

# Supply Chain Policy



Al Bahrain Bullion DMCC, a well established bullion trader observes highest ethical and moral standards in carrying out its business. The company and their valued customers are mutually committed to be responsible and act to attain a conflict free supply chain. Al Bahrain Bullion DMCC formulated a robust Compliance, Anti Money Laundering and Supply Chain Policy.

Al Bahrain Bullion DMCC is bound with Dubai Multi Commodities Centre (DMCC) with its rules and regulations concerning responsible supply chain management. The company adheres to the Practical Guidance for Market Participants in the Gold and Precious Metals Industry that incorporates with the OECD management on responsible supply chain. As a LBMA Associates member since 2012, the company integrates the LBMA Responsible Gold Guidance to its policy.

As part of our obligations, Al Bahrain Bullion DMCC is committed to:

1. Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities.

- Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source are from, or linked to, any party committing serious abuses as defined above.

2. Not tolerate any of its locally registered suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is 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:

i) Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or

ii) Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

iii) Illegally tax or extort intermediaries, export companies or international traders.

- Not to accept and directly discontinue transactions with upstream suppliers which were identified as high risk due to involvement and or participation in any of the above mentioned points.

3. Contribute and participate in the promotion of Responsible Sourcing of Precious Metals to our suppliers by:

i) Creating a long term association with suppliers and established strong relationship with our customers.

ii) Supporting our suppliers of gold to adhere with the provisions of this policy and encourage them to impart or convey it to its staff and their supply chain.

iii) Disseminating the precious metal gold guidance by local and international bodies in which this policy was created such as the DMCC, LBMA and OECD.

4. Not to offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade , handling, transport and export..

5. Play a part and contribute in elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti- Money Laundering and Combating Financing Terrorism.

- To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.

6. Ensure that effective Due Diligence on a risk based approach is carried before starting any transactions and continuous monitoring to existing clients to assess the level of risk and plan to mitigate the risk identified.

7. Create and keep proper and adequate records of all precious metals transactions and activities that demonstrate the due diligence has been strictly followed.

8. Train relevant staff and educate employees through formal education, trainings or seminars and conferences with the provisions of this policy and the responsible sourcing of precious metals.