

INDEPENDENT REASONABLE ASSURANCE REPORT

To,

General Manager

M/s. RG Refinery (FZE)

400 M2 Warehouse T5-123, T5-124, T5-104

P.O. Box: 513414

Sharjah - United Arab Emirates

Introduction

UHY James Chartered Accountants LLC ("We") have been engaged by M/s. RG Refinery FZE (the "Regulated Entity") to provide an Independent Reasonable Assurance on its Compliance Report (the "Regulated Entity's Compliance Report") with the Ministry of Economy ("MoE") Due Diligence Regulations for Responsible Sourcing of Gold, Version 1, August 2022 MoE Due Diligence Regulations for the period from 1 January 2024 to 31 December 2024 (the "Period").

Scope of Review

The objective of the review is to assess the Regulated Entity's compliance with the MOE Due Diligence Regulations for Responsible Sourcing of Gold (Version 1 August 2022), and the Regulated Entity's internal policy manual governing responsible sourcing and supply chain due diligence. The scope covered review of Steps 1 to 5 of the regulatory framework, mentioned below:

- Governance and risk management structure.
- Supplier due diligence and risk classification.
- Know Your Customer (KYC) and Enhanced Due Diligence (EDD) for high-risk suppliers.
- Internal controls and procedures for traceability and chain of custody.
- Supplier engagement, grievance mechanisms, employee training, and public reporting.

The review was confined to the designated review period and excluded legal opinions, advisory services, and forensic investigations. We believe that the above criteria is a suitable base for our reasonable assurance engagement.

Management's Responsibility

The management of the Regulated Entity is responsible for preparing the Compliance Report in accordance with the MOE's Due Diligence Regulations. This includes establishing effective governance, risk management, and internal control systems to ensure the accuracy and integrity of the reported information. The management is also responsible for implementing processes that ensure the Regulated Entity's Compliance Report is free from material misstatement whether due to fraud or error. The information in relation to the activities described within the Regulated Entity's Compliance Report is determined by the Management of the Regulated Entity to be appropriate and relevant to validate the degree of compliance with the MoE Due Diligence Regulations.

Independence and quality control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) of the International Ethics Standards Board of Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1, which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. In conducting our engagement, we further confirm that we satisfy the Minimum Criteria for Reviewers as set out in the MoE's Due Diligence Regulations Annex I – Review Protocol (the "MoE Review Protocol") to carry out the assurance engagement.

Our Responsibility

Our responsibility is to was to carry out a Reasonable Assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000: *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, as issued by the International Auditing and Assurance Standards Board (IAASB) following the MOE's Review Protocol and applicable regulatory requirements for responsible sourcing of gold, and express conclusion on the Independent Assurance Report based on the work performed.

Summary of Work Performed

We conducted our reasonable assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB).

A reasonable assurance engagement in accordance with ISAE 3000 involves the application of procedures to obtain sufficient and appropriate evidence regarding the fairness and accuracy of the Regulated Entity's Compliance Report. The objective was to determine whether the management's conclusions were made in accordance with the requirements of the UAE MoE Due Diligence Regulations for Responsible Sourcing of Gold and the MoE Review Protocol.

The procedures performed, and the nature, timing, and extent of the review work undertaken were based on our professional judgment, taking into account our assessment of the risks of material misstatement whether due to fraud or error in the Compliance Report. In making these risk assessments, we also considered the internal controls relevant to the preparation and presentation of the Compliance Report.

Evidence Collection and Assurance Procedures

We applied a structured, risk-based approach to collect sufficient and appropriate evidence to support our conclusions. The assurance procedures included, but were not limited to, the following:

- Evaluation of the internal controls established by the Regulated Entity.
- Inquiries with personnel responsible for compliance, data collection, and reporting processes.
- Review of systems used for data capture and information compilation.

- Examination and sample-based testing of relevant documentation supporting the Compliance Report.
- Conducting onsite visits to validate the existence and implementation of control measures.

The assurance process was executed through the following key stages:

1. Planning and Engagement Scoping

We developed a detailed review plan outlining the scope, objectives, methodology, and assurance criteria. This plan was shared with the management of the Regulated Entity to ensure mutual understanding, transparency, and alignment with MoE requirements.

2. Opening Meeting

An initial meeting was conducted with senior management and key personnel. The objective was to present the assurance framework, establish communication protocols, align timelines, and reinforce confidentiality expectations.

