

GRIEVANCE MECHANISM POLICY

Company	GoldTakas FZCO
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This Policy shall be read in conjunction with GoldTakas FZCO's Responsible Sourcing Policy, Third-Party and Supply Chain Due Diligence Policy, Code of Ethics and Business Conduct Policy, Whistleblowing Policy and other applicable compliance procedures.

Rather than duplicating detailed reporting, investigation and compliance requirements contained within other policies, this Policy establishes the framework through which Employees, suppliers, counterparties, Business Partners, affected stakeholders and other interested parties may raise concerns relating to responsible sourcing, human rights, ethical conduct, supply chain practices and other compliance-related matters.

1. PURPOSE

The purpose of this Policy is to establish an effective, transparent and accessible grievance mechanism that enables concerns relating to GoldTakas FZCO's business activities, sourcing practices, supply chain relationships and ethical conduct to be raised, assessed and addressed appropriately.

This Policy aims to:

- Promote transparency and accountability
- Support responsible sourcing practices
- Facilitate early identification of risks and concerns
- Support human rights and ethical business conduct
- Provide a structured process for grievance handling and resolution
- Strengthen GoldTakas FZCO's governance and compliance framework

2. SCOPE

This Policy applies to grievances relating to:

- Responsible sourcing activities
- Supply chain participants
- Human rights concerns
- Child labour
- Forced labour
- Human trafficking
- Modern slavery
- Corruption and bribery concerns
- Environmental concerns related to sourcing activities
- Ethical misconduct
- Supply chain transparency concerns
- Compliance-related concerns associated with GoldTakas FZCO's operations

This Policy may be used by:

- Employees
- Suppliers
- Counterparties
- Business Partners
- Contractors
- Local communities
- Civil society organizations
- Industry participants
- Other affected stakeholders

3. REFERENCE FRAMEWORK

This Policy has been prepared with reference to:

- Applicable UAE laws and regulations
- DMCC Responsible Sourcing Requirements

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- United Nations Guiding Principles on Business and Human Rights
- GoldTakas FZCO Responsible Sourcing Policy
- GoldTakas FZCO Third-Party and Supply Chain Due Diligence Policy
- GoldTakas FZCO Code of Ethics and Business Conduct Policy
- GoldTakas FZCO Whistleblowing Policy
- Other applicable internal policies and procedures

4. DEFINITIONS

Grievance: A concern, complaint, allegation or issue raised regarding actual, suspected or potential adverse impacts associated with GoldTakas FZCO's business activities or supply chain relationships.

Complainant: The individual or organization submitting a grievance.

Stakeholder: Any individual, group or organization affected by or interested in GoldTakas FZCO's activities.

Human Rights Concern: Any concern relating to internationally recognized human rights principles.

Responsible Sourcing Concern: Any concern relating to sourcing practices, supply chain conduct or traceability.

Supply Chain Participant: Any supplier, counterparty, intermediary, refinery, logistics provider or other participant within the supply chain.

Retaliation: Any adverse action taken against an individual who raises a concern in good faith.

Compliance Function: The function responsible for assessing and coordinating grievance reviews.

5. GOVERNANCE AND RESPONSIBILITIES

5.1 Senior Management

Senior Management is responsible for:

- Approving this Policy
- Supporting an effective grievance mechanism
- Reviewing significant grievance matters where appropriate
- Ensuring adequate resources are available

5.2 Compliance Function

The Compliance Function is responsible for:

- Receiving grievances
- Assessing grievances
- Coordinating investigations and reviews
- Maintaining grievance records
- Escalating significant concerns
- Monitoring corrective actions
- Reporting material matters to Senior Management

5.3 Employees

Employees are responsible for:

- Cooperating with grievance reviews

- Reporting concerns where appropriate
- Supporting investigations
- Maintaining confidentiality

5.4 Suppliers and Business Partners

Suppliers and Business Partners are expected to:

- Cooperate with grievance assessments
- Provide relevant information when requested
- Support remediation activities where appropriate
- Avoid retaliatory conduct

6. GRIEVANCE SUBMISSION

GoldTakas FZCO shall maintain accessible and appropriate channels through which grievances may be submitted by Employees, suppliers, counterparties, Business Partners and other affected stakeholders.

Grievances may be submitted through:

- Designated email addresses
- Written correspondence
- Compliance reporting channels
- Other communication channels designated by GoldTakas FZCO

Where possible, grievances should include:

- Description of the concern
- Relevant dates and locations
- Parties involved
- Supporting information or documentation
- Any actions already taken

Anonymous grievances may be accepted where permitted by applicable law and where sufficient information is available to assess the concern.

GoldTakas FZCO shall seek to ensure that grievance submission channels are accessible, fair and capable of supporting good faith reporting.

Grievances may be submitted through the designated Compliance reporting channel at compliance.ae@goldtakas.com or through other communication channels designated by GoldTakas FZCO.

7. ASSESSMENT AND INVESTIGATION

All grievances shall be reviewed objectively, independently and in good faith.

Upon receipt of a grievance, GoldTakas FZCO may:

- Acknowledge receipt where appropriate
- Conduct an initial assessment

- Determine the nature and severity of the concern
- Determine whether additional information is required
- Decide whether further investigation is necessary
- Assign responsibility for review where appropriate

Investigations may include:

- Document reviews
- Interviews
- Due diligence activities
- Supplier engagement
- Site visits where appropriate
- Independent verification where necessary

The scope and depth of any investigation shall be proportionate to the nature, severity and potential impact of the concern.

8. REMEDIATION AND CORRECTIVE ACTION

Where a grievance is substantiated, GoldTakas FZCO may implement corrective actions appropriate to the circumstances.

Corrective actions may include:

- Enhanced monitoring
- Additional due diligence
- Supplier remediation measures
- Additional training and awareness activities
- Process improvements
- Risk mitigation measures
- Suspension of activities
- Termination of business relationships
- Other corrective actions deemed appropriate

Corrective actions shall be documented and monitored where appropriate.

Where feasible, GoldTakas FZCO may engage relevant stakeholders during the remediation process.

9. CONFIDENTIALITY AND NON-RETALIATION

GoldTakas FZCO is committed to protecting individuals who raise concerns in good faith. Grievances shall be handled with appropriate confidentiality.

Information shall only be disclosed where necessary for:

- Assessment
- Investigation
- Remediation

- Legal obligations
- Regulatory obligations

GoldTakas FZCO prohibits retaliation against any individual who:

- Raises a grievance in good faith
- Participates in an investigation
- Provides information relating to a grievance
- Assists in remediation activities

Retaliation may result in disciplinary, contractual or other appropriate action.

10. ESCALATION

Certain grievances may require immediate escalation due to their nature, severity or potential impact.

Examples include:

- Serious human rights concerns
- Child labour allegations
- Forced labour allegations
- Human trafficking concerns
- Corruption or bribery concerns
- Significant responsible sourcing concerns
- Regulatory violations
- Serious reputational risks
- Environmental incidents with significant impact

The Compliance Function shall determine appropriate escalation measures and involve Senior Management where necessary.

11. RECORD KEEPING

GoldTakas FZCO shall maintain complete, accurate and auditable records relating to grievances and their resolution.

Records may include:

- Grievance submissions
- Assessment records
- Investigation records
- Correspondence
- Supporting documentation
- Corrective action records
- Escalation records
- Closure records

Records shall be retained for a minimum of five (5) years or longer where required by applicable laws, regulations, investigations, audits or legal holds.

A Grievance Register may be maintained to record, monitor and track reported grievances and their status. Grievances shall be tracked until closure and the outcome, remediation measures and closure rationale shall be documented where appropriate.

12. TRAINING AND AWARENESS

GoldTakas FZCO shall promote awareness of the grievance mechanism among relevant Employees and, where appropriate, external stakeholders.

Training and awareness activities may include:

- Responsible sourcing awareness
- Human rights awareness
- Grievance handling procedures
- Reporting channels
- Non-retaliation requirements
- Stakeholder engagement principles

Training shall be provided:

- Upon joining where relevant
- At least annually
- Following significant regulatory or policy changes
- Where additional training is considered necessary

Training records shall be documented and retained.

13. MONITORING AND REVIEW

The Compliance Function shall periodically review the effectiveness of the grievance mechanism.

Reviews may consider:

- Number and nature of grievances
- Investigation outcomes
- Corrective action effectiveness
- Trends and recurring issues
- Response times
- Stakeholder feedback
- Opportunities for improvement

This Policy shall be reviewed at least annually and whenever significant regulatory, operational or organizational changes occur.

14. FINAL PROVISIONS

This Policy shall enter into force upon approval by Senior Management and shall remain effective until amended, replaced or withdrawn.

The Compliance Function shall be responsible for the interpretation, implementation and ongoing administration of this Policy.

All Employees, suppliers, counterparties, Business Partners and relevant stakeholders are encouraged to support GoldTakas FZCO's commitment to responsible sourcing, ethical business conduct, stakeholder engagement and effective grievance resolution.

In cases of uncertainty regarding the application or interpretation of this Policy, guidance shall be sought from the Compliance Function before any action is taken.