



Annual Business Responsible Report
For the year 2024. Dated 8th January 2025

1- Introduction

- The subject document presents that annual business responsible report prepared by the compliance officer and been discussed along with senior management. The report covers the period from 1st January 2024 and till 31st December 2024.

This document comprises of 5 sections as below:

- Section A General Information about IPMR
- Section B Financial Compliance
- Section C Social Compliance
- Section D Human Rights Compliance
- Section E OECD Compliance Report.

SECTION A General Information about IPMR.

- In IPMR we do believe that human resources are our asset, our team maintains knowledge, experience and appropriate qualifications for each role, as a team it acts collectively to create an environment where we not only go to provide services to our customers, but to anticipate our customer's needs, follow through on them in a compliance regulatory environment.

IPMR with over than 15 years of experience this state-of-the-art gold and silver refinery, places your assets where they will be in high demand, and also offers a number of other strategic advantages. our vision is to become the leading internationally recognized precious metal refinery and to achieve our vision IPMR is committed to:

- Customer orientation, security, hard work, growth, and attention to details as our pillars of our success.
- Offering high quality products to our customers across geographical areas.
- Demonstrating trustworthiness through our compliance with the rules, regulations, and international business best practices whenever applicable.
- Fostering a culture of innovation and improvement.
- Strength our relationships with different regulatory bodies inside the UAE as well as internationally.
- Ensure keeping abreast and fully compliant with regulatory requirements.

SECTION B Financial Compliance in IPMR

B.1 Money Laundering, Terrorism financing, Weapons proliferation, Targeted Finance Sanctions

- IPMR, has recognized the fact that entities in precious metals industry must take the onus of analysing their potential vulnerabilities to money laundering and other related

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financial offences and implement specific steps that are required for protection against abuse by criminals.

- IPMR appointed a designated senior staff to perform the role of the Compliance Officer and the Anti-Money Laundering Reporting Officer duties and functions.
- In accordance with the MOE requirements and to ensure the independency of the compliance function the current CO will step down and will be assigned to handle the business side while the compliance function will be conducted by the rest of the compliance members.
- The CO role is IPMR will be assigned to Jane Camil will be the designated CO for IPMR with effect of 1st of January 2025, till that date she will be under close training and supervision by the current CO to ensure smooth, efficient hand over.
- IPMR has set stringent internal policies to be adhered by all staff in IPMR, their implementation and adherence are monitored by the designated CO/AMLRO in the organization.
- Know Your Customer, Risk Assessment, and ongoing monitoring are properly implemented in IPMR, EDD is mandated whenever any red flag is identified at any point of time.
- Risk Management system in IPMR is subject to an annual review and/or whenever required taking into consideration updates and amendments in related rules, regulations, and laws.
- During 2024 IPMR compliance has submitted DPMSR through GoAML platform in accordance with the mandated rules of the Ministry of Economy.
- One (1) Suspicious Activity Report SAR was submitted through GoAML platform that pertained to a potential customer that approached IPMR to open an account, while compliance checks it has been identified that the company's owner was involved in ML and corruption, the report was submitted, and the account has been rejected by IPMR.
- IPMR received the MOE-AML survey for the year 2023, the mentioned survey was completed and submitted on time.
- IPMR was subject to the RJC-COP related inspection audit, and it has been accredited for the second time with the RJC-COP accreditation for three consecutive years with no mid-term audit based on the stringent internal control system implemented.
- IPMR was subject to the MOE and EBC related inspection audit, and risk level in IPMR was classified as Low-risk in both reports, however the auditor was contacted by the DMCC, and the risk rating was changed from Low-risk to Medium.
- An appeal had been officially submitted to DMCC no reply has been received despite of IPMR continues follow-up with DMCC management.
- IPMR RJC-COP certificate was granted for the second time for three consecutive years with no mid-term audit based on the stringent internal control system implemented.



Areas of Concerns and Remedial Actions:

- As highlighted and in accordance with the MOE/ EBC requirements has strengthened the level of existing EDD with respect to sourcing of non-branded bars. needs to be improved. EDD checklist on transaction level has been introduced and implemented accordingly, the check list is to be completed to ensure the conflict-free origin of metal.

B.2 Anti-Bribery and Facilitation Payment Policy:

- IPMR has in place a policy that stipulates complete prohibition of Bribery and facilitation payment across the organization.
- Separate LOG is created, monitored that includes any gifts provided and / or received with minimal economic value, the subject LOG is monitored by the CO.
- Grievance mechanism is appropriately set in IPMR to receive any grievance or complaints.

Areas of Concerns and Remedial Actions:

- All gifts received was in alignment with threshold and are properly logged.
- No grievances have been raised and or received through any of provided channels.

B.3 Ethical sourcing of Gold and Silver

- IPMR is concerned about the environment and social impacts of irresponsible mining.
- IPMR, has identified the risk of supply chain with respect to conflict affected and high-risk areas for reducing the potential risks may be associated.
- IPMR maintains a stringent onboarding process applies to all customers, (gather information, documents, identify shareholders and UBOs, identify FPEP, Compliance screening, Risk assessment, ...etc)
- Related supply chain policy is published on our website for easy public reference, links to OECD, MOE, EBC, and other international regulations is provided to all IPMR customers to ensure their full awareness and abidance.
- GoAML reporting is promptly conducted in accordance with the prevailing regulations whenever applicable.
- During the year IPMR only one SAR was submitted as mentioned above, no partial or full match reports have been identified and /or reported.