3. Document Collection and Analysis

We reviewed a broad range of documentation to assess governance, due diligence processes, and supply chain control mechanisms. Key documents reviewed included:

- Corporate policies, manuals, contracts, licenses, and permits;
- Supply chain due diligence records, KYC files, and risk assessments;
- Gold sourcing documentation, inventory control evidence, and transaction records;
- Internal monitoring logs, training records, and board minutes.

4. Onsite Review and Fieldwork

Fieldwork was conducted to validate the implementation of internal controls. This included:

- Physical walkthroughs and visual inspections of operational areas;
- Interviews with management, compliance teams, and operational staff;
- Cross-verification of documented procedures against actual practices.

5. Evaluation of Core Compliance Components

We assessed compliance across the following areas to ensure alignment with MoE Due Diligence Regulations:

- Supply Chain Governance: Effectiveness of organizational policies, training programs, and reporting structures.
- Due Diligence Procedures: Execution of KYC checks, identification of high-risk suppliers, and handling of red flag indicators.
- Recordkeeping and Traceability: Accuracy and completeness of gold sourcing records, including receipt dates, physical characteristics, declared origin, transport documents, and sealing information.

6. Closing Meeting and Preliminary Feedback

A concluding session was held with the Regulated Entity's leadership to present our observations, preliminary findings, and practical recommendations for strengthening compliance frameworks.

7. Consistency Review and Final Validation

Finally, we compared the management assertions stated in the Compliance Report against the evidence obtained during our review to confirm consistency, accuracy, and completeness.

Restriction on Use of this Report

This report is prepared solely for the use of the management of the Regulated Entity and the UAE Ministry of Economy. It is intended for the purpose of evaluating the Regulated Entity's compliance with the MoE Due Diligence Regulations and must not be circulated, reproduced, or relied upon by any third parties without prior written consent.

While this Report provides an assessment of the Regulated Entity's adherence to the "MOE's" Due Diligence Regulations for the Responsible Sourcing of Gold, certain inherent limitations must be acknowledged regarding the review methodology and scope:

- **Subjectivity in Compliance Evaluation:**

The assessment of regulatory compliance involves qualitative judgments, interpretations, and contextual analysis. Although we employed standardized assessment tools and review protocols, inherent subjectivity may influence the evaluation outcomes, particularly in areas requiring discretion or interpretation of regulatory expectations.

- **Limited Verification of Source Documentation:**

The assessment included reviews of selected documents and management representations to evaluate the refinery's due diligence implementation. While interviews and document sampling were conducted, the authenticity of the submitted documents was not independently verified through external authorities or third-party institutions.

- **Dependence on Client-Provided Information:**

The review was based on data and materials furnished by The Regulated Entity. We exercised reasonable professional diligence in assessing the accuracy and relevance of this information; however, independent validation of the data was not performed. Accordingly, the conclusions drawn assume that all information provided was complete, accurate, and not misleading.

- External Developments Beyond Review Scope:

The review scope does not extend to future developments, such as amendments in regulatory requirements, shifts in enforcement priorities, or changes in The Regulated Entity's operations. We do not provide assurance against the impact of such external changes post-review.

- Time-Specific Nature of Findings:

The findings reflect the status of compliance as observed during the period under review. Due to the dynamic nature of business operations and regulatory environments, compliance status may evolve, and new issues may emerge outside the timeframe assessed.

- Risk of Human Error or Fraud:

Despite rigorous procedures, no review process can offer absolute assurance against undetected errors, omissions, or fraudulent activities. There remains an inherent risk that certain irregularities may not be identified during the course of the review.

Our Opinion

In our opinion, the Compliance Report prepared by the Regulated Entity, dated 10 June 2025, for the period from 1 January 2024 to 31 December 2024, fairly presents the Regulated Entity's compliance activities in line with the MOE's Due Diligence Regulations for Responsible Sourcing of Gold (Version 1 August 2022).

UHY James Chartered Accountants LLC



James Mathew
Engagement Partner
10 June 2025



COMPLIANCE REPORT RG REFINERY FZE

DURING THE YEAR OF 2024



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INTRODUCTION

RG Refinery continues to be a leading gold refinery in the UAE, committed to maintaining the highest standards of compliance and ethical practices. During the year of 2024, we focus on reinforcing our anti-money laundering (AML) measures, enhancing operational transparency, responsible sourcing, and ensuring our practices meet both local and international regulations.

RG Refinery conducted a comprehensive supply chain audit to assess and improve the integrity of our sourcing processes for the year 2023. That audit allowed us to evaluate the ethical standards of our supply chain, identify potential risks, and implement key improvements. These actions have set the foundation for even stronger compliance in the future.

