MARMARA METAL REFINERY

GRIEVANCE POLICY

MARMARA METAL REFINERY FZE

DOCUMENT NO: MMR-GR-POL-03 | 600 M2 WAREHOUSE U2-125 SHARJAH, UAE

DOCUMENT OWNER: MARMARA MANAGEMENT

IMPLEMENTATION DATE: 23-FEB-2026

1- INTRODUCTION

Marmara Metal Refinery FZE (“Marmara”), operating under Sharjah Airport International Free Zone (SAIF Zone), is committed to maintaining the highest standards of service quality, responsible sourcing, and ethical business conduct. Grievances and complaints are considered essential tools for improving operations and strengthening relationships with employees, customers, suppliers, service providers, and all stakeholders involved in the precious metals supply chain.

This policy establishes Marmara’s formal grievance mechanism and outlines the procedures for submitting, documenting, reviewing, and resolving grievances in a fair, transparent, and timely manner.

2- OBJECTIVES OF THE POLICY

2.1 Ensure that materials acquired and services provided adhere to human rights, labor standards, environmental protection, and the highest business ethics.

2.2Promote justice, employee satisfaction, and stability of employment conditions within Marmara.

2.3 Ensure that business activities meet international market ethics and standards.

2.4 Ensure full compliance with all applicable UAE refinery regulations, including:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA)

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- Emirates Bullion Market Committee (EBC) Rules for Risk-Based Due Diligence in the Gold Supply Chain
- Ministry of Economy (MOE) regulations
- UAE Good Delivery Rules
- UAE AML/CFT/CPF laws and Cabinet Decisions
- SAIF Zone regulations and Emiri Decree No. 2 of 1995
- Any amendments issued from time to time

2.5 Maintain Marmara's reputation for providing the highest operational standards in the gold and silver industry.

3- SCOPE OF THE POLICY

This grievance policy applies to:

- Marmara employees
- Customers and clients
- Suppliers and intermediaries
- Third-party service providers
- Any other stakeholder or end-user impacted by Marmara's operations or supply chain activities

4- SCOPE OF THE POLICY

Grievance is defined as any expression of dissatisfaction, concern, or complaint submitted by internal or external stakeholders.

Grievances may relate to:

- Day-to-day operational functions
- Internal Marmara procedures or policies
- Conduct or behaviour of Marmara staff
- Supply-chain related concerns
- Ethical, legal, or compliance-related matters

Marmara encourages all stakeholders to formally document and submit grievances at any time through the authorized channels. All grievances are handled with confidentiality, fairness, and objectivity.

Nature of Grievances

Grievances may include, but are not limited to:

1. Human rights violations, forced labour, child labour, torture, or serious abuses
2. Violations of laws, regulations, or bylaws
3. Accounting irregularities or financial manipulation
4. Fraud, bribery, corruption, or solicitation
5. Falsification of documents or records
6. Support to non-state armed groups, criminal activities, or tolerance of regulatory violations
7. Employee misconduct and labour practices
8. Health, safety, and working condition concerns

Stakeholders may submit grievances along with supporting documents (if any) to: **marmara.refinery@gmail.com**

MARMARA STATEMENTS

Marmara is committed to:

1. Ensuring grievances are handled objectively, based on facts and circumstances, maintaining fairness and efficiency.
2. Maintaining strict confidentiality of all grievance-related information, including personal details, business information, and nature of the complaint.
3. Ensuring transparency and ethical conduct throughout the grievance resolution process.
4. Providing open communication channels between stakeholders and Marmara management.
5. Rectifying grievances within an agreed turnaround time (TAT) and communicating outcomes promptly.
6. Logging all grievances in a dedicated Grievance Log maintained by the Compliance Department.
7. Implementing corrective actions and preventive measures where necessary.

Record Retention

Marmara ensures retention of all grievance-related records and documentation for a **minimum of 5 years** after resolution.

DEFINITIONS

TAT (Turn-Around Time): The time between receipt of a grievance and its rectification.

EBCUAE: Emirates Bullion Market Committee requirements for UAE Good Delivery.

REFERENCES

MARMARA METAL REFINERY HR POLICY,
MARMARA METAL REFINERY WHISTLE-BLOWER POLICY
MARMARA METAL REFINERY CODE OF CONDUCT

TRACK CHANGES

Any amendments to this policy will be highlighted for easy reference.