



MMTC-PAMP RESPONSIBLE PRECIOUS METAL POLICY

Introduction

MMTC-PAMP India Private Limited (MMTC-PAMP) has set for its supply chains ambitious ESG goals, i.e. to reduce negative impacts, including environmental and aim for significant positive societal impact through its commercial and operational activities. In that spirit, MKS PAMP Group plays a leading role in the formulation and implementation of responsible supply chain practices in the industry and commits to source precious metals in a secure, transparent, traceable, ethically, socially and environmentally responsible way, not tainted by conflict or human right abuses. MKS PAMP Group will support measures to build secure, transparent, fair-trade and verifiable gold supply chains from responsible artisanal or small-scale miners to market, and to establish long-term relationships with precious metals counterparts in order to build and support responsible supply chain. MMTC-PAMP complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the LBMA Responsible Gold/Silver Guidance, Responsible Jewellery Council (RJC) Code of Practice and RJC Chain of Custody and introduced in 2022 a strong carbon footprint management framework in its responsible practices.

Our approach

The following are central tenets of the MMTC-PAMP operating procedures, which guide our business conduct and direct our compliance procedures.

1. We fight against:

- Systematic or widespread human rights abuses associated with the extraction, processing, transport or trade of precious metals, including
 - any forms of torture, inhuman and degrading treatment,
 - forced or compulsory labour,
 - worst forms of child labour (as defined in ILO Convention No.182),
 - widespread sexual violence or other gross human rights violations,
 - war crimes, crimes against humanity or genocide;
- Direct or indirect support to illegitimate non-state armed groups, or illegitimate private/public security forces who:
 - Illegally control mine sites, traders or other upstream actors and transportation routes through the supply chains or
 - Illegally tax or extort money or minerals through the supply chains;
- Bribery and fraudulent misrepresentation of the origin of precious metals;
- Non-compliance with taxes, fees and royalties due to governments related to mineral extraction, trade and export;
- Money laundering and terrorism financing; and
- Contribution to conflict



over our supply chains (“**threat financing**”).

2. We commit to:

- Strictly adhere to local and applicable international sanctions including but not limited to UN, EU, UK and US.
- Not tolerate sourcing from illegal mining operations or from an area designated as a World Heritage Site.
- Not tolerate within our Group or through our precious metal supply chains employment:
 - of children less than 15 years or, if higher, the applicable age for completion of compulsory education (ILO convention 138);
 - of juveniles under 18 years of age that perform work that might jeopardize their health, safety and morals (ILO convention 138).
- Not offer, promise, give or demand any bribes, and resist the solicitation of bribes.
- Support efforts, and take steps, to contribute to the effective elimination of money laundering and terrorism financing. Should we suspect or have reasonable grounds to suspect that the funds or the precious metals are the proceeds of a criminal activity or are related to terrorist financing we will promptly terminate the relationship and report our suspicions to the local financial intelligence unit (FIU).
- Recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
- Make and receive payments for precious metals transactions through official banking channels.
- Maintain adequate records to demonstrate that appropriate and ongoing due diligence has been followed.
- Train our employees on our AML-CFT and responsible sourcing practices.
- Ascertain that our suppliers of precious metals are committed to this Responsible Precious Metals Policy or to their own precious metals supply chain policy consistent with the OECD Annex II.

3. We address:

- Adverse ESG factors, such as environmental, health & safety, labour or ethical conduct, in our primary precious metals supply chain,
- Our own environmental and societal responsibilities including climate change concern by having Science Based Target (SBTi) approved carbon emissions reduction targets in line with the Paris Agreement.



4. We adopt and implement:

- Strong company management systems to ascertain that existing due diligence and management systems are structured for effective due diligence to fight threat finance risk and consider ESG factors in our primary supply chains.
- Best Practice AML-CFT and Responsible supply chain due diligence procedures and policies including risk identification and assessment as outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“the OECD Due Diligence Guidance”), RJC Code of Practice, RJC Chain of Custody and the LBMA responsible sourcing guidances.
- Risk mitigation strategies, including suspending or discontinuing strategies, to respond to the above identified risk in accordance with the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“the OECD Annex II”), RJC Code of Practice, RJC Chain of Custody and the LBMA Responsible Sourcing Guidances.

Our Grievance mechanism

The MMTC-PAMP has put in place an accessible, independent, respectful and transparent grievance mechanisms allowing any employee, supply chain actor or stakeholder to confidentially and without any fear of reprisal voice any concerns over the supply chain through the email id: Responsiblepm@mmtcpamp.com All concerns raised will be treated, even anonymous grievance, with fair conduct and transparency towards the concerned party and for the purpose of preventing future grievance or harm and of contributing to continuous learning.

Governance

As an industry leader, MMTC-PAMP prides itself on its leading role in developing an ethical and transparent value chain and constant innovation in its products and services. The companies’ purpose guides its approach and aims to safeguard its partners’ values through investments in precious metals.

To fulfil its responsibilities to its stakeholders including clients, suppliers, employees and ensure our stakeholders are satisfied with our responsible sourcing, service and product offering, we will apply the following concepts:

- To respect stakeholders’ rights and ensure their equal treatment
- To consider the interests of stakeholders, and cooperate with them accordingly
- To regularly engage in constructive dialogues with our stakeholders
- To strengthen transparent exchanges on ESG objective and performance with our stakeholders

Members of the MMTC-PAMP GROUP of companies, which refine, manufacture, trade or distribute precious metals will apply this policy and as a result will comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the LBMA



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Responsible Gold/Silver Guidance for any type of precious metals handled. LBMA Responsible Sourcing Guidances follow the five-steps framework for risk-based due diligence of the OECD Due Diligence Guidance.

This policy is implemented through a comprehensive management system that encompasses strict threat financing and adverse ESG factor supply chain risk-based due diligence before entering new commercial relationship, as well as continuous monitoring of transactions on such risk-based approach for existing commercial relationships. In addition, the initial due diligence work will be regularly updated, this on a risk-based approach.

This policy is approved by the Board of Directors of MMTC-PAMP and will be periodically reviewed and amended to reflect relevant updates and regulatory developments in the precious metals markets.

Approved on 27 December 2022 by MMTC-PAMP Board of Directors.

A handwritten signature in blue ink that reads 'Nishtha' with a horizontal line underneath.

(NISHTHA KHURANA)

CHIEF RISK AND COMPLIANCE OFFICER

PLACE : GURGAON

DATE : 30-December - 2022