RESPONSIBLE SUPPLY CHAIN POLICY

1. Policy Statement

GGT PRIME FZCO ("the Company") is a precious metals trading company fully committed to providing high-quality products while meeting the highest ethical and moral standards with respect to responsible sourcing. The Company is fully committed to upholding appropriate standards for human rights, labour, environmental impact, and business ethics in order to attain and maintain a responsible supply chain.

The Company recognizes that Gold and Platinum Group Metals (Platinum, Palladium and Rhodium) carry a risk of significant adverse impact associated with their extraction, trading, handling, and export from conflict-affected and high-risk areas (CAHRAs). Recognizing our responsibility to respect human rights and not to contribute to conflict, the Company commits to adopt, widely disseminate, and incorporate into contracts and/or agreements with suppliers the policy set out below, as a common reference point for conflict-sensitive sourcing practice and supplier risk awareness from the point of extraction through to the end user.

The Company commits to refrain from any action which contributes to the financing of conflict, and to comply with relevant United Nations sanctions resolutions and, where applicable, domestic laws implementing such resolutions, together with applicable UAE laws and regulations.

The Company strongly recommends, and where commercially reasonable requires, that its suppliers operate in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Responsible Jewellery Council (RJC) Code of Practices / Chain of Custody Standard for Precious Metals, the LBMA Responsible Gold and Responsible Silver Guidance, the DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain, and, where relevant, the Responsible Minerals Initiative (RMI) standards.

2. Scope and Applicability

This Policy applies to all directors, officers, employees, and relevant contractors of GGT PRIME FZCO, and to all suppliers, refiners, agents, and business partners engaged in the sourcing, trading, transport, handling, refining, or export of Gold and Platinum Group Metals on behalf of, or in transactions with, the Company. It applies from the point of extraction or first point of entry into the supply chain through to sale to the end user, covering the full mineral supply chain regardless of country of origin.

3. Definitions

- Conflict-Affected and High-Risk Areas (CAHRAs): areas identified by the presence of armed conflict, widespread violence, fragile state institutions, systemic human rights abuses, or breakdown of civil infrastructure, per OECD guidance.
- Non-State Armed Groups: armed groups distinct from government security forces, including rebel or paramilitary groups not under effective state control.
- Due Diligence: an ongoing, proactive, and reactive process by which companies identify, assess, prevent, mitigate, and account for how they address actual and potential adverse impacts in their supply chains.
- Red Flag: a fact, circumstance, or pattern of activity that indicates an elevated risk within the supply chain warranting enhanced due diligence.

- Politically Exposed Person (PEP): an individual entrusted with a prominent public function, and their close family members and associates.

4. Commitments

4.1 Human Rights and Serious Abuses

The Company commits to:

- Neither gain from, nor be a party to, assist, or facilitate any transaction arising from serious abuses, including inhumane or degrading treatment, forced or compulsory labour, child labour, or any other form of human rights violation or criminal activity.
- Immediately suspend or discontinue engagement with any supplier where the Company identifies a reasonable risk that its source is, or is linked to, a party committing serious abuses as defined above, pending the outcome of enhanced due diligence.

4.2 Non-State Armed Groups and Conflict Financing

The Company will not tolerate any supplier that directly or indirectly supports non-state armed groups through the extraction, transport, trade, handling, or export of minerals, including but not limited to procuring minerals from, making payments to, or otherwise providing logistical assistance or equipment to non-state armed groups or their affiliates who:

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

The Company will not accept, and will directly discontinue, transactions with any upstream supplier identified as high-risk due to involvement or participation in any of the above.

4.3 Promotion of Responsible Sourcing

The Company will contribute to and participate in the promotion of responsible sourcing of precious metals by:

- Building long-term relationships with suppliers and customers founded on mutual commitment to responsible sourcing.
- Supporting suppliers in adhering to this Policy and encouraging them to communicate it to their staff and their own supply chains.
- Disseminating relevant guidance published by international and local bodies including the RJC, DMCC, LBMA, OECD, and RMI.

