



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

Section A: General Information about the Company:

The sourcing, import, trading, and distribution of high-purity precious metals. The company provides secure, transparent, and compliant trading solutions to wholesalers and refiners clients across regional and international markets. Committed to quality, integrity, and responsible business practices, SR Jewellers LLC delivers reliable precious metals solutions through trusted sourcing, efficient logistics, and strong regulatory compliance.

For More Details refer to website : <https://www.srbulliondmcc.com/>

Section B: Ethical Compliance of SR Jewellers LLC:

1.1 Legislation and Regulations

- a. SR JEWELLERS LLC shall operate in compliance with relevant national and international legislations / regulations as applicable in the countries in which they operate.
- b. All personnel are expected and directed to comply with all applicable laws and regulations as well as all internal SR JEWELLERS LLC rules and policies relating to their business activities.
- c. It is the responsibility of personnel to know and understand legal, regulatory and internal requirements as they apply to their jobs.
- d. Compliance team maintains the list of applicable legal and regulatory requirements and same is followed for compliance on day-to-day basis. Necessary records of requirements and its compliance is maintained.

1.2 Money Laundering, Terrorism Financing, Other Financial Offences

- a. SR JEWELLERS LLC recognizes the fact that entities in the gems and jewellery sector must take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- b. SR JEWELLERS LLC shall act in accordance with national laws with respect to auditing of its financial accounts and maintaining internal controls as guided by various regulations. Following acts and international guidelines is considered while establishing company level policies.
 - UAE Go AML
 - FATF 40 Recommendations and 8 special recommendations
- c. It is the responsibility of concerned personnel to know and understand the relevant money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs.



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Principles, depending on the seriousness of the non-conformance.

- d. Compliance officers ensure all the critical steps such as KYC & KYS, Identification of suspicious transaction, reporting to management and record keeping as required by the local act and legislations are complied with.

1.3 Anti-Bribery and Facilitation Payment Policy:

- a. The SR JEWELLERS LLC shall ensure complete prohibition of Bribery and facilitation payment across organization and in all the entities.
- b. SR JEWELLERS LLC will not offer, accept or countenance any payment, gift of kind, hospitality, expense or promises such that may compromise promises of fair competition.
- c. SR JEWELLERS LLC shall prohibit bribery and facilitation payment and shall comply with various rules and regulations of the land.

1.4 Disclosure of Precious Metal

- a. The SR JEWELLERS LLC shall provide appropriate disclosure of gold purity, weight of the metals processed by them.
- b. Supply chain shall be provided with fire assay report for fine metal in case industrial large size bars and in case of commercial bars purity certificate with unique bar number is provided (these bars are DGD/ LBMA regulated refinery bars)

1.5 Gold & Silver Group of Metal Sourcing Policy (As per DRC)

SR Jewellers LLC is committed to the responsible sourcing of precious metals and to conducting business in a manner that respects human rights and ethical business practices. The Company seeks to procure precious metals from reputable and responsible suppliers and strives to ensure that materials are not sourced from Conflict-Affected and High-Risk Areas (CAHRAs) that may contribute to conflict, illegal activities, or human rights abuses.

The Company expects its suppliers to comply with applicable laws, regulations, and responsible sourcing standards. Where reasonably practicable, SR Jewellers LLC seeks information regarding the origin of precious metals and promotes transparency throughout its supply chain.

Through these efforts, the Company aims to support responsible sourcing practices and maintain the integrity of its products and operations.

CAHRA's are.



SR JEWELLERS LLC

ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

SR Jewellers LLC ensures that none of its supplies come from the aforesaid countries/regions. SR Jewellers LLC shall communicate its sourcing policy to all its stakeholders and will ensure effective implementation of its policy amongst all its entities.

SR Jewellers LLC shall ensure that none of its supplies come from CAHRA Region sources. For More Details of CAHRA's refer to list of country under the regulation of EU 2017 <https://www.cahraslist.net/cahras>.

1.6 Supply Chain Management / Best Endeavours

The management of SR JEWELLERS LLC is committed to take appropriate action to use best endeavours to ensure that the suppliers and contractors are committed for compliance to International Social Standards such as RJC.

