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PART I

**CORPORATE GOVERNANCE,
RESPONSIBLE SOURCING
FRAMEWORK AND DUE DILIGENCE PRINCIPLES**

1. EXECUTIVE STATEMENT OF COMMITMENT

Bullion Metallics International Group (Private) Limited is committed to conducting all precious metals business with the highest standards of integrity, professionalism, transparency, accountability and ethical conduct.

Our objective extends beyond mere legal compliance.

We seek to become one of Africa's most trusted precious metals trading companies by ensuring every transaction demonstrates complete legitimacy, transparency and responsible stewardship.

The Company maintains an absolute ZERO-TOLERANCE policy towards:

- Money laundering
- Terrorist financing
- Proliferation financing
- Bribery
- Corruption
- Fraud
- Tax evasion

- Customs fraud
- Human trafficking
- Child labour
- Forced labour
- Illegal mining
- Conflict minerals
- Environmental destruction
- Wildlife crime
- Forged documentation
- Sanctions evasion
- Organised crime

No commercial opportunity shall justify compromising these principles.

2. CORPORATE ETHICS STATEMENT

Every business decision shall be guided by five overriding principles:

- Integrity before profit.
- Transparency before convenience.
- Compliance before commercial gain.
- Sustainability before short-term advantage.
- Accountability without exception.

The Company rejects any transaction inconsistent with these principles irrespective of its financial value.

3. PURPOSE

The purpose of this Manual is to establish a comprehensive enterprise-wide compliance framework governing:

- Responsible sourcing.
- Supply chain due diligence.
- Customer onboarding.

- Supplier onboarding.
- AML/CFT compliance.
- Counterparty due diligence.
- Corporate governance.
- Risk management.
- ESG compliance.
- Human rights.
- Environmental stewardship.
- Trade compliance.
- Export controls.
- Sanctions compliance.
- Financial crime prevention.

4. OBJECTIVES

The objectives of this Manual include:

- Protecting shareholders.
- Protecting investors.
- Protecting counterparties.
- Protecting employees.
- Protecting the Company's reputation.
- Facilitating access to international bullion markets.
- Supporting institutional onboarding.
- Maintaining full supply chain traceability.
- Demonstrating regulatory compliance.
- Promoting responsible mining.

5. COMPLIANCE PHILOSOPHY

Compliance shall never be regarded as an administrative obligation.

It is an essential commercial function integrated into every business decision.

Every transaction shall undergo a documented compliance review before execution.

Failure to satisfy compliance requirements automatically prevents transaction approval.

6. ENTERPRISE RISK APPETITE

BMIG maintains an extremely conservative compliance risk appetite.

The Company has zero tolerance for exposure involving:

- Criminal organisations.
- Terrorist organisations.
- Conflict financing.
- Human rights abuses.
- Sanctioned persons.
- Shell companies lacking economic substance.
- Anonymous ownership.
- Cash-intensive unexplained transactions.
- Fraudulent documentation.

Commercial opportunities shall never override compliance concerns.

7. APPLICABLE LEGAL FRAMEWORK

BMIG shall comply with all legislation applicable to its operations, including:

- Mining legislation.
- Export legislation.
- Customs legislation.
- Tax legislation.
- Exchange control legislation.
- Anti-money laundering legislation.
- Counter-terrorist financing legislation.

- Environmental legislation.
- Labour legislation.
- Occupational safety legislation.
- Data protection legislation.
- International sanctions applicable to counterparties and transactions.

8. INTERNATIONAL COMPLIANCE FRAMEWORK

BMIG aligns its management systems, where applicable to its business model, with internationally recognised responsible sourcing and compliance standards, including:

- OECD Due Diligence Guidance for Responsible Mineral Supply Chains.
- London Bullion Market Association (LBMA) Responsible Gold Guidance.
- Financial Action Task Force (FATF) Recommendations.
- United Nations Guiding Principles on Business and Human Rights.
- United Nations Convention Against Corruption.
- ISO 37301 Compliance Management Systems (guiding principles).
- ISO 37001 Anti-Bribery Management Systems (guiding principles).

9. DEFINITIONS

For purposes of this Manual:

Beneficial Owner means the natural person who ultimately owns or controls a legal entity.

CAHRA means Conflict-Affected and High-Risk Area.

CDD means Customer Due Diligence.

EDD means Enhanced Due Diligence.

PEP means Politically Exposed Person.

KYC means Know Your Customer.

KYT means Know Your Transaction.

AML means Anti-Money Laundering.

CFT means Countering the Financing of Terrorism.

Supply Chain includes every activity from extraction through final delivery.

10. CORPORATE GOVERNANCE MODEL

The Company adopts the internationally recognised Three Lines of Defence model.

First Line

Operational Management

Responsible for compliance execution.

Second Line

Compliance Function

Responsible for monitoring and advisory services.

Third Line

Internal Audit

Responsible for independent assurance.

Ultimate oversight remains with the Board.

11. BOARD COMPLIANCE CHARTER

The Board shall:

- approve compliance strategy;
- approve this Manual;
- receive quarterly compliance reports;
- review significant compliance incidents;
- oversee enterprise risk;
- appoint the Compliance Officer;
- ensure adequate resources;
- approve annual compliance certifications.

12. COMPLIANCE COMMITTEE

The Managing Director shall chair a quarterly Compliance Committee.

Standing members shall include:

- Compliance Officer
- Finance Manager
- Operations Manager
- Company Secretary
- Internal Audit Representative

The Committee shall:

- review new suppliers;
- review high-risk transactions;
- review investigations;
- monitor corrective actions;
- review sanctions developments; • recommend policy amendments.

13. COMPLIANCE OFFICER

The Compliance Officer shall operate independently.

The Officer may suspend any transaction where:

- documentation is incomplete;
- sanctions concerns arise;
- suspicious activity exists;
- source of funds cannot be verified;
- source of gold cannot be established.

Operational staff may not override a compliance suspension.

14. DECISION AUTHORITY MATRIX

Low Risk Transactions

Approval:
Operations Manager

Medium Risk

Approval:
Compliance Officer

High Risk

Approval:
Managing Director

Critical Risk

Approval:
Board of Directors

Prohibited

Transactions

Automatically

rejected.

15. CORPORATE VALUES

BMIG adopts the following core values:

- Integrity
- Accountability
- Transparency
- Professionalism
- Respect
- Sustainability
- Fairness
- Independence
- Confidentiality
- Continuous Improvement

16. HUMAN RIGHTS COMMITMENT

The Company recognises internationally accepted human rights.

BMIG shall not knowingly participate in supply chains involving:

- Child labour.
- Forced labour.
- Slavery.
- Human trafficking.
- Sexual exploitation.
- Torture.
- Arbitrary detention.
- Violence against indigenous communities.

