

Responsible Business Policy**Emirates Minting Factory LLC*****Committed to Integrity, Excellence & Ethical Stewardship in Precious Metals*****1. Our Purpose and Ethos**

Founded in the UAE with a deep-rooted legacy in minting, Emirates Minting Factory (EMF) is a cornerstone of excellence in the precious metals industry. EMF specializes in the manufacturing, refining, and customization of gold and silver products for clients across the MENA region and internationally.

The operations are built on the pillars of trust, technical mastery, compliance, and responsibility. As a participant in the global supply chain for precious metals, EMF recognizes the duty not only to deliver high-quality products, but also to uphold the highest standards of ethical conduct, human rights, and environmental stewardship. This policy outlines EMF's comprehensive commitment to responsible business practices across every facet of the company.

2. Legal Integrity & Regulatory Alignment

EMF is fully compliant with the legislative framework of the United Arab Emirates, including:

- Federal Decrees and Cabinet Decisions related to commercial law, customs, AML/CFT, labor, and environment
- Applicable international frameworks relevant to our sector (RJC Code of Practices, OECD Due Diligence Guidelines, FATF)
- Local regulatory authorities such as the UAE Ministry of Economy, Dubai Customs, and the Central Bank of the UAE

We continuously monitor legal developments and engage third-party legal advisors when necessary to ensure compliance and adaptability.

3. Ethical Gold Sourcing & Due Diligence Protocol

At EMF, we believe that responsible sourcing begins at the origin. Our precious metals sourcing program is governed by:

- Full alignment with the OECD Due Diligence Guidance for Responsible Supply Chains
- Active supplier onboarding, risk-based assessments, and monitoring of sourcing regions

We do not accept any precious metals that:

- Funds conflict, terrorism, or organized crime
- Is linked to human rights violations, including child or forced labour

- Originates from illegal or unregulated mining operations

A dedicated compliance team ensures that all material entering our supply chain is verified, traceable, and responsibly sourced, supported by documentation, declarations, and audits.

4. Anti-Money Laundering & Financial Crime Prevention

Our AML/CFT framework is both robust and proactive, in line with:

- UAE Federal Decree Law No. (20) of 2018 on Anti-Money Laundering and Terrorist Financing
- FATF Recommendations and RJC guidance
- All reporting requirements to the UAE Financial Intelligence Unit (FIU)

Our controls include:

- Full Know Your Customer (KYC) processes for all clients and suppliers
- Risk-based customer and transaction assessments
- Continuous screening against international watchlists and sanctions
- Recordkeeping for a minimum of five years
- Mandatory AML training and certification for relevant staff
- Internal audit and compliance reviews conducted regularly

5. Anti-Bribery Measures & Whistleblower Assurance

We operate a strict Anti-Bribery and Integrity Framework to ensure transparency in all business dealings:

- No tolerance for bribery, facilitation payments, kickbacks, or illicit commissions
- Pre-approval procedures for all payments, gifts, and hospitality offered or received
- Regular internal audits of financial and procurement transactions

A secure and anonymous whistleblowing channel is maintained to report:

- Misconduct, fraud, corruption, harassment, or other violations
- Reports are independently reviewed and investigated by a designated compliance officer
- Whistleblowers are fully protected from retaliation under our internal policies

6. Supply Chain Engagement & Partnership Standards

EMF's supplier relationships are governed by a principle of shared responsibility. We require that all business partners:

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- Adhere to legal, ethical, and environmental standards
- Submit to due diligence screening, including origin disclosure, company history, and compliance track record
- Sign a Supplier Code of Conduct that reflects our standards

We use best efforts to support suppliers in improving their practices and provide engagement tools, training, and corrective action pathways where needed.

7. Human Rights & Labor Dignity

EMF is committed to upholding the dignity, safety, and fair treatment of every individual within our organization and supply chain. Our policies are grounded in our internal ethical standards and full compliance with applicable UAE labour laws.

