RESPONSIBLE SOURCING AND SUPPLY CHAIN DUE DILIGENCE POLICY

Company	**GoldTakas FZCO**
Jurisdiction	United Arab Emirates – Dubai / DMCC
Version / Date	2.0 / 28.08.2026
Effective Date	01/09/2026
Document Owner	MLRO / Compliance Function
Approval Authority	Senior Management

This Policy shall be read in conjunction with GoldTakas FZCO's Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy, Risk Assessment and Scoring Policy, Client Acceptance Policy, Anti-Bribery and Anti-Corruption Policy, Code of Ethics and Business Conduct Policy, Grievance Mechanism Policy, Information Security and Data Protection Policy, Whistleblowing Policy, applicable compliance procedures and the Company's Annual Compliance and Responsible Sourcing Assessment Report.

This Policy consolidates GoldTakas FZCO's responsible sourcing principles and its Third-Party and supply chain due diligence framework into a single integrated governance and control framework. It establishes the principles, responsibilities, risk assessment requirements and due diligence controls applied by the Company in relation to the sourcing, purchase, sale, trading, transportation and movement of precious metals and the management of relevant suppliers, counterparties and other supply chain participants.

Detailed AML/CFT, sanctions screening, customer due diligence and suspicious transaction reporting methodologies are governed by the Company's respective policies and procedures and are not duplicated in this Policy.

1. PURPOSE

The purpose of this Policy is to establish an integrated, risk-based framework for the responsible sourcing of precious metals and the identification, assessment, approval, monitoring and management of risks arising from Third Parties and supply chain relationships.

GoldTakas FZCO recognises that the precious metals sector may be exposed to financial crime, sanctions, corruption, human rights, conflict, provenance, traceability and other responsible sourcing risks throughout the supply chain. Such risks may arise through the origin of precious metals, the conduct or ownership of supply chain participants, geographic exposure, transportation and payment arrangements, documentation, intermediaries or other aspects of the sourcing and trading process.

Accordingly, GoldTakas FZCO is committed to conducting its sourcing and supply chain activities in a manner that promotes legality, transparency, traceability, ethical business conduct, respect for human rights and effective risk management.

This Policy is intended to:

- establish GoldTakas FZCO's responsible sourcing principles and supply chain governance framework;
- identify, assess and manage risks associated with suppliers, counterparties, refineries, intermediaries and other relevant Third Parties;
- establish clear accountability for responsible sourcing and supply chain oversight, including the role of the Designated Supply Chain Officer;
- apply a risk-based approach to Third-Party and supply chain due diligence;
- promote transparency, traceability and appropriate understanding of the origin and movement of precious metals;
- prevent or mitigate involvement in money laundering, terrorist financing, proliferation financing, sanctions violations, corruption, bribery, fraud and other illicit activities;
- identify and address risks relating to conflict financing, serious human rights abuses, child labour, forced labour, human trafficking and other unacceptable sourcing practices;
- establish minimum due diligence, Enhanced Due Diligence and ongoing monitoring requirements;
- define Red Flag identification, escalation, approval, remediation, suspension and disengagement requirements;
- support compliance with applicable UAE and DMCC requirements and internationally recognised responsible sourcing standards; and
- provide a consistent and auditable framework for responsible sourcing and supply chain risk management across the Company.

2. SCOPE

This Policy applies to GoldTakas FZCO's sourcing, purchasing, selling, trading, transportation and other activities involving gold and other precious metals, to the extent relevant to the Company's business activities.
It applies to relationships with, as applicable:

- precious metals suppliers;
- counterparties;

- refineries;
- miners and mining-related entities where relevant;
- traders;
- intermediaries;
- agents;
- brokers;
- logistics providers;
- transportation providers;
- consultants;
- contractors;
- service providers involved in or materially supporting the supply chain;
- strategic Business Partners; and
- other Third Parties involved in the sourcing, purchase, sale, trading, custody, transportation or movement of precious metals or acting on behalf of GoldTakas FZCO in connection with such activities.

This Policy applies both before establishing a relevant business relationship and throughout the lifecycle of that relationship.

The level and nature of due diligence applied shall be proportionate to the role performed by the relevant Third Party, the nature of the relationship and the risks reasonably associated with that relationship. Accordingly, not every requirement under this Policy will apply identically to every Third Party.

Where a Third Party is also a Client of GoldTakas FZCO, the requirements of this Policy shall apply together with the Company's Client Acceptance Policy, Customer Due Diligence Procedure and Risk Assessment and Scoring Policy, as applicable.

3. REFERENCE FRAMEWORK

This Policy has been prepared having regard to applicable legal and regulatory requirements and internationally recognised responsible sourcing and financial crime standards, as amended from time to time.

3.1 UAE and DMCC Framework

The Policy shall be implemented with reference to, where applicable:

- United Arab Emirates AML/CFT legislation and implementing requirements;
- applicable UAE Targeted Financial Sanctions requirements;
- applicable requirements and guidance relating to Dealers in Precious Metals and Precious Stones;
- DMCC rules, regulations, guidance and responsible sourcing requirements applicable to GoldTakas FZCO;
- applicable requirements relating to sanctions, financial crime prevention and regulatory reporting; and
- other binding directions or requirements issued by competent UAE authorities.

3.2 International Standards

The Company shall also have regard, where relevant and proportionate, to:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- FATF Recommendations and relevant risk-based guidance;
- United Nations Guiding Principles on Business and Human Rights;
- applicable United Nations Security Council sanctions and Targeted Financial Sanctions requirements; and
- other internationally recognised responsible sourcing standards relevant to the Company's activities.

3.3 Relationship with Internal Policies and Procedures

This Policy forms an integral component of GoldTakas FZCO's Compliance Management Framework.
It shall be interpreted together with, and shall not replace, the Company's applicable policies and procedures, including:

- Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy;
- Risk Assessment and Scoring Policy;
- Client Acceptance Policy;
- Anti-Bribery and Anti-Corruption Policy;
- Code of Ethics and Business Conduct Policy;
- Grievance Mechanism Policy;
- Whistleblowing Policy;
- Information Security and Data Protection Policy;
- Customer Due Diligence Procedure;
- Suspicious Transaction Reporting Procedure; and
- Sanctions Screening Procedure.

Where a matter gives rise to AML/CFT, sanctions, suspicious transaction or other specialised compliance concerns, the corresponding policy or procedure shall apply in addition to this Policy.

Where any inconsistency arises between this Policy and applicable law or binding regulatory requirements, the applicable legal or regulatory requirement shall prevail.

4. DEFINITIONS

For the purposes of this Policy:
Adverse Media: Credible negative information obtained from publicly available or otherwise reliable sources that may indicate financial crime, corruption, sanctions, human rights, regulatory, integrity or responsible sourcing concerns.
Beneficial Owner / Ultimate Beneficial Owner (UBO): The natural person who ultimately owns or controls a legal entity or arrangement, in accordance with applicable legal and regulatory requirements.
Business Partner: Any external entity or individual maintaining a business relationship with GoldTakas FZCO and whose activities may create relevant compliance, responsible sourcing or supply chain risk.
CAHRA: Conflict-Affected and High-Risk Area, including areas affected by armed conflict, widespread violence, political instability, weak governance, insecurity, systematic human rights abuses or other circumstances giving rise to elevated responsible sourcing risk.

Chain of Custody: Records, documentation and processes designed to demonstrate the ownership, movement, handling and transfer of precious metals through relevant stages of the supply chain.

Compliance Function: The function responsible for overseeing GoldTakas FZCO's compliance framework, including AML/CFT, sanctions and related financial crime requirements, and for providing independent compliance review and escalation where required.

Counterparty: Any person or entity involved in the purchase, sale, sourcing, trading, transfer or other relevant transaction involving precious metals with GoldTakas FZCO.

Designated Supply Chain Officer: The individual formally designated by GoldTakas FZCO to coordinate and oversee implementation of the Company's responsible sourcing and supply chain due diligence framework.

Disengagement: The decision to decline, suspend, restrict or terminate a sourcing, supplier, counterparty or other supply chain relationship due to unacceptable or insufficiently mitigated risk.

Due Diligence: The risk-based process of identifying, verifying, assessing and monitoring relevant Third Parties, supply chain participants, sourcing activities and associated risks.

Enhanced Due Diligence (EDD): Additional and more intensive due diligence measures applied where higher or material responsible sourcing, supply chain, financial crime or integrity risks are identified.

Provenance: Information and evidence concerning the origin, history, ownership, source and movement of precious metals.

Red Flag: A fact, circumstance, behaviour or indicator suggesting elevated responsible sourcing, financial crime, sanctions, corruption, human rights, provenance, traceability or integrity risk requiring further assessment or escalation.

Responsible Sourcing: The sourcing, purchasing, trading and handling of precious metals in a manner designed to identify, assess, prevent and mitigate risks relating to conflict, serious human rights abuses, financial crime, sanctions, corruption and other unacceptable or unlawful practices.