17. ENVIRONMENTAL COMMITMENT

BMIG encourages suppliers to:

- minimise pollution;
- rehabilitate mined land;

- reduce hazardous chemicals;
- improve waste management;
- reduce emissions;
- conserve biodiversity;
- comply with environmental laws.

Environmental performance forms part of supplier risk assessment.

18. CONFLICT OF INTEREST

Every employee shall disclose:

- financial interests;
- family relationships;
- outside employment;
- gifts;
- hospitality;
- personal relationships affecting impartiality.

Failure to disclose constitutes misconduct.

19. GIFTS AND HOSPITALITY

No employee shall solicit or accept gifts capable of influencing business judgement.

Hospitality shall:

- be reasonable;
- be lawful;
- be transparent;
- be recorded in the Gifts Register.

20. ANTI-BRIBERY POLICY

The Company prohibits:

- kickbacks;
- facilitation payments;
- hidden commissions;
- secret rebates;
- improper political donations;
- improper charitable contributions.

Every suspected bribery incident shall immediately be investigated.

21. DATA PROTECTION

All compliance records shall remain confidential.

Access shall be limited to authorised personnel.

Electronic records shall be securely backed up and protected against unauthorised access.

22. RECORD RETENTION

Compliance records shall be retained in accordance with applicable legal and regulatory requirements and the Company’s record retention schedule.

No compliance record may be destroyed while it is relevant to an investigation, audit, legal proceeding, or regulatory inquiry.

23. POLICY REVIEW

This Manual shall undergo formal review every six months or sooner if:

- legislation changes;
- international standards change;
- material compliance failures occur;
- Board resolution requires revision.

24. CERTIFICATION

Every employee, director and relevant contractor shall annually certify that they have:

- read this Manual;
- understood this Manual;
- complied with this Manual;
- reported all known breaches.

Failure to certify shall constitute a compliance matter requiring investigation.

PART II

SUPPLIER ONBOARDING, CUSTOMER DUE DILIGENCE, AML/CFT CONTROLS AND RESPONSIBLE SOURCING PROCEDURES

25. INTRODUCTION

This Part establishes the mandatory operational procedures governing the onboarding, approval, monitoring and ongoing review of every supplier, customer, intermediary, logistics provider, refinery, financial institution and other business counterparty with whom Bullion Metallics International Group (Private) Limited ("BMIG") conducts business.

No transaction involving precious metals shall commence unless the procedures prescribed in this Part have been completed, documented and approved by the appropriate authority.

Compliance with these procedures is mandatory and may not be waived except by a written resolution of the Board of Directors.

26. RISK-BASED DUE DILIGENCE FRAMEWORK

BMIG adopts a risk-based approach to customer and supplier due diligence in accordance with internationally recognised standards and applicable law.

Every counterparty shall undergo due diligence proportionate to its assessed risk profile.

Due diligence shall be classified into:

- Simplified Due Diligence (SDD)
- Standard Customer Due Diligence (CDD)
- Enhanced Due Diligence (EDD)
- Continuous Monitoring

Risk classification shall be documented before any commercial relationship is established.

27. CUSTOMER ACCEPTANCE POLICY

The Company shall conduct business only with counterparties capable of demonstrating:

- lawful incorporation;
- identifiable beneficial ownership;
- financial legitimacy;
- lawful source of funds;
- lawful source of precious metals;
- satisfactory reputation;
- compliance with applicable laws.

Relationships shall not be established merely because commercial terms are attractive.

Compliance considerations shall always prevail.

28. CUSTOMER IDENTIFICATION PROCEDURES

Before any commercial engagement, the Compliance Officer shall verify:

Corporate Customers

- Certificate of Incorporation
- Articles of Association or Constitution
- Business Registration Certificate
- Tax Registration
- VAT Registration (where applicable)
- Registered Office
- Principal Place of Business
- Trading Licence
- Board Resolution
- Register of Directors
- Register of Shareholders
- Ultimate Beneficial Owners

- Organisational Structure

Individual Customers

- Passport
- National Identity Document
- Proof of Residence
- Tax Identification Number
- Occupation
- Employer
- Source of Wealth
- Source of Funds

Verification shall be performed using reliable independent documentation.

29. ULTIMATE BENEFICIAL OWNERSHIP (UBO)

The Company shall identify every natural person who ultimately owns or controls a customer or supplier.

Ownership structures shall be traced through every intermediate entity until the ultimate natural persons are identified.

Nominee shareholders shall not obscure beneficial ownership.

Where beneficial ownership cannot be satisfactorily established, the relationship shall not proceed.

30. POLITICALLY EXPOSED PERSONS (PEPs)

Every counterparty shall be screened for PEP exposure.

Enhanced Due Diligence shall automatically apply where:

- the customer is a PEP;

- a shareholder is a PEP;
- a director is a PEP;
- a beneficial owner is a PEP;
- an immediate family member is a PEP;
- a close associate is a PEP.

Approval of any PEP relationship requires Managing Director authorisation supported by a written recommendation from the Compliance Officer.

31. SANCTIONS SCREENING

Every counterparty shall be screened before onboarding and periodically thereafter against applicable sanctions lists.

Screening shall extend to:

- customers;
- suppliers;
- shareholders;
- directors;
- beneficial owners;
- vessels;
- aircraft;
- logistics providers;
- correspondent banks.

Positive matches shall immediately suspend onboarding pending investigation.

No transaction shall proceed with sanctioned persons or entities.

32. ADVERSE MEDIA SCREENING

The Compliance Department shall conduct adverse media searches covering allegations involving:

- fraud;
- bribery;
- corruption;
- money laundering;
- environmental crimes;
- sanctions violations;
- organised crime;
- terrorism;
- illegal mining;
- customs offences.

Documented findings shall form part of the risk assessment.

33. SOURCE OF WEALTH VERIFICATION

For higher-risk counterparties BMIG shall establish the origin of accumulated wealth.

Acceptable evidence may include:

- audited financial statements;
- business ownership records;
- inheritance documentation;
- investment records;
- mining licences;
- dividend records; • sale agreements.

Unsupported declarations shall not be accepted.

34. SOURCE OF FUNDS VERIFICATION

Every payment shall be traceable to legitimate banking channels.

The Compliance Officer shall confirm:

- payer identity;
- account ownership;
- payment purpose;
- consistency with contractual terms; • consistency with customer profile.

Third-party payments require prior written approval.

Cash payments shall only be accepted where lawful, documented and specifically authorised under Company policy.

35. SUPPLIER ONBOARDING PROCEDURE

Before any supplier is approved the following steps shall be completed:

Step 1

Supplier Application

Step 2

Corporate Documentation Review

Step 3

Mine Verification

Step 4

Beneficial Ownership Verification

Step 5

AML Screening

Step 6

Sanctions Screening

Step 7

Environmental Assessment

Step 8

Human Rights Assessment

Step 9

Country Risk Assessment

Step 10

Approval Recommendation

No supplier shall appear on the Approved Supplier Register until every step has been completed.

