



ارجاء ريفائيرى ف.م.م.
RG REFINERY FZE

Supply Chain Policy



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SUPPLY CHAIN POLICY

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Definition of Terms

Terms	Definitions
AML & CFT	<p>Anti-Money Laundering (AML) refers to the policies, procedures and controls implemented by the company and other regulated entities to prevent, detect and report money laundering activities.</p> <p>Countering the Financing of Terrorism (CFT) involves the measures taken to prevent and combat the provision, collection, or movement of funds intended to support terrorist activities.</p>
Artisanal and Small-Scale Mining (ASM)	<p>Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing and transportation. ASM is normally not capital-intensive and uses highly labour-intensive technology. It can include men and women working on an individual basis as well as those working in family groups or as members of cooperatives or other types of legal associations and enterprises involving hundreds and even thousands of miners. Small, mechanised mines can be considered ASM.</p>
Assay Certificate	<p>An assay certificate is an official document that verifies the purity and weight of a precious metal. It is issued by an assayer after testing the metal to ensure it meets specified standards. This certificate provides essential details like the item's weight, purity, and unique identifying characteristics, offering assurance of the metal's authenticity and quality.</p>
Beneficial Owner	<p>The natural person who owns or exercises effective ultimate control, directly or indirectly, over a customer or the natural person on whose behalf a Transaction is being conducted or, the natural person who exercises effective ultimate control over a legal person or Legal Arrangement.</p>
Block Chain Traceability System	<p>A blockchain traceability system refers to the use of blockchain technology to track and record the history, location, and movement of products or assets through a supply chain. The system provides a transparent, secure and immutable ledger that records every transaction or change of hands, making it possible to trace the journey of a product from its origin to its destination.</p>
CDD	<p>"Customer due diligence" is the process of identifying or verifying the information of a customer or Beneficial Owner, whether a natural or legal person or a legal arrangement, and the nature of its activity and the purpose of the business relationship and the ownership structure and control over it for the purposes of the Decretal-Law and this Decision.</p>
Chain of custody	<p>The chain of custody refers to the comprehensive documentation and tracking of gold from its origin through every stage of the supply chain until it reaches the refinery. This process ensures that the gold is responsibly sourced, fully traceable, and compliant with regulatory standards. It includes all relevant forms, declarations, and transportation documents that verify the legitimacy and integrity of the gold at each step.</p>



Conflict-Affected and High-Risk Areas (CAHRA):	These areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.
DNFBPs	Designated Non-Financial Businesses and Professions (DNFBPs) Means Real estate agent & Dealers in precious metals. Dealers in precious stones. Lawyers, notaries, other independent legal professionals and accountants.
Downstream Companies / Partners	The Downstream Companies / Partners include the manufacturers, retailers and end users.
DPEP	The FATF Guidance for PEPs also defines Domestic PEPs as high-risk individuals located in the same country as the financial institution of which it is a customer and has a domestically located position. These domestic high-risk individuals are defined as officials of a local political party, senior politicians, heads of state companies, or senior military officials.
ESG	Environment, Social and Governance
Gold Bullion	Bullion means precious metal bars and coins (gold, silver, and platinum) that are designated for trading through their sale or purchase in units of ounces, kilograms and/or ten tolas and are considered high-quality precious metals, unless stated otherwise by the company, and comply to the minimum purity requirements of the Dubai Good Delivery (DGD) and London Good Delivery (LGD) standards.
Gold Ingot	A gold bar, also called gold bullion or gold ingot, is a quantity of refined metallic gold of any shape that is made by a bar producer meeting standard conditions of manufacture, labeling, and record keeping. Larger gold bars that are produced by pouring the molten metal into molds are called ingots.
Governance	Governance related requirements are stipulated under AML/CFT Law No.20 of 2018, Article 16.1(d) and AML/CFT Cabinet Decision No. (10) of 2019, Article 4.2(a), 20, 21, 2 Term Definition 44.4 and AML/CFT guidance for Designated Nonfinancial Businesses and Professions (DNFBPs) issued by the Ministry of Economy (April 1, 2019), Article 8.
Grandfathered Stocks	Gold investment products (e.g., ingots, bars, coins and grain in sealed containers)
LLC	Limited Liability Company