Looking ahead to 2024, we have implemented additional initiatives aimed at further enhancing our monitoring systems and compliance processes. These initiatives will allow us to stay ahead of emerging risks and ensure that our operations remain fully compliant with regulatory standards. We are focusing on ongoing improvements and the steps taken to ensure the integrity of our operations.

This report highlights the initiatives, supply chain risk factors and identification, improvements and answer for all 5 steps, showcasing RG Refinery's continued commitment to compliance, operational excellence, and transparency. Through these efforts, we aim to maintain our reputation as a trusted partner in the global precious metals industry.

Details of Reporting Entity/Company	
Name	RG REFINERY (FZE)
Address	400 M2 Warehouse T5-123, T5-124, T5-104 P.O Box 513414 Sharjah - UAE
Reporting Period	January 1 st 2024, to December 31 st 2024
Email	compliance@rgrefinery.com
Prepared By	Joel John Compliance Officer
Approved By	Mohammed Shameem Nendoli General Manager

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RESPONSIBLE SOURCING DUE DILIGENCE FRAMEWORK

RG Refinery FZE's Responsible Sourcing Programme is designed to enhance and standardize due diligence practices in gold refining. The primary objective is to ensure continuous improvements in responsible sourcing while assuring customers that all gold processed by RG Refinery FZE complies with strict industry standards and regulatory requirements.

The company regularly conducts supply chain audits to assess and strengthen its sourcing practices. These audits evaluate supplier due diligence, transaction monitoring, and overall compliance with international guidelines, such as the OECD Due Diligence Guidance for Responsible Supply Chains. The findings from these assessments lead to ongoing refinements in risk management procedures and supplier onboarding processes. As part of continuous improvements, RG Refinery has implemented additional initiatives to enhance oversight, transparency, and due diligence across its supply chain. These efforts focus on reinforcing compliance measures, improving transaction screening, and ensuring that responsible sourcing practices remain at the core of our operations.

Through these initiatives, RG Refinery FZE remains committed to maintaining the highest standards of compliance, integrity, and leadership within the global gold refining industry. The results of each audit further demonstrate our dedication to responsible business practices.

STEP 01: ESTABLISHING AN EFFECTIVE GOVERNANCE FRAMEWORK

Compliance Statement: RG Refinery FZE is non-compliant with the MOE Due Diligence Regulations for Responsible Sourcing of Gold – Medium Risk Deviations at Step 1.

➤ **Adopting and committing to a policy for managing risks in the gold supply chain due diligence process:**

RG Refinery is fully committed to maintaining a responsible and ethical supply chain through the Responsible Sourcing of Precious Metals Supply Chain Policy. This policy, aligned with OECD Due Diligence Guidance and UAE regulations, guides our approach to sourcing recycled gold and silver. We ensure compliance with both local and international standards, incorporating environmental and sustainability principles into our operations. Our policy is communicated across our network of suppliers and stakeholders, and it is regularly reviewed to ensure its effectiveness. This commitment extends to providing ongoing training programs for employees and suppliers to enhance their understanding of responsible sourcing and ensure consistent adherence to our policies.

RG Refinery has demonstrated a strong commitment to compliance by encouraging staff participation and delivering periodic in-house AML/CFT training sessions. These initiatives reflect a proactive approach toward building a compliance-conscious culture within the organization.



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As part of our ongoing efforts to strengthen awareness, we recognize the value of extending compliance training to a broader group of employees. Additionally, the inclusion of formal training on responsible sourcing and supply chain due diligence will further support staff in understanding upstream risks and applying due diligence principles more effectively across operations. These enhancements are being considered to reinforce our alignment with international best practices and responsible sourcing expectations.

➤ **Establishing management structures that support supply chain due diligence:**

At RG Refinery, we have developed a robust governance structure to support effective due diligence across our supply chain. The roles and responsibilities of all personnel involved in the sourcing process are clearly defined, ensuring everyone understands their part in maintaining compliance.

A dedicated compliance officer and team members for overseeing all due diligence activities, ensuring that all operations meet the highest standards in line with AML, CFT, and OECD guidelines. Our compliance team conducts regular risk assessments and maintains continuous monitoring to evaluate and improve supply chain operations. This ensures that all aspects of our supply chain are constantly in compliance with regulatory and ethical standards.

