MARMARA METAL REFINERY

SUPPLY CHAIN POLICY

MARMARA METAL REFINERY FZE

DOCUMENT NO: MMR-SC-POL-01 | 600 M2 WAREHOUSE U2-125 SHARJAH, UAE
DOCUMENT OWNER: MARMARA MANAGEMENT
IMPLEMENTATION DATE: 22-FEB-2026

MARMARA METAL REFINERY

INTRODUCTION

Marmara Metal Refinery FZE ("Marmara"), licensed under Sharjah Airport International Free Zone (SAIF Zone), recognizes that risks of adverse impacts may be associated with the extraction, trading, handling, and movement of minerals originating from certain jurisdictions.

Marmara acknowledges its responsibility to respect human rights, prevent contribution to conflict, and ensure responsible sourcing throughout the supply chain. Marmara sources gold and precious metals from **international suppliers located in legally regulated, stable, and compliant jurisdictions**, and **does not source from Conflict-Affected and High-Risk Areas (CAHRAs)**.

This policy establishes Marmara's commitment to responsible sourcing and outlines the standards, controls, and due diligence measures applied across the supply chain.

POLICY OBJECTIVES

Marmara commits to:

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

2.Ensuring that Marmara's sourcing activities comply with all applicable UAE regulations, including:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (as required by UAE regulators)
- Emirates Bullion Market Committee (EBC) Rules for Risk-Based Due Diligence
- Ministry of Economy (MOE) Responsible Sourcing Regulations
- UAE AML/CFT/CPF laws and Cabinet Decisions
- SAIF Zone regulations and Emiri Decree No. 2 of 1995

3.Maintaining Marmara's reputation for responsible, ethical, and compliant sourcing of gold and precious metals.

4.Ensuring that Marmara does not source from CAHRAs, sanctioned jurisdictions, or any region associated with conflict, human-rights violations, or illegal mining.

SCOPE OF THE POLICY

This policy applies to:

- Marmara employees
- Suppliers, intermediaries, and service providers
- Customers and counterparties
- All gold and precious metals handled, refined, traded, or transported by Marmara

SOURCING PRINCIPLES

1-Responsible Sourcing Commitment

- Marmara sources gold and precious metals only from suppliers who operate in accordance with:
- UAE regulatory requirements
- Internationally recognized due diligence standards
- Ethical business practices
- Full legal compliance in their respective jurisdictions

2-Prohibited Sourcing Areas

Marmara strictly prohibits sourcing from:

- Conflict-Affected and High-Risk Areas (CAHRAs)
- Regions under international or UAE sanctions
- Areas with illegal mining operations
- Regions controlled by armed groups
- Areas with known human-rights abuses
- Unregulated artisanal mining zones

3-Supplier Requirements

All suppliers must:

- Be legally registered and licensed
- Provide complete documentation on origin and chain of custody
- Undergo KYC/KYCC verification
- Comply with UAE AML/CFT/CPF regulations
- Maintain transparent and traceable supply chains

SERIOUS ABUSES — ZERO TOLERANCE

Marmara will neither tolerate nor profit from, contribute to, assist with, or facilitate the commission of:

- Torture, cruel, inhuman, or degrading treatment b. Forced or compulsory labour c. Child labour prohibited by law d. Gross human-rights violations including sexual violence e. War crimes, crimes against humanity, or genocide f. Health and safety violations that endanger workers or communities
- Any supplier linked to such abuse will be immediately suspended or discontinued.

NON-STATE ARMED GROUPS — ZERO TOLERANCE

Marmara is Marmara prohibits any direct or indirect support to non-state armed groups through extraction, transport, trade, handling, or export of minerals.
“Direct or indirect support” includes:
a. Procuring minerals from armed groups b. Making payments to armed groups c. Providing logistical assistance or equipment d. Engaging with intermediaries who illegally control mine sites or routes e. Illegal taxation, extortion, or forced payments f. Illegal mining operations or human-rights violations
Any supplier linked to such activities will be immediately terminated.

PUBLIC OR PRIVATE SECURITY FORCES

Marmara shall not engage in any relationship involving illegal taxation, extortion, or support to public or private security forces who:

- Illegally control mine sites or transport routes
- Illegally tax or extort intermediaries or traders
- Commit human-rights abuses
- Marmara recognizes that legitimate security forces must operate strictly within the rule of law and international human-rights standards.
- Marmara will:
- Screen security personnel to avoid hiring individuals involved in human-rights abuses
- Engage with authorities and civil organizations to improve transparency and accountability

Support efforts to protect vulnerable groups

BRIBERY & FRAUD — ZERO TOLERANCE

Marmara prohibits:

- Offering, giving, or demanding bribes
- Misrepresentation of mineral origin
- False documentation
- Concealment of taxes or fees
- Any fraudulent activity related to mineral extraction, trade, or transport

All suppliers must comply with UAE tax, licensing, and reporting laws.

MONEY LAUNDERING & TERRORIST FINANCING

Marmara follows strict UAE AML/CFT/CPF regulations:

- Full KYC/KYCC onboarding

- Source-of-funds and source-of-wealth verification
- Continuous monitoring of transactions
- Screening against UAE and international sanctions lists
- Reporting Suspicious Transaction Reports (STRs) via goAML

Any suspicious activity is escalated immediately

CASH TRANSACTIONS

Marmara avoids cash transactions.

Where unavoidable:

- Full documentation is required
- Preferably routed through UAE banking channels
- Cash transactions above AED 55,000 must be reported to MOE via goAML

ENVIRONMENTAL & SOCIAL RESPONSIBILITY

Marmara takes reasonable measures to mitigate environmental and social risks associated with minerals it refines, trades, transports, exports, or purchases.

MANAGEMENT SYSTEM

Marmara maintains a robust compliance system including:

- Defined responsibilities and escalation channels
- High-risk assessment criteria
- KYC/KYCC procedures
- Transaction monitoring and surveillance
- Mandatory staff training
- Periodic review and update of due diligence procedures

All employees involved in the supply chain must strictly comply with this policy.

CONTACT DETAILS

For assistance or queries related to this Supply Chain Policy, please contact:

marmara.refinery@gmail.com

DISCLAIMER

This policy is aligned with UAE regulations and incorporates relevant principles from OECD and EBC guidance as required by UAE law.