

POLICY FOR RESPONSIBLE SUPPLY CHAIN OF PRECIOUS METALS

BULLION LINK TRADING - FZCO

Version V1.0

24.11.2025

Introduction

BULLION LINK TRADING - FZCO ("Bullion Link Trading" or "we" or "our") is committed to ethical trade and developing a responsible and resilient supply chain. This policy outlines our approach to identifying, assessing, and mitigating supply chain risks that can affect our business, employees, communities, and the environment. We aim to collaborate with suppliers, business partners, and other stakeholders, including governments, regulators, industry organizations, and civil society, to promote responsible sourcing.

Responsible Sourcing Policy

Our responsible sourcing policy focuses on preventing contributions to conflicts, securing vulnerable groups from human rights abuses, protecting the health and safety of supply chain workers and communities, preventing environmental degradation, and promoting better governance. We adhere to numerous national and international regulations, standards, and guidelines, including the OECD Due Diligence Guidance, Responsible Jewellery Council Code of Practices, and various UN principles and conventions.

Key Principles and Commitments

1. **Conflict-Free Sourcing:** Avoid any direct or indirect contribution to conflicts and crimes associated with conflict and war.
2. **Human Rights Protection:** Safeguard the rights and well-being of workers and communities, with zero tolerance for child labour, forced labour, discrimination, harassment, and abuse.
3. **Health and Safety:** Ensure safe working conditions and the health and safety of all workers and host communities.
4. **Environmental Stewardship:** Implement practices that prevent environmental degradation, including waste management, hazardous material management, biodiversity conservation, water and energy conservation, and emission reduction.
5. **Governance and Integrity:** Maintain high standards of ethics and integrity, adhering to legal and regulatory requirements, preventing bribery and corruption, ensuring transparency, and implementing effective grievance mechanisms.

Implementation Framework

We have integrated the OECD's five-step framework for risk-based due diligence into our management systems:

1. **Establish Strong Management Systems:** Implement policies and procedures that ensure responsible sourcing.
2. **Identify and Assess Risks:** Conduct thorough risk assessments in the supply chain.
3. **Design and Implement Risk Management Strategies:** Develop and enforce strategies to mitigate identified risks.
4. **Independent Third-Party Audits:** Engage third parties to review our supply chain due diligence practices.
5. **Annual Reporting:** Regularly report on our supply chain due diligence efforts to ensure transparency and accountability.

Supplier Expectations

We expect our suppliers to:

- Comply with our responsible sourcing policy and all applicable laws and regulations.
- Collaborate with us in identifying, assessing, and mitigating supply chain risks.
- Ensure that their practices do not contribute to conflicts, human rights abuses, or environmental harm.
- Participate in training and capacity-building programs to enhance compliance with our standards.

Stakeholder Engagement

We actively engage with various stakeholders, including employees, suppliers, local communities, and regulatory bodies, to promote responsible sourcing. We encourage open communication and collaboration to address supply chain challenges and improve practices continuously.

Monitoring and Continuous Improvement

We continuously monitor our supply chain to ensure compliance with our policy and adapt to evolving risks and regulatory requirements. We commit to regularly reviewing and updating our policy to reflect best practices and emerging standards in responsible sourcing.

By adhering to these principles and commitments, BULLION LINK TRADING - FZCO aims to build a responsible and sustainable supply chain for precious metals, contributing positively to the environment and society.

This is the first version of the Policy, and it will be revised as and when required to keep abreast with the fast-changing business and regulatory milieu.

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Version Control V1.0 24 November 2025	Name	Signature
Document Prepared and Approved By:	Pieter Arie Borsje (Owner and Money Laundering Reporting Officer)	