1.7 Employment

- a. Compliance is always required, with applicable national and, where appropriate, international laws / regulations with respect to employment and labor.
- b. The SR JEWELLERS LLC shall not require Staff to work for more than the national limit of hours in a week on a regular basis.
- c. The SR JEWELLERS LLC shall ensure that wages and benefits for a standard working week shall meet at least national minimum standards.

1.8 Health and Safety

SR JEWELLERS LLC recognizes the need to develop a sustainable, value-creating business and is committed to the following:

- Any adverse impact of our business processes on those who carry them out shall be identified and eliminated. Towards this end, we will systematically review our operations to identify sources of health and safety related risks.
- This review will use appropriate standards as required by prevailing laws, expert opinion and our knowledge of best practices.
- The review will lead to formulation of clearly described work practices and drills.
- All workplaces will be constructed to meet safety standards with local regulations as the minimum standards that will be applicable

1.9 Non-Discrimination, Disciplinary Practices

- a. Discrimination can mean distinction, exclusion or preference.



SR JEWELLERS LLC

ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

- b. Any form of discrimination relating to the hiring, discharge, pay, promotion and training of employees on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, Migrant status, membership of worker representative bodies, political affiliations, or any criteria that are unlawful is strongly discouraged by the SR JEWELLERS LLC. Any such reported incidents will be viewed as a serious violation of this Business Principles.
- c. We shall at no time condone the use of corporal punishment or other forms of mental or physical coercion.
- d. We encourage all personnel to voice concerns promptly, if they have a genuine reason to believe that a policy, SR JEWELLERS LLC operation or practice is or will likely be in violation of any law, regulation or internal rule or policy, including this Business Principles.

1.10 Child Labour

- a. No form of child labour should be employed at any of the facilities of the SR JEWELLERS LLC. Unless local laws stipulate a higher age, the minimum age for employment that will be applicable is fifteen (As per ILO Convention No. 138).
- b. As per our SR JEWELLERS LLC policy no child labour or young labour will be employed.
- c. SR JEWELLERS LLC will implement suitable policy and procedures to verify the age proof all new employees joining the organization.

1.11 Forced Labour

- a. The management of SR JEWELLERS LLC is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities. Any reported incidents relating to forced labour will be considered as a serious violation of this Business Principles.
- b. The following definitions will be applicable:
 - The Universal Declaration of Human Rights that states that 'No one shall be held in slavery or servitude'
 - ILO Convention 29, which defines forced or compulsory labour as 'all work or service which is extracted from any person under the menace of any penalty, and for which they said person has not offered himself voluntarily'

1.12 Human Rights

- a. All employees in the Company's facilities will be treated with equality, respect and dignity.
- b. The company will not interfere in the right of employees to Observe tenets practices based on caste,



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

race, national origin, gender, religion or disability, union membership or political affiliation

- c. The Company strongly discourages any form of sexually coercive, threatening, abusive or exploitative behavior.
- d. Any reported incidents relating to direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment will not be tolerated by the company.
- e. Our Human Right Policy is in line with The UN Guiding Principles on Business and Human Rights (UNGPs).
- f. Company has well defined human right due diligence frame work which ensure due diligence across the organization for various aspects of human right violation.
- g. Company will ensure non retaliation of employees who has initiated the grievance or whistle blowing and protected from all forms of discrimination in the organization.

1.13 Environment Protection

SR JEWELLERS LLC is committed to effective environmental management as one of its important corporate priorities, and will focus on the following initiatives:

- Compliance with all applicable environmental laws and regulations
 - The impact of each of our operations/ activities on the environment will be systematically assessed for compliance with appropriately defined standards and reviewed periodically to mitigate or eliminate such impact.
 - Improvement of employee & supplier's environmental awareness and performance through detailed policies and procedures, training, and recognition of excellence.
- a. **Environmental Management Systems:** The Group maintains environmental controls and procedures to manage resource use, emissions, and waste in line with applicable legal and RJC COP 2024 requirements.
 - b. **Legal Compliance:** Environmental practices, including water treatment and waste disposal, are implemented in compliance with applicable environmental laws, permits, and regulatory obligations.
 - c. **Water Stewardship:** We are a small office operation and does not have any heave water usage, however precaution is taken for water preservation and awareness is created for water management.
 - d. **Effluent Treatment & Discharge** we are service provider and we do not generate any hazardous waste however, waste of packing material and other office wastes are handled appropriately and same is handover to license/ authorized agency for further treatment.
 - e. **Resource Efficiency** Company promotes efficient use of natural resources by adopting water-



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

efficient systems, preventive maintenance, and environmentally responsible technologies.