LSM	Large-scale or medium-scale mining is governed by a framework of regulatory controls, permits and inspections and is subject to health, safety, social, environmental, closure and governance standards. Large-scale mining involves the payment of royalties and other taxes to governments in return for developing publicly owned mineral resources.
Mined Gold (also referred to as primary gold)	Gold that originates from Large and/or Medium-Scale Mines (LSM) or Artisanal and Small-Scale Mines (ASM) and has never been previously refined. This term means any gold or gold-bearing material produced by or at a mine, in any form, shape and concentration, until it is fully refined (995 or greater), fabricated into a gold refinery product (e.g., bar or grain) and sold.
ML/TF	<p>Money laundering is the process by which the financial proceeds of crime are disguised in order to conceal their illegal origin. Money laundering refers to activities designed to conceal or disguise the origin of the proceeds of crime (i.e. predicate offences) through processes that transform illegal inputs into apparently legitimate outputs. The proceeds of crimes such as theft, fraud, corruption and drug trafficking are made to look like the fruits of honest activity - for example, by being converted into apparently legitimate bank accounts, real estate or luxury goods.</p> <p>Terrorism Financing is the illegal smuggling of money to terrorist organizations. Terrorist financing is often linked to money laundering and is often conducted across international borders. Terrorist financing involves the collection and processing of funds from both legal and illegal sources to provide terrorists with the resources to carry out their attacks. While the phenomena differ in key respects, they often seek to exploit the same vulnerabilities that allow an inappropriate degree of anonymity and non-transparency in the conduct of transactions.</p>
OECD Due Diligence Guidance	Organization for Economic Co-operation and Development Means the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
Origin of Mined Gold	The mine where it was extracted, i.e., where the mine is located
Politically exposed persons (PEP)	"Politically exposed persons" - When individuals are elected to prominent political positions or assigned high-profile public roles, they should be categorized as politically exposed persons (PEPs) to reflect their increased risk of involvement in money laundering or terrorism financing.



Recycled Gold and/or Precious Metals	Recycled Gold means gold and/or precious metals that have been previously refined, such as end-user, post-consumer and investment gold and/or precious metals and products containing gold and/or precious metals, as well as scrap and waste metals and materials generated during refining and product manufacturing, including recovered materials from industrial recovery, that are returned to a refiner or other downstream intermediate processor to start a new life cycle as "recycled gold". The origin of the recycled gold and/or precious metals is the point in the supply chain where the gold and/or precious metals are returned to the refiner or other downstream intermediate processor or recycler; assay samples are excluded from this category and are outside the scope of verification if the member is able to do so.
Supplier	An individual or entity that engages with the Company or a service provider. This includes buyers, contractors, sellers, miners, and suppliers.
Suspicious Activity Report (SAR)	A report that details the activity or transactions that raised suspicion.
Suspicious transaction	A suspicious transaction is a transaction that causes a reporting entity to have a feeling of apprehension or mistrust about the transaction considering its unusual nature or circumstances, or the person or group of persons involved in the transaction.
Suspicious Transaction Report (STR)	A Suspicious Transaction Report (STR) is a report that is required to be filed with the relevant UAE Financial Intelligence Unit (UAE FIU) when they detect activity that might indicate money laundering, terrorist financing, or other illegal conduct.
Transaction	Transaction is defined under Article 1 of the Cabinet Decision No. (10) Of 2019 "Transaction: All disposal or use of Funds or proceeds including for example deposit, withdrawal, conversion, sale, purchase, lending, swap, mortgage, and donation."
UAE FIU	United Arab Emirates Financial Intelligence Unit means the agency will collect raw transactional information and Suspicious activity reports (SAR) usually provided by banks and other entities as part of regulatory requirements.
Upstream Partners / Companies	The Upstream Companies / Partners include mining companies, Artisanal and small-scale miners, gold traders and aggregators and recycling companies.



1. INTRODUCTION

At RG Refinery FZE, we recognise that a responsible and ethical supply chain is fundamental to our commitment to integrity, sustainability, and corporate social responsibility. We are dedicated to ensuring that every step of our supply chain is transparent, accountable, and aligned with international best practices.