36. SUPPLIER DOCUMENTATION REQUIREMENTS

Each supplier shall provide, where applicable:

- Certificate of Incorporation
- Company Constitution
- Mining Licence
- Export Licence
- Tax Clearance
- Environmental Approval
- Production Records
- Assay Reports
- Chain of Custody Records
- Commercial References
- Banking Details
- Insurance Certificates
- Responsible Sourcing Declaration

Failure to provide complete documentation shall delay onboarding.

37. MINE OF ORIGIN VERIFICATION

The Company shall establish:

- exact mine location;
- licence number;
- operator;
- ownership;
- production capacity;
- legal status;
- regulatory compliance.

Verification may include:

- satellite imagery;
- government records;
- independent consultants;
- physical inspection;
- third-party reports.

38. CHAIN OF CUSTODY REQUIREMENTS

Every shipment shall possess a documented chain of custody covering:

- extraction;
- collection;
- aggregation;
- transport;
- storage;
- export;
- refining;
- final delivery.

Breaks in documentation shall immediately trigger investigation.

39. RESPONSIBLE ASM SOURCING

Where sourcing from Artisanal and Small-Scale Mining (ASM):

BMIG shall verify:

- legal registration;
- cooperative membership;
- environmental practices;
- absence of child labour;
- absence of forced labour;
- security conditions;
- production capacity.

ASM suppliers shall undergo more frequent monitoring.

40. COUNTRY RISK ASSESSMENT

Country assessments shall consider:

- political stability;
- corruption; sanctions; armed conflict; terrorism; human rights; environmental governance; regulatory quality; financial crime.

Countries presenting unacceptable risks shall require Board approval or be designated as prohibited sourcing jurisdictions.

41. TRANSACTION DUE DILIGENCE

Each proposed transaction shall be assessed for:

- commercial rationale;
- pricing anomalies;
- unusual payment structures; • unusual shipment routes;
- inconsistent documentation; • unexplained intermediaries;
- unusual urgency.

Suspicious transactions shall be escalated immediately.

42. RED FLAG INDICATORS

Examples include:

- forged documents;
- altered assay certificates;
- inconsistent weights;
- unusually high discounts;
- unexplained intermediaries;

- refusal to disclose ownership;
- cash transactions;
- politically exposed counterparties;
- inconsistent logistics;
- implausible mine production;
- third-party payments.

Any unresolved red flag shall result in suspension or rejection.

43. ENHANCED DUE DILIGENCE

EDD shall include, where appropriate:

site visits;
management interviews;

independent legal
opinions; forensic
document review;
financial analysis;
external
intelligence
reports;
independent assay
verification;

- enhanced screening; • periodic re-approval.

44. CONTINUOUS MONITORING

Approved counterparties shall be monitored continuously through:

- sanctions screening;
- adverse media reviews;

- transaction monitoring;
- annual KYC updates;
- periodic site inspections;
- compliance questionnaires.

High-risk suppliers shall be reviewed at least quarterly.

45. SUSPICIOUS ACTIVITY REPORTING

Every employee shall immediately report suspected:

- money laundering;
- terrorist financing;
- bribery;
- corruption;
- sanctions evasion;
- illegal mining;
- fraud;
- document forgery.

Reports shall be submitted confidentially to the Compliance Officer.

46. RECORD KEEPING

The Compliance Department shall maintain comprehensive records of:

- KYC files;
- onboarding documents;
- screening reports; approvals; investigations

. transaction monitoring; supplier reviews; and audit findings.

Records shall be stored securely, indexed, and readily available for regulatory inspection and independent audit.

47. QUALITY ASSURANCE

The Internal Audit Department shall periodically test compliance with this Part by reviewing supplier files, customer files, transaction records, and due diligence documentation to confirm that all mandatory procedures have been followed.

Findings shall be reported to the Managing Director and the Board together with recommendations for corrective action.

48. MANAGEMENT CERTIFICATION

The Managing Director and Compliance Officer shall certify annually that:

- supplier onboarding procedures have been implemented;
- customer due diligence has been conducted in accordance with this Manual;
- AML/CFT controls are functioning effectively;
- identified deficiencies have been addressed or are subject to an approved remediation plan.

PART III

OPERATIONAL CONTROLS, CHAIN OF CUSTODY MANAGEMENT, TRANSACTION SECURITY, AUDIT, REPORTING AND COMPLIANCE APPENDICES

49. INTRODUCTION

This Part establishes the operational procedures governing the physical handling, transportation, storage, export, sale, financing and delivery of precious metals by Bullion Metallics International Group (Private) Limited (“BMIG”).

The objective is to preserve the integrity of the supply chain from the point of origin to final delivery while ensuring compliance with applicable laws, contractual obligations and internationally recognised responsible sourcing practices.

Every shipment shall be fully documented, traceable and capable of independent verification.

CHAPTER A

CHAIN OF CUSTODY MANAGEMENT

50. OBJECTIVES

The Company shall maintain an uninterrupted chain of custody for every gram of precious metal handled.

The chain of custody shall demonstrate:

- legal ownership;
- lawful origin;
- uninterrupted possession;
- secure transportation;

- complete documentation;
- independent verification.

51. CHAIN OF CUSTODY PROCEDURES

Each shipment shall be assigned a unique Shipment Reference Number (SRN).

The SRN shall appear on every document including:

- Purchase Agreement
- Sales Contract
- Commercial Invoice
- Packing List
- Assay Certificate
- Export Permit
- Customs Declaration
- Air Waybill
- Insurance Certificate
- Warehouse Receipt
- Delivery Confirmation

No shipment may proceed without complete documentation.

52. METAL IDENTIFICATION

Each bullion bar or package shall be identified using:

- Serial Number
- Weight
- Purity
- Gross Weight
- Net Weight
- Production Lot
- Packaging Reference
- Security Seal Number
- Photograph

- Date of Collection

53. ASSAY VERIFICATION

Before purchase BMIG shall verify:

- purity
- weight
- composition
- impurities
- moisture (where relevant)

Acceptable assay methods include:

- Fire Assay
- X-Ray Fluorescence (XRF)
- ICP-OES
- Independent Laboratory Analysis

Disputed assay results shall require an independent referee assay.

CHAPTER B TRANSPORT

SECURITY

54. TRANSPORT REQUIREMENTS

Transport shall only be undertaken by approved logistics providers.

The Compliance Officer shall maintain an Approved Logistics Register.

Approval criteria include:

- operating licences;
- insurance;
- security capability;
- GPS tracking;

- armed escort (where necessary);
- incident history.

55. SECURITY REQUIREMENTS

Every shipment shall undergo a documented security assessment.

