



PRECIOUS METALS SUPPLY-CHAIN POLICY

PHONIX PRECIOUS METALS DMCC

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Precious Metals Supply Chain Policy

COMMITMENT:

Phoenix Precious Metals DMCC (**The Company / We**) with its capacity as a responsible gold sourcing and trading company, Dubai, is committed to supporting the standard compliance rules and regulations aimed at combating money laundering and the financing of terrorism.

The issuance of this policy and our Compliance Procedure is a reflection of our commitment towards responsible business and a responsible engagement with conflict-free supply chain and our willingness to co-operate with Government Authorities/Agencies and law enforcement agencies as a part of our efforts to support AML-CFT and compliance activities.

PURPOSE

This Precious Metals Supply-Chain Policy depicts our provisions, statements/commitment and controls on our metal supply and transactions including the sales and purchase of precious metal in line with standard sourcing practice and our company policy and procedures.

The policy clarifies our intentions to deal only in legitimate business transactions and avoid any supply/transactions if we feel/identify is suspicious or not as per our “AML-CFT & Compliance Policy”. The Company will not tolerate any involvement in illegal activities (if identified) by its staff, Members, subsidiaries, or client/customers/supplier.

SCOPE

This policy is an integral part of our operations and our commitments. The provisions, procedures and control mentioned in this policy shall apply to:

1. The Company Compliance team, Operations Team and all other employee who are directly involved in the transactions such as receiving and processing of the precious metal before sending physical processing.

General awareness of the policy for the following:

2. The Company Senior Management
3. The Branches and Subsidiary.
4. The company Owner/Partner(s)

Breach of the policy by any of the staff, Senior Management, Branches, subsidiaries shall constitute a disciplinary offence and The Company reserves the right take any action to take any additional action as it, in its sole discretion, deems fit in securing the diligent and proper implementation and enforcement of this Policy.

PRECIOUS METAL SUPPLY-CHAIN POLICY

We accept precious metals as mined gold ore, refined gold bullions or scrap jewellery to process and refine them to the fineness of 24kt, which is then converted into fine bullions in our refinery. The company source the precious metals from different local and international mines and companies, which makes it important to have a supply-chain policy for sourcing conflict free gold responsibly.

With this supply-chain policy we endorse our commitment towards responsible sourcing of conflict free gold from our suppliers. We are committed to the highest standards, including OECD (Organisation for Economic Co-operation and Development), LBMA (London Bullion Market Association), and DMCC (Dubai Multi Commodity Centre) with good faith efforts, to achieve its commercial objectives and fulfil its corporate obligations. In other words, we commit to ensure our supply chain is legitimate and free from money laundering, any forms of human rights violation including the worst forms of child labour.

The company commits to monitor each transaction and shipments in terms of country of origin, payment method and the relevant transactional documents including the supply volume. Payment of relevant taxes, royalties and other charges that may be applicable during a legitimate export/import process will be monitored for each transaction. Adhering to the standards and guidance we do not source from the countries having higher conflict rates and engage with reputed transporters and logistics company to minimize risks involved during the transportation from source to destination.

We source the material from legitimate companies which are duly registered in their countries and are aware of compliance requirements. The in-house Compliance Team is regularly monitoring the shipments and has full right and authority to accept and reject any supply chain or immediately suspend and discontinue engagement with suppliers or customers where we identify a reasonable risk that they are providing direct or indirect support to non-state armed groups. We suspend the supply chain immediately if any unaddressed inconsistency found or if we notice the supplier's involvement in any suspicious activities, proper transaction documents not provided, without proper explanation. We commit to reporting immediately to regulating authorities about any shipment or transactions we believe are suspicious.

The Company will always support and contribute to responsible sourcing of gold and educate its clients and supplier about the same. For any queries related to compliance due diligence and for this Supply-Chain Policy please contact us on the contact details below:

Please contact our Compliance Team if you have any questions, comments, or suggestions regarding the content of this policy:

Email: compliance@ppmdmcc.com

Telephone: +971 4 3300263

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