CORPORATE POLICY

MD OVERSEAS FZCO

Responsible Sourcing of Precious Metals Policy

Version 2026

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REGISTERED / BUSINESS ADDRESS

Unit No. 2910, DMCC Business Centre, Level No. 1, Jewellery & Gemplex 3,
Dubai, United Arab Emirates

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01 Purpose

MD OVERSEAS FZCO (the "Company") trades in jewellery and non-manufactured precious metals and is a Dealer in Precious Metals and Stones (DPMS). It is therefore a Designated Non-Financial Business and Profession (DNFBP) supervised for AML/CFT/CPF purposes by the Ministry of Economy and Tourism (MoET), and is registered on the goAML platform of the UAE Financial Intelligence Unit (FIU).

This Policy sets out the Company's commitment to sourcing precious metals responsibly and to avoiding contribution to conflict, serious human rights abuses, money laundering, terrorist financing and other illicit activity through its supply chain.

02 Legal and Regulatory Framework

This Policy is framed with reference to the following instruments, as amended or replaced from time to time:

- Federal Decree-Law No. 10 of 2025 regarding Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing (the "AML Law").
- Cabinet Resolution No. 134 of 2025 issuing the Executive Regulations of the AML Law (the "Executive Regulations").
- Ministerial Decision No. 68 of 2024 on the Due Diligence Regulations for Responsible Sourcing of Gold, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- MoET circulars and guidance applicable to DPMS, including the AML/CFT Guidelines for DNFBPs, the Supplemental Guidance for DPMS and Circular No. 08/AML/2021 on the DPMS Report (DPMSR).

Where a stricter requirement applies under law, regulatory guidance, a banking or refinery counterparty's requirements or another applicable jurisdiction, the Company will apply the stricter requirement.

03 Scope

This Policy applies to all precious metals purchased, received, sold or otherwise handled by the Company, including bullion, dore, scrap and recycled material, and to all suppliers and intermediaries.

04 Policy Commitments

The Company will not knowingly source from, contribute to or facilitate:

- Serious abuses such as torture, forced or child labour, or war crimes.
- Direct or indirect support to non-state armed groups or public or private security forces acting unlawfully.
- Bribery, fraudulent misrepresentation of origin, money laundering or terrorist financing.
- Non-payment of taxes, fees and royalties due to governments.
- Trade with sanctioned persons or jurisdictions.

Where such a risk is identified, the Company will suspend or disengage from the supplier, as appropriate.

05 Five-Step Due Diligence Framework

Step	What the Company does
1. Management systems	Adopts this Policy, assigns responsibility to the Compliance Officer, maintains supplier records and a grievance mechanism
2. Identify and assess risk	Performs KYC on suppliers, determines origin and transport route, identifies CAHRA exposure and red flags
3. Respond to risk	Reports findings to Senior Management and adopts a risk management plan: continue, mitigate with improvement measures, suspend or disengage
4. Independent audit	Arranges independent third-party audit of its due diligence where required by the applicable regulations
5. Annual reporting	Reports publicly or to the competent authority on its supply chain due diligence as required

06 Supplier Due Diligence

- Identity, ownership, licences and reputation of each supplier and relevant intermediary.
- Type, form, weight and assay of the material, and the country of origin and transit.
- For mined material, the mine of origin where practicable; for recycled material, the source of the scrap.
- Supporting documents such as invoices, packing lists, export and import declarations and assay reports.
- Payment method and account ownership; cash is avoided and unexplained third-party payments are not accepted.

07 Red Flags

Enhanced due diligence is required where material originates from or transits through a CAHRA, where a supplier's ownership or documentation is unclear, where volumes are inconsistent with known sources, or where the material is declared as recycled without a credible explanation.

08 Grievance Mechanism

Any person, including suppliers, customers, communities and other external stakeholders, may raise a concern about the Company's supply chain with the Compliance Officer. Concerns are handled confidentially and in accordance with the Company's Whistleblowing Policy, and may be submitted to:

Compliance Department	MD OVERSEAS FZCO
Email	compliance@mdoverseasdmcc.com
Address	Unit No. 2910, DMCC Business Centre, Level No. 1, Jewellery & Gemplex 3, Dubai, United Arab Emirates

09 Record Keeping

All supply-chain due diligence records are retained for not less than five years.

10 Breaches

Failure to comply with this Policy may expose the Company and individuals to criminal liability and to administrative penalties under the AML Law and Cabinet Resolution No. 71 of 2024. Any breach may result in disciplinary action up to and including termination of employment or engagement, subject to applicable law.

11 Monitoring and Review

The Compliance Officer will monitor implementation of this Policy and report material issues to Senior Management. This Policy shall be reviewed at least annually and earlier where required by changes in law, regulatory guidance, the National Risk Assessment, the Company's business or its risk profile.

12 Approval

This Responsible Sourcing of Precious Metals Policy is approved for adoption by MD OVERSEAS FZCO with effect from **01 January 2026** and remains effective until replaced or amended by an authorised version.

POLICY APPROVAL	
PREPARED BY	Compliance Department
APPROVED BY	Senior Management, MD OVERSEAS FZCO
EFFECTIVE DATE	01 January 2026
NEXT SCHEDULED REVIEW	January 2027

Reference note: This is the public version of the Company's policy. It is supported by the Company's AML/CFT/CPF Policies and Procedures Manual and internal procedures. Applicable legislation, regulatory guidance and official Arabic legal texts prevail in the event of inconsistency.