RG Refinery continues to make strong strides in enhancing its compliance framework, with commendable progress in AML/CFT/CFP controls and KYC processes. These advancements play a vital role in reinforcing the company's responsible sourcing practices. The Compliance Officer and team remain actively engaged in maintaining alignment with OECD and DMCC guidelines, reflecting a commitment to international standards. As part of continuous improvement, the team is working on further refining its risk appetite specific to more responsible sourcing, enhancing the execution of risk control plans, and formalizing internal protocols for addressing red flags. These proactive steps underscore RG Refinery's forward-looking approach to strengthening compliance governance and risk oversight.

➤ **Establishing a system of transparency, promoting widespread information sharing, and control on the gold supply chain:**

To ensure transparency and proper control over the gold supply chain, RG Refinery has implemented a comprehensive system that includes traceability and secure data management. All transactions are tracked using a unique reference number, ensuring that all related documentation is stored securely for future reference. We only process payments through secure banking channels, and suppliers are required to submit essential documents, such as country of origin declarations. We actively engage with regulatory authorities to ensure that all transactions are fully compliant with traceability and origination requirements. Furthermore, we are continuously enhancing our monitoring and data tracking systems to maintain the integrity of our supply chain and to provide full transparency at every stage. RG Refinery has taken significant steps toward formalizing its supply chain compliance framework in alignment with responsible sourcing expectations. Key policies—including AML/CFT, Supply Chain Due Diligence, and Responsible Sourcing—have been developed and shared with suppliers as part of the KYC process. Suppliers have acknowledged and accepted these policies in writing, reflecting a strong commitment to transparency and ethical sourcing.

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RG Refinery actively supports shipment traceability by collecting key transport documents such as customs declarations, airway bills, and airline tickets—providing valuable insights into the physical movement of gold into the UAE. These efforts reflect our commitment to maintaining transparency and control across the gold supply chain. As part of our continuous improvement strategy, we are working to further strengthen upstream due diligence based on the nature of the gold. In the case of mined gold, verification of mine sites, origin declarations, and chain of custody records would be key areas of focus. For recycled gold, we aim to complement existing gold declarations with more supporting documents to reinforce traceability and assurance around its source. Customer risk assessment framework currently incorporates rule-based evaluations covering risk factors such as Politically Exposed Persons (PEPs), exposure to sanctioned jurisdictions, and the type of gold sourced. We are now working towards deeper integration of upstream risk indicators into the tool to further enhance early risk detection and effective supply chain management. These proactive steps form part of RG Refinery's broader strategy to align with international standards and uphold responsible sourcing practices.

➤ **Strengthening company engagement with gold supplying counterparties:**

RG Refinery has taken significant steps to strengthen relationships with gold-supplying counterparties. We regularly conduct audits and reviews to ensure our customer and suppliers are complying with our responsible sourcing standards. These assessments help us ensure that all business relationships are aligned with our social, environmental, and regulatory expectations. We have established clear criteria for engaging new suppliers, and only those who meet these standards are onboarded. In addition, we maintain regular communication with our suppliers to reinforce our expectations and address any issues that may arise. This ongoing collaboration ensures that our suppliers continue to operate in alignment with our responsible sourcing policies.

As part of our internal compliance review for the period of 2025, we have proactively highlighted the importance of capturing the expected trading volume in the KYC forms. Including this information is considered a best practice, as it supports more effective transaction monitoring and enhances the accuracy of customer risk profiling. Steps are being taken to ensure this becomes a standard part of our onboarding documentation.

We also recognized the need to further strengthen the quality of our site visit reports. While site visits to immediate suppliers were conducted and documented, we have acknowledged the opportunity to enrich these reports by including more detailed observations, findings, and feedback. We are currently working on enhancing the reporting structure to provide greater clarity and value from these visits and for future visit, aligning with our commitment to continuous improvement and robust due diligence.

➤ **Establishing a confidential grievance mechanism:**

RG Refinery has put in place a confidential grievance mechanism to ensure that all employees and stakeholders can report concerns or misconduct without any problem. We take any form of misconduct seriously and provide clear channels for individuals to report issues. Complaints are handled with the utmost confidentiality and are escalated to the General Manager and Senior Management for review and resolution.

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We have made this grievance system accessible to all employees, suppliers, and stakeholders, ensuring that everyone has a means to voice concerns. To further enhance this mechanism, we are planning to introduce an online platform for easier access and tracking of complaints, providing a more efficient and transparent process.

RG Refinery FZE has successfully implemented a comprehensive governance framework for responsible sourcing. We have taken all necessary steps to ensure compliance with regulatory requirements and industry best practices. Through continuous improvements, effective engagement with stakeholders, and a strong commitment to transparency, we are confident in our ability to uphold the highest standards in managing our supply chain. These ongoing efforts are aimed at maintaining long-term sustainability, ethical practices, and regulatory compliance in all aspects of our operations.