- f. **Climate & Energy Management – GHG Measurement:** Greenhouse gas emissions from **Scope 1 and Scope 2 sources** are periodically calculated and monitored in alignment with recognized methodologies. Our Carbon Footprint review for the calendar year 2025 is done and copy of carbon baseline report shall be shared to supply chain partner on request.
- g. **Climate Action & Continuous Improvement:** Emission reduction targets and energy-efficiency initiatives shall be identified after doing the baseline study based on 2025 data.
- h. **Pollution Prevention & Land Protection:** We are small office of Bullion trading and our activities does not involved land contamination, however we ensure safe handling, storage, treatment, and disposal of packing material and other consumables used in our premises.
- i. **Waste Management** We are a Small office of Bullion trading and does not generate any hazardous waste, however we ensure segregation of applicable Solid, and liquid waste and disposed of through authorized methods in accordance with statutory and RJC COP expectations.

1.14 Product Security

SR JEWELLERS LLC is committed to providing safety of products throughout its supply chain by following precautions as mentioned below

- a. Each -and- every stage of product processing it is covered through blanket insurance
- b. Suitable safeguarding and storage are ensured at all stage with the help of safes
- c. We are taking at most care to ensure safety of visitors, Customers and interested parties, suitable arrangements such as CCTV, Multi-level entry doors and other electronic intelligence.
- d. All the concern persons are trained on relevant safety and security procedures to be always followed.

1.15 WHISTLEBLOWER PROTECTION – SCOPE & COVERAGE

- a. This Whistle blower Protection mechanism is established to enable employees, contract workers, suppliers, and other relevant stakeholders to safely raise concerns related to actual or suspected misconduct or non-compliance. The scope of reportable concerns includes, but is not limited to, breaches of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, AML/CFT laws and regulations, and disclosure requirements, as well as social, labour, and human rights standards, and health, safety, and environmental (HSE) obligations. This mechanism supports ethical conduct, transparency, and responsible business practices across the precious metals, and



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

jewellery supply chain, and is designed to align with applicable legal, regulatory, and industry-specific expectations.

- b. Any grievance or whistleblowing can be done using multiple ways such as phone call to compliance officer, email, meeting in personal and using other communication techniques, contact details of compliance officers are published.

1.16 Supply Chain Grievances and Whistleblowing Policy

- a. SR Jewellers LLC Grievance Procedures have been established and available for all employees to raise any issue/grievance for work culture, discipline, practices and supply chain concerns.
- b. If any Grievance from a customer and/or supply chain partner has been reported, relating to any actual, alleged or suspected breach of this Policy, this matter should be raised in accordance with Supply Chain Grievance Policy.
- c. The Relevant Worker responsible for the relationship with the Supplier must communicate to the Supplier about the receipt of the complaint and issue a summary report on the conclusion of the investigation.
- d. It is required that the Supplier's staff have been informed of our supply chain grievance policy and it is available to them as well and can be used by them as a way of raising any concerns.
- e. With respect to breaches, by any party in the Supply Chain Policy Commitments and/or in the Supplier Code of Conduct, the breach will be reported to senior management and based on an investigation report, necessary actions shall if needed be taken.
- f. The Top Management and Marketing team to deal with Grievances, concerns and complaints submitted by the employees, clients, customers, and other affected end user and stakeholders.
- g. A written objection to the business operation resolution issued concerning the employees, clients, customers, and other affected end-user and stakeholders. Which is submitted by him/her to remove the injustice or wrongdoing he/she claims to have been witnessed or inflicted.

The Objectives of the Grievances:

- 1. Ensures that materials acquired and services provided are obtained with adherence to human rights, labor, environmental and highest business ethics.
- 2. Ensures to achieve justice, employment satisfaction and the stability of the legal status of the employees.



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

3. Ensures that business activities meet the international market ethics and standard.
4. Ensures that business operates in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Supplement on Gold, DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain and Responsible Jewellery Council.
5. Maintain the business status in providing the highest standard in operating in the gold and silver industry.