Security measures may include:

- GPS monitoring;
- dual control;
- tamper-evident packaging;
- armed escorts;
- satellite tracking;
- secure vault transfers;
- route confidentiality;
- emergency response procedures.

56. WAREHOUSING

Storage facilities shall:

- maintain controlled access;
- operate CCTV;
- maintain intrusion alarms;
- conduct inventory reconciliation;
- maintain visitor registers;
- conduct periodic security audits.

CHAPTER C EXPORT

CONTROLS

57. EXPORT DOCUMENTATION

Every export shall include, where applicable:

- Export Permit
- Commercial Invoice • Packing List
- Certificate of Origin
- Assay Certificate
- Air Waybill
- Customs Declaration
- Insurance Certificate
- Chain of Custody Certificate
- Purchase Contract
- Sales Contract

Incomplete documentation prohibits shipment.

58. EXPORT APPROVAL

Export approval shall require written confirmation from:

Operations Manager

Finance Manager

Compliance Officer

Managing Director

No single individual may approve an export unilaterally.

CHAPTER D PAYMENT

CONTROLS

59. PAYMENT METHODS

Payments shall only be accepted through legitimate regulated financial institutions.

Acceptable methods include:

- Wire Transfer
- MT103 Cash Transfer
- Standby Letter of Credit
- Escrow Arrangements
- Bank Guarantees

Cash transactions shall only be permitted where lawful, documented and authorised.

60. PAYMENT VERIFICATION

Finance shall verify:

- sender;
- beneficiary;
- account ownership;
- payment purpose;
- sanctions status;
- consistency with contract.

Third-party payments require Enhanced Due Diligence.

CHAPTER E

TRANSACTION MONITORING

61. CONTINUOUS MONITORING

Every transaction shall be monitored for:

- unusual pricing;
- unusual discounts;
- unusual routing;
- inconsistent documentation;
- sanctions exposure;
- adverse media;
- payment irregularities.

62. AUTOMATED SCREENING

Where available BMIG shall utilise electronic compliance systems to monitor:

- sanctions;
- politically exposed persons;
- adverse media;
- corporate ownership; • transaction anomalies.

CHAPTER F INCIDENT MANAGEMENT

63. INCIDENT REPORTING

Every employee shall immediately report:

- theft;
- fraud;
- attempted bribery;
- suspicious payments;
- document forgery;
- security breaches;
- data breaches;
- environmental incidents.

Reports shall be made immediately to the Compliance Officer.

64. INTERNAL INVESTIGATIONS

Investigations shall follow:

1. Initial Assessment
2. Evidence Preservation
3. Witness Interviews
4. Documentary Review
5. Risk Assessment
6. Investigation Report
7. Corrective Action
8. Board Review (where required)

65. DISCIPLINARY ACTION

Breaches may result in:

- counselling;
- retraining;
- written warning;
- suspension;
- dismissal; • civil proceedings;
- criminal referral.

CHAPTER G INTERNAL AUDIT

66. AUDIT PROGRAMME

Internal Audit shall conduct:

Monthly Compliance Reviews

Quarterly Transaction Reviews

Semi-Annual Operational

Reviews Annual

Enterprise Compliance

Audit

67. AUDIT SCOPE

Audits shall examine:

- supplier files;
- customer files;
- KYC;
- sanctions screening;
- payment records;
- shipment files;
- chain of custody;
- export documentation;
- financial controls;
- governance.

68. MANAGEMENT ACTION PLANS

Audit findings shall be:

- classified;
- prioritised;
- assigned;
- monitored;
- closed.

CHAPTER H MANAGEMENT REPORTING

69. MONTHLY REPORTS

Compliance Officer shall report:

- new suppliers;
- rejected suppliers;
- investigations;
- suspicious transactions; • sanctions alerts;
- audit findings.

70. QUARTERLY REPORTS

Managing Director shall report to the Board:

- enterprise risks;
- compliance statistics;
- investigations;
- litigation;
- regulatory developments;
- corrective actions.

71. ANNUAL COMPLIANCE REPORT

The Board shall receive:

- compliance performance;
- supplier statistics;
- customer statistics;
- training records;
- audit findings;
- major incidents;

- policy improvements.

CHAPTER I

TRAINING

72. TRAINING PROGRAMME

Mandatory training shall include:

- Responsible Sourcing
- AML
- CFT
- Anti-Bribery
- Human Rights
- Environmental Compliance
- Export Controls
- Sanctions
- Fraud Prevention
- Data Protection

73. COMPETENCY ASSESSMENT

Employees shall successfully complete annual competency assessments.

Failure requires retraining.

CHAPTER J BUSINESS CONTINUITY

74. BUSINESS CONTINUITY PLAN

BMIG shall maintain contingency procedures covering:

- political instability;
- cyber-attacks;
- transport disruption;
- refinery closure;
- banking interruption;
- security incidents;
- pandemics;

- natural disasters.

75. CRISIS MANAGEMENT TEAM

The Crisis Management Team shall comprise:

- Managing Director
- Compliance Officer
- Finance Manager
- Operations Manager
- Company Secretary

CHAPTER K

POLICY AMENDMENT

76. AMENDMENTS

Only the Board may amend this Manual.

Emergency amendments may be approved between Board meetings by written resolution.

77. DOCUMENT CONTROL

The Compliance Officer shall maintain:

- version history;
- amendment register;
- distribution register;
- obsolete document register.

CHAPTER L

ANNEXURES

The following documents form part of this Manual:

Annexure A
Supplier Application Form

Annexure B
Corporate KYC Questionnaire

Annexure C
Individual KYC Questionnaire

Annexure D
Ultimate Beneficial Ownership Declaration

Annexure E
Politically Exposed Person Declaration

Annexure F
Source of Funds Declaration

Annexure G
Source of Wealth Declaration

Annexure H
Supplier Risk Assessment Matrix

Annexure I
Country Risk Assessment Matrix

Annexure J
Transaction Risk Assessment Form

Annexure K
Conflict-Free Gold Declaration

Annexure L
Responsible Sourcing Declaration

Annexure M
Environmental Compliance Declaration

Annexure N
Human Rights Compliance Declaration

Annexure O
Anti-Bribery Compliance Certificate

Annexure P
Annual Supplier Certification

Annexure Q
Chain of Custody Register

Annexure R
Shipment Inspection Checklist

Annexure S
Gold Reception Report

Annexure T
Assay Verification Report

Annexure U
Vault Register

Annexure V
Export Readiness Checklist

Annexure W
Suspicious Activity Report (SAR)

Annexure X
Whistleblower Complaint Form **Annexure Y**
Corrective Action Register

Annexure Z
Annual Compliance Certification

CONCLUSION

This Manual constitutes the official Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Framework of Bullion Metallics International Group (Private) Limited.