2. POLICY PURPOSE

This Supply Chain Policy outlines our principles and procedures for sourcing gold, ensuring that all materials are sourced through legal and ethical channels.

Our Policy is designed to comply with local and international regulations, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3. POLICY STATEMENT

The Company is committed to working only with suppliers who share our values of responsible sourcing, environmental stewardship, and respect for human rights.

This Policy applies to all employees and suppliers (including sub-suppliers) involved in the Company's supply chain, ensuring that our operations align with national and international standards.

By adhering to this Policy, we seek to foster trust and transparency with our stakeholders, including suppliers, and regulatory bodies, while upholding the highest standards of business conduct in the gold industry.

4. OECD 5-STEP DUE DILIGENCE PROCESS

DMCC has issued practical guidance to assist DMCC licensed members and non-members within the UAE's gold and precious metals industry in implementing the OECD Due Diligence Guidance on conducting due diligence and developing a risk management framework for responsible supply chain management of gold and precious metals when sourcing from conflict-affected and high-risk areas.

To ensure responsible sourcing of gold, the Company will implement the following five-step due diligence process:

Step 1: Establishing an Effective Governance Framework

Step 2: Identifying and Accessing the Risks in the Supply Chain

Step 3: Developing and Implementing Risk Mitigation/Control Plan

Step 4: Independent Third-Party Audit

Step 5: Annual Reporting



4.1. **Step 1: Establishing an Effective Governance Framework**

4.1.1. **Supply Chain Policy Development and Adoption**

The Company should develop a comprehensive supply chain policy that outlines the Company's commitment to responsible sourcing, ethical practices, and compliance with international standards, including OECD Due Diligence Guidance. The Policy should be publicly available on the company's website to ensure stakeholders understand the supply chain policy. The Company is committed to:

- Neither tolerate, contribute to, assist with or facilitate the commission of:
 - Any forms of torture, cruel, inhuman and degrading treatment.
 - Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily.
 - Any forms of child labour.
 - Other human rights violations and abuses such as widespread sexual violence.
 - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Immediately suspend or discontinue engagement with our supplier where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.
- Support measures to build secure, transparent, fair-trade and verifiable gold supply chains from local or large scale/ artisanal miners to market.
- Never source from illegal mining operations.
- Not tolerate any direct or indirect support to non-state armed groups or public or private security forces through the extraction, transport, trade, handling or export of precious metals which:
 - Illegally control mines, sites, traders or other intermediaries, and transport routes through the supply chains; or
 - Illegally tax or extort money or minerals through the supply chains.
- Neither gain nor be a part of, assist or facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labour, any forms of human rights violations and all forms of criminal activities.
 - Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source is from, or linked to, any party committing serious abuses as defined above.
- Not to offer, promise, give or demand any bribes and will resist the solicitation of bribes to conceal or misrepresent the origin of precious metals.
- Play a part and contribute to the elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti Money Laundering and Combating Financing Terrorism.



- To inform and report to relevant authorities any suspicious individuals, entities and transactions arising upon implementing the provision of this Policy.
- Ensure that effective Due Diligence on a risk-based approach is carried out before starting any transactions and continuous monitoring of existing clients to assess the level of risk and plan to mitigate the risk identified.
- Create and keep proper and adequate records of all precious metals transactions and activities that demonstrate that due diligence has been strictly followed.
- Train relevant staff and educate its employees through formal education, training or seminars and conferences with the provision of this Policy and the responsible sourcing of precious metals.

4.1.2. Establish Internal Management Structure

To ensure the effective implementation and adherence to this Policy, specific roles and responsibilities are assigned as follows:

Senior Management

- Ensure that all operations comply with the Company's ethical standards and regulatory requirements.
- Approve the initial Supply Chain Policy and any subsequent updates. Responsible for regular oversight and review of the Policy to ensure it remains current and effective.
- Set the strategic direction for Supply Chain Management, integrating ethical sourcing into the broader business strategy.
- Allocate necessary financial, human, and technological resources to ensure the successful implementation and ongoing maintenance of the Policy.
- Monitor overall performance and compliance with the Policy, making high-level decisions based on reports and assessments provided by the Compliance Officer.