Supplier: Any person or entity supplying precious metals, precious metal products or materially relevant supply chain services to GoldTakas FZCO.

Supply Chain: The network of relevant persons and entities involved in the extraction, production, sourcing, transportation, refining, trading, transfer and delivery of precious metals.

Supply Chain Participant: A supplier, refinery, trader, intermediary, broker, logistics or transportation provider, or other person or entity materially involved in the Company's precious metals supply chain.

Third Party: Any external person or entity conducting business with, providing services to, representing, acting on behalf of, or otherwise maintaining a relevant relationship with GoldTakas FZCO.

Traceability: The ability, to a degree appropriate to the nature and risk of the relationship, to understand and evidence the origin, movement and relevant supply chain history of precious metals.

Zero Tolerance: A circumstance classified under the Company's applicable policies as presenting a prohibited or unacceptable risk that cannot be overridden through Enhanced Due Diligence, mitigation or commercial approval.

5. GOVERNANCE AND RESPONSIBILITIES

GoldTakas FZCO shall maintain clear governance, accountability and escalation arrangements for the implementation and oversight of its responsible sourcing and supply chain due diligence framework.

The allocation of responsibilities under this Section does not remove the responsibility of any Employee, Business Unit or control function to identify and escalate material concerns arising within the scope of their duties.

5.1 Senior Management

Senior Management is responsible for:

- approving this Policy and material amendments;
- establishing and supporting GoldTakas FZCO's commitment to responsible sourcing;
- ensuring that the responsible sourcing and supply chain due diligence framework is appropriate to the nature, scale and complexity of the Company's activities;
- defining or approving the Company's risk appetite in relation to material supply chain and Third-Party risks;
- ensuring that adequate resources, systems and authority are available for effective implementation of this Policy;
- reviewing significant or material responsible sourcing and supply chain risk matters;
- reviewing high-risk sourcing or supply chain relationships where Senior Management approval is required;
- considering material recommendations relating to remediation, suspension or disengagement; and
- exercising appropriate oversight over the effectiveness of the framework.

Senior Management shall not override applicable legal prohibitions or Zero Tolerance determinations for commercial or relationship-management reasons.

5.2 Designated Supply Chain Officer

GoldTakas FZCO designates Saqip Gülzar as the Company's Designated Supply Chain Officer.

The Designated Supply Chain Officer shall have primary responsibility for coordinating and overseeing the day-to-day implementation of the Company's responsible sourcing and supply chain due diligence framework.

Responsibilities shall include, as applicable:

- coordinating the implementation of this Policy across relevant Business Units;
- overseeing the operation of supply chain due diligence processes;
- coordinating supplier, counterparty and other relevant supply chain risk assessments;
- supporting the identification and assessment of sourcing and supply chain Red Flags;
- overseeing, together with relevant Business Units and control functions, provenance, traceability and Chain of Custody reviews;
- coordinating CAHRA and other high-risk supply chain assessments;
- monitoring the implementation of agreed risk mitigation measures and Corrective Action Plans;
- ensuring that material supply chain concerns are appropriately escalated;
- coordinating the maintenance of appropriate responsible sourcing and supply chain records;
- supporting responsible sourcing training and awareness activities;
- monitoring material changes in supply chain risks and practices;
- providing relevant responsible sourcing information and assessments for the Company's annual compliance and responsible sourcing reporting process;
- reporting material responsible sourcing and supply chain matters to the Compliance Function and, where appropriate, Senior Management; and
- supporting the periodic review and enhancement of this Policy and related controls.

The Designated Supply Chain Officer shall have sufficient access to relevant records, personnel and management to perform these responsibilities effectively.

The Designated Supply Chain Officer shall not be responsible for making regulatory determinations reserved to the MLRO or Compliance Function, including decisions relating to suspicious transaction reporting or legally binding sanctions determinations.

5.3 MLRO and Compliance Function

The MLRO and Compliance Function are responsible for providing compliance oversight and specialist review in relation to matters arising under this Policy.

Responsibilities shall include:

- advising on the interpretation and application of applicable AML/CFT, sanctions and related compliance requirements;
- reviewing material or escalated supply chain risk matters;
- reviewing higher-risk relationships and Enhanced Due Diligence where required;
- assessing financial crime, sanctions, corruption or other compliance concerns identified through supply chain due diligence;
- determining whether matters require escalation under the Suspicious Transaction Reporting Procedure, Sanctions Screening Procedure or other applicable compliance procedures;
- supporting the Designated Supply Chain Officer in the assessment of material responsible sourcing risks;
- making or supporting recommendations regarding approval, restriction, suspension, rejection or termination where appropriate;
- monitoring regulatory developments relevant to responsible sourcing and supply chain due diligence; and
- reporting material compliance concerns to Senior Management.

Where the same individual performs both the role of MLRO and Designated Supply Chain Officer, the dual designation shall not remove or reduce any applicable segregation of duties, independent review or Senior Management approval requirement.

Where the same individual would otherwise be responsible for both initiating or materially developing a high-risk supply chain decision and independently approving that same decision, the matter shall be escalated to Senior Management or another appropriately authorised independent person for review and approval.

5.4 Business Units and Relevant Employees

Business Units and Employees involved in sourcing, trading, onboarding, supplier management, logistics, operations or related activities are responsible for:

- complying with this Policy and related procedures;
- identifying proposed suppliers, counterparties and relevant Third Parties;
- obtaining and maintaining required information and documentation;

- supporting due diligence, risk assessment, provenance and traceability reviews;
- providing accurate and timely information to the Designated Supply Chain Officer and Compliance Function;
- identifying and promptly escalating Red Flags or material concerns;
- complying with restrictions, mitigation measures and approval conditions;
- supporting ongoing monitoring and periodic review activities; and
- maintaining accurate and complete records relating to their responsibilities.

No Employee shall knowingly circumvent, suppress or improperly influence a due diligence, escalation or approval requirement.

5.5 Suppliers, Counterparties and Business Partners

Suppliers, counterparties, Business Partners and other relevant Third Parties are expected to:

- conduct their activities in compliance with applicable laws and regulations;
- cooperate with GoldTakas FZCO's risk-based due diligence requirements;
- provide accurate, complete and non-misleading information and documentation;
- provide sufficient information regarding ownership, control and relevant beneficial ownership;
- support reasonable provenance, traceability and Chain of Custody requirements;
- cooperate with reasonable requests for additional information, verification or remediation;
- maintain appropriate licences, permits, registrations and regulatory authorisations;
- comply with applicable sanctions, anti-bribery, anti-corruption and financial crime requirements;
- respect internationally recognised human rights principles;
- promptly disclose material changes affecting their risk profile or relevant supply chain arrangements; and
- promptly disclose material compliance or responsible sourcing concerns relevant to their relationship with GoldTakas FZCO.

Failure to cooperate with reasonable due diligence or remediation requirements may result in enhanced review, restriction, suspension or disengagement.

6. RESPONSIBLE SOURCING PRINCIPLES

GoldTakas FZCO shall conduct its precious metals sourcing and related supply chain activities in accordance with the principles of legality, integrity, transparency, traceability, proportionality and risk-based due diligence.

The Company shall seek to establish and maintain business relationships with suppliers, counterparties and other supply chain participants that demonstrate appropriate standards of legal, ethical and responsible business conduct.

6.1 Legality and Regulatory Compliance

GoldTakas FZCO shall conduct its sourcing and supply chain activities in compliance with applicable laws, regulations, sanctions requirements and regulatory obligations.

The Company shall not knowingly source precious metals from, or maintain supply chain relationships involving, persons, entities, activities or arrangements that are prohibited under applicable law or fall within the Company's approved Zero Tolerance criteria.

Relevant suppliers, counterparties and supply chain participants shall be expected to maintain all licences, registrations, permits and regulatory authorisations required for their activities.

6.2 Ethical Business Conduct

GoldTakas FZCO shall not tolerate bribery, corruption, fraud, deliberate misrepresentation, sanctions evasion or other unlawful or unethical conduct in connection with its sourcing and supply chain activities.

The Company shall take reasonable measures to identify and assess integrity risks associated with relevant suppliers, counterparties, intermediaries and other supply chain participants.

Where bribery, corruption, fraud or other material integrity concerns are identified, the matter shall be escalated in accordance with this Policy and, where applicable, the Anti-Bribery and Anti-Corruption Policy, Code of Ethics and Business Conduct Policy and other relevant compliance procedures.

6.3 Human Rights and Conflict-Related Risks

GoldTakas FZCO shall seek to avoid contributing to, facilitating or benefiting from serious human rights abuses or conflict-related misconduct through its precious metals supply chain.