Every director, employee, consultant, contractor, supplier, intermediary and representative acting on behalf of the Company is required to comply fully with its provisions. The Board of
Directors affirms that adherence to this Manual is fundamental to safeguarding the Company’s integrity, maintaining access to international bullion markets and ensuring compliance with applicable legal, regulatory and ethical standards.

ANNEXURE A

SUPPLIER APPLICATION FORM
Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL
Document Reference: BMIG-RS-ANN-A

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Classification: Controlled Compliance Document

Department: Compliance

CONFIDENTIALITY NOTICE
The information contained in this application is confidential and shall be used solely for the purpose of conducting supplier due diligence and determining eligibility for onboarding by Bullion Metallics International Group (Private) Limited (“BMIG”).

Providing false or misleading information may result in rejection of the application, immediate termination of any contractual relationship, referral to regulatory authorities, and possible civil or criminal proceedings.

SECTION A

SUPPLIER DETAILS

1. **Registered Company Name**

2. **Trading Name**

3. **Registration Number**

4. **Date of Incorporation**

5. **Country of Incorporation**

6. **Registered Office**

7. **Principal Business Address**

8. **Postal Address**

9. **Website**

10. Company Email

---

11. Telephone

---

12. Mobile

SECTION B
BUSINESS PROFILE

Business Activities (Tick all applicable)

☐ Gold Mining

☐ Gold Trading

☐ Gold Aggregation

☐ Refining

☐ Recycling

☐ Exporting

☐ Importing

☐ Logistics

☐ Security

☐ Other

Specify

Years in Business

Number of Employees

Annual Gold Production

Average Monthly Supply

Expected Annual Volume to BMIG

SECTION C

COMPANY OWNERSHIP

Ultimate Parent Company

Holding Company

Is the Company publicly listed?

☐ Yes

☐ No

Stock Exchange

SECTION D DIRECTORS

Name	Nationality	Position	ID/Passport

Attach additional sheet if necessary.

SECTION E SHAREHOLDERS

Name	Nationality	Ownership %

SECTION F

ULTIMATE BENEFICIAL OWNERS

Every natural person owning or controlling 10% or more.

Name	**Nationality**	**Ownership**	**Country of Residence**

SECTION G

COMPANY MANAGEMENT

Chief Executive Officer

Managing Director

Chief Financial Officer

Compliance Officer

Company Secretary

SECTION H

PRECIOUS METALS SUPPLIED

Tick all applicable.

☐ Gold Doré

☐ Gold Bullion

☐ Gold Nuggets

☐ Gold Grain

☐ Gold Concentrate

☐ Recycled Gold

☐ Silver

☐ Platinum

☐ Palladium

Other

SECTION I

MINE INFORMATION

Mine Name

Mining Licence Number

Mining Authority

Mining Location

GPS Coordinates

Latitude

Longitude

Mining Method

☐ Underground

☐ Open Pit

☐ Alluvial

☐ Artisanal

☐ Tailings

Average Monthly Production

SECTION J
LEGAL COMPLIANCE

Do you possess a valid Mining Licence?

List of Licensing Documents:

Comments from Evaluation Officer:

Yes

No

Export Licence?

☐ Yes

☐ No

Environmental Licence?

☐ Yes

☐ No

Tax Registration?

☐ Yes

☐ No

VAT Registration?

☐ Yes

☐ No

Workers Compensation Registration?

☐ Yes

☐ No

Occupational Health Compliance?

☐ Yes

☐ No

SECTION K

ENVIRONMENTAL COMPLIANCE

Do you maintain an Environmental Management Plan?

☐ Yes

☐ No

Environmental Officer

Tailings Management System

☐ Yes

☐ No

Mercury Usage

☐ Yes

☐ No

If yes explain

Land Rehabilitation Programme

☐ Yes

☐ No

ISO Environmental Certification

SECTION L
HUMAN RIGHTS

Confirm the following:

☐ No Child Labour

☐ No Forced Labour

No Human Trafficking

No Discrimination

☐ Equal Opportunity Employer

☐ Fair Wages

☐ Safe Working Conditions

☐ Freedom of Association

SECTION M
RESPONSIBLE SOURCING

Does your organisation maintain a Responsible Sourcing Policy?

☐ Yes

☐ No

Supply Chain Due Diligence Policy?

☐ Yes

☐ No

AML Policy?

☐ Yes

☐ No

Anti-Bribery Policy?

☐ Yes

☐ No

Whistleblower Policy?

☐ Yes

☐ No

SECTION N

CONFLICT MINERALS

Are your minerals sourced from Conflict Affected or High Risk Areas?

☐ Yes

☐ No

If yes provide details.

SECTION O

SANCTIONS

Has the Company ever:

Been sanctioned?

☐ Yes

☐ No

Been investigated for money laundering?

☐ Yes

☐ No

Been investigated for corruption?

☐ Yes

☐ No

Been investigated for tax offences?

Yes

No

Been convicted of criminal offences?

☐ Yes

☐ No

Provide details where applicable.

SECTION P

BANKING DETAILS

Bank

Branch

Account Name

Account Number

SWIFT

IBAN (where applicable)

SECTION Q REFERENCES

Reference 1

Company

Contact Person

Telephone

Email

Reference 2

Company

Contact Person

Telephone

Email

SECTION R

DOCUMENT CHECKLIST

Attach certified copies of:

☐ Certificate of Incorporation

☐ Constitution

☐ Company Extract

Directors Register

Shareholders Register

☐ UBO Register

☐ Mining Licence

☐ Export Permit

☐ Environmental Licence

☐ Tax Clearance

☐ VAT Registration

☐ AML Policy

☐ Responsible Sourcing Policy

☐ Financial Statements (last three years)

☐ Bank Reference Letter

☐ Insurance Certificates

☐ Assay Certificates

☐ Production Records

☐ ESG Reports

☐ Human Rights Policy

☐ Anti-Bribery Policy

☐ Organisation Structure

☐ Passport Copies of Directors

☐ Utility Bills

☐ Board Resolution

SECTION S

SUPPLIER DECLARATION

I, the undersigned, being duly authorised by the Supplier, hereby declare that:

1. The information contained in this Application is true, complete and accurate.
2. The Supplier is lawfully established and authorised to conduct its business.
3. All precious metals supplied originate from lawful sources.
4. The Supplier complies with all applicable laws.
5. The Supplier has disclosed all material information relevant to this application.
6. The Supplier undertakes to notify BMIG immediately of any material change affecting the information provided.
7. BMIG may verify all information contained herein with any governmental, financial or regulatory authority.

