



ارجي ريفائيري م.م.ح  
RG REFINERY FZE

## RG REFINERY FZE GOLD SUPPLY CHAIN POLICY

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Table of Contents

GLOSSARY .....	3
1. INTRODUCTION.....	6
2. LABOUR & HUMAN RIGHTS.....	6
3. HEALTH & SAFETY.....	8
4. ENVIRONMENT AND CLIMATE CHANGE.....	8
5. GOVERNANCE .....	9
6. MANAGEMENT SYSTEM .....	10
7. CONTACT DETAILS .....	10

## GLOSSARY

Term	Definition
ABAC	Anti-Bribery and Anti-Corruption
AML	Anti-Money Laundering
AML/CFT	Anti-Money Laundering and Combating the Financing of Terrorism
AML/CFT/CPF	Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Financing
CAHRA	Conflict-Affected and High-Risk Area — an area identified by the presence of armed conflict, widespread violence, or other risks of serious harm to people, as defined in Annex II of the OECD Due Diligence Guidance
CDD	Customer Due Diligence — the process of identifying or verifying the information of a counterparty or beneficial owner, the nature of their activities, and the purpose of the business relationship
CFT	Combating the Financing of Terrorism
CPF	Counter-Proliferation Financing
DNFBP	Designated Non-Financial Business and Profession — any person conducting commercial or professional activities as defined under applicable AML/CFT legislation, including dealers in precious metals and stones
DPMSR	Dealers in Precious Metals and Stones Report — the mandatory threshold-based report submitted to the UAE FIU via goAML for all cash and wire transactions at or above AED 55,000
EDD	Enhanced Due Diligence — heightened customer due diligence measures applied where elevated risk indicators are identified
ESG	Environmental, Social and Governance
EU	European Union
EWRA	Enterprise-Wide Risk Assessment — a documented, board-approved assessment of all AML/CFT/CPF risks at entity level, reviewed and updated at least annually

FATF	Financial Action Task Force — the intergovernmental body that sets international standards for combating money laundering, terrorist financing, and proliferation financing
FCPA	Foreign Corrupt Practices Act
FIU	Financial Intelligence Unit — the UAE body responsible for receiving, analysing, and disseminating financial intelligence, including reports submitted via goAML
FZE	Free Zone Establishment
GHG	Greenhouse Gas
goAML	The federally mandated reporting portal administered by the UAE FIU through which Suspicious Transaction Reports and Dealers in Precious Metals and Stones Reports are submitted
ILO	International Labour Organisation
KYC	Know Your Customer — the process of identifying and verifying a counterparty's identity, beneficial ownership, and the nature of their business activities
MLRO	Money Laundering Reporting Officer — the designated individual responsible for receiving internal disclosures and filing Suspicious Transaction Reports with the UAE FIU
OECD	Organisation for Economic Co-operation and Development
OECD Guidance	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)
OFAC	Office of Foreign Assets Control — the US Treasury authority administering and enforcing economic and trade sanctions
PEP	Politically Exposed Person — a natural person who is or has been entrusted with a prominent public function, including heads of state, senior government officials, senior executives of state-owned entities, and their family members and close associates
SAR	Suspicious Activity Report
STR	Suspicious Transaction Report — a report filed immediately with the UAE FIU via goAML upon identification of a suspicious transaction, irrespective of

	transaction value
UAE	United Arab Emirates
UBO	Ultimate Beneficial Owner — the natural person who ultimately owns or exercises effective control, directly or indirectly, over a legal entity (defined as 25% or more ownership) or on whose behalf a transaction is conducted
UKBA	UK Bribery Act
UN	United Nations
UNCAC	UN Convention Against Corruption

## 1. INTRODUCTION

RG REFINERY (FZE) (the “Company”) is committed to building a better tomorrow by maintaining the highest industry standards of quality, transparency, and integrity while upholding the highest ethical and moral standards related to responsible sourcing. The Company is fully committed to supply chain compliance and ethical trade, and its economic objectives are aligned with social and environmental considerations. The Company expects all RG REFINERY (FZE) employees, business partners, and supply chain actors to respect human rights, comply with applicable labour laws in both home and host countries, and adhere to relevant international laws, conventions, and standards. This commitment aims to ensure safe working conditions, protect the health and safety of people and the environment, promote responsible governance and business ethics, and support accountable and secure mining practices that safeguard workers, local communities, and the environment from adverse impacts.

The Company recognizes the risks and potential adverse health, environmental, and social impacts associated with the extraction, transport, handling, trading, and export of gold, silver, and other precious metals from conflict-affected and high-risk areas (CAHRA). The Company is committed to ensuring that its business activities do not contribute to or become associated with conflict, human rights abuses, or violations of applicable United Nations sanctions. This policy forms an integral part of the Company’s contracts and agreements with suppliers and business partners to promote awareness of responsible sourcing requirements and ensure their implementation throughout the supply chain.