Compliance Officer (CO)

- Responsible for day-to-day execution of the Policy, ensuring all procedures are followed correctly.
- Conduct regular risk assessments to identify and mitigate potential risks within the Supply Chain. Develop and implement strategies to address these risks proactively.
- Develop and deliver a training program to ensure all employees and suppliers (including sub-suppliers) understand the Policy, relevant regulations, and their responsibilities.



- Oversee due diligence processes and conduct regular audits of suppliers (including sub-suppliers) to ensure compliance. Address any findings promptly and effectively.
- Maintain comprehensive records of all compliance activities, including risk assessments, training sessions, due diligence, and audit results. Prepare and present regular reports to Senior Management on compliance status and any issues encountered.
- Identify opportunities for improving Supply Chain practices and implement changes to enhance efficiency, transparency, and ethical standards.

Suppliers (including sub-suppliers)

- Adhere strictly to the standards and requirements outlined in the Policy. This includes implementing their own measures to ensure ethical practices in their operations.
- Actively participate in due diligence processes by providing necessary information and documentation. Respond promptly to any request from the Company for additional information or clarification.
- Report any suspected violations of the Supply Chain Policy or ethical standards to the Company's CO immediately.
- Engage in continuous improvement efforts to build capacity for compliance with the Policy's standards. This may include adopting new technologies, enhancing employee training, and implementing best practices in Supply Chain Management.
- Maintain open and transparent communication with the Company, ensuring that any potential issues are reported and addressed promptly.

4.1.3. Strengthen Supplier Relationships

The Company should actively communicate their expectations and requirements to all its suppliers and ensure that the suppliers (as well as the sub-suppliers) have an understanding and adherence to the Company's supply chain policy. This can be achieved through the following means:

- Maintaining adequate KYC due diligence processes for suppliers including reviewing suppliers' own due diligence practices.
- Establishing long-term relationships with each supplier.
- Sharing with each supplier the DMCC practical guidance/regulatory board and acknowledging the receipt and compliance of the supplier.
- Incorporating the provisions of the DMCC practical guidance/regulatory board updates into contracts and/or agreements and KYC forms with each supplier.



- Considering ways to support and build capabilities of suppliers, if needed, to ensure compliance with the Company's responsible supply chain policy and process and with the regulatory board and DMCC practical guidance.

4.1.4. Establish a Precious Metal Traceability System

The Company should establish a system of controls for visibility and transparency over the supply chain. This includes a chain of custody or traceability system that identifies the origin of the precious metal and the upstream companies / partners involved in the supply chain, and a mechanism to trace the source of where the precious metal is procured, the input of each lot refined and the first destination of each product shipment.

The Traceability information should include, but not limited to:

- Proof of mining origin for primary product (e.g., official government-issued certificate of origin, chain of custody documentation (audited, if possible), blockchain traceability records (if possible), formal invoices or packing lists).
- Proof of origin for Recycled Gold and Grandfathered Stocks (e.g., official government-issued certificate of origin, chain of custody documentation (audited, if possible), blockchain traceability records (if possible), formal invoices or packing lists).
- Chain of custody documentation including forms and declarations relating to export/import submitted or issued by the regulatory authorities.
- A unique reference number is assigned to each input and output¹ for any tampering to be evident.
- Weight and assay: declared and processed², including the date of arrival at the refinery, the date of assay finalisation, and the assay certificate.

¹ **Input:** This includes raw materials like unrefined gold, chemicals used in the refining process, or any other resources needed to produce the final product.

Output: This includes refined gold bullion or other finished gold products.

² **Weight Declared and Processed:** This involves recording the weight of the gold when it arrives at the refinery and after it has been processed. The initial weight is declared upon arrival, and the final weight is recorded after refining.

Assay Declared and Processed: Assaying is the process of determining the purity and composition of the gold. The declared assay is the initial assessment of the gold's purity when it arrives, while the processed assay is the final determination after refining.