Name

Position

Signature

Date:

Company Stamp

SECTION T

FOR BMIG COMPLIANCE USE ONLY

Application Number

Date Received

Compliance Officer

Initial Risk Rating

☐ Low

☐ Medium

☐ High

☐ Prohibited

Sanctions Screening

☐ Passed

☐ Failed

PEP Screening

☐ Passed

☐ Failed

Adverse Media

☐ Clear

☐ Further Review

Site Visit Required

☐ Yes

☐ No

EDD Required

☐ Yes

☐ No

Recommendation

☐ Approve

☐ Reject

☐ Defer Pending Further Information

Compliance Officer

Name

Signature

Date

Managing Director Decision

☐ Approved

☐ Rejected

☐ Conditional Approval

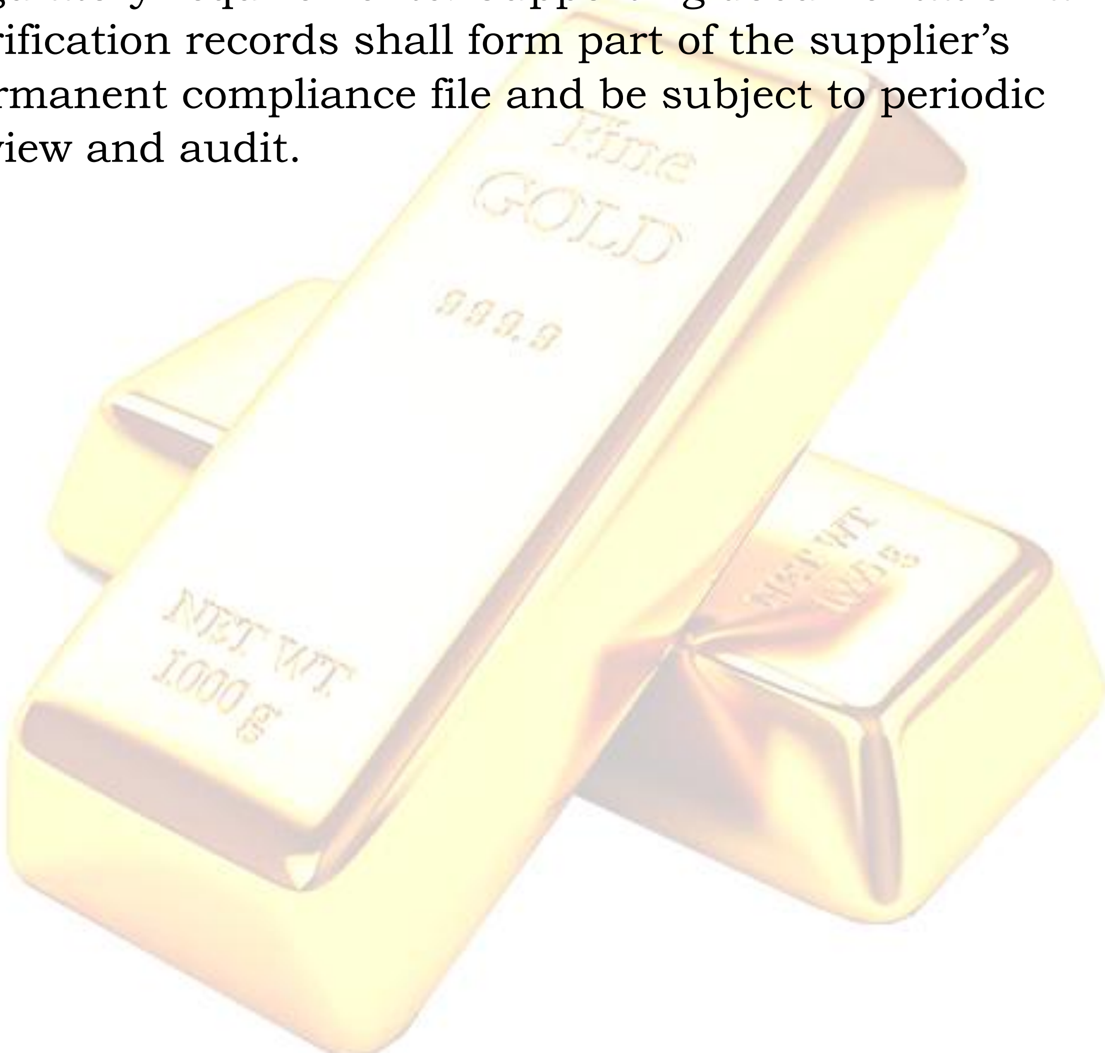
Managing Director

Signature

Date

DOCUMENT RETENTION

This document shall be retained by BMIG in accordance with its Record Retention Policy and applicable legal and regulatory requirements. Supporting documentation and verification records shall form part of the supplier's permanent compliance file and be subject to periodic review and audit.



ANNEXURE B

CORPORATE KNOW YOUR CUSTOMER (KYC) & CUSTOMER DUE DILIGENCE (CDD) QUESTIONNAIRE

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-B

Version: 1.0

Effective Date: 15 December 2025

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Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document **Department:**

Compliance

CONFIDENTIALITY NOTICE

This Corporate KYC Questionnaire is issued pursuant to the Company's Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual.

The information supplied shall be used exclusively for Know Your Customer (KYC),
Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), sanctions compliance, and responsible sourcing assessments.

Knowingly providing false, misleading, or incomplete information may result in rejection of the application, immediate termination of any commercial relationship, reporting to competent authorities, and any other remedies available under applicable law.

SECTION 1 – CUSTOMER IDENTIFICATION

1.1 Legal Name of Entity

1.2 Trading Name (if different)

1.3 Registration Number

1.4 Date of Incorporation

1.5 Country of Incorporation

1.6 Legal Form

☐ Private Company

☐ Public Company

☐ Partnership

☐ State-Owned Enterprise

☐ Trust

☐ Cooperative

☐ Other: ________________________

1.7 Tax Identification Number

1.8 VAT Registration Number

1.9 Registered Office

1.10 Principal Place of Business

SECTION 2 – BUSINESS PROFILE
Nature of Business

☐ Mining

☐ Gold Trading

☐ Precious Metals Brokerage

☐ Refining

☐ Jewellery Manufacturing

☐ Recycling

☐ Investment

☐ Logistics

☐ Government Agency

☐ Other

Specify

Date Business Commenced

Number of Employees

Annual Turnover (USD)

Annual Precious Metals Volume

Principal Products

☐ Gold Doré

☐ Refined Gold

☐ Silver

☐ Platinum

☐ Palladium

☐ Other

SECTION 3 – CONTACT PERSONS

Primary Contact

Name

Position

Telephone

Email

Secondary Contact

SECTION 4 – CORPORATE STRUCTURE

Does the Company belong to a group?

☐ Yes

☐ No

If yes:

Parent Company

Country

Ultimate Parent

Provide an organisational chart.

☐ Attached

SECTION 5 – DIRECTORS

Full Name	Nationality	Position	Passport/ID No.	Country of Residence

Attach additional schedules if necessary.