The Company shall apply risk-based due diligence designed to identify concerns including, where relevant:

- torture, cruel, inhuman or degrading treatment;
- forced or compulsory labour;
- the worst forms of child labour;
- human trafficking;
- serious human rights violations or abuses;
- direct or indirect support to non-state armed groups;
- unlawful support to public or private security forces;
- sourcing connected to armed conflict or widespread violence; and
- other material human rights or conflict-related risks relevant to the supply chain.

Where such risks are identified, GoldTakas FZCO shall assess whether the circumstances require Enhanced Due Diligence, mitigation, suspension or disengagement in accordance with this Policy.

6.4 Transparency, Provenance and Traceability

GoldTakas FZCO shall maintain a risk-based approach to understanding the provenance and movement of precious metals within its supply chain.

Depending on the nature and risk of the relationship, the Company shall seek sufficient information and documentation to reasonably understand:

- the identity and role of relevant supply chain participants;
- the origin or source of the precious metals, where applicable;
- relevant ownership and control information;
- the nature and purpose of the relevant transaction or relationship;
- relevant transportation, logistics and delivery arrangements;
- material intermediaries involved in the supply chain; and
- the movement and Chain of Custody of precious metals to a degree proportionate to the identified risk.

Gaps, inconsistencies or anomalies in provenance, traceability or Chain of Custody information shall be assessed and, where material, escalated for further review.

6.5 Risk-Based and Proportionate Due Diligence

Due diligence measures shall be proportionate to the nature, scale, complexity and risk of the relevant relationship or supply chain activity.

Higher-risk circumstances shall be subject to enhanced scrutiny and, where appropriate, Enhanced Due Diligence, additional verification, management approval, monitoring or other risk mitigation measures.

Lower-risk relationships may be subject to proportionate due diligence provided that applicable minimum legal and Company requirements are satisfied.

The application of a risk-based approach shall not permit the Company to waive mandatory legal requirements or override applicable Zero Tolerance criteria.

6.6 Continuous Risk Awareness

Responsible sourcing due diligence is an ongoing process and shall not be limited to initial onboarding.
GoldTakas FZCO shall remain alert to changes in:

- ownership or control;
- geographic exposure;
- sourcing locations;
- transaction patterns;
- supply chain participants;
- provenance or Chain of Custody information;
- sanctions exposure;
- adverse media;
- regulatory status;
- CAHRA exposure; and
- other circumstances capable of materially affecting the risk profile of a relationship.

Material changes shall trigger reassessment in accordance with this Policy.

7. SUPPLY CHAIN MANAGEMENT AND DUE DILIGENCE FRAMEWORK

GoldTakas FZCO shall maintain a documented, risk-based supply chain due diligence framework designed to identify, assess, manage and monitor risks associated with relevant suppliers, counterparties, Third Parties and supply chain participants.

The framework shall be applied before establishing a relevant relationship and throughout the lifecycle of that relationship.

7.1 Due Diligence Lifecycle

The Company's supply chain due diligence framework shall generally comprise the following stages:

- identification of the relevant supplier, counterparty, Third Party or supply chain participant;
- collection of required information and documentation;
- identity, ownership and regulatory verification, where applicable;
- sanctions, PEP and adverse media screening, as applicable;
- assessment of geographic, activity, ownership, provenance, integrity and supply chain risks;
- identification and assessment of Red Flags;
- assignment of the appropriate risk classification;
- application of Enhanced Due Diligence where required;
- approval, conditional approval, rejection or escalation;
- ongoing monitoring and periodic review;
- implementation and monitoring of risk mitigation measures where appropriate; and
- suspension, restriction or disengagement where risks become unacceptable or cannot be adequately mitigated.

The depth of each stage shall be proportionate to the nature and risk of the relevant relationship.

7.2 Pre-Relationship Due Diligence

No relevant supplier, counterparty or Third Party relationship shall be established until the due diligence required under this Policy has been completed to a level appropriate to the identified risk and all required approvals have been obtained.

Where material information remains outstanding or material concerns remain unresolved, onboarding shall remain suspended pending satisfactory clarification, verification or escalation.

Commercial urgency, transaction value or relationship importance shall not justify bypassing mandatory due diligence or approval requirements.

7.3 Reliance on Information and Documentation

Due diligence may be supported by information obtained from the relevant Third Party, reliable independent sources, approved screening solutions, regulatory or corporate registries and other appropriate sources.

The Company shall assess the reliability and sufficiency of information proportionately to the identified risk.

Information provided by a Third Party shall not be accepted without further enquiry where:

- it is materially inconsistent with other available information;
- its authenticity or reliability is reasonably questioned;
- material information appears to have been omitted;
- ownership or control cannot reasonably be understood;
- provenance or transaction information is inconsistent;
- the documentation does not reasonably correspond with the stated activity or transaction; or
- other Red Flags are identified.

Additional information, independent verification or Enhanced Due Diligence shall be undertaken where appropriate.

7.4 Screening

Relevant suppliers, counterparties, UBOs, controlling persons and other relevant parties shall be screened in accordance with the Company's approved screening methodology and applicable policies and procedures.

Screening shall include, as applicable:

- sanctions and Targeted Financial Sanctions;
- PEP exposure;
- adverse media; and
- other relevant financial crime or integrity indicators.

Screening results shall be assessed in context and shall not be treated as confirmed findings solely on the basis of an automated or potential match.

Potential sanctions matches shall be handled in accordance with the Sanctions Screening Procedure.

Where screening results create reasonable grounds for suspicion of money laundering, terrorist financing, proliferation financing or other financial crime, the matter shall be escalated to the MLRO / Compliance Function in accordance with the Suspicious Transaction Reporting Procedure.

7.5 Risk Assessment and Documentation

The outcome of due diligence shall be documented in a manner sufficient to demonstrate:

- the information reviewed;
- material risks identified;
- relevant Red Flags;
- the basis for the assigned risk classification;
- additional due diligence undertaken;
- material mitigating measures;
- required approvals; and
- the final decision regarding the relationship.

Material judgements shall be supported by an appropriate rationale and shall be capable of subsequent review.

8. RISK IDENTIFICATION AND CLASSIFICATION

GoldTakas FZCO shall apply a risk-based approach to the identification and classification of responsible sourcing, Third-Party and supply chain risks.

Risk assessment under this Policy shall complement, and shall not replace or contradict, the Company's Risk Assessment and Scoring Policy.

Where a supplier or counterparty is also subject to the Company's Client risk assessment methodology, the applicable Client risk classification shall continue to be determined in accordance with the Risk Assessment and Scoring Policy.

8.1 Relevant Risk Factors

Supply chain risk assessments shall consider, as relevant:

- jurisdiction and geographic exposure;
- CAHRA exposure;
- nature of business and activities;
- ownership and control structure;
- UBO transparency;
- regulatory and licensing status;
- sanctions exposure;
- PEP exposure;
- adverse media and integrity concerns;
- corruption and bribery exposure;
- human rights and conflict-related risks;
- source and provenance of precious metals;
- traceability and Chain of Custody;
- use of intermediaries;
- transaction and payment arrangements;
- logistics and transportation arrangements;
- complexity or opacity of the supply chain;
- historical compliance concerns;
- responsiveness to due diligence requests; and
- any other relevant Red Flags or material risk indicators.

No single risk factor shall necessarily determine the overall outcome unless it constitutes an applicable legal prohibition, Zero Tolerance criterion or other mandatory override under the Company's compliance framework.

8.2 APPLICATION OF THE COMPANY RISK CLASSIFICATION METHODOLOGY

Risk classification under this Policy shall be determined in accordance with GoldTakas FZCO's Risk Assessment and Scoring Policy, which establishes the Company's authoritative methodology for risk identification, classification, scoring, overrides and acceptance or rejection decisions.

This Policy does not establish a separate or alternative risk-rating methodology for suppliers, counterparties or supply chain participants.

Responsible sourcing and supply chain information identified under this Policy shall be incorporated into the applicable risk assessment, taking into account, as relevant:

- the nature and role of the supplier, counterparty or other supply chain participant;
- ownership and control information;
- geographic and CAHRA exposure;
- sanctions and other financial crime exposure;
- provenance and origin of precious metals;
- traceability and Chain of Custody;
- refinery or processor information;
- regulatory and licensing status;
- Third-Party and intermediary involvement;
- transaction and payment arrangements;
- human rights, conflict, corruption and integrity concerns;
- adverse media;
- material Red Flags; and
- other information relevant to the overall risk profile.

Where the relevant party is assessed within the Company's corporate risk model, applicable supply chain and Third-Party factors shall be reflected in the Corporate – Supply Chain and Third-Party Risk component of the Risk Assessment and Scoring Policy.

The classification and treatment of risk shall follow the decision framework established under the Risk Assessment and Scoring Policy:

- Red Flag / Zero Tolerance: circumstances classified as unacceptable risk and excluded from quantitative scoring; High Risk Override: circumstances resulting in direct High-Risk classification regardless of the calculated score; and
- Risk Scoring: risk factors falling outside Zero Tolerance and High Risk Override categories and assessed through the applicable quantitative scoring methodology.

