



# SR BULLION FZCO

AG-PF-225, AG Tower, Plot No.JLT-PH1-I1A, Jumeirah  
Lakes Tower,Dubai,UAE

## **Responsible Supply Chain Policy SR Bullion FZCO Version Control (V.3.0) 2025**

### **1. Introduction and Policy Objective**

- 1.1 SR Bullion FZCO ("SR Bullion") is committed to conducting its business operations in a responsible and ethical manner, with a strong focus on environmental sustainability, social responsibility, and governance integrity. This Responsible Supply Chain Policy outlines the principles, standards, and procedures that guide our approach to sourcing and managing our supply chain, particularly in the gold and precious metals sector. The policy supports our commitment to comply with applicable national and international laws and regulations, including those specific to the United Arab Emirates (UAE).
- 1.2 This Policy should be read in conjunction with SR Bullion's AML/CFT Policy, which sets out the Company's overarching compliance framework for Anti-Money Laundering, Countering the Financing of Terrorism, and related financial crime risks. Together, these policies form the foundation of SR Bullion's commitment to ethical sourcing and regulatory compliance.
- 1.3 The objective of this policy is to ensure that SR Bullion's sourcing practices do not contribute to human rights violations, armed conflict, money laundering, terrorist financing, or other illicit activities.

### **2. Legal and Regulatory Framework**

- 2.1 This policy has been developed in alignment with the following UAE laws and regulations, as well as international standards:
  - Federal Decree Law No. (20) of 2018 on Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT);
  - Cabinet Decision No. (10) of 2019 implementing the above Decree Law;
  - Cabinet Decision No. (58) of 2020 on Beneficial Ownership;
  - Cabinet Decision No. (74) of 2020 on Terrorism Lists and the Implementation of UN Security Council Resolutions;
  - Ministerial Decision No. (68) of 2024, extending due diligence requirements to gold dealers, including adherence to the first three steps of the OECD Due Diligence Guidance for Responsible Supply Chains;
  - Circulars issued by the Ministry of Economy and the UAE Financial Intelligence Unit (FIU) regarding high-risk jurisdictions, suspicious transaction indicators, and responsible sourcing obligations.

### **3. Scope**

- 3.1 This policy applies to all SR Bullion operations, employees, and stakeholders involved in the sourcing, refining, trading, transportation, and export of gold and precious metals. It is applicable to all supply chain actors, whether upstream or downstream, including refiners, aggregators, traders, importers, and exporters.



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## 4. Supplier Classification and Risk Categorization

4.1 SR Bullion categorizes its suppliers based on the nature of the supply and the associated risk level. This classification enables a tailored due diligence approach and risk mitigation strategy. Suppliers may be categorized as:

- Mined Gold Suppliers: Artisanal or industrial miners from high-risk or conflict-affected areas;
- Recycled Gold Suppliers: Local market sources, including scrap dealers and pawnshops;
- Refinery-to-Refinery Transfers: Inter-refinery transactions involving processed gold;
- Traders and Aggregators: Entities purchasing from multiple upstream sources.

4.2 Each category is assessed based on the origin of materials, the country of operation, known risk indicators, and the supplier's due diligence and traceability practices.

## 5. Responsible Sourcing Commitments

5.1 SR Bullion is committed to:

- Avoid sourcing materials that may contribute to conflict financing, child labour, forced labour, or environmental degradation;
- Conducting risk-based due diligence on all supply chain actors in accordance with the OECD Due Diligence Guidance and UAE-specific guidance issued by the Ministry of Economy;
- Implementing continuous monitoring and periodic reassessments of suppliers;
- Documenting and retaining due diligence results and risk assessments for audit and regulatory purposes;
- Reporting suspicious transactions to the UAE FIU in accordance with the AML/CFT Law.

## 6. Risk Assessment and Mitigation

6.1 Each supplier shall be subject to a due diligence process based on the risk they pose. Risk indicators may include:

- Operations in high-risk jurisdictions;
- Lack of documentation on origin of gold;
- Involvement of politically exposed persons (PEPs);
- History of non-compliance or suspicious activities.
- High-risk suppliers will be subject to enhanced due diligence (EDD) measures. Where risks cannot be mitigated satisfactorily, SR Bullion may suspend or terminate the business relationship.

## 7. Training and Awareness

7.1 SR Bullion provides mandatory training to relevant employees on responsible sourcing practices, AML/CFT obligations, red flag indicators, and reporting procedures. Training is updated periodically based on changes in the regulatory landscape and business operations.



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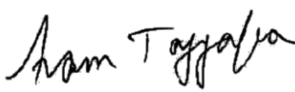
## 8. Policy Review and Update

- 8.1 This Responsible Supply Chain Policy shall be subject to formal review at least once every 12 months, or earlier if prompted by significant changes in the legal or regulatory environment, operational scope, or identified compliance risks.
- 8.2 The Compliance Officer, in coordination with the senior management, will be responsible for evaluating the adequacy of this policy and recommending any necessary amendments. All updates shall be communicated to relevant staff and stakeholders.

## 9. Approval and Implementation

- 9.1 This Policy has been approved by SR Bullion's senior management and shall take effect from the date of its publication. It is binding on all employees, contractors, and relevant stakeholders engaged in the supply chain of gold and precious metals.

### END OF DOCUMENT

Version Control (V.3.0) 15.05.2025	Name	Signature
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