MARMARA METAL REFINERY

WHISTLE-BLOWING POLICY

MARMARA METAL REFINERY FZE

DOCUMENT NO: MMR-WB-POL-06 | 600 M2 WAREHOUSE U2-125 SHARJAH, UAE

DOCUMENT OWNER: MARMARA MANAGEMENT

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MARMARA METAL REFINERY

INTRODUCTION

Marmara Metal Refinery FZE ("Marmara") is committed to maintaining the highest levels of ethics, integrity, and transparency in all business activities. Speaking up about misconduct is essential to protecting our reputation, ensuring compliance, and maintaining trust with regulators, customers, suppliers, and stakeholders.

This Whistle-Blowing Policy ("the Policy") provides a safe, confidential, and structured mechanism for reporting concerns related to unethical, illegal, or improper conduct. Marmara encourages all employees, suppliers, customers, and stakeholders to report concerns without fear of retaliation.

Marmara strictly prohibits any form of detrimental action against whistle-blowers or individuals involved in investigations. The identity of whistle-blowers will be protected unless disclosure is required by law.

OBJECTIVES OF THE POLICY

This Policy aims to:

- Embed whistle blowing within Marmara's ethical culture.
- Provide clear reporting channels for raising concerns.
- Establish a structured investigation process.
- Ensure protection for whistle-blowers.
- Promote transparency, accountability, and compliance with UAE regulations.

SCOPE OF THE POLICY

This Policy applies to:

- All Marmara employees (permanent, temporary, outsourced, trainees, consultants).
- Suppliers, service providers, contractors, and intermediaries.
- Customers and external stakeholders who wish to report concerns.

Customers with service-related complaints may refer to Marmara's **Grievance Policy** or contact their Relationship Manager.

WHISTLE-BLOWING POLICY IN MARMARA

What is Whistle-Blowing?

Whistleblowing means reporting concerns to Marmara's senior management or compliance team, either internally or externally, in the public interest.

Marmara is committed to openness, accountability, and responsible conduct in the gold and precious metals industry. Whistleblowing helps detect misconduct, prevent violations, and protect the integrity of our operations.

Reportable Concerns Include (but are not limited to):

1. Financial malpractice, fraud, or impropriety
2. Failure to comply with UAE laws, regulations, or SAIF Zone rules
3. Human-rights violations, unsafe working conditions, or child labour
4. Environmental damage or unsafe practices
5. Criminal activity
6. Unethical or improper conduct
7. Attempts to conceal violations of due diligence requirements
8. Falsification of documents or fraudulent suppliers
9. Offering or accepting bribes
10. Links to conflict financing, terrorism financing, or weapons proliferation
11. Violations of AML/CFT/CPF regulations or international best practices

HOW TO MAKE A WHISTLE-BLOWER REPORT

Before making a report, the whistle-blower should have **reasonable grounds** to suspect misconduct. Reports may be submitted **non-anonymously** or **anonymously**, depending on the preference of the individual.

Non-Anonymous Disclosure
Whistle-blowers may:

- Contact the **Compliance Officer**
- Report the matter to their **direct manager or supervisor**
- Report directly to **Senior Management** if the concern involves compliance personnel

Anonymous Disclosure
Whistle-blowers may submit an anonymous report through either of the following channels:

- Send an anonymous email to: **marmara.refinery@gmail.com**
- Submit a written report through courier to Marmara Metal Refinery FZE's **registered address**
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Anonymous reports will be treated with strict confidentiality and investigated in accordance with Marmara's internal procedures.

INVESTIGATION PROCESS

Marmara's investigation process ensures:

- Reports are assessed by the Compliance Officer and Senior Management

- Confidential handling of disclosures on a “need-to-know” basis
- Fair treatment of individuals mentioned in the report
- Timely, efficient, and impartial investigation
- Presumption of innocence until evidence is established
- Determination of whether sufficient evidence substantiates the concern

Once the investigation is concluded, the whistle-blower (if identifiable) will be notified of the outcome.

False or Malicious Reports

Whistle-blowers will not face disciplinary action if their report is incorrect **provided it was made in good faith**.

However, knowingly false or misleading reports constitute a breach of Marmara’s Code of Conduct and may result in disciplinary or legal action.

WHAT TO INCLUDE IN A REPORT

Whistle-blowers should provide as much detail as possible, including:

- Date, time, and location of the incident
- Names of individuals involved
- Nature of the concern
- How the whistle-blower became aware of the issue
- Names of witnesses
- Any supporting documents or evidence

DEFINITIONS

AML – Anti-Money Laundering
CFT – Combating Financing of Terrorism
CPF – Combating Proliferation Financing
EBC – Emirates Bullion Market Committee
RBD-GPM – Risk-Based Due Diligence for Gold & Precious Metals
GPM – Gold & Precious Metals
WMP – Weapons of Mass Production
RM – Relationship Manager

REFERENCES

- UAE AML/CFT/CPF Regulations
- EBC Rules for Risk-Based Due Diligence
- UAE Federal Penal Code

- Marmara Staff Code of Conduct
- Marmara Risk Control Policy

WHERE TO GET HELP

marmara.refinery@gmail.com

TRACK CHANGES

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