SECTION 6 – SHAREHOLDERS

List all shareholders holding **5% or more**.

Shareholder	Nationality	Percentage	Corporate / Individual

SECTION 7 – ULTIMATE BENEFICIAL OWNERS (UBOs)

Identify every natural person exercising ultimate ownership or effective control.

Name	Date of Birth	Nationality	Ownership %	Country of Residence

Attach certified identification documents for each UBO.

SECTION 8 – MANAGEMENT

Chief Executive Officer

Managing Director

Chief Financial Officer

Compliance Officer

Company Secretary

SECTION 9 – BANKING DETAILS

Primary Bank

Branch

Account Name

Account Number

SWIFT/BIC

IBAN (if applicable)

Secondary Bank

SECTION 10 – BUSINESS RELATIONSHIP

Purpose of relationship with BMIG

☐ Purchase Gold

☐ Sell Gold

☐ Refining

☐ Storage

☐ Logistics

☐ Financing

☐ Joint Venture

☐ Agency

☐ Other

Expected Annual Transaction Value (USD)

____

Expected Monthly Volume (kg)

____

____

SECTION 11 – SOURCE OF FUNDS

Primary source of funds:

☐ Mining Revenue

☐ Trading Revenue

☐ Investment Income

☐ Bank Finance

☐ Shareholder Capital

☐ Government Funding

☐ Other

Explain:

SECTION 12 – SOURCE OF WEALTH

The Company’s accumulated wealth originates from:

☐ Mining

☐ Manufacturing

☐ Investments

☐ Agriculture

☐ Real Estate

☐ Financial Services

☐ Other

Provide supporting evidence.

☐ Attached

SECTION 13 – AML/CFT COMPLIANCE

Does the Company maintain:

AML Policy?

☐ Yes ☐ No

Compliance Officer?

☐ Yes ☐ No

Transaction Monitoring System?

☐ Yes ☐ No

Internal Audit Function?

☐ Yes ☐ No

Whistleblower Programme?

☐ Yes ☐ No

Independent Compliance Reviews?

☐ Yes ☐ No

If “No”, explain.

SECTION 14 – SANCTIONS COMPLIANCE

Has the Company, any Director, Shareholder, UBO or Senior Officer ever:

Been sanctioned?

☐ Yes ☐ No

Been refused banking services?

☐ Yes ☐ No

Appeared on any sanctions list?

☐ Yes ☐ No

Provide details where applicable.

SECTION 15 – POLITICALLY EXPOSED PERSONS (PEPs)

Are any of the following PEPs?

- Directors
- Shareholders
- UBOs
- Senior Officers
- Immediate Family Members
- Close Associates

☐ Yes

☐ No

If yes, complete Annexure E.

SECTION 16 – REGULATORY HISTORY

Has the Company ever been:

Investigated for money laundering?

☐ Yes ☐ No

Investigated for fraud?

☐ Yes ☐ No

Investigated for bribery?

☐ Yes ☐ No

Subject to tax penalties?

☐ Yes ☐ No

Declared insolvent?

☐ Yes ☐ No

Subject to regulatory enforcement?

☐ Yes ☐ No

Explain all affirmative answers.

SECTION 17 – LITIGATION

Current litigation?

☐ Yes ☐ No

Arbitration?

☐ Yes ☐ No

Criminal proceedings?

☐ Yes ☐ No

Material civil claims?

☐ Yes ☐ No

Attach details.

SECTION 18 – RESPONSIBLE SOURCING

Does the Company maintain:

Responsible Sourcing Policy?

☐ Yes

☐ No

Human Rights Policy?

☐ Yes

☐ No

Environmental Policy?

☐ Yes

☐ No

Anti-Bribery Policy?

☐ Yes

☐ No

Supplier Due Diligence Programme?

☐ Yes

☐ No

SECTION 19 – REQUIRED DOCUMENTS

Please attach certified copies of:

☐ Certificate of Incorporation

☐ Constitution

☐ Company Registry Extract

☐ Tax Registration Certificate

☐ VAT Registration

☐ Register of Directors

☐ Register of Shareholders

☐ UBO Register

☐ Board Resolution

☐ Passport/ID of Directors

☐ Passport/ID of UBOs

☐ Proof of Address

☐ Organisational Chart

☐ Audited Financial Statements (3 years)

☐ Bank Reference Letter

☐ AML/CFT Policy

☐ Responsible Sourcing Policy

☐ Anti-Bribery Policy

☐ Human Rights Policy

☐ Environmental Policy

☐ Business Licences

☐ Insurance Certificates

SECTION 20 – DECLARATION

I, the undersigned, being duly authorised to act on behalf of the Company, certify that:

1. The information contained in this questionnaire is true, accurate and complete.
2. The Company undertakes to notify BMIG immediately of any material change affecting this information.
3. BMIG is authorised to verify the information with banks, regulators, government authorities, auditors and other appropriate third parties.
4. The Company acknowledges that providing false or misleading information may result in rejection of this application or termination of any existing business relationship.

Name

Position

Signature

Date

Company Stamp

SECTION 21 – BMIG COMPLIANCE REVIEW

Application Reference No.

Date Received

Compliance Officer

KYC Status

☐ Complete

☐ Incomplete

CDD Risk Rating

☐ Low

☐ Medium

☐ High

☐ Prohibited

Sanctions Screening

☐ Passed

☐ Failed

PEP Screening

☐ Passed

☐ Failed

Adverse Media

☐ Clear

☐ Review Required

EDD Required

☐ Yes

☐ No

Site Visit Required

☐ Yes

☐ No

Recommendation

☐ Approve

☐ Approve with Conditions

☐ Reject

Compliance Officer

Name

Signature

Date

Managing Director Decision

☐ Approved

☐ Conditionally Approved

☐ Rejected

Managing Director

Signature

Date

SECTION 22 – RECORD RETENTION

This questionnaire and all supporting documentation shall be retained in the Company’s permanent compliance file in accordance with the Record Retention Policy and applicable legal and regulatory requirements. All KYC records are subject to periodic review, independent audit, and regulatory inspection.

ANNEXURE C

INDIVIDUAL KNOW YOUR CUSTOMER (KYC), CUSTOMER DUE DILIGENCE (CDD) & ENHANCED DUE DILIGENCE (EDD) QUESTIONNAIRE

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

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DOCUMENT CONTROL

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Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document **Department:**

Compliance

CONFIDENTIALITY NOTICE

This questionnaire is designed to enable Bullion Metallics International Group (Private) Limited ("BMIG") to comply with applicable Anti-Money Laundering (AML), Counterterrorist Financing (CTF), sanctions, and responsible sourcing obligations.

All information supplied shall be treated as confidential and used solely for customer due diligence, regulatory compliance, and risk management purposes.

Providing false, incomplete, or misleading information may result in refusal to establish a business relationship, termination of an existing relationship, and reporting to competent authorities where required by law.

