IPMR Compliance
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1- INTRODUCTION

At IPMR, we are committed to the highest levels of ethics and integrity in the way that we do business. We understand that this is crucial to our continued success and reputation. We have a professional responsibility to speak up and report unethical behaviour. IPMR's Whistle-blowing policy (the policy) is an important element in detecting corrupt, illegal, or other undesirable conduct. IPMR strongly encourages you to speak up if you suspect or witness any matters of concern. IPMR will take all reports made under this policy seriously.

We expect everyone who works for IPMR to comply with our code of conduct, our policies and procedures, laws, rules, regulations, and international best business practices. You also have a responsibility to speak up using any of the available channels. We encourage you to consider talking to your trusted IPMR representative, manager, or if external to IPMR contact. We would rather hear your concerns directly so that we can resolve them directly. If you make a Whistle-blower Report pursuant to this Policy, we have a responsibility to protect you, including not disclosing your identity (unless required or permitted by law) and making sure you are not subject to detrimental conduct. IPMR does not tolerate any form of detrimental conduct taken by any person against the whistle-blower, or any of the people that are involved in an investigation of a whistle- blower report.

2- OBJECTIVES OF THE POLICY

- Stipulates whistleblowing in IPMR's culture.
- Identify methods of whistleblowing in IPMR.
- How to investigate a whistleblowing in IPMR?
- Protection of whistle-blower in IPMR.

3- SCOPE OF THE POLICY

This policy applies to all IPMR staff, both temporarily staff or permanent staff. Customers/suppliers and any other party is encouraged to whistle-blow when found applicable. Customers with complaints may refer to IPMR Grievance policy published on IPMR website. Or they may contact their relationship manager ("RM").

4- WHISTLE-BLOWER POLICY IN IPMR

What is whistle Blowing?

Whistle Blowing means making a disclosure to IPMR Senior management (internally) or in the public interest (externally). IPMR is committed to the highest standards of openness, probity, and accountability in the global industry and/ or precious metals for concerns about suspicious or illegal acts involving gold and/ or precious metals trade in a responsible and effective manner.

These concerns may include, but are not limited to, the following:

- 1- Financial malpractice or impropriety of fraud.
- 2- Failure to comply with legal obligation or applicable laws.
- 3- Human right abuses including dangers to health, safety, and child labour.
- 4- Severe damage to the environment.
- 5- Criminal activity.
- 6- Improper conduct or unethical behaviour.
- 7- Attempts to conceal any violations of the OECD due diligence guidance for responsible supply chain from CAHRAs, EBC rules for risk based due diligence in the gold supply chain, prevailing rules, regulations, and international best business practices as for example (RJC COP & RJC CoC).
- 8- Falsification of documents and /or fraudulent suppliers.
- 9- Offering or accepting a bribe.
- 10- Direct or indirect link to conflict gold financing: terrorism financing, and weapons of mass production proliferation.
- 11- Direct or indirect violations of prevailing related rules, regulations, laws, and international business best practices (RJC COP & RJC CoC , EBC as an example).

How do I make a whistle- blower report in IPMR?

Before making a whistle-blower report in IPMR you should satisfy yourself that you have a reasonable grounds to suspect reportable conduct. "Reasonable grounds to suspect are based on an objective reasonableness of the reasons of the suspicion.

Whistle -blower report in IPMR can be done through, there are two options for whistleblowing in IPMR either

In case of non-anonymous disclosure, whistle-blower may:

call or submit a written report to the IPMR compliance officer, OR contact your direct manager, supervisor. In case that the report is filed against the compliance officer you may contact directly either your direct manager or the IPMR senior management.

In case of anonymous disclosure, whistle blower may:

Drop your written report in the box located in T5-007 entrance on the ground floor and specially designated to that purpose. The box is under the custody of IPMR Compliance who inspects the box monthly and proceed with appropriate action. The compliance officer will take steps to investigate the submitted report, escalate to senior management if found required. Investigation and decision are based on case by case and depends on the evidence, and/ or proof associated with the submitted report.

Investigation process in IPMR is designed to ensure:

- Matters reported will be assessed by the compliance officer in coordination with senior management and may be subject to investigation.
- Disclosures will be handled confidentially by the compliance in coordination with related parties on ("Need to Know") basis.
- Fair treatment of the individuals mentioned in the whistle- blower report is maintained.
- Be conducted as quickly, efficiently as the circumstances permit.
- Determine whether there is enough evidence to substantiate the matters reported. be independent of the person (s) concerned with the allegation.
- There will be always a presumption of innocence until the outcome of the investigation is determined. And the purpose of the investigation is to determine whether there is enough evidence to substantiate the matters reported.
- Once the report and a decision are concluded, IPMR compliance officer will notify the reporter officially with the outcome of the investigation.

In general, when making a disclosure you will be expected to have reasonable ground to suspect the information you are disclosing is true, but you will not be subject to penalty or disciplinary action if the information turns to be incorrect. You must not make a report that you know is not true, or misleading. This case will be considered a breach to IPMR code of conduct, and the involved staff may be subject to disciplinary action. In addition to that it will be considered serious matter that may also have legal consequences.

Anonymous disclosure:

IPMR encourages staff members to put their names to any disclosure, however anonymous disclosures may be considered at the discretion of IPMR compliance. In exercising this discretion seriousness of the issue raised, credibility of the concern, and the likelihood of confirming the allegation from attributable sources will be taken into consideration.

WHAT SHOULD I INCLUDE IN THE REPORT?

You need to provide as much details as possible for example:

- Date, time, and location of the incident.
- Name of person (s) involved.
- Nature of the concern.
- How you became aware of the incident.
- Possible witness.
- Any other related information, documents, and supporting.

5- DEFINITIONS

- IPMR means International Precious Metal Refiners
- EBC means the Emirates Bullion Market Committee
- RBD-GPM means Risk Based Due- Diligence
- GPM means Gold and Precious Metals
- AML means Anti Money Laundry
- CFT Means Combating Financing terrorism
- WMP means Weapons of Mass Production.
- RM means Relationship Manager in IPMR.
- RJC means Responsible Jewellery Council
- COP means Code of Practice requirements by RJC
- CoC means Chain of Custody requirements by RJC
- EBC mean The Emirates Bullion Committee

6- REFERENCES

- EBC Rules for risk based due diligence in the gold supply chain.
- The UAE Federal Penal Code “The Code”.
- IPMR Risk Control Policy and its amendments.
- IPMR staff code of conduct.

7- WHERE TO GET HELP?

For queries, and assistance please contact your direct supervisor. For further assistance please contact the compliance officer.

For external please contact your relationship manger/ or send an email to: info@ipmr.com

8- TRACK CHANGES

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