4.1.5. Establish a confidential grievance mechanism

The company will develop a grievance mechanism that enables stakeholders, including employees, suppliers, and affected communities, to raise concerns related to the supply chain.

This grievance mechanism will be easily accessible, confidential, and will provide clear guidelines on how complaints can be submitted and handled.

Procedures will be established for the timely investigation, response, and remediation of grievances. Corrective actions will be implemented where necessary, and complainants will be kept informed of the process and outcomes. *(Further details can be found in RG Refinery's Grievance Policy).*

4.2. Step 2: Identifying and Assessing the Risks in Supply Chain

According to the Regulatory Board / DMCC practical guidelines, companies in the gold and precious metals supply chain should use a strong risk management system to identify and assess the risks associated with gold and precious metals.

The Company should conduct a thorough risk assessment. This includes using a supply chain due diligence questionnaire (Refer to **Appendix 1**) to gather detailed information about suppliers and their practices. This Supply Chain Due Diligence Questionnaire should be used to obtain relevant information from suppliers in business tie up.

The Supply Chain Due Diligence Questionnaire helps identify potential risks such as gold sourced from CAHRA, human rights abuses, and environmental degradation. By gathering relevant data on the supplier's policies, practices, and compliance with international standards, the responses are analysed to determine the level of risk. This assessment guides the development of appropriate risk management strategies, ensuring the supply chain remains ethical and sustainable.

4.2.1. Factors to take into consideration for conducting the risk assessment are as follows:

- The origin, location and transportation.
- The level of government regulation and supervision.
- The extent of cash transactions used in the country.
- The level of conflicts or Human Rights abuses in any location comprising part of the supply chain.
- Payment methods/systems used.
- The level of involvement or potential involvement of any criminal organisation.
- The level of involvement or potential involvement of any high-risk businesses (such as gaming and casinos, etc.)



- The level of enforcement of laws addressing significant criminal activity; and
- 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 existence of sanctions and/or embargoes that have been directed against the country and/or individuals/entities in that country.
- KYC information of the suppliers as identified (including information about the origin and transportation of the gold and/or precious metals).
- Any Red Flags identified in any part of the entire supply chain.
- The number of participants in the supply chain (i.e. the greater the number, the higher the risk).
- The level of control that a supplier has over its own sub-suppliers.
- The level and adequacy of the due diligence practices of a supplier and the sub-suppliers.
- The proportionality of the due diligence to the identified risks and severability and probability of adverse impacts of the applicable transaction.
- Gold and/or precious metals that are transported and/or exported which are not reasonably reconciled with the declared location of the origin.
- Unexplained geographic distance in the supply chain.
- The nature of the underlying assets (for example melted recyclable gold and/or precious metals transactions may be higher in risk than unprocessed recyclable gold and/or precious metals).
- The level of concentration of gold and/or precious metals.
- Payment by cash and/or physical delivery to unrelated third parties.
- Transaction structuring to make payments in smaller multiple transactions to avoid payment thresholds.

4.2.2. High-Risk Supply Chain

A High-Risk Supply Chain in the gold sector in relation to the procurement of mined or recycled gold involves sourcing gold from CAHRA or countries with a weak governance and regulatory framework. Such a high-risk supply chain will trigger an Enhanced Due Diligence.

- 4.2.2.1. Red flags relating to Mined/Recycled Gold should include, but are not limited to the following:

For Location-based red flags, the Mined/Recycled Gold:

- Originates from, has transited or has been transported via a CAHRA.



- Is unjustifiably claimed to have originated from a country that has limited or no exports of gold history.
- Is claimed to have originated from a country that has limited / no known gold reserves, likely resources or expected production levels.

For supplier-based red flags, the gold-supplying counterparty or other known upstream companies:

- Operate in a country with a high risk of money laundering.
- Have shareholders, or UBOs, or other gold-supplying interests in one of the location-based high-risk criteria.
- Have UBOs that are Politically Exposed Persons (PEPs).
- Have been known to have sourced gold from a high-risk country in the last 12 months.
- Have material discrepancies/inconsistencies in the documentation provided or have refused to provide requested documentation.