SECTION 1 – APPLICANT DETAILS

1.1 Full Legal Name

1.2 Former Name(s) (if applicable)

1.3 National Identity Number

1.4 Passport Number

1.5 Country of Issue

1.6 Date of Birth

1.7 Place of Birth

1.8 Nationality

1.9 Dual Citizenship (if applicable)

☐ Yes ☐ No

If yes, specify:

1.10 Marital Status

☐ Single

☐ Married

☐ Divorced

☐ Widowed

SECTION 2 – RESIDENTIAL DETAILS

Residential Address

City

Province/State

Country

Postal Code

Length of Residence

Proof of Address Attached

☐ Utility Bill

☐ Bank Statement

☐ Lease Agreement

☐ Government Correspondence

☐ Other

SECTION 3 – CONTACT INFORMATION

Telephone

Mobile

Email Address

Preferred Method of Communication

☐ Email

☐ Telephone

☐ WhatsApp

☐ Other

SECTION 4 – EMPLOYMENT AND OCCUPATION

Current Occupation

Employer

Employer Address

Position Held

Length of Employment

Business Nature

If Self-Employed

Business Name

Business Registration Number

SECTION 5 – PURPOSE OF RELATIONSHIP

Purpose of dealing with BMIG

☐ Purchase Precious Metals

☐ Sale of Precious Metals

☐ Investment

☐ Agency

☐ Consultancy

☐ Brokerage

☐ Logistics

☐ Other

Specify

Expected Annual Transaction Value (USD)

Expected Monthly Volume (kg)

SECTION 6 – SOURCE OF WEALTH

Primary Source of Wealth

☐ Employment Income

☐ Business Ownership

☐ Mining Operations

☐ Investments

☐ Inheritance

☐ Property Sales

☐ Dividends

☐ Other

Explain in detail

Supporting Evidence Attached

☐ Yes

☐ No

SECTION 7 – SOURCE OF FUNDS

Funds intended for transactions originate from:

☐ Salary

☐ Business Revenue

☐ Mining Income

☐ Investment Portfolio

☐ Loan Facility

☐ Personal Savings

☐ Other

Explain

SECTION 8 – BANKING INFORMATION

Primary Bank

Branch

Account Name

Account Number

SWIFT/BIC

IBAN (where applicable)

Length of Banking Relationship

SECTION 9 – POLITICALLY EXPOSED PERSON (PEP)

Are you currently or have you ever been:

☐ Head of State

☐ Minister

☐ Member of Parliament

☐ Senior Government Official

☐ Judge

☐ Military Officer

☐ Ambassador

☐ Executive of State-Owned Enterprise

☐ Political Party Official

☐ None of the Above

If yes:

Position

____

Country

____

Dates Held

____

____

SECTION 10 – FAMILY MEMBERS AND CLOSE ASSOCIATES

Is an immediate family member or close associate a PEP?

☐ Yes

☐ No

If yes:

Name

Relationship

Position Held

Country

SECTION 11 – SANCTIONS

Have you ever:

Appeared on any sanctions list?

☐ Yes

☐ No

Been refused banking services?

☐ Yes

☐ No

Been subject to asset freezing?

☐ Yes

☐ No

Been investigated under AML legislation?

☐
Yes

☐ No

Provide details where applicable.

SECTION 12 – REGULATORY HISTORY

Have you ever:

Been convicted of a criminal offence?

☐ Yes

☐ No

Been investigated for fraud?

☐ Yes

☐ No

Been investigated for bribery?

☐ Yes

☐ No

Been investigated for corruption?

☐ Yes

☐ No

Been declared bankrupt?

☐ Yes

☐

☐ No

Been disqualified as a director?

☐ Yes

☐ No

Provide details.

SECTION 13 – LITIGATION

Current civil litigation?

☐ Yes

☐ No

Arbitration?

☐ Yes

☐ No

Pending criminal proceedings?

☐ Yes

☐ No

If yes provide full details.

☐

SECTION 14 – PRECIOUS METALS EXPERIENCE

Years of Experience

Nature of Experience

☐ Mining

☐ Trading

☐ Export

☐ Refining

Investment

☐ Logistics

☐ Other

Countries of Operation

SECTION 15 – REQUIRED DOCUMENTS

Please attach certified copies of:

☐ Passport

☐ National Identity Card

☐ Proof of Address

☐ Tax Identification Number

☐ Curriculum Vitae

☐
☐ Bank Reference Letter

☐ Six Months Bank Statements

☐ Source of Wealth Evidence

☐ Source of Funds Evidence

☐ Professional References

☐ Police Clearance Certificate (if requested)

☐ Curriculum Vitae / Business Profile

SECTION 16 – DECLARATION

I hereby declare that:

1. The information supplied is true, complete and accurate.
2. I undertake to notify BMIG immediately of any material change.
3. BMIG is authorised to verify all information with financial institutions, government authorities, regulators and other competent bodies.
4. I acknowledge that knowingly providing false or misleading information may result in rejection of this application or termination of any existing business relationship. Applicant Name

---

Signature

☐
Date

Witness

Signature

SECTION 17 – FOR BMIG COMPLIANCE DEPARTMENT

Reference Number

Date Received

Identity Verification

☐ Completed

Address Verification

Completed

Sanctions Screening

☐ Passed

☐ Failed

PEP Screening

☐

☐ Passed

☐ Failed

Adverse Media Screening

☐ Clear

☐ Review Required

Risk Rating

☐ Low

☐ Medium

☐ High

☐ Prohibited

Enhanced Due Diligence Required

☐ Yes

☐ No

Recommendation

☐ Approve

☐ Conditional Approval

☐ Reject

Compliance Officer

Signature

☐

Date

Managing Director Decision

☐ Approved

☐ Conditionally Approved

☐ Rejected

Managing Director

Signature

Date

☐

SECTION 18 – RECORD RETENTION

This questionnaire and all supporting documentation shall form part of the applicant's permanent compliance file and shall be retained in accordance with BMIG's Record Retention Policy, applicable AML/CFT legislation, and regulatory requirements. Records shall be subject to periodic review, independent audit, and inspection by competent authorities where required by law.

ANNEXURE D

ULTIMATE BENEFICIAL OWNERSHIP (UBO) DECLARATION AND BENEFICIAL OWNERSHIP VERIFICATION FORM Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

---

DOCUMENT CONTROL
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Version: 1.0

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Document Classification: Internal Confidential –

Controlled Compliance Document **Department:**

Compliance

PURPOSE
This Declaration is intended to identify the natural person(s) who ultimately own or exercise effective control over a legal entity seeking to establish or maintain a

☐
business relationship with Bullion Metallics International Group (Private) Limited (“BMIG”).

The information is collected to comply with applicable Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), sanctions, corporