

**FUJAIERAH GOLD FZC**  
**Quality, Environment & Safety Management System**  
 In conformance with ISO 9001(2015),  
 ISO 14001 (2015) & ISO 45001(2018)

**POLICY: DUE DILIGENCE**

REV.NO. 01	VERSION NO. 02	FGP/DMCC/01	Page 1 of 7
------------	----------------	-------------	-------------


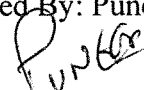
**Responsible Gold Supply-Chain Due-Diligence Policy**

As a vital company within Vedanta Resources Limited, Fujairah Gold FZC (FG) is committed to support, to cooperate and participates in actively, and enhances worldwide efforts to ensure that Precious Metals are come from legitimate, ethical sources, and that they have not been associated with any organized crime, armed conflict or human right abuses and/or money laundering. Consequently, it assures that the origin of the gold is ethically acceptable. It is our policy to do business with legitimate and law-abiding customers.

Fujairah Gold, as responsible Gold refiner in UAE, has developed and implemented policy complies with the DMCC and the LMBA Responsible Gold Guidance for any type of precious metal handled, follows the ‘5’ steps framework for risk based due diligence of the OECD Guidelines. The DMCC rules for Risk Based Due Diligence in the Gold and/or Precious Metal Supply Chain (DMCC Rules for RBD-GPM) is based on the DMCC’s Guidance For Risk based Compliance for Designated Non-Financial Business and Professions (DNFBs), the DMCC’s Anti–Money Laundering and Combating the Financing of terrorism policy and process as updated on their website. Fujairah Gold Complies to the DMCC’s Rules for Risk Based Due- Diligence in the Precious Metals supply chain *Version 1.1/2017*.

We employ this policy by our commitment to conduct our activities and business:

- ✦ With honesty and transparency;
- ✦ Do not support fraud, corruption or any other illegal activity;

Issued By: Sanjay Pandit (CFO & Compliance Officer) 	Approved By: Puneet Khurana (CEO) 
DATE : 01.02.2021	DATE : 01.02.2021

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-------------------	-----------------------	--------------------	--------------------

- ✦ Maintain high moral, ethical and social standards;
- ✦ Maintaining proper business relationship with all counterparts.

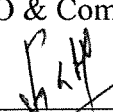
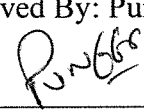
**Scope:** This policy is issued to all the Staff related to the Precious Metal Refinery of Fujairah Gold, the raw material suppliers & their counter parties of Fujairah Gold Precious Metal Refinery.

We implemented this policy through an effective and comprehensive management system which is based on strong KYC due diligence practices in order to identify our counterparts. In that regard we are strongly committed to:

1. We, Fujairah Gold, will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- ✦ Torture, cruel, inhuman and degrading treatment;
- ✦ Forced or compulsory labor;
- ✦ Child labor;
- ✦ Human rights violations and abuses;
- ✦ War crimes, violation of international humanitarian law, crimes against humanity and genocide.

2. We will not deal with, and will immediately discontinue engagement with, upstream suppliers, where we identify a reasonable prospect that they are committing, or are sourcing from or linked to any party committing, abuses described as above or any other illegal party.

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-------------------	-----------------------	--------------------	--------------------

3. We will not directly or indirectly support non-state armed groups, including, but not limited to, procuring gold from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally:

- ✦ Control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain; and/or
- ✦ Tax or extort money or gold at mine sites, along transportation routes or at points where gold is traded, or from intermediates, export companies or international traders.

4. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable prospect that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as described above.

5. We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commits abuses and act illegally as described above.

6. We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold.

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REV.NO. 01	VERSION NO. 02	FGP/DMCC/01	Page 4 of 7
------------	----------------	-------------	-------------

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold.

We encourage our suppliers of precious metal to take appropriate steps to ensure that the provisions of this policy are communicated to their employees and their own supply chain and to urge our suppliers to commit to a gold supply chain consistent with Annex II of the OECD Due diligence Guidance for responsible supply chains.

The Policy is issued as a guide line for the sourcing of the raw material (Gold) for the precious metal refinery. It defines the type of action to be taken for each supplier in case of suspicious activity. Policy to be seen along with the KYC form, Due-diligence risk assessment procedure, Gold purchase Procedure, Internal Audit procedure, Roles & responsibility of compliance officer etc.

The defined KYC shall identify the Ultimate Beneficial owner (5% and above share-holding) of the supplier & suitable due diligence of the entity shall be conducted as per the laid down assessment procedure. The latest KYC form (Rev 7) captures all the necessary requirements laid down by DMCC in RBD-GPM rules.

FGF has appointed a Supply Chain officer to effectively execute the policy & to monitor the same. Roles and responsibilities of the compliance officer have been defined clearly & suitable authorities and resources have been provided to him to implement the policy. Any deviations from the policy

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REV.NO. 01	VERSION NO. 02	FGP/DMCC/01	Page 5 of 7
------------	----------------	-------------	-------------

shall be reported to the senior management & suitable actions would be taken in line with the policy.

FGF has appointed a Controller who has direct access to the Senior Management and he shall report any suspicious transactions to the relevant authorities & the senior management.

The implementation of the policy is done through the KYC & Risk assessment for which separate SOPs are issued.

The effectiveness of the policy implementation shall be monitored by internal audits & the third party audit conducted annually. The scope & frequency of the internal audit is defined.

We commit to train our employees who handles the supplies to have necessary skills to do the due diligence audit of the suppliers.

Business with parties who doesn't comply to Fujairah Gold policy / support our due diligence process shall be reviewed & shall be terminated in case of continued noncompliance.

In case of the red flagged suppliers/transactions FG shall conduct enhanced due diligence as described in the risk assessment procedure to mitigate the risk.

The policy shall be reviewed once in a year to update the policy to align with changed scenarios / circumstances & to accommodate any changes in DMCC, OECD guidelines.

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REV.NO. 01	VERSION NO. 02	FGP/DMCC/01	Page 6 of 7
------------	----------------	-------------	-------------

**Contact Information:**

If you have any questions or concerns regarding this policy, or its implementation contact Fujairah Gold FZC at

**[compliance@fujairahgold.com](mailto:compliance@fujairahgold.com)**

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**1. AMENDMENT HISTORY**

S.No	Previous condition (before this revision)	Present condition (Reason made)	Previous Rev. No.& Issue date	Current Rev. No & Issue date
<b>1.</b>	Vedanta new logo	Vedanta changes new logo with addition of "Transforming Elements"	Rev. No: 06, Ver.No: 01 01.02.2018	Rev. No: 07, Ver. No: 01, 01.02.2019
<b>2.</b>	OSHAS 18001 (2007) standard	OSHAS 18001 (2007) replaced with ISO 45001(2018).	Rev. No: 07, Ver. No: 01, 01.02.2019	Rev.No: 00, Ver.No: 02, 15.10.2019
<b>3.</b>	-	Reviewed	Rev.No: 00, Ver.No: 02, 15.10.2019	Rev.No: 01, Ver.No: 02, 01.02.2021

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