For type of material-based red flags, the Mined Gold is:

- Sourced from ASM.
- Produced with the use of mercury.
- Contributing to catastrophic harm or highly adverse ESG factors, to the extent that the Company can identify this from the information provided in the Supply Chain Due Diligence Questionnaire.

For type of material-based high risks, the Recycled Gold is:

- From an Intermediate Refinery or supplier with a high-risk supply chain or trading with a supplier sourcing from an Intermediate Refinery with a high-risk supply chain.

4.3. Step 3: Developing and Implementing and Risk Mitigation/Control Plan

Effective risk mitigation is essential for maintaining a responsible and sustainable supply chain. The Company is committed to developing and implementing strategies to address identified risks in our supply chain, ensuring compliance with ethical standards and international guidelines. A risk control plan should include the following:

- Documenting and reporting the supply chain risks identified to the company's senior management and the CO.
- Enhancing engagement with suppliers through establishing a chain of custody and/or traceability system where a red flag has been identified.



- Enhancing physical segregation and security of shipments where a Red Flag has been identified. These include allocating dedicated storage areas for high-risk precious metals, implementing stricter security protocols such as increased surveillance and restricted access, and ensuring clear labelling and documentation.
- Establishing the right to conduct additional checks on high-risk suppliers (including sub-suppliers) as needed and ensuring the timely and accurate provision of additional information requested from suppliers (including sub-suppliers) related to the risk identified in the supply chain.
- Performing on-the-ground assessments and site visits to verify the accuracy of additionally requested information and observe practices firsthand.

The Company should immediately stop refining gold / dealing with suppliers where the EDD concludes that there is a suspicion of:

- Money Laundering
- Terrorist Financing
- Serious Human Rights abuses
- Direct or indirect support to illegitimate non-state armed groups
- Fraudulent misrepresentation of the origin of gold/precious metals.

Where the company suspects that the supplier has engaged in any of the predicate crimes, the matter must be promptly reported to the CO.

The CO, on receiving such a report, must promptly evaluate whether there are reasonable grounds for such belief and must then immediately report the case to the UAE FIU as Suspicious Activity/Transactions through the go AML portal. *(For further details refer to RG Refinery (FZE)'s AML/CFT Policy).*

4.4. Step 4: Independent Third-Party Audit

The Company should engage an independent, third-party auditor to conduct regular audits of the supply chain due diligence process. These audits will focus on high-risk areas and suppliers to ensure compliance with the Company's standards.

The scope and frequency of the audit should be defined based on the risk level associated with each supplier or region. Audits should be thorough and include on-site inspections where necessary.



Review and respond to the audit findings, ensuring that any gaps or non-compliance issues are addressed promptly. Use the audit results to inform and improve the due diligence process.

Share the audit results with relevant stakeholders, including regulators and suppliers to demonstrate the Company's commitment to transparency and accountability.

4.5. Annual Reporting

This policy will be reviewed on an annual basis and updated as necessary to ensure its effectiveness and alignment with best practices. Any updates or changes will be communicated to all representatives.

5. TRAINING AND AWARENESS

Providing comprehensive training and adequate resources is essential to ensure all employees and suppliers understand and adhere to the Supply Chain Policy.

- Regularly scheduled training sessions for all employees involved in the Supply Chain to ensure they are knowledgeable about current regulations, best practices, and their specific roles and responsibilities.
- Conducting training and awareness for suppliers to reinforce the importance of compliance with our standards and to provide guidance on implementing best practices in their operations.
- Ensuring sufficient resources are allocated to support ongoing training and development. This includes investing in training materials, hiring experts to lead sessions, and providing access to necessary tools and technologies.
- Establishing a system for collecting feedback from training participants to continually improve the effectiveness of our training programs. This includes post-training surveys and regular review meetings to assess progress and identify areas for enhancement.

6. ACKNOWLEDGMENT

All representatives (Employees involved in the supply chain, Suppliers, and Sub-Suppliers) are required to acknowledge their understanding and acceptance of this Policy. Acknowledgement forms will be collected and retained by the Compliance Department.

7. LIST OF APPENDICES

Appendix No.	Description
1	Supply Chain Due Diligence Questionnaire