Responsible sourcing or supply chain factors shall not be independently reclassified under this Policy where their treatment is expressly prescribed by the Risk Assessment and Scoring Policy.

Where a supply chain matter gives rise to more than one risk factor, the relevant factors shall be assessed in accordance with the Company's established methodology while avoiding inappropriate duplication or double counting of substantially identical risk indicators.

The resulting risk classification shall determine the applicable level of due diligence, Enhanced Due Diligence, monitoring, approval and risk management measures under this Policy.

8.3 HIGH-RISK RELATIONSHIPS

A relationship shall be treated as High Risk where it is classified as such under the Company's Risk Assessment and Scoring Policy, whether as a result of the applicable quantitative risk score or a High Risk Override.

A High-Risk classification shall not, by itself, mean that the relationship is prohibited.

High-Risk relationships may only be established or continued where:

- the relationship is legally permissible;
- the nature and source of the identified risks have been adequately understood;
- required Enhanced Due Diligence has been completed;
- identified risks can be appropriately managed or mitigated;
- the Designated Supply Chain Officer and Compliance Function have completed the reviews applicable to their respective responsibilities; and
- required Senior Management approval has been obtained.

Approval may be subject to specific conditions, enhanced monitoring, transaction or sourcing restrictions, additional documentation requirements, Corrective Action Plans or other proportionate controls.

8.4 ZERO TOLERANCE / RED FLAG OUTCOMES

Where circumstances identified under this Policy fall within a Red Flag / Zero Tolerance criterion under the Risk Assessment and Scoring Policy or another applicable Company policy, the relevant relationship or activity shall be treated in accordance with the applicable Zero Tolerance requirements.

Zero Tolerance circumstances shall not be incorporated into the quantitative scoring model and shall not be overridden through Enhanced Due Diligence, mitigating factors, commercial justification or Senior Management approval.
Where a potential Zero Tolerance circumstance is identified, the relevant relationship or activity shall not progress pending appropriate review and confirmation.

Where an existing relationship is affected, the matter shall be escalated promptly for determination of the appropriate action, including suspension, restriction, termination and any required regulatory or suspicious transaction reporting assessment.

8.5 ESCALATION AND IMPACT ON RISK ASSESSMENT

Material responsible sourcing or supply chain findings identified under this Policy shall be communicated promptly to the Designated Supply Chain Officer and/or Compliance Function, according to the nature of the matter.

Where the finding is capable of affecting the applicable risk classification or score, the relevant risk assessment shall be updated in accordance with the Risk Assessment and Scoring Policy.

Circumstances requiring reassessment may include:

- new or changed CAHRA exposure;

- inability to verify origin or provenance;
- material deterioration in supply chain traceability;
- changes in refinery or key supply chain participants;
- material sanctions, PEP or adverse media developments;
- changes in ownership or control;
- significant regulatory or licensing concerns;
- material Third-Party payment or transaction structure concerns;
- serious human rights or conflict-related concerns; and
- other material Red Flags identified under this Policy.

Where a matter falls within a High Risk Override or Zero Tolerance criterion, the applicable override shall take precedence over the quantitative score.

Where a matter involves AML/CFT, sanctions, terrorist financing, proliferation financing, bribery, corruption or other specialised compliance concerns, the applicable Company policy or procedure shall also be followed.

9. MINIMUM DUE DILIGENCE REQUIREMENTS

GoldTakas FZCO shall perform proportionate due diligence on relevant suppliers, counterparties, Business Partners and other supply chain participants before establishing a relationship and throughout the lifecycle of that relationship.

The minimum due diligence requirements shall be applied according to the nature, role and risk profile of the relevant party. Additional information or verification may be required where risk indicators, Red Flags or material inconsistencies are identified.

9.1 Identification and Legal Existence

For legal entities, the Company shall obtain and verify, as applicable:

- legal name;
- registered and principal business address;
- jurisdiction of incorporation or establishment;
- legal form;
- incorporation or registration details;
- valid trade licence or equivalent regulatory authorisation;
- nature and principal activities of the business;
- authorised representatives and signatories; and
- other information reasonably required to establish the legal existence and business purpose of the entity.

For natural persons, the Company shall obtain and verify appropriate identification information in accordance with applicable requirements and the nature of the relationship.

Documentation shall be obtained from reliable and appropriate sources and shall be current to the extent reasonably required for the purpose of the assessment.

9.2 Ownership and Control

GoldTakas FZCO shall obtain sufficient information to understand the ownership and control structure of relevant suppliers, counterparties and Third Parties.

Where applicable, due diligence shall include:

- identification of direct and indirect owners;
- identification and verification of Ultimate Beneficial Owners;
- identification of controlling persons;
- understanding of intermediate holding entities;
- assessment of complex or unusual ownership structures; and
- identification of nominee, trust or similar arrangements where relevant.
- Complexity in ownership or control shall not automatically result in rejection. However, unexplained, unnecessarily opaque or materially inconsistent ownership arrangements shall be subject to further review and, where appropriate, Enhanced Due Diligence.
- Intentional concealment or misrepresentation of ownership or beneficial ownership information shall be escalated in accordance with the Company's applicable Zero Tolerance and compliance requirements.
- 9.3 Regulatory Status and Business Activity
- Where the relevant activity is subject to licensing, registration, supervision or other regulatory authorisation, GoldTakas FZCO shall take reasonable measures to verify the status of the relevant party.
- The assessment shall consider, as applicable:
- validity and scope of licences and permits;
- relevant regulatory authority;
- consistency between the authorised activity and the actual or proposed business relationship;
- material regulatory restrictions;
- material enforcement or disciplinary information identified through due diligence; and
- whether the relevant party appears to be conducting regulated activity without required authorisation.

Material licensing or regulatory concerns shall be escalated to the Designated Supply Chain Officer and/or Compliance Function.

9.4 Business Purpose and Expected Relationship

The Company shall obtain sufficient information to understand the nature and intended purpose of the relationship.

This shall include, as relevant:

- the role of the Third Party in the supply chain;
- products or services to be supplied or provided;
- expected sourcing or trading activity;
- expected transaction volumes and values;
- expected jurisdictions and trading routes;
- expected payment arrangements;
- use of intermediaries or agents;

- relevant logistics and transportation arrangements; and
- other information necessary to establish a reasonable expected profile for the relationship.

Material deviation from the expected profile may trigger further review or reassessment.

9.5 Screening and Integrity Review

Relevant parties shall be subject to sanctions, PEP and adverse media screening in accordance with Section 7.4 and the Company's applicable screening requirements.

Where relevant to the risk profile, the Company shall also consider credible information concerning:

- fraud;
- bribery and corruption;
- money laundering or terrorist financing;
- proliferation financing;
- sanctions evasion;
- smuggling or illicit trade;
- serious regulatory misconduct;
- human rights abuses;
- conflict financing;
- environmental or responsible sourcing misconduct; and
- other serious integrity concerns.

Adverse information shall be assessed in context, taking into consideration its credibility, seriousness, relevance, recency and relationship to the relevant party.

9.6 Supply Chain and Sourcing Information

For relationships involving the sourcing, supply, trading or movement of precious metals, the Company shall obtain information proportionate to the nature and risk of the relationship concerning:

- the type and form of precious metals involved;
- source and origin information, where relevant;
- relevant suppliers and intermediaries;
- refinery or processing information, where applicable;
- relevant countries of origin, transit and destination;
- transportation and logistics arrangements;
- transaction and payment arrangements;
- available provenance and Chain of Custody information; and
- other information necessary to reasonably understand the supply chain.

The depth of verification shall increase where CAHRA exposure, unusual intermediaries, inconsistent documentation, complex trading routes or other material Red Flags are identified.

9.7 Completion of Due Diligence

A relevant relationship shall not be established until required due diligence has been satisfactorily completed and applicable approvals have been obtained.

Where information is incomplete, inconsistent or initially unverifiable, the relationship shall not automatically be treated as prohibited solely for that reason. The matter shall remain pending while reasonable clarification, verification or Enhanced Due Diligence is undertaken.

Where mandatory due diligence ultimately cannot be completed, or material risks cannot be adequately understood or managed, the relationship shall not be established or continued.

10. ENHANCED DUE DILIGENCE

Enhanced Due Diligence shall be applied where the nature, circumstances or risk profile of a relationship presents elevated responsible sourcing, supply chain, financial crime, sanctions, corruption, human rights, provenance or integrity risk.

EDD shall be proportionate to the identified risk and shall be designed to obtain sufficient information to enable an informed decision regarding whether the relationship may be established or continued and, where appropriate, under what conditions.