4.4 Anti-Bribery and Anti-Corruption

The Company will not offer, promise, give, or demand any bribe, and will resist the solicitation of bribes intended to conceal or disguise the origin of precious metals, or to misrepresent taxes, fees, or royalties paid to governments in connection with extraction, trade, handling, transport, or export.

4.5 Anti-Money Laundering and Counter-Terrorist Financing

- Maintain a robust management system consistent with applicable Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) standards, including UAE Central Bank and DMCC/Free Zone AML regulations where applicable.
- Conduct Know-Your-Customer (KYC) and Know-Your-Counterparty checks, including beneficial ownership identification and screening against applicable UN, OFAC, EU, and UAE sanctions and PEP lists, prior to onboarding any supplier or counterparty and on an ongoing basis thereafter.
- Promptly report suspicious individuals, entities, or transactions identified in the course of implementing this Policy to the relevant competent authorities, in accordance with applicable law.

4.6 Risk-Based Due Diligence

- Carry out effective due diligence on a risk-based approach, aligned with the OECD five-step framework, before entering into any transaction, and apply continuous monitoring to existing counterparties to assess and mitigate identified risks.
- Escalate any transaction or relationship presenting a red flag for enhanced due diligence, senior management review, and, where warranted, independent third-party investigation prior to proceeding.

4.7 Record-Keeping

The Company will create and retain complete, accurate, and readily retrievable records of all precious metals transactions and due diligence activities, sufficient to demonstrate compliance with this Policy, for a minimum of five (5) years or such longer period as required by applicable law.

4.8 Training and Awareness

The Company will train relevant staff and raise employee awareness of this Policy and responsible sourcing principles through induction, periodic formal training, and participation in relevant seminars and conferences, with training completion documented and refreshed at least annually.

4.9 Independent Verification and Audit

- Subject the Company's due diligence management system to periodic internal review and, where required by applicable standards (e.g., RJC, LBMA, DMCC), independent third-party audit.
- Cooperate with reasonable audit or verification requests from customers, refiners, or accreditation bodies relevant to this Policy.

4.10 Data Protection and Confidentiality

Information collected through due diligence, KYC, and reporting processes will be handled in accordance with applicable data protection law and kept confidential, accessible only to personnel with a legitimate compliance need, save where disclosure is required by law or to competent authorities.

5. Grievance and Whistleblowing Mechanism

The Company maintains a confidential channel through which employees, suppliers, and other stakeholders may raise concerns or report suspected non-compliance with this Policy, including suspected human rights abuses, conflict financing, bribery, or money laundering, without fear of retaliation. Reports may be submitted via the contact details in Section 8. The Company prohibits retaliation against any person who raises a concern in good faith and will investigate all reports promptly and, where appropriate, confidentially.

6. Non-Compliance and Corrective Action

Where a supplier or counterparty is found to be in breach of this Policy, the Company will assess the severity of the breach and may require a time-bound corrective action plan, suspend the relationship pending remediation, or immediately terminate the relationship where the breach involves serious abuses, conflict financing, or illegal armed group involvement as described in Section 4. Employees found to have knowingly violated this Policy may be subject to disciplinary action up to and including termination.

7. Governance and Policy Review

Ultimate responsibility for this Policy rests with the Company's senior management, who will designate a Compliance Officer (or equivalent function) responsible for day-to-day implementation, supplier due diligence, record-keeping, and reporting. This Policy will be reviewed at least annually, and whenever there is a material change in applicable law, industry standards, or the Company's risk profile, to ensure it remains current and effective.

GGT PRIME FZCO requires all staff involved in the precious metals supply chain to strictly comply with this Policy and to implement it within the Company's management system.

8. Contact Details

For questions, concerns, or reports related to this Supply Chain Policy, employees, suppliers, stakeholders, and counterparties may contact the Compliance Department at:compliance#ggtprime.ae.

Acknowledgment

We would like to thank the OECD for Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, portions of which this Policy adapts.

Approved by: ________________________ Position: ________________________ Date: ________________________