Grounds for the Grievance and Procedure for submission:

1. Human rights violations; force and child labor, torture, serious abuses, etc.
2. Contravention of the law, regulations or by-laws
3. Accounts and financial Manipulation
4. Fraud, bribery, corruption and solicitation
5. Falsification of documents
6. Tolerates law and regulation violators and supporter of non-state armed group and all forms of criminal activities.
7. Employee misconduct and labor practices.
8. Health and safety; working conditions.

We encourage all to submit reports along with solid proof of documents and provide as much information as possible for the investigation. Reports may submit to the following email address:

compliance@srgold.com

Confidentiality:

Committee will guarantee with the outmost capability of SR Jewellers LLC to keep the identity of the concern person confidential with respect to all events. Documents and files, they view and all information that comes from their knowledge will solely be used for the purpose of investigating illegal activities or non-compliance allegations to SR Jewellers LLC policies.

Escalation Procedure and Timeline for Grievances and Whistleblowing

1. Submission of Grievance



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

- Responsible Party: Complainant (employee, client, customer, stakeholder, or end-user)
- Method: Submission via email
- Content Required:
 - Full details of the grievance or complaint
 - Supporting documentation and evidence (if available)
 - Name and contact information (optional for anonymous reporting)
- Timeline: At any time
- Confidentiality: Full confidentiality guaranteed by SR Jewellers LLC

2. Acknowledgement of Receipt

- Responsible Party: Compliance Officer
- Action: Issue written acknowledgment of grievance receipt
- Timeline: Within 3 working days of submission

3. Preliminary Review and Risk Assessment

- Responsible Party: Grievances and Complaints Committee
- Actions:
 - Assess completeness of submission
 - Evaluate urgency and severity
 - Determine if the issue falls under Committee jurisdiction
- Timeline: Within 7 working days from acknowledgment

4. Initiation of Investigation

- Responsible Party: Assigned Investigators (from Compliance or Legal Dept.)
- Action:



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

- Conduct internal investigation
- Request clarifications or additional documents (if needed)
- Interview relevant parties (when applicable)
- Timeline: Investigation must be initiated within 10 working days from the preliminary review
- Duration: Completed within 20 working days, unless extended due to complexity

5. Escalation (if necessary)

If the issue cannot be resolved internally or requires higher authority or external reporting:

- Escalation to:
 - Senior Management info@srgold.com
 - Board Compliance Sub-Committee
 - External Auditor (if legally required or high-risk breach)
- Timeline for escalation decision: Within 5 working days of investigation conclusion

6. Issuing Final Decision and Corrective Actions

- Responsible Party: Grievances and Complaints Committee
- Action:
 - Issue a reasoned written decision
 - Recommend corrective or disciplinary actions
 - Notify the complainant (unless anonymous)
 - Update internal risk management systems
- Timeline: Within 10 working days from conclusion of investigation

7. Follow-Up and Monitoring

- Responsible Party: Compliance Officer



SR JEWELLERS LLC
ETHICAL BUSINESS POLICY

Ethical Policy, Version #01 dated 11th May, 2026

- Action:
 - Ensure implementation of corrective measures
 - Monitor resolution progress
 - Re-assess for recurrence risk
- Timeline: Periodic check-ins at 30, 60, and 90 days after decision

8. Recordkeeping and Reporting

- Responsible Party: Compliance Department
- Action:
 - Securely store grievance records
 - Report summary of grievances and actions to senior management quarterly

Include anonymized data in annual compliance reports

Public Grievances against social & Ethical compliance of the SR Jewellers LLC.

If you come across any instance of non-compliance or specific deviation from our ethical policy, financial non-compliance, Social issue, Human right deviation and or HSE issues pertaining to following

- 1) bribery, facilitation payment, Product security, OECD non-compliance and or reporting any supply chain related issues
- 2) Human Right violation in our premises or in our supply chain
- 3) Concerns of Health, Safety and Environment
- 4) Supply chain related grievance

Please feel free to reach us at below mentioned contact details Our Annual OECD compliance report has been published on our company website

Mode	Details
By Email	compliance@srgold.com

Prepared By : Compliance officer

Approved By : Director

Date : 11th May 2026