10.1 EDD Triggers

EDD shall be considered or applied, as appropriate, where:

- the relationship is classified as High Risk;
- CAHRA exposure is identified;
- precious metals originate from, transit through or are otherwise materially connected to higher-risk jurisdictions;
- ownership or control structures are complex, opaque or difficult to verify;
- material adverse media or integrity concerns are identified;
- material PEP exposure is identified;
- provenance or Chain of Custody information is incomplete, inconsistent or presents material concerns;
- unexplained or unusual intermediaries are involved;
- transaction, payment, logistics or trading arrangements appear unusual or unnecessarily complex;
- third-party payments or payments involving unrelated parties are proposed without a clear legitimate rationale;
- material discrepancies exist between documentation and the stated commercial activity;
- the relevant party has material regulatory, licensing or compliance concerns;
- significant human rights, conflict, corruption or responsible sourcing concerns are identified;
- the relevant party is reluctant or unable to provide information reasonably required for the risk assessment; or
- other Red Flags or circumstances indicate that standard due diligence is insufficient.

The presence of an EDD trigger shall not, by itself, establish wrongdoing or require automatic rejection unless the circumstances separately meet a legal prohibition or Zero Tolerance criterion.

10.2 Enhanced Due Diligence Measures

Depending on the identified risks, EDD may include:

- obtaining additional corporate, ownership or UBO documentation;

- independently verifying ownership and control information;
- obtaining additional information concerning directors, authorised persons or relevant related parties;
- obtaining additional information concerning the nature and purpose of the relationship;
- obtaining information regarding Source of Funds or Source of Wealth where relevant;
- conducting enhanced sanctions, PEP, adverse media and integrity research;
- obtaining additional regulatory or licensing verification;
- obtaining more detailed provenance and Chain of Custody documentation;
- obtaining information concerning upstream suppliers, intermediaries, refineries or other relevant supply chain participants;
- verifying origin, transit and destination information;
- obtaining transaction-specific supporting documentation;
- reviewing payment arrangements and the economic rationale for third-party payments;
- assessing the rationale for complex trading or logistics routes;
- requesting relevant responsible sourcing policies, certifications, audit reports or equivalent evidence;
- obtaining representations, undertakings or contractual commitments;
- conducting management interviews or obtaining written explanations;
- conducting site visits or commissioning independent verification where justified by the risk;
- applying enhanced or more frequent monitoring; and
- imposing specific conditions, restrictions or Corrective Action Plans.

The nature and extent of EDD performed and the rationale for the resulting decision shall be documented.

10.3 EDD Review and Approval

High-Risk relationships shall be subject to review by the Designated Supply Chain Officer and the Compliance Function within their respective areas of responsibility.

Where Senior Management approval is required under this Policy or another applicable Company policy, the relationship shall not be established or continued until such approval has been obtained.

Approval of a High-Risk relationship shall be documented and may be subject to:

- enhanced monitoring;
- shortened review cycles;
- transaction or sourcing restrictions;
- additional documentary requirements;
- specific risk mitigation measures;
- Corrective Action Plans; or
- other conditions considered appropriate to the identified risk.

No approval authority may override an applicable legal prohibition or confirmed Zero Tolerance determination.

11. SUPPLY CHAIN TRACEABILITY AND SOURCE VERIFICATION

GoldTakas FZCO shall maintain risk-based controls designed to obtain reasonable transparency regarding the origin, ownership, movement and relevant supply chain history of precious metals.

The objective of traceability and source verification is to enable the Company to identify and assess material responsible sourcing, financial crime, sanctions, conflict, provenance and integrity risks and to maintain an appropriate evidentiary basis for its sourcing decisions.

11.1 Provenance Information

Depending on the nature and risk of the transaction or relationship, relevant provenance information may include:

- country or location of origin;
- supplier and relevant upstream party information;
- mine or extraction source, where relevant and reasonably available;
- refinery or processor information;
- recycled, scrap or secondary source information, where applicable;
- ownership and transfer information;
- purchase and sales documentation;
- transport and logistics records;
- customs or import/export documentation;
- assay, refinery or product documentation;
- invoices and payment records; and
- other records reasonably supporting the stated source and movement of the precious metals.

The information required shall be proportionate to the type of material, supply chain structure and identified risk.

11.2 Chain of Custody

Where appropriate to the nature and risk of the activity, GoldTakas FZCO shall seek to maintain or obtain records sufficient to reasonably understand relevant transfers and movements of precious metals through the supply chain.

Chain of Custody information shall be assessed for consistency with:

- the identity of relevant supply chain participants;
- stated origin and destination;
- commercial documentation;
- transportation and logistics information;
- transaction values and quantities;
- payment arrangements; and
- the expected profile of the relationship.

The Company is not required to rely on a single form of evidence. Relevant information shall be assessed collectively and in context.

11.3 Provenance and Traceability Red Flags

The following circumstances may require further enquiry or escalation:

- inability to reasonably establish the stated origin of precious metals;
- unexplained inconsistencies in invoices, transport records, assay documentation or other supporting records;
- discrepancies in quantities, weights, values, dates or counterparties;

- unusual or unexplained changes in origin, route or supplier;
- use of intermediaries without a clear commercial rationale;
- transactions involving unrelated third-party payers or beneficiaries without satisfactory explanation;
- unusual routing through higher-risk or secrecy jurisdictions;
- documentation appearing altered, duplicated, fabricated or otherwise unreliable;
- refinery or supplier information that cannot reasonably be verified;
- unexplained breaks in Chain of Custody;
- sourcing patterns inconsistent with the known business profile of the relevant party;
- indications that the stated origin may conceal a different source;
- circumstances suggesting smuggling, customs fraud, trade-based money laundering or sanctions evasion; or
- other information materially inconsistent with the declared provenance or supply chain.

The presence of a Red Flag shall trigger proportionate investigation and shall not automatically constitute a confirmed violation.

11.4 Unresolved Provenance Concerns

Where material provenance or traceability concerns cannot be satisfactorily resolved, GoldTakas FZCO shall not proceed solely on the basis of commercial assurances or unsupported representations.

Depending on the nature and severity of the concern, the Company shall consider:

- additional verification;
- Enhanced Due Diligence;
- independent evidence;
- transaction restriction or suspension;
- Corrective Action Plans;
- escalation to the Compliance Function;
- Senior Management review; or
- disengagement.

Where the circumstances create reasonable grounds for suspicion of financial crime, the matter shall be escalated to the MLRO / Compliance Function under the applicable compliance procedures.

12. CAHRA AND HIGH-RISK SUPPLY CHAINS

GoldTakas FZCO shall apply enhanced scrutiny to sourcing and supply chain relationships involving Conflict-Affected and High-Risk Areas or other circumstances presenting materially elevated responsible sourcing risk.

CAHRA exposure shall be assessed on a risk basis and shall not be determined solely by reference to a single external list.

12.1 Identification of CAHRA Exposure

The Company shall consider relevant and reasonably available information when determining whether a sourcing location, transit route or other material supply chain connection presents CAHRA exposure.

Relevant indicators may include:

- armed conflict or widespread violence;
- political instability or severe insecurity;
- weak or absent governance;
- systemic corruption;
- serious or widespread human rights abuses;
- presence or influence of non-state armed groups;
- unlawful involvement of public or private security forces;
- illicit mineral extraction or trade;
- smuggling or significant informal trade;
- material sanctions exposure;
- weak regulatory or law-enforcement capacity; and
- other circumstances indicating materially elevated responsible sourcing risk.

The assessment shall consider the actual nature of the Company's exposure rather than relying solely on the country of incorporation of a supplier or counterparty.

12.2 Due Diligence for CAHRA Exposure

Where CAHRA exposure is identified, the Company shall apply Enhanced Due Diligence proportionate to the nature and severity of the risk.

Measures may include:

- obtaining more detailed origin and provenance information;
- identifying relevant upstream supply chain participants;
- enhanced verification of ownership and control;
- reviewing transport and trading routes;
- enhanced assessment of sanctions and conflict exposure;
- reviewing the involvement of state or non-state armed groups;
- assessing serious human rights risks;
- assessing payments, taxes, fees or other transfers to public or private security forces where relevant;
- obtaining additional supporting documentation;
- considering independent or third-party information;
- conducting enhanced monitoring; and
- obtaining Senior Management approval where required.

12.3 Serious Human Rights and Conflict-Related Risks

GoldTakas FZCO shall not knowingly tolerate or support supply chain activities involving serious human rights abuses or prohibited support to armed groups.

Where credible information indicates a material risk of:

- torture, cruel, inhuman or degrading treatment;
- forced or compulsory labour;
- the worst forms of child labour;

- human trafficking;
- serious or widespread human rights abuses;
- direct or indirect support to non-state armed groups; or
- other conduct classified as prohibited or Zero Tolerance under applicable Company requirements,
- the matter shall be escalated promptly and the relevant relationship or transaction shall not progress pending assessment.