RG Refinery has taken proactive steps to establish a grievance mechanism in line with Section 1.5 of the UAE Ministry of Economy's Due Diligence Regulations. This includes issuing a Grievance Policy, introducing a standard grievance submission form, and creating a dedicated email channel to encourage transparent communication from both internal and external stakeholders. These measures reinforce our commitment to integrity, accountability, and open dialogue within our responsible sourcing framework. To support this system, a grievance register is actively maintained to track and monitor submissions received. In line with our continuous improvement approach, RG Refinery is in the process of formalizing a detailed grievance procedure, including defined timelines for resolution and clear roles and responsibilities. These enhancements aim to align with international best practices and further strengthen the effectiveness of our grievance handling process.

STEP 02: IDENTIFICATION AND ASSESSMENT OF THE SUPPLY CHAIN RISK

Compliance Statement: RG Refinery FZE non-compliant with the MOE Due Diligence Regulations for Responsible Sourcing of Gold – Medium Risk Deviations at Step 2.

➤ Conducting supply chain due diligence to assess potential risks:

At RG Refinery FZE, we have established a comprehensive process for identifying and assessing the risks in our supply chain. We have implemented a Responsible Precious Metals Supply Chain Policy, which ensures we source gold responsibly in alignment with industry best practices. This policy helps us evaluate the potential risks associated with our suppliers, including the sources of their materials and the environmental, social, and governance (ESG) factors that might impact their business. We use a combination of manual assessments and automated tools to gather and analyse this data. By doing so, we ensure that we thoroughly evaluate each supplier before entering any business relationship.

Each supplier undergoes a risk assessment based on a detailed set of criteria, and we review this assessment regularly as new information becomes available. Additionally, we use advanced software like screening, risk assessment to continuously monitor these risks in real time, helping us stay ahead of any emerging threats and ensuring we stay compliant with AML/KYC/CTF/Responsible sourcing regulations.

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➤ **Identifying red flags or high-risk indicators in the gold supply chain:**

We have implemented a proactive manual tracking system to identify red flags or high-risk indicators within our supply chain. We regularly assess key factors such as the origin of materials, supplier compliance, and transaction. Specific attention is given to geographic regions where risks like illegal mining, human rights abuses, or environmental harm may be prevalent. If we detect any red flags, such as inconsistencies in supply chain data or warnings from reliable sources, we act immediately to investigate further. Our monitoring system tracks suppliers' activities and watches for signs of financial crime, corruption, or violations of human rights. When a risk is detected, we act by suspending relationships with suppliers and reporting concerns to the Financial Intelligence Unit via the GOAML portal. Our team plays a key role in ensuring our supply chain remains transparent and compliant by reviewing risk profiles regularly.

➤ **Undertaking enhanced due diligence measures for supply chains deemed high-risk:**

For suppliers identified as high-risk, we apply Enhanced Due Diligence (EDD) to assess their operations more thoroughly. High-risk suppliers, often from regions with histories of conflict or human rights abuses, undergo in-depth reviews, including document checks, site visits, and third-party audits. This helps us ensure that all sourced materials comply with responsible sourcing standards. We request detailed documentation from these suppliers about their sourcing practices and verify their compliance with international standards. Additionally, we consult with external experts to evaluate the social and environmental impacts of these suppliers. Once these high-risk suppliers meet our due diligence requirements, we continue to monitor their operations closely to ensure ongoing compliance. Our ongoing monitoring helps identify any potential risks early, allowing us to address them promptly.

RG Refinery FZE has successfully established a thorough system for assessing and managing risks in our supply chain. We have implemented a comprehensive approach using manual checks, automated tools, and real-time monitoring to assess and manage risks with suppliers. Our Enhanced Due Diligence processes for high-risk suppliers ensure that we only engage with suppliers who meet our ethical standards. We continue to focus on improving our compliance practices, maintaining a transparent, ethical, and sustainable supply chain, while always ensuring we meet regulatory requirements.

STEP 03: MANAGEMENT OF THE SUPPLY CHAIN RISK

Compliance Statement: RG Refinery FZE is non-compliant with the MOE Due Diligence Regulations for Responsible Sourcing of Gold – High Risk Deviations at Step 3.

