



International Precious Metal Refiners IPMR Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict- Affected and High-Risk Areas (CAHRAs)

IPMR is fully committed in providing high quality services and products to its customers while meeting the highest ethical standards with respect to the responsible sourcing.

IPMR recognizes the risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and we recognize that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

IPMR Risk and Compliance Statements

- 1- IPMR statement with regards to serious violations relating to the extraction, transportation and commerce of valuable minerals** Moreover and while conducting our business or acquiring metals in areas conflicted or in high risk areas none of the below will be tolerated and IPMR immediately will reject / cease any transaction.
 1. Forced labour or non-voluntary work under threat
 2. Child labour use not permitted by law
 3. Other human rights violation such sexual violence
 4. Crimes such as ethnic cleaning, crimes against humanity, war crimes and serious violation of human rights
 5. Health, and safety measures.

- 2- IPMR statement with regards to direct or indirect support of non- governmental armed groups** none of the below subjects will be tolerated by IPMR. Concerning direct or indirect support of non-governmental armed groups or those in collusion during extraction, transportation, trade, import or export stages of the mineral.
 1. Illegal control of areas or transportation routes within the supply chain
 2. Illegal taxation, money extortion or racketeering in entry to mining or transportation routes
 3. Illegal taxation or extortion of money from intermediary organizations, export companies or from persons engaged in international trade.
 4. Illegal health, safety measures and/ or human rights violation.

- 3- IPMR statement with regards to public or private security forces** IPMR shall not have any illegal taxation and money extortion relationship concerning mining areas, transportation routes, places where mineral trade is conducted, or elements closely related with supply chain which are under illegal control of public or private security forces. IPMR shall be aware of the role of public or private security forces charged with the safety of mining areas, transportation routes, personal employed at such places, materials, equipment, and trade conducted. Our company and others on our supply chain shall only enter into agreements with public and private security forces and that provides services in the context of safety and human rights within the framework of international standards and principles.



- 4- **IPMR statement with regards to money laundry and terrorist financing** IPMR takes all reasonable preventive measures, efforts and applications to obstruct money laundering and terrorist finance during the entire process covering mineral extraction, transportation, trade stages, including at points of passage to mining area, exports and taxation. The above is secured by the on boarding process to all clients that covers areas of KYC, KYCC, source of funds and wealth in addition to frequent monitoring and update. It is the responsibility of the compliance officer “Controller” to ensure effective implementation and prompt escalation to any identified / suspicious transaction. It is one of the main roles of the compliance officer to promptly report any suspicious transaction reports after been discussed with IPMR Senior Management.
- 5- **IPMR statement with regards to human rights violation, health, and safety measures breach** IPMR takes all reasonable preventive measures, efforts and applications to obstruct the violation of human rights laws and breach of health, and safety measures as mandated by prevailing laws and regulations and in alignment with international business best practices during the entire process covering mineral extraction, transportation, trade stages, including at points of passage to mining area, exports and taxation. The above is secured by the on boarding process to all clients that covers areas of KYC, KYCC, source of funds and wealth in addition to frequent monitoring and update. It is the responsibility of the compliance officer “Controller” to ensure effective implementation and prompt escalation to any identified / suspicious transaction. It is one of the main roles of the compliance officer to promptly report any suspicious transaction reports after been discussed with IPMR Senior Management.
- 6- **IPMR statement with regards to misdeclaration of precious mineral source by way of bribery or deception** IPMR hereby declares that it shall in no way engage in any bribery for situations of false or incorrect information declaration, etc. or any proposals which may be construed as such, demands, claims, or promises in activities concerning payments made to the State in matters such as mineral’s origin, taxation, fees, and licensing.
- 7- **IPMR statement with regards to level of cash involvement** IPMR shall avoid, where practicable, cash purchases and ensure that all unavoidable cash purchases of minerals are supported by verifiable documentation and preferably routed through official banking channels. Cash purchases, shall, in any event, be made in compliance with the provisions of the DMCC’s Anti Money Laundering and Combating Financing of Terrorism Policy.

The International Precious Metal Refiners (IPMR) has existing management system to ensure consistent implementation of the due diligence and risk control requirements of the policy which includes but not limited to:

- Scope, clear responsibilities, and escalation channels
- Identification, assessment, and criteria for high-risk gold supply chain
- Know-Your-Customer (KYC) process
- Monitoring and surveillance of transactions
- Mandatory trainings for relevant staff that are involved in the supply chain at any stage.

IPMR requires all its staff involved in the gold supply chain to strictly comply with this policy and implement it in the management system.

For assistance or further queries related to the supply chain policy, employees, stakeholders, and counterparties can send an email to Compliance@ipmr.com