Where the circumstances are confirmed to fall within an applicable prohibition or Zero Tolerance criterion, the relationship shall be rejected, suspended or terminated as appropriate.

12.4 Public and Private Security Forces

Where sourcing activities involve material interaction with public or private security forces, the Company shall assess whether payments, support or other arrangements create material human rights, corruption, conflict or integrity risks.

GoldTakas FZCO shall not knowingly provide direct or indirect support to public or private security forces where such support involves or facilitates serious human rights abuses or other prohibited conduct.

Where risks are identified but do not require immediate disengagement, appropriate mitigation measures and monitoring shall be established.

12.5 Risk Mitigation in High-Risk Supply Chains

Where elevated supply chain risks are identified but immediate disengagement is not legally required and the risks are considered capable of effective mitigation, GoldTakas FZCO may continue the relationship subject to documented risk mitigation measures.

Such measures shall:

- address the identified risk;
- define responsible persons;
- establish clear actions and, where appropriate, timeframes;
- provide for monitoring and evidence of implementation; and
- specify escalation consequences where remediation is ineffective.

Continued engagement shall not be used where the relevant risk constitutes an applicable legal prohibition or confirmed Zero Tolerance circumstance.

13. RED FLAGS AND ZERO TOLERANCE RISKS

GoldTakas FZCO shall maintain a risk-based approach to identifying and assessing Red Flags arising from suppliers, counterparties, transactions, sourcing arrangements, provenance information and other relevant aspects of the precious metals supply chain.

Red Flags are indicators requiring further assessment and shall not, by themselves, constitute evidence of misconduct or automatically result in rejection unless the circumstances meet an applicable legal prohibition or Zero Tolerance criterion.

13.1 General Red Flag Indicators

Relevant Red Flags may include, without limitation:

- reluctance or refusal to provide information reasonably required for due diligence;
- material inconsistencies between information provided and independently available information;
- unexplained changes in ownership, control, management or business activity;
- complex or opaque ownership structures lacking a reasonable commercial explanation;
- material adverse media concerning financial crime, corruption, sanctions, human rights or responsible sourcing;
- regulatory, licensing or enforcement concerns;
- unexplained use of intermediaries, agents or brokers;
- unusual transaction structures lacking an apparent legitimate commercial rationale;
- unusual or unexplained third-party payments;
- payments involving unrelated persons or entities;
- unexplained cash-intensive arrangements;
- transaction values materially inconsistent with available market or commercial information;
- unusual urgency or pressure to complete transactions before required due diligence is completed;
- requests to omit, alter or misstate relevant transaction or supply chain information; and
- other conduct inconsistent with the expected profile of the relationship.

13.2 Precious Metals and Supply Chain Red Flags

Particular attention shall be given to indicators specific to precious metals sourcing and trading, including:

- inability to reasonably establish the origin or provenance of precious metals;
- inconsistencies between declared origin and available supporting documentation;
- unexplained breaks in Chain of Custody;
- material discrepancies in weight, purity, value, quantity or description;
- invoices or supporting documents that appear duplicated, altered, fabricated or materially inconsistent;
- precious metals apparently originating from jurisdictions inconsistent with the supplier's known business model or trading profile;
- unexplained routing through multiple jurisdictions or intermediaries;
- routing through jurisdictions with no apparent commercial relevance to the transaction;
- unexplained changes in refinery, supplier, transport route or source;
- use of refineries, processors or intermediaries whose identity or legitimacy cannot reasonably be established;
- unexplained discrepancies between customs, transport, refinery, assay, purchase or payment records;
- indications of smuggling, customs fraud, false invoicing or misdeclaration;
- transaction structures potentially designed to obscure the origin, ownership or movement of precious metals;
- unexplained third-party payments or settlement arrangements potentially capable of obscuring the economic parties to a transaction;

- indications that precious metals may have been sourced from conflict-affected or sanctioned locations through intermediary jurisdictions;
- circumstances suggesting falsification or manipulation of provenance, refinery or origin information; and
- other indicators suggesting trade-based money laundering, sanctions evasion, illicit mineral trade or concealment of supply chain origin.

13.3 Human Rights and Conflict-Related Red Flags

Relevant indicators may include:

- sourcing from areas affected by armed conflict, widespread violence or severe insecurity;
- credible allegations of forced labour, child labour or human trafficking;
- credible allegations of serious human rights abuses;
- indications of direct or indirect support to non-state armed groups;
- unexplained payments to public or private security forces;
- involvement of security forces associated with serious human rights abuses;
- illegal or informal extraction presenting material responsible sourcing concerns;
- credible allegations that mineral revenues contribute to armed conflict or serious criminal activity; and
- other circumstances indicating material conflict or human rights risk.

13.4 Assessment of Red Flags

Where a Red Flag is identified, the Designated Supply Chain Officer and/or Compliance Function, according to the nature of the concern, shall ensure that appropriate further assessment is undertaken.

The assessment may include:

- obtaining clarification from the relevant party;
- requesting additional information or documentation;
- independent verification;
- Enhanced Due Diligence;
- additional provenance or traceability review;
- enhanced screening or adverse media research;
- transaction-specific review;
- review of payment or logistics arrangements;
- escalation to Senior Management; or
- other measures proportionate to the nature and severity of the concern.

The rationale for resolving, mitigating or escalating a material Red Flag shall be documented.

A Red Flag shall not be treated as satisfactorily resolved solely because the relevant Third Party provides an unsupported explanation where additional verification is reasonably required.

13.5 Zero Tolerance and Prohibited Risks

Where assessment establishes that the circumstances fall within an applicable legal prohibition or a Zero Tolerance criterion under the Company's approved compliance framework, the relevant relationship or transaction shall not be established, approved or continued.

The determination of Zero Tolerance status shall be made in accordance with the applicable Company policy or procedure, including, where relevant, the Risk Assessment and Scoring Policy, Client Acceptance Policy, AML/CFT Policy and Sanctions Screening Procedure.

No Enhanced Due Diligence measure, mitigating factor, commercial justification or management approval may override an applicable legal prohibition or confirmed Zero Tolerance determination.

Where circumstances also create reasonable grounds for suspicion of money laundering, terrorist financing, proliferation financing or other financial crime, the matter shall be separately escalated to the MLRO / Compliance Function in accordance with the Suspicious Transaction Reporting Procedure.

14. ONGOING MONITORING AND TRIGGER EVENTS

GoldTakas FZCO shall monitor relevant suppliers, counterparties, Business Partners and supply chain relationships throughout the lifecycle of the relationship on a risk-sensitive basis.

Ongoing monitoring shall be designed to identify material changes in risk, emerging Red Flags and circumstances requiring reassessment, Enhanced Due Diligence, additional controls, escalation or disengagement.

14.1 Risk-Based Monitoring

The nature and frequency of monitoring shall be proportionate to the risk profile of the relationship.

Monitoring may include, as appropriate:

- periodic review of due diligence information;
- sanctions, PEP and adverse media rescreening;
- review of changes in ownership or control;
- review of licensing or regulatory status;
- review of sourcing locations and geographic exposure;
- review of CAHRA exposure;
- review of provenance and Chain of Custody information;
- review of transaction and payment patterns;
- review of intermediaries and logistics arrangements;
- monitoring of agreed mitigation measures or Corrective Action Plans; and
- consideration of material changes in applicable legal, regulatory or responsible sourcing risk.

High-Risk relationships shall be subject to enhanced monitoring and, where appropriate, more frequent periodic review.

14.2 Trigger Events

A relationship shall be reassessed where a material Trigger Event occurs.

Trigger Events may include:

- change in ownership, UBO or control;
- material change in management;

- change in business activity or regulatory status;
- new or materially changed sourcing location;
- new CAHRA exposure;
- material change in supplier, refinery, intermediary or logistics arrangements;
- significant change in transaction volume, value or pattern;
- material deviation from the expected relationship profile;
- new sanctions, PEP or adverse media information;
- regulatory investigation or enforcement action;
- material human rights or conflict-related allegations;
- material provenance or traceability concerns;
- unexplained third-party payment arrangements;
- identification of fraud, bribery, corruption or other integrity concerns;
- failure to comply with an agreed Corrective Action Plan;
- material breach of contractual compliance commitments; or
- any other development reasonably capable of materially affecting the risk profile.

14.3 Reassessment Following a Trigger Event

Following a Trigger Event, the Company shall determine whether:

- existing due diligence remains sufficient;
- additional information or verification is required;
- the risk classification should be amended;
- Enhanced Due Diligence is required;
- monitoring frequency should be increased;
- additional restrictions or mitigation measures should be imposed;
- Senior Management approval should be obtained or renewed; or
- the relationship should be suspended, restricted or terminated.

Material reassessments and resulting decisions shall be documented.