We strictly prohibit:

- The use of child labour under any circumstances
- Any form of forced, bonded, or involuntary labour
- Human trafficking, deceptive recruitment, or coercive practices

We promote:

- Equal opportunity for all employees regardless of gender, nationality, religion, or background
- Fair wages, safe working conditions, and respect for personal and professional dignity
- Ongoing employee training to raise awareness on rights, responsibilities, and workplace conduct

These principles are reinforced through our HR practices, supplier agreements, and company-wide expectations of ethical behaviour.

8. Fair Employment Practices & UAE Labor Compliance

All employment practices at EMF comply with UAE Federal Labour Law and international ethical standards. We guarantee:

- Employment contracts that clearly define terms of work, wages, and entitlements
- Access to annual leave, sick leave, maternity leave, and end-of-service benefits
- Salary payments through official channels (WPS) in a timely and documented manner
- Freedom of association and right to communicate grievances without retaliation
- Prohibition of unfair disciplinary actions or coercive practices

Our HR department ensures that every employee is onboarded with proper documentation, training, and access to all internal policies.

9. Workplace Conduct, Equality & Disciplinary Principles

We promote a workplace where everyone is treated with respect and fairness, and we explicitly prohibit:

- Discrimination based on race, gender, religion, disability, or nationality
- Harassment of any kind—verbal, physical, or emotional
- Retaliation against individuals raising concerns or complaints

Our disciplinary code includes:

- Incident reporting and investigation protocols
- Escalation paths from supervisors to HR to management
- Corrective actions that align with UAE labour law and internal due process

All employees receive training in our Code of Conduct, which sets expectations for behaviour, ethics, and professionalism.

10. Occupational Health, Safety & Emergency Management

We are proud to be ISO 45001 certified, with a fully implemented Health and Safety Management System that includes:

- Routine workplace inspections and hazard risk assessments
- Emergency response protocols for fire, chemical exposure, and medical incidents
- Provision of appropriate PPE and safety tools to all employees
- Safety committees, drills, and incident reporting systems
- Annual safety audits and continuous monitoring of compliance

Training is mandatory for all workers, from entry-level staff to technical operators and managers.

11. Environmental Sustainability & Resource Stewardship

As part of our ISO 14001 Environmental Management System, we prioritize:

- Efficient energy and water usage
- Reduction of waste, emissions, and pollution

- Responsible use of chemicals and raw materials
- Environmental impact assessments for new operations or expansions

Internal programs include:

- Recycling initiatives
- Water-saving systems in production
- Green office campaigns to reduce paper and electricity use

Our goal is not just compliance but proactive contribution to sustainability in the metals sector.

12. Product Security, Storage & Movement Protocols

Our finished products and raw materials are safeguarded under stringent security and control procedures:

- 24/7 CCTV, access control systems, and movement logs
- Vault management protocols and internal inventory reconciliations
- Chain-of-custody records for each stage of production
- Secured packaging, dispatch, and armoured transport arrangements

Security staff and production teams undergo regular training in handling protocols and deviation response procedures.

13. Confidentiality & Data Privacy Safeguards

Confidentiality is vital to our operations and client trust. We guarantee:

- Non-disclosure of client, supplier, or employee data without consent
- Protection of proprietary information, product specs, and pricing
- IT safeguards including access control, encryption, and secure backup
- Confidentiality clauses in all employment and supplier agreements

Our internal IT and legal teams monitor and ensure full compliance with data privacy regulations.

Policy Ownership & Continuous Improvement

This policy is monitored and reviewed by the Management and Compliance Department of Emirates Minting Factory and is reviewed annually or in response to regulatory changes.

We are committed to continuous improvement through:

- Regular training

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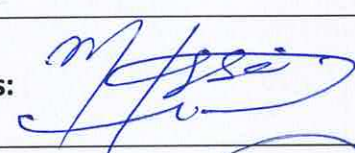

- Internal audits and assessments
- Stakeholder feedback mechanisms
- Transparent communication of progress and updates

Amendment History Record

No.	VERSION NO.	MONTH/YEAR	DRAFTED / REVISED BY	APPROVED BY	Remarks
1	1.0	June 2025	MR	Management	Revised business policy in accordance with human rights policy guidelines

Revision History:

Revision No	Revision Date	Reason
01	30-06-2025	Updated business policy based on human rights policy to clarify guidelines

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