



DMCC WHISTLEBLOWING POLICY

“**Whistleblowing**” is making a disclosure in the public interest and/or to uphold the integrity of the DMCC’s responsible sourcing initiatives and its Accredited Members and Reviewers.

1. Introduction

Part 1 This policy is complementary to, and intended to be read in conjunction with the DMCC Rules for RBD-GPM for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain (DMCC Rules for RBD-GPM).

Part 2 unless otherwise expressly stated, defined terms used in this DMCC Whistleblowing Policy shall have the meaning given to them in the DMCC Rules for RBD-GPM.

Part 3 The DMCC is committed to the highest standards of openness, probity and accountability in the global industry for the trade of gold and/or precious metals. An important aspect of accountability and transparency is a mechanism for those members of the DMCC that are subject to the DMCC Rules for RBD-GPM, other market participants, Reviewers (as defined in the DMCC Rules for RBD-GPM) and other concerned parties to raise concerns about suspicious or illegal acts involving gold or precious metals trade in a responsible and effective manner.

2. DMCC Review Protocol

Part 4 The DMCC Review Protocol was established in November 2012 to provide guidance to international audit firms and Reviewers conducting assessments on members accredited to DMCC’s responsible sourcing initiatives to ensure a level of conformity when implementing the DMCC Practical Guidance.

Part 5 Pursuant to Article 1 of the DMCC Rules for RBD-GPM; the DMCC Practical Guidance has been replaced by the DMCC Rules for RBD-GPM. Pursuant to Article 6 of the DMCC Rules for RBD-GPM, the DMCC Review Protocol has been amended and restated in the form set out in Annex 3 of the DMCC Rules for RBD-GPM.

Part 6 The DMCC Whistleblowing Policy is designed to enable market participants, Accredited Members, Non-Accredited Members, Reviewers and prospective Reviewers and any other relevant market participants to raise concerns and disclose information about a suspicious wrongdoing and/or an illegal act, with the aim of protecting public interest and/or upholding the integrity of the DMCC’s responsible sourcing initiatives and its Accredited Members.



Part 7 These concerns may include, but are not limited to, the following:

1. Financial malpractice or impropriety or fraud;
2. Failure to comply with a legal obligation or applicable laws;
3. Human Rights abuses (including dangers to health and safety and child labour);
4. Severe damage to the environment;
5. Criminal activity;
6. Improper conduct or unethical behaviour;
7. Attempts to conceal any violations of the DMCC Rules for RBD-GPM or the DMCC AML/CFT Policy;
8. Falsification of documents or fraudulent suppliers;
9. Direct or indirect link to conflict gold financing; and
10. (Direct or indirect violations of the DMCC AML/CFT Policy or the DMCC Rules for RBD-GPM. 4. Responsible Sourcing and Whistleblowing.

Part 8 Upon the discovery of any information, which could give rise to a reasonable suspicion of serious malpractice or wrongdoing within the terms of the DMCC Rules for RBD-GPM, any Reviewer or member of the Tigris Gold Refinery(FZE) 400 M2 Warehouse Q4 – 286&287, P.O.BOX 120811, Sharjah, U.A.E. Land line: +971-6-5527773 refinery@tigrisgold.com 47 DMCC's responsible sourcing initiatives should promptly disclose such information to the DMCC, stating in such disclosure an explanation of the associated grounds for suspicion.

Part 9 Accredited Members or Non-Accredited Members (as defined in the DMCC Rules for RBD-GPM) and other market participants are encouraged to report any suspicious activities taking place in the global gold and/or precious metals market.

5. Zero Tolerance Breach Reporting

Part 10 Any Reviewer who identifies a zero-tolerance breach (as defined in Section 21 of the DMCC Review Protocol) should promptly report such breach to the DMCC. 6. Procedures for reporting to the DMCC

Part 11 any person wishing to invoke this policy may send an email (accompanied by supporting evidence, if possible) to members.whistleblowing@dmcc.ae or in hardcopy via courier or hand delivery to: Director of Compliance DMCC P.O Box 48800, Dubai UAE



Part 12 The relevant department within the DMCC will determine if it is necessary to report the case on a confidential basis to the relevant local and federal government authorities.

Part 13 The DMCC will review and determine the validity of the reported case and appropriate actions.

7. Confidentiality

Part 14 The DMCC will treat any disclosures made pursuant to the DMCC Whistleblowing Policy (and the identity of the discloser) in a confidential and sensitive manner. Disclosure may only be made to the extent required or permitted by law or a legal authority. Any investigation process arising from events, however, may reveal the source of the information. The individual making the disclosure may need to provide a statement as part of the evidence required.

8. Safeguards

Part 15 Protection: the DMCC Whistleblowing Policy is designed to offer protection to those individuals who disclose concerns pursuant to this policy provided the disclosure is made in good faith and in the reasonable belief of the occurrence of serious malpractice or wrongdoing.

Part 16 The DMCC Whistleblowing Policy will not, however, protect those who raise malicious or knowingly unsubstantiated claims of misconduct or wrongdoing.

Part 17 Anonymous disclosures: the DMCC Whistleblowing Policy encourages individuals to put their name to any disclosures they make to protect the integrity of the policy.

Part 18 Anonymous disclosures may be considered at the discretion of the DMCC. In exercising this discretion, the factors to be taken into account will include:

a. The seriousness of the issues raised; b. The credibility of the concern; and c. The likelihood of confirming the allegation from attributable sources.

9. Timescales for Investigations

Part 19 Due to the varied nature of circumstances, which may involve internal investigators and/or applicable authorities; the DMCC cannot prescribe precise timescales for such i



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investigations. The DMCC will ensure that investigations are undertaken efficiently and effectively without any compromise to the integrity or credibility of the process.