14.4 Screening During the Relationship

Relevant parties shall be subject to ongoing or periodic screening in accordance with the Company's Sanctions Screening Procedure and other applicable compliance requirements.

Potential screening matches shall be reviewed and resolved before adverse action is taken solely on the basis of the screening result, except where immediate action is required under applicable law or sanctions requirements.

15. RISK MITIGATION AND CORRECTIVE ACTION PLANS

Where a material risk is identified but immediate disengagement is not legally required and the risk is considered capable of effective mitigation, GoldTakas FZCO may establish proportionate risk mitigation measures or a documented Corrective Action Plan.

Risk mitigation shall not be used to circumvent applicable legal prohibitions or Zero Tolerance criteria.

15.1 Risk Mitigation Measures

Depending on the nature of the identified risk, mitigation measures may include:

- obtaining additional information or documentation;
- enhanced verification;
- additional provenance or Chain of Custody requirements;
- enhanced transaction monitoring;
- increased review frequency;
- restrictions on particular sourcing locations, suppliers, intermediaries or transaction structures;
- restrictions on third-party payments;
- additional contractual representations or undertakings;
- requirement to improve internal controls or compliance procedures;
- remediation of documentation or record-keeping deficiencies;
- independent audit, certification or verification where appropriate;
- training or awareness requirements;
- enhanced management oversight; or
- other controls proportionate to the identified risk.

15.2 Corrective Action Plans

Where remediation requires action over a defined period, the Company may establish a Corrective Action Plan.

A Corrective Action Plan shall, where appropriate, specify:

- the risk or deficiency identified;
- the corrective actions required;
- the person or entity responsible for implementation;
- appropriate target dates or milestones;
- evidence required to demonstrate completion;
- monitoring and review arrangements; and
- consequences of failure to implement the required actions.

Corrective Action Plans shall be proportionate to the seriousness and urgency of the identified risk.

15.3 Monitoring of Remediation

The Designated Supply Chain Officer shall coordinate monitoring of material supply chain Corrective Action Plans, with Compliance Function involvement where the remediation concerns AML/CFT, sanctions, corruption or other compliance matters.

Progress shall be documented and material delays, failures or deterioration in risk shall be escalated.

Completion of a Corrective Action Plan shall not be assumed solely on the basis of confirmation by the relevant Third Party. Evidence of implementation shall be obtained where reasonably appropriate to the risk.

15.4 Failure to Remediate

Where a supplier, counterparty or other relevant Third Party:

- fails to implement agreed corrective actions;

- repeatedly fails to meet agreed milestones;
- refuses to cooperate with reasonable remediation requirements;
- provides materially misleading information regarding remediation; or
- remains exposed to risks that cannot be adequately mitigated,

GoldTakas FZCO shall reassess whether the relationship should be restricted, suspended or terminated.

Material failures shall be escalated to the Designated Supply Chain Officer, Compliance Function and, where appropriate, Senior Management.

16. ESCALATION, APPROVAL, SUSPENSION AND DISENGAGEMENT

GoldTakas FZCO shall maintain clear escalation and decision-making arrangements for material responsible sourcing and supply chain concerns.

Decisions shall be proportionate to the nature, severity, likelihood and potential impact of the identified risk and shall take into account applicable legal and regulatory requirements.

16.1 Escalation

Employees and Business Units shall promptly escalate material Red Flags and responsible sourcing concerns to the Designated Supply Chain Officer and/or Compliance Function, according to the nature of the matter.

Matters requiring escalation include, as applicable:

- potential legal or regulatory breaches;
- potential sanctions exposure;
- suspected money laundering, terrorist financing or proliferation financing;
- suspected bribery, corruption or fraud;
- serious human rights concerns;
- conflict-related sourcing concerns;
- material provenance or traceability discrepancies;
- potential Zero Tolerance circumstances;
- significant failure of a Corrective Action Plan;
- material adverse information concerning a supplier or counterparty; and
- other risks capable of materially affecting the acceptability of the relationship.

Employees shall not delay escalation in order to establish certainty or independently investigate matters outside the scope of their responsibilities.

16.2 Approval of High-Risk Relationships

High-Risk supply chain relationships shall require completion of applicable EDD and the approval requirements established under this Policy and other applicable Company policies.

Where Senior Management approval is required, the approval record shall document, as appropriate:

- the material risks identified;
- EDD performed;
- relevant Red Flags and their resolution;

- proposed mitigation measures;
- monitoring requirements;
- any conditions or restrictions imposed; and
- the basis for the decision.

Approval of a High-Risk relationship does not permanently fix its risk status. The relationship remains subject to ongoing monitoring and reassessment.

16.3 Suspension and Restriction

GoldTakas FZCO may suspend onboarding, transactions or other aspects of a relationship while material concerns are being assessed.

The Company may also impose proportionate restrictions, including:

- transaction limitations;
- sourcing restrictions;
- restrictions on specific jurisdictions or supply chain participants;
- restrictions on third-party payments;
- additional pre-transaction verification;
- enhanced approval requirements; or
- other controls reasonably required to manage identified risk.

Suspension or restriction shall not be used as a substitute for disengagement where the relationship is prohibited or the risk is no longer acceptable.

16.4 Disengagement

GoldTakas FZCO shall reject, suspend or terminate a relationship where:

- continuation is prohibited by applicable law or sanctions requirements;
- a confirmed Zero Tolerance criterion applies;
- mandatory due diligence cannot be satisfactorily completed;
- serious responsible sourcing risks cannot be adequately understood or mitigated;
- the relevant party refuses to provide information materially necessary for due diligence;
- material provenance or traceability concerns remain unresolved;
- serious human rights or conflict-related risks require disengagement;
- agreed remediation materially fails and residual risk becomes unacceptable; or
- continued engagement would otherwise fall outside the Company's approved risk appetite.

Disengagement decisions shall be documented together with the material rationale supporting the decision.

16.5 Responsible Disengagement

Where immediate termination is not legally required and the circumstances permit an orderly disengagement, GoldTakas FZCO shall consider whether the manner and timing of disengagement could create additional legal, human rights, operational or responsible sourcing risks.

Where appropriate, disengagement may therefore include:

- documented communication of material concerns;
- completion of legally required actions;
- controlled suspension of further sourcing;

- implementation of appropriate transition measures; and
- preservation of relevant records and evidence.

Responsible disengagement shall not delay action required by law, sanctions obligations or confirmed Zero Tolerance circumstances.

16.6 AML/CFT and Regulatory Escalation

A decision to reject, suspend, restrict or terminate a relationship shall not, by itself, determine whether an STR/SAR or other regulatory report is required.

Where the underlying circumstances create reasonable grounds for suspicion, the matter shall be separately referred to the MLRO / Compliance Function for assessment under the Suspicious Transaction Reporting Procedure.

Where sanctions or Targeted Financial Sanctions concerns arise, the Sanctions Screening Procedure and applicable legal requirements shall be followed.

Employees and other persons involved in the matter shall not disclose information in a manner that could constitute prohibited tipping-off or otherwise prejudice an investigation or regulatory process.

17. GRIEVANCE AND REPORTING MECHANISM

GoldTakas FZCO shall maintain accessible channels through which Employees, suppliers, counterparties, Business Partners and other relevant stakeholders may raise concerns relating to responsible sourcing, supply chain conduct, human rights, unethical practices or other matters within the scope of this Policy.

17.1 Matters That May Be Reported

Concerns may include, without limitation:

- suspected violations of this Policy;
- serious human rights or conflict-related concerns;
- suspected child labour, forced labour or human trafficking;
- concerns regarding the origin or provenance of precious metals;
- suspected falsification or manipulation of supply chain documentation;
- bribery, corruption, fraud or other unethical conduct;
- suspected sanctions evasion or financial crime;
- improper conduct by suppliers, intermediaries or other supply chain participants;
- attempts to circumvent due diligence or traceability controls;
- retaliation against persons raising concerns; and
- other material responsible sourcing or supply chain concerns.

17.2 Reporting Channel

Responsible sourcing and supply chain concerns may be reported to the Compliance Function through the **Company's designated Compliance reporting channel:**
Email: compliance.ae@goldtakas.com

Reports should, where reasonably available, contain sufficient information to enable appropriate assessment, including the nature of the concern, relevant persons or entities, transactions, dates and supporting information. A reporting person is not required to establish or prove that misconduct has occurred before raising a concern.

17.3 Handling and Escalation

Reports received under this Section shall be assessed and escalated according to their nature and seriousness. Responsible sourcing and supply chain matters shall be referred to the Designated Supply Chain Officer and/or Compliance Function, as appropriate.

Where a report involves:

- suspected money laundering, terrorist financing or proliferation financing;
- sanctions or Targeted Financial Sanctions concerns;
- bribery or corruption;
- suspected criminal conduct; or
- other matters subject to a specialised Company policy or procedure,
- the matter shall also be handled in accordance with the applicable policy or procedure.

