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Bullion Link Trading - FZCO

# **Supply Chain Policy**

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## Supply Chain Policy

### Version Control

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# Supply Chain Policy

## 1. INTRODUCTION

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Bullion Link Trading - FZCO, a non-manufactured precious metals trader, is fully committed in providing high quality products while meeting the highest ethical and moral standards with respect to responsible sourcing. We are fully committed to follow appropriate standards apply for human rights, labor standards, environmental impact, and business ethics to attain a responsible supply chain.

## 2. PURPOSE

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Bullion Link Trading - FZCO, understands and recognises that as a Dealer in Precious Metals, there exists a risk of significant adverse impact which may be associated with extraction, trading, handling, and exporting minerals from conflict-affected and high-risk areas. Recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with supplier the following policy on responsible sourcing of minerals from conflict affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practice and supplier's risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant United Nations sanction resolutions or, where applicable, domestic laws implementing such resolutions.

## 3. SCOPE

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OECD definition of CAHRAs: Conflict-affected and High-Risk areas are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. Various types of armed conflict can form such as those involving two or more states, or those that involve wars of liberation, insurgencies, and civil wars. There are many areas that are high risks, such as those that have political instability, institutional weakness, insecurity, collapsed infrastructure, and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

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### 4. OBJECTIVES

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We strongly recommend our suppliers and counterparties to operate in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Responsible Sourcing Framework set up by the London Bullion Market Association (LBMA), Kimberley Process Certification Scheme (KPCS), World Diamond Council, Responsible Jewellery Council (RJC).

### 5. RESPONSIBILITIES

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**A. As a part of our responsibility, Bullion Link Trading - FZCO is committed to:**

- (1) Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities.

**Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source is from, or linked to, any party committing serious abuses as defined above.**

- (2) Not tolerate any of its suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates.
- (3) To not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.
- (4) Play a part and contribute to the elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti- Money Laundering and Combating Financing Terrorism.
- (5) To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.

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- (6) Ensure that effective Due Diligence on a risk-based approach is carried out before starting any transactions and continuous monitoring to existing clients to assess the level of risk and plan to mitigate the risk identified.
- (7) Create and keep proper and adequate records of all precious metals transaction and activities that demonstrates the due diligence has been strictly followed.
- (8) Train relevant staff and educate its employees through formal education, trainings or seminars and conferences with the provision of this policy and the responsible sourcing of precious metals.

### **B. As part of our Supply Chain Policy, Bullion Link Trading - FZCO is committed to:**

- (1) Neither tolerating, contributing to, assisting with or facilitating the commission of cutting or polishing of the diamonds and stones we would buy or may give for scrap if there are:
  - Any forms of torture, cruel, inhumane, and degrading treatment;
  - Any forms of forced or compulsory labor;
  - Illegal and or unacceptable forms of child labor;
  - Other human rights violations and abuses such as widespread sexual violence
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- (2) Immediately suspend or discontinue engagement with our counterparty where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.
- (3) Support measures to build secure, transparent, fair-trade, and verifiable diamond supply chains from artisanal miners to market.
- (4) Never source from illegal mining operations
- (5) Not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals who:
  - Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or

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- Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain, and/or Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Illegally tax or extort intermediaries, export companies or international traders.

**Bullion Link Trading - FZCO require all its staff involved in the precious stones supply chain to strictly comply with this policy and implement it in the management system.**

### **Contact Details:**

For questions and/or concerns related to the supply chain policy, employees, stakeholders, and counterparties can send an email to .....

### **Acknowledgment:**

We would like to thank the OECD for the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict - Affected and High-Risk Areas and the Kimberley Process Certification Scheme to which parts of this policy is adapted.

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