The Company supports the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the Voluntary Principles on Security and Human Rights. The Company also requests its suppliers and business partners to adopt, disseminate, and incorporate the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) within their gold supply chain operations.

Compliance with legal and regulatory requirements, as well as internationally recognized industry standards on responsible sourcing, is of utmost importance to RG REFINERY (FZE). To achieve this objective, protect the human rights of workers and affected communities within its supply chain, and enhance Environmental, Social, and Governance (ESG) performance at mines and workplaces, the management of RG REFINERY (FZE) implements, as required by UAE law, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRA and established an ESG Compliance Team. The following sections of this policy outline the key principles and commitments specific to RG REFINERY FZE’s gold supply chain. This policy is implemented in accordance with UAE Ministerial Decree No. 68 of 2024, the Ministry of Economy Due Diligence Regulations for Responsible Sourcing of Gold, and Federal Decree-Law No. 10 of 2025 on Anti-Money Laundering and Combating the Financing of Terrorism.

## 2. LABOUR & HUMAN RIGHTS

The Company is committed to protect the human rights of the workers and the affected communities in this supply chain. While sourcing from, or operating in, CAHRA and other vulnerable areas we will

neither tolerate nor be a part, assist and facilitate any transactions arising from serious abuses and all form of criminal activities. The Company seeks to promote responsible business practices and continuous improvement in labour conditions and social performance across its supply chain. Suppliers and business partners are expected to uphold equivalent standards and to cooperate in implementing measures that support compliance with applicable laws and internationally recognised human rights principles.

The Company commits to adherence with the following labour and human rights standards and requires its suppliers and counterparties to observe the same:

**Child Labour:** The Company does not employ any person below the local minimum age of employment and appeals to all suppliers and business partners to ensure that they do not hire or engage any child labour as required under ILO Convention No. 182 that clearly defines:

- Child to be all persons below the age of 18; and
- Worst forms of child labour to prohibit and eliminate work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children, push them into slavery and towards sexual abuse and illicit activities.

**Forced or Compulsory Labour:** The Company wants suppliers and business partners in their supply chain to end all forms of slavery or practices similar to slavery and not to engage their workers in any kind of forced or compulsory labour/involuntary work and protect them from any kind of debt bondage and serfdom. Business partners and suppliers shall safeguard the supply chain from any such practice. The Company promotes an environment for the workforce to work voluntarily, without any threat of punishment or retaliation.

**Freedom of Association:** The Company allows its workers to freely associate and collectively bargain cordially as per their legal rights. It recommends suppliers and business partners to grant their workers this privilege.

**Non-Discrimination:** The Company respects the dignity and worth of every individual, it is an equal opportunity employer and does not indulge in any form of discrimination. The Company is committed to fair treatment of women workers across its supply chain. It expects all suppliers and business partners to respect this basic human right.

**Working Hours:** The Company strictly adheres to the local law and industry standards on working hours with one day off in seven. Suppliers and business partners shall comply with all applicable laws. The Company does not support excessive working hours that undermines the well-being and productivity of workers.

**Remuneration:** The Company ensures that its workforce is paid wages which meet or exceed the minimum wages laid out legally or as per industry standards. It extends all statutory benefits to the workers. Suppliers and business partners should ensure that all legal requirements pertaining to wages and benefits are complied with to secure the basic needs of the workers in the supply chain.

**Disciplinary Practices:** The Company has always treated all its personnel with dignity and respect. All disciplinary actions are in accordance with law. It does not support or engage in any form of harassment or abuse (both verbal and physical). All suppliers and business partners shall ensure their workers are not subject to any of these coercions.

**Serious Abuses:** The Company urges its employees, suppliers, and business partners to refrain from indulging in and encouraging any forms of torture, cruel, inhuman, and degrading treatment; and other gross human rights violations like sexual violence.

**Criminal Activities:** The Company is committed to protect workers from serious human rights abuses and does not tolerate, contribute to, assist with, or facilitate the commission by any party of war crimes or other serious violations of international humanitarian law; and crimes against humanity or genocide.

**Non-State Armed Groups:** The Company does not tolerate any direct or indirect support to any non-state armed groups or their affiliates through the extraction, transport, trade, handling, or export of minerals who:

- Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain, and/or
- Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Illegally tax or extort intermediaries, export companies or international traders.

**Public or Private Security Forces:** The Company wants to eliminate all forms of illegal mining, taxation and extortion as mentioned in the section on non-state armed forces above and does not want supply chain actors to directly or indirectly support public or private security forces who indulge in such activities in its supply chain. Where the company and its supply chain partners/actors engage with public or private security forces the role and responsibility of these forces should be to maintain the rule of law and protect human rights as set out in Voluntary Principles on Security and Human Rights.