Areas of Concerns and Remedial Actions:

- IPMR faces a challenge with some of its customers that are reluctant to provide details about their suppliers. IPMR meets regularly with its customers building a rapport and enhances comforts and level of confidence and transparency.
- IPMR has set a dedicated team responsible of on-site visits to mines whenever required, however no mined materials have been sourced during 2024.
- Ongoing monitoring is conducted in IPMR to ensure compliance measures are in place.



- To enhance the customers awareness and ensures that all parties are on the same page, IPMR maintains the long-term momentum with its customers through visits, communications, and emails, creating awareness about our ethical sourcing requirements for our supply chain through the frequent meetings with our suppliers and sharing applicable regulations.

SECTION C Social Compliance

- IPMR ensures its full compliance with all applicable national and, where appropriate, international laws/ regulations with respect to employment and labour related matters.
- IPMR maintains an appropriate Human Resources manual in place that stipulates all related matters, it is subject to frequent review and update taking into considerations related rules amendments and updates.
- IPMR respects all regulations with regards to child labour, forced labour non-discrimination, non- retaliation, and others.
- IPMR maintains an appropriate grievance mechanism, suggestion, and complaints are always encouraged.

Areas of concerns and Remedial Actions

- No complaints have been reported during the year 2024.

Health and Safety:

- IPMR is committed to provide health and safety measures to all its employees and are constantly studding about any adverse impact of our business processes are identified and eliminated.
- Appropriate Health and safety manual is in place, related training is conducted and provided to IPMR employees frequently.
- PPE is continuously provided to all concerned staff free of cost.
- Health and Safety committee is convened on a quarter basis for related topics discussion, escalation, and decision.
- All workplaces are constructed to meet safety standards with local regulations as the minimum standards that will be applicable.
- A Separate fire extinguisher report check report was introduced, it is prepared every six months, any discrepancy is promptly highlighted, escalated, and resolved accordingly.

Areas of concern and Remedial Actions:

- Incidents are appropriately Logged, escalated, investigated where root cause are identified, and corrective actions are implemented.
- No incidents are officially reported.



Environment Protection

- IPMR complies with all applicable environmental laws and regulations.
- The impact of each of our operations are thoroughly studied and assessed along with applicable standards and laws.
- Disposal procedures for waste generated are followed in line with applicable national and international laws.
- Environmental management manual is in place and related training is provided to all concerned employees.
- All related licenses and permits are updated.
- All related trainings have been conducted to all involved staff.

SECTION D Human Rights Compliance

- IPMR is committed to fully compliance with prevailing related laws as applicable.
- IPMR, is not and will not interfere in the right of employees to observe tenets or practises based on caste, race, national origin, gender, religion.
- The company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behaviour.
- Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by IPMR.
- IPMR ensures that none of its suppliers and stake holders have engaged in any activity which can violate the Human Rights principles.
- All above is stipulated in the Human Resources manual that is under yearly review or whenever required taking into consideration all updates and amendments in the related prevailing laws, regulations.

Areas of concerns and Remedial Actions

- No incidents and/ or areas of concerns have been identified during the reported period.

SECTION E OECD Compliance Report

Step 1 Establish strong company management systems.

1.A Adopt and clearly communicate to suppliers and the public company policy for the supply chain of mineral originated from conflict affected and high -risk areas.

- IPMR has established its supply chain policy, approved by Senior management, and published on IPMR official website.
- The Supply chain policy is communicated to all suppliers during onboarding and to all IPMR staff and stakeholders.

1.B Structural internal management system to support supply chain due diligence.

- IPMR has established a stringent compliance culture within the organization.
- IPMR has established a strong risk assessment management system to ensure that all its supplies are conflict free and ethically sourced.



- IPMR has carried during the reported period counterparty risk assessment in accordance with the OECD requirements.

1.C Establishing system of controls and transparency over the minerals supply chain.

- IPMR suppliers are obliged to provide information and related documents, which is analysed to identify potential risk of CAHRAs if any.

1.D Stringent company engagement with suppliers.

- Regular communications are carried out with IPMR suppliers, ongoing monitoring is carried to strengthen the supply chain and to enhance awareness level and compliance with the OECD requirements.

Step 2 Identify and assess risks in the supply-chain.

- IPMR has established a stringent risk assessment system to identify potential risks in the supply chain. And assess its impact considering the OECD requirements.
- Ongoing monitoring, KYC, and EDD are pillars of the risk assessment management system in IPMR to ensure continuous compliance with the said requirements.

Step 3 Design and Implement a strategy to respond to identified risks.

3.1 Report Findings of the supply chain risk assessment to the designated senior management of the company

- IPMR has established a robust risk management system that identifies risks, the compliance officer is held responsible of monitoring the system, escalation of identified risks.

3.2 Devise and adopt a risk management plan.

- IPMR has adopted a strategy of risk identification, management as clearly stipulated in the related Risk Control Policy (RCP). Different scenarios have been identified along with the related actions.

3.3 Implement the risk management plan and monitor the performance of the risk mitigation efforts.

- The compliance officer in IPMR is held responsible to implement, monitor, and track performance of risk mitigation efforts reporting back to IPMR Senior management.
- CO is responsible to monitor the effectiveness of the risk management system mitigation actions taken and revised status of associate risk whenever applicable.



Step 4 Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.

- RJC COP audit has been conducted in February 2024 for the certificate renewal, and IPMR has been granted the RJC-COP for another three consecutive years (till April 2027).
- IPMR is subject to MOE related audit inspection on an annual basis in accordance with prevailing regulations.

Step 5 Report on supply chain due diligence

- Subject report is prepared by the designated compliance officer, discussed with senior management, and published on the company's official website.

INTERNATIONAL PRECIOUS METAL REFINERS

Compliance Officer / Anti-Money Laundering Reporting Officer

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