Where a concern involves the Designated Supply Chain Officer, MLRO or another person ordinarily responsible for reviewing the matter, the concern shall be escalated to Senior Management or another appropriately independent authorised person.

17.4 Confidentiality and Protection Against Retaliation

Reports shall be handled confidentially and information shall be disclosed only to persons with a legitimate need to know or where disclosure is otherwise required or permitted by applicable law.

GoldTakas FZCO prohibits retaliation, victimisation, intimidation, harassment or other detrimental treatment against a person who raises a concern in good faith, assists another person in raising a concern or participates in an assessment or investigation.

The detailed requirements governing grievance handling, confidentiality, whistleblower protection, investigation and protection against retaliation shall be governed by the Company's Grievance Mechanism Policy and Whistleblowing Policy, as applicable.

18. TRAINING AND AWARENESS

GoldTakas FZCO shall provide risk-based training and awareness appropriate to the responsibilities of Employees involved in sourcing, trading, supplier management, onboarding, compliance, logistics and other activities relevant to the precious metals supply chain.

18.1 Training Content

Training shall address, as relevant:

- the requirements of this Policy;
- responsible sourcing principles;
- Third-Party and supply chain due diligence responsibilities;
- CAHRA and conflict-related risks;

- serious human rights risks;
- provenance, traceability and Chain of Custody;
- supply chain and precious metals Red Flags;
- sanctions, AML/CFT, bribery and corruption risks relevant to supply chain activities;
- escalation requirements;
- grievance and reporting mechanisms;
- confidentiality and protection against retaliation; and
- consequences of non-compliance.

Training shall be proportionate to the role and risk exposure of relevant Employees.

18.2 Training Frequency

Relevant Employees shall receive training:

- as part of induction or onboarding where appropriate;
- periodically thereafter;
- following material changes to this Policy, applicable requirements or relevant risk exposure; and
- where identified deficiencies or emerging risks indicate a need for additional training.

Specialised or enhanced training may be provided to Employees performing higher-risk or control functions.

18.3 Training Records

Records of relevant training shall be maintained and may include:

- training materials;
- attendance or completion records;
- dates of training; and
- evidence of completion where applicable.

19. RECORD KEEPING

GoldTakas FZCO shall maintain sufficient records to demonstrate the implementation and operation of its responsible sourcing and supply chain due diligence framework.

19.1 Records to Be Maintained

Records may include, as applicable:

- supplier, counterparty and Third-Party due diligence documentation;
- ownership and UBO information;
- licensing and regulatory verification;
- screening results and review records;
- risk assessments and classifications;
- Enhanced Due Diligence records;
- provenance and source verification records;
- Chain of Custody and traceability documentation;
- CAHRA assessments;
- Red Flag assessments and supporting documentation;
- approvals and escalation records;

- Corrective Action Plans and evidence of remediation;
- monitoring and periodic review records;
- suspension, restriction and disengagement decisions;
- relevant grievance and reporting records;
- training records; and
- other documentation supporting material decisions under this Policy.

19.2 Record Integrity and Confidentiality
Records shall be accurate, sufficiently complete and maintained in a manner that enables material decisions and due diligence activities to be reconstructed where reasonably required.

Access shall be restricted to authorised persons on a need-to-know basis.

Records containing confidential, personal or sensitive information shall be protected against unauthorised access, disclosure, alteration, loss or destruction in accordance with the Company's Information Security and Data Protection Policy and applicable legal requirements.

19.3 Retention
Records shall be retained for at least the minimum period required under applicable UAE laws, regulations and DMCC requirements and for longer where required by:

- an ongoing investigation;
- regulatory or law-enforcement requirements;
- litigation or legal hold;
- audit or assurance activities; or
- another applicable legal or Company requirement.

Where different retention periods apply, the longer applicable period shall be observed where legally permissible.

20. MONITORING, ASSURANCE AND REVIEW
GoldTakas FZCO shall periodically assess the design, implementation and effectiveness of its responsible sourcing and supply chain due diligence framework.

20.1 Compliance Monitoring
The Designated Supply Chain Officer and Compliance Function shall, within their respective responsibilities, monitor the implementation of this Policy and identify material deficiencies, recurring issues or emerging risks requiring remediation.
Monitoring may consider:

- completion and quality of due diligence;
- risk classifications;
- High-Risk relationships;
- EDD quality and completeness;
- provenance and traceability controls;

- CAHRA assessments;
- Red Flag identification and resolution;
- Corrective Action Plans;
- escalation and approval processes;
- ongoing monitoring;
- record keeping; and
- training effectiveness.

Material deficiencies shall be documented and subject to appropriate corrective action.

20.2 Independent Assurance

Where appropriate having regard to applicable requirements and the nature, scale and risk profile of the Company's activities, GoldTakas FZCO may subject its responsible sourcing and supply chain due diligence framework to independent review, audit or assurance.

Any person conducting an independent review shall have appropriate competence and sufficient independence from the activities being reviewed.

Material findings shall be reported to Senior Management and tracked through remediation.

20.3 Annual Compliance and Responsible Sourcing Assessment

GoldTakas FZCO shall perform an annual assessment of the implementation and effectiveness of its compliance and responsible sourcing framework.

The results shall be documented through the Company's Annual Compliance and Responsible Sourcing Assessment Report, which shall remain a separate governance and assessment document and shall not form part of this Policy.

The annual assessment shall consider, as relevant:

- material responsible sourcing and supply chain risks identified during the period;
- High-Risk relationships and material Red Flags;
- significant CAHRA exposures;
- material due diligence or control deficiencies;
- Corrective Action Plans and remediation;
- material grievances and escalations;
- training activities;
- changes in applicable requirements or risk exposure; and
- opportunities to enhance the framework.

The Designated Supply Chain Officer shall support the preparation of responsible sourcing and supply chain components of the annual assessment. The Compliance Function shall provide relevant compliance input.

The assessment shall be subject to appropriate Senior Management review and approval.

20.4 Policy Review

This Policy shall be reviewed at least annually and earlier where required due to:

- material changes in applicable laws, regulations or DMCC requirements;
- material changes in the Company's business model or supply chain;
- significant changes in responsible sourcing risks;
- material compliance incidents or control deficiencies;
- findings arising from audits, assurance reviews or regulatory assessments; or
- other developments materially affecting the adequacy of the framework.

Material amendments shall be approved by Senior Management.

21. FINAL PROVISIONS

21.1 Compliance with this Policy

Compliance with this Policy is mandatory for all Employees and functions within its scope.
Failure to comply with this Policy may result in disciplinary action and, where relevant, contractual, commercial or other appropriate measures.

Non-compliance by a supplier, counterparty, Business Partner or other Third Party may result in additional due diligence, enhanced monitoring, remediation requirements, restriction, suspension or termination of the relationship, depending on the nature and severity of the matter.

21.2 No Circumvention

No Employee, manager, supplier, counterparty or other person acting for or on behalf of GoldTakas FZCO shall knowingly circumvent, override, suppress or improperly influence a due diligence, screening, escalation, approval, monitoring or record-keeping requirement established under this Policy.

Commercial considerations, transaction urgency, relationship value or revenue opportunity shall not justify non-compliance with applicable legal requirements or the Company's approved Zero Tolerance criteria.

21.3 Interpretation and Escalation

Questions regarding the interpretation or application of this Policy shall be referred to the Designated Supply Chain Officer and/or Compliance Function, depending on the nature of the matter.

Where a matter involves AML/CFT, sanctions, suspicious activity or another specialised compliance area, the relevant Company policy or procedure shall apply.

Where there is uncertainty concerning the appropriate treatment of a material risk, the matter shall be escalated rather than resolved through unsupported assumptions.

GoldTakas FZCO
Almas Tower-49-A05 Plot No: JLT-PH1-A0 JLT, P.O. Box: 23789 Dubai, UAE
DUBAI, Tax No: 105144175400003
+971 4 576 7036 - info.ae@goldtakas.com - www.goldtakas.com

21.4 Effective Date and Supersession

This Policy shall become effective on the date approved by Senior Management.

Upon its effective date, this Policy shall supersede and replace the Company's previous:

- Responsible Sourcing Policy; and
- Third-Party and Supply Chain Due Diligence Policy.

References in other Company policies, procedures, reports or records to either superseded policy shall, where appropriate, be interpreted as references to this Responsible Sourcing and Supply Chain Due Diligence Policy until the relevant documents are formally updated.

The Annual Compliance and Responsible Sourcing Assessment Report shall remain a separate document and shall continue to be prepared and approved in accordance with Section 20.3.

21.5 Approval and Ownership

This Policy is owned by the MLRO / Compliance Function, coordinated in respect of responsible sourcing and supply chain matters by the Designated Supply Chain Officer, and approved by Senior Management.

The current approved version shall be maintained within the Company's controlled policy framework and made available to relevant Employees.