### 3. HEALTH & SAFETY

The Company is committed to providing a safe and healthy working environment for all personnel and to identifying and mitigating occupational health and safety risks. Suppliers and business partners are expected to uphold equivalent standards throughout the supply chain.

Appropriate measures shall include adequate ventilation and lighting, safe handling of hazardous substances, machine and electrical safeguards, provision and enforcement of suitable personal protective equipment, access to sanitation and first-aid facilities, fire safety arrangements, clear safety signage, and regular training on health, safety, and emergency preparedness.

### 4. ENVIRONMENT AND CLIMATE CHANGE

The Company is committed to protecting the environment and preventing climate change. Environmental responsibility is at the centre of how the company work and appeal to its suppliers and

business partners to join hands and work with us towards realizing this noble cause and making its supply chain green by adopting the following measures:

**Environmental Management:** Continuously monitor and mitigate the adverse impacts on the environment on account of the operations (blasting, vibration, noise, dust, etc.) including impact on host communities.

**Waste Management:** Practising proper waste management to minimise contamination that impacts both human health and the ecosystem. Specifically, by responsibly managing tailings waste and waste rock, or mineralised waste. Also continuously work towards reducing, reusing, and recycling both non-hazardous and hazardous waste.

**Hazardous Material Management:** Identifying and managing potential risks related to transport, handling, storage, and disposal of all hazardous materials including cyanide. Also specifically identify the mercury emissions to the atmosphere arising from the activities and work towards minimising it and eventually phase out the use of mercury.

**Biodiversity Conservation:** Minimising deforestation arising from the activities, ensuring the protection of flora and fauna, considering the land access needs of host communities, and facilitating responsible closure of mines.

**Continuous Improvements:** Reducing the water footprint and recycling, preserving the quality of water resources by not contaminating them, using energy efficiently, minimising GHG emissions, and combating climate change.

## 5. GOVERNANCE

Good governance is an integral part of the company's operations, and the company continuously works with the employees, suppliers, and business partners to integrate ethics and integrity in all that the company does for which the company has undertaken the following measures:

**Ethics and Integrity:** Drafted the ethical principles to avoid dilemmas and encourage all the employees, suppliers, and business partners to be fair, honest, transparent and accountable in their actions.

**Code of Conduct:** The Company has developed and rolled out a code of conduct for its employees, suppliers and business partners setting out the standards the company wants them to follow. As a minimum, the company wants all the supply chain actors to adhere to this code and conduct their business ethically and responsibly if they want to be in business with us.

**Management Systems:** The Company has developed a robust management system to understand and manage risks and for continuous improvements (refer to the last section of this policy).

**Anti-bribery and Corruption:** The Company appeals to all its supply chain actors to work against corruption in all its forms, including extortion and bribery. This section should be read in conjunction with the AML-CFT Policy.

**Legal Compliance:** The Company complies with the home and host country laws and international legal requirements and standards applicable to us and would require its suppliers and business partners to be compliant. Specifically, with the UKBA, FCPA and UN Convention Against Corruption (UNCAC) in the context of ABAC. The Company also complies with UAE Federal Decree-Law No. 10 of 2025 on Anti-Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organisations, and Cabinet Resolution No. 134 of 2025 (its Implementing Regulation), which supersede Federal Decree-Law No. 20 of 2018 and Cabinet Decision No. 10 of 2019 respectively as the primary UAE AML/CFT legislative framework. Compliance with Ministerial Decree No. 68 of 2024 regarding responsible sourcing of gold is mandatory for all regulated entities.

## **6. MANAGEMENT SYSTEM**

Leadership, support, and action are the three pillars of the company's management system to ensure sustainability and responsible sourcing. Compliance at RG REFINERY FZE is driven from the top; spelt out clearly in the Supply Chain Policy for Responsible Sourcing of Gold, Silver, and other precious metals (this policy), Code of Conduct, guided by other policies that are clearly communicated; and actioned in the supply chain, monitored routinely, documented, and disclosed. Suppliers and business partners shall put management systems in place to ensure compliance and effectively communicate, implement, monitor, and report performance.

The Company continuously tracks its labour and human rights performance through establishing effective management systems. All complaints and grievances are addressed judiciously, without retaliation and used as input to further improve the systems and processes.

The Company never sources from illegal mining operations and supports measures to build secure, transparent, fair-trade, and verifiable precious metals supply chains from artisanal miners to markets.

In case of critical non-compliances with this policy, the Company will suspend or discontinue with any supplier (counterparty) where the company identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses, criminal and legal offences as defined in this document earlier.

## **7. CONTACT DETAILS**

For questions and/or concerns related to the supply chain policy, employees, stakeholders, and counterparties can send an email to [compliance.officer@rgrefinery.com](mailto:compliance.officer@rgrefinery.com)

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