CORPORATE POLICY

MD OVERSEAS FZCO

Whistleblowing Policy

Version 2026

DOCUMENT CONTROL	
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APPROVED BY	Senior Management
VERSION	2026
EFFECTIVE DATE	01 January 2026
NEXT SCHEDULED REVIEW	January 2027
REVIEW FREQUENCY	At least annually and upon material legal or regulatory change
CLASSIFICATION	Public

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 encourages personnel and third parties to report concerns about wrongdoing, and protects those who report in good faith.

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").
- 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 personnel and to suppliers, customers and other persons dealing with the Company.

04 Reportable Concerns

- Money laundering, terrorist financing, proliferation financing or sanctions breaches.
- Bribery, fraud or falsification of records.
- Breaches of the Company's policies or applicable law.
- Concerns about the responsible sourcing of precious metals.
- Attempts to conceal any of the above.

05 How to Report

Concerns should be reported to the Company's Compliance Officer. Where the concern involves the Compliance Officer, or the reporter prefers, it may be addressed to Senior Management, marked "Confidential – For the Attention of Senior Management". Reports may be made verbally or in writing, and may be made anonymously, although this may limit the ability to investigate.

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

06 Handling of Reports

Reports are acknowledged, assessed promptly and investigated where appropriate. Where a report indicates suspicion of ML, TF or PF, it will be handled under the Company's suspicious transaction reporting procedures.

07 Confidentiality and Protection

The identity of the reporter is kept confidential to the extent permitted by law. Retaliation against anyone who reports in good faith is prohibited and will be treated as serious misconduct. Knowingly false or malicious reports may themselves result in disciplinary action.

08 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.

09 Approval

This Whistleblowing 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.