➤ **Developing a Risk Management Strategy for Identified Risks:**

At RG Refinery FZE, we have established a robust risk management strategy to address potential risks in our supply chain. This strategy is in line with the standards outlined in our Responsible Sourcing Policy, and Risk Management Framework. Our organization has adopted a Risk Appetite Policy that helps us identify and evaluate potential threats and vulnerabilities in our operations. This policy outlines the levels of risk we are willing to accept while remaining aligned with our overall objectives and values.

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By regularly reviewing and assessing these risks, we proactively work to mitigate any potential impacts, ensuring that we maintain a secure and compliant operational environment.

As part of this strategy, we conduct thorough checks on all old and new suppliers, particularly those from CAHRA regions (Conflict-Affected and High-Risk Areas). We verify the origin of the gold and ensure its sourcing complies with industry standards. This proactive approach helps maintain transparency and integrity in our supply chain, enabling us to address any potential concerns before they become a problem. We prioritize transparency and integrity in our supplier relationships to navigate uncertainties effectively and confidently.

Our risk management approach also integrates responsible sourcing into every refining process. Suppliers are required to meet regulatory standards, and we ensure compliance by conducting thorough due diligence and enhanced assessments before establishing any business relationship. If any risks related to conflicts, corruption, or human rights issues are detected within our supply chain, we initiate a supplier relationship review, which may include an internal investigation. If necessary, an improvement plan is implemented to ensure that the supplier meets all regulatory and OECD requirements. This collaborative approach helps safeguard the integrity of our supply chain and promotes continuous compliance.

RG Refinery remains committed to ethical sourcing and regulatory compliance. Structured measures have been implemented across customer onboarding, supply chain due diligence, and grievance handling. Key policies are shared with suppliers, supported by site visits and transport documentation to enhance transparency and traceability. A formal grievance mechanism is in place, including a submission process and centralized register, with procedural improvements underway. Risk assessments are being refined to align with the UAE National Risk Assessment, with enhanced focus on CAHRA-related sourcing and sub-supplier risks. Whether sourcing recycled or mined gold, we prioritize traceability and verification through supplier engagement and documentation. Ongoing staff training and system enhancements continue to strengthen our compliance framework and alignment with international standards.

➤ Risk Control Plan:

At RG Refinery FZE, we have developed a comprehensive Risk Control Plan to manage the risks associated with the sourcing of gold and silver. This plan includes several key elements designed to protect both the refinery and our supply chain. First, we conduct risk assessments to identify and evaluate risks at each stage of the supply chain, considering environmental, social, and governance (ESG) factors such as human rights violations, environmental degradation, and corruption.

We have also planned to implement due diligence procedures to verify supplier compliance with international standards like the OECD Due Diligence Guidance. This includes conducting on-site visits and supplier audits to ensure that sourcing practices align with our responsible sourcing policy. These procedures help us confirm that suppliers are operating responsibly and ethically. Our approach extends to supplier engagement and collaboration, where we work closely with our suppliers to promote responsible sourcing practices.

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This includes providing training and support to suppliers, addressing identified risks, and improving transparency across the supply chain. Through regular collaboration, we help create a more transparent and sustainable supply chain.

Additionally, we have developed and implemented risk mitigation strategies to address the identified risks in the supply chain. These strategies include setting clear sourcing criteria and fostering a culture of compliance within our workforce. We are planning to use advanced internal tools to gather information on red-flagged supply chains and conduct enhanced due diligence to identify and mitigate risks effectively. By taking these steps, we ensure that risks are addressed in a proactive and systematic manner.

While RG Refinery FZE has established a risk control plan, we recognize the need for continuous improvement. We are committed to developing a more detailed, structured risk control plan that outlines specific risk mitigation strategies more clearly. This enhanced plan will ensure that all identified risks are effectively managed with well-defined control measures. By improving the documentation and accessibility of this plan, we aim to support better implementation and monitoring, ensuring that our risk management practices remain effective and up to date.

➤ Continuous Monitoring:

To ensure the ongoing effectiveness of our risk management strategies, we have set up comprehensive monitoring mechanisms to track the implementation of the Risk Control Plan. These mechanisms include regular audits and reporting systems that allow us to assess the effectiveness of our risk control measures. We continuously monitor the progress of risk mitigation efforts and periodically report our findings to Senior Management for review.

We are also committed to fostering a culture of continuous improvement within RG Refinery FZE. By regularly reviewing and updating the risk control plan in response to new risks and changing circumstances, we ensure that our approach remains dynamic and adaptable. This allows us to stay ahead of potential threats and make informed decisions to protect the integrity of our supply chain. The regular updates to our risk management plan reflect our commitment to maintaining a responsive system that adapts to the evolving risk landscape.

➤ Senior Management Reporting:

RG Refinery FZE maintains a strong reporting structure to ensure that our Senior Management is continuously informed about the progress of our risk management and compliance efforts. Regular reporting and performance monitoring provide management with a clear overview of the risks we face and the effectiveness of our mitigation strategies. If any potential risks are identified, particularly those related to AML/CTF/Responsible sourcing concerns or non-compliance with industry standards, we take immediate action. In such cases, we may suspend operations with the concerned supplier until further investigation is conducted to determine the legitimacy of the findings.

In the event of serious risks or breaches of contract, we have clear procedures in place for the termination of business relationships. This includes quarantining materials and returning them to the supplier if necessary.

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Decisions regarding contract termination are made based on documented procedures and the terms outlined in our refining dealership proposal. We ensure that any breach or suspicion of non-compliance is dealt with swiftly and transparently, maintaining the integrity of our operations. Furthermore, our Senior Management is provided with regular updates on the progress of risk mitigation efforts, ensuring that they have the oversight necessary to guide the organization toward continued compliance and improvement.

Through the implementation of a clear risk management strategy, risk control plan, continuous monitoring, and strong senior management reporting, RG Refinery FZE is committed to maintaining a proper, transparent, and responsible supply chain. We will continue to focus on improving our risk management framework and ensure our operations are aligned with the highest industry standards. Our dedication to responsible sourcing and risk mitigation will guide our actions as we work to enhance the integrity and sustainability of our gold and silver supply chain.

STEP 04: INDEPENDENT THIRD-PARTY AUDIT OF DUE DILIGENCE MEASURES

Compliance Statement: RG Refinery FZE is fully compliant with Step 4 by organizing an independent third-party audit of the supply chain due diligence over the year.

As part of this process, RG Refinery FZE was thoroughly reviewed to ensure compliance with all relevant standards and regulations. RG Refinery FZE recognizes the importance of independent audits as part of our commitment to maintaining the highest standards in supply chain due diligence. To fulfil this requirement, we engaged the services of UHY JAMES CHARTERED ACCOUNTANTS L.L.C, an auditing firm based in Dubai, UAE, which is approved by the UAE Ministry of Economy. The audit covered various aspects of our operations, ensuring that our supply chain due diligence measures are robust and effective in addressing risks related to responsible sourcing and compliance with industry regulations.

Throughout the year, RG Refinery FZE has worked closely with UHY JAMES CHARTERED ACCOUNTANTS L.L.C to facilitate the audit process. This collaboration ensured that all aspects of our supply chain, including sourcing practices, supplier engagement, and risk mitigation strategies, were thoroughly assessed. The audit also involved reviewing the implementation of our due diligence procedures, confirming that they align with international standards such as the OECD Due Diligence Guidance. By engaging an independent third party to review our due diligence measures, RG Refinery FZE has further reinforced our commitment to transparency and accountability.

Following the completion of the audit, RG Refinery FZE will be publishing the independent assurance report, which will detail the findings of the audit and provide an overview of our compliance with due diligence standards. This report will be made available to stakeholders to demonstrate our ongoing efforts to adhere to responsible sourcing practices and regulatory requirements.



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STEP 05: ANNUAL REPORTING ON DUE DILIGENCE MEASURES

Compliance Statement: RG Refinery FZE is fully compliant with Step 5 by diligently reporting on its supply chain due diligence, ensuring full compliance with all relevant regulations and guidelines.

At RG Refinery FZE, we understand that transparency is a critical component of our responsible sourcing efforts. Each year, we produce an annual report that provides detailed information on the measures we have implemented to ensure compliance with due diligence requirements. This report outlines the actions taken in our supply chain to identify and mitigate risks, engage suppliers, and maintain the highest standards of responsible sourcing. The reporting process also highlights any improvements made in our due diligence procedures, further demonstrating our commitment to ongoing compliance and transparency.

Our supply chain policy, aml/cft and other related policies and procedures, which is available for internal use, outlines the specific steps we take to ensure compliance with the responsible gold and silver guidance. This policy serves as a comprehensive guide to our sourcing practices, including supplier assessments, due diligence procedures, and risk management strategies. The document reflects our commitment to adhering to the OECD due diligence guidance and other relevant international standards. It also ensures that all employees and stakeholders are aligned with our responsible sourcing goals.

In addition to the internal policy, RG Refinery FZE provides detailed reports to regulatory bodies and other relevant stakeholders, demonstrating how our due diligence measures align with global best practices. These reports serve as an important tool for showcasing our efforts in mitigating risks and ensuring that all suppliers within our supply chain are held to the highest standards of compliance. We are committed to providing transparent and accurate information to all parties involved, ensuring that our practices are continuously evaluated and improved to meet evolving regulatory requirements. By diligently reporting on our due diligence measures, RG Refinery FZE maintains its commitment to responsible sourcing and ensures compliance with all relevant guidelines and regulations. This ongoing process is a key part of our strategy for maintaining the integrity of our operations and strengthening trust with our customers, suppliers, and regulatory bodies.



Framework Steps	Rating
Step 1: Supply Chain Management System	<input type="checkbox"/> Fully Compliant <input type="checkbox"/> Compliant with Low-Risk Deviations <input checked="" type="checkbox"/> Non-Compliance: Medium Risk Deviation <input type="checkbox"/> Non-Compliance: High Risk Deviation
Step 2: Supply Chain Risk Identification and Assessment	<input type="checkbox"/> Fully Compliant <input type="checkbox"/> Compliant with Low-Risk Deviations <input checked="" type="checkbox"/> Non-Compliance: Medium Risk Deviation <input type="checkbox"/> Non-Compliance: High Risk Deviation
Step 3: Risk Control Plan	<input type="checkbox"/> Fully Compliant <input type="checkbox"/> Compliant with Low-Risk Deviations <input type="checkbox"/> Non-Compliance: Medium Risk Deviation <input checked="" type="checkbox"/> Non-Compliance: High Risk Deviation
Step 4: Independent Third-Party Audits	<input checked="" type="checkbox"/> Fully Compliant <input type="checkbox"/> Compliant with Low-Risk Deviations <input type="checkbox"/> Non-Compliance: Medium Risk Deviation <input type="checkbox"/> Non-Compliance: High Risk Deviation
Step 5: Annual Reporting on Responsible Supply Chain Due Diligence	<input checked="" type="checkbox"/> Fully Compliant <input type="checkbox"/> Compliant with Low-Risk Deviations <input type="checkbox"/> Non-Compliance: Medium Risk Deviation <input type="checkbox"/> Non-Compliance: High Risk Deviation

CONCLUSION

RG Refinery FZE is fully committed to adhering to the Responsible Sourcing Gold Guidance and Responsible Silver Guidance set out by the Regulatory Board. Our operations are aligned with the OECD Due Diligence Guidance for Responsible Supply Chains, ensuring that we follow international best practices in all aspects of our supply chain management. While we have made significant progress in addressing the gaps identified during our responsible sourcing audit and have implemented a wide range of compliance initiatives to meet regulatory standards. However, we remain dedicated to the ongoing improvement of our responsible sourcing practices and business operations. We take all audit recommendations seriously and promptly incorporate them into our processes for subsequent reporting periods. This commitment to continuous improvement is at the heart of our approach to compliance and regulatory standards. We are actively working to close any gaps and address any remaining deviations, ensuring that we meet or exceed all relevant regulatory requirements moving forward. A culture of responsibility throughout RG Refinery FZE, influencing every level of our organization. This culture shapes how we approach regulatory policies, sustainability, and the ethical practices that guide our business operations.



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We firmly believe that responsible sourcing is not just about compliance—it is a fundamental part of how we do business and how we build long-lasting, trustworthy relationships with our suppliers, customers, and stakeholders. Our focus on responsible sourcing extends beyond just the materials we procure; it also includes the ethical standards and sustainability considerations in our supplier risk assessments and counterparty due diligence processes. At RG Refinery FZE, we strive to strong partnerships that are built on mutual trust, respect, and a shared commitment to the responsible sourcing of gold and silver. By doing so, we aim to create a positive impact on the industry and ensure that our operations contribute to the well-being of both the present and future generations. Additionally, we recognize the importance of integrating recycled gold into our sourcing practices, ensuring that our processes remain sustainable and contribute to the broader goals of minimizing environmental impact and promoting a circular economy. This reflects our dedication to sustainability and responsible sourcing throughout our operations. As we continue to evolve and refine our practices, RG Refinery FZE is committed to maintaining the highest standards of responsible sourcing, transparency, and ethical conduct. We will continue to prioritize these values in all aspects of our business, working to ensure that our operations remain aligned with the most stringent regulatory and industry standards.

Authorised Signatory

Name: Mohammed Shameem Nendoli

Designation: General manager | RG Refinery FZE



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