



DIJLLAH GOLD SUPPLY CHAIN POLICY

Dijllah Gold conducts its business with the highest ethical, moral and social responsibility standards. We require all our employees to comply by the Code of Conduct of the company as described in the policy. Dijllah Gold's approach and risk policy has been designed and implemented to ensure that our engagements and the style of operations is in accordance with the Rules of **DMCC for RBD – GPM 2016**. This Supply chain policy was developed in 2016 complimenting the existing Supplier Code of Ethics.

This policy is to ensure and safeguard the Company against the following risks.

1. Dijllah constantly monitors through internal and external research any developments in the geographical origin and locations of the company's suppliers.
2. Changes of government regulations and supervision in the countries of our suppliers are monitored and changes being implemented if required.
3. Dijllah monitors through Desk research changes and recommendations from the Central Banks of our supplier's countries concerning the extend of cash transactions within the relevant country.
4. Dijllah does not support or transact any business in locations which are subject to human right abuses or experience a heightened level of conflict.
5. Dijllah encourages and prefers payments through financial institutions wherever possible and practically applicable.
6. Dijllah will under no circumstances be involved in conducting business with any criminal organization, high risk businesses and / or high risk areas.
7. Dijllah will always monitor and conduct business recognizing existence of sanctions and embargoes against a particular country or particular individuals.
8. Dijllah adheres fully with ALL requirements of the KYC process for each supplier and Dijllah will only conduct business if the collection of information has been positively assessed.
9. Dijllah does not entertain business with any supplier, as defined in Rule 2.4 of the DMCC Rules concerning red flags within the supply chain.
10. Dijllah monitors closely each supplier and attempts to gain a heightened level of insights into our supplier's customers and their due diligence practices.
11. Dijllah conducts business with suppliers which are known to the company and the management for considerable length of time in order to ensure the supplier's level of professionalism and adherence to the DMCC Rules.
12. Dijllah is in possession of the informations relating to the beneficial ownership of every supplier.
13. Dijllah does not receive supplies from any mining operation within the reporting period.
14. Dijllah identifies through the KYC process any potential involvement of a Politically Exposed Persons (PEP) and it is Dijllah's policy not to engage in any business activities with this specific group of people.



15. Dijllah's Due Diligence procedure are in accordance to the size of any potential transaction but by maintaining the minimum KYC requirements under all circumstances.
16. Dijllah monitors the transport and logistics of the supply shipments.
17. Dijllah acquires gold supplies from Artisanal mining mainly from West African countries as well as South American countries in addition to the scrap gold supplies from the local and middle eastern market.
18. Dijllah monitors and adheres to local governmental policies concerning cash transactions, payments to unrelated third parties other than specifically authorized by Debt Assignment notes.
19. Dijllah do not engage in any transactions or business with any of the Red flag countries, red flag supplier and any circumstances based Red flag as described in Rule 2.7 of the DMCC Rules.
20. Dijllah maintains and updates constantly all relevant systems, procedures and processes in order to guarantee full compliance with DMCC Rules at all times.

The compliance department of Dijllah Gold is conducting for each existing and potential future supplier Risk assessment based on the DMCC Rules and the compliance department will classify each supplier as a low or medium risk. Dijllah does not entertain business relationship with potential high risk suppliers. The classification of the supplier takes place on the KYC form where the compliance department gives their recommendations of the risk to the management of the company. The risk assessment is carried out based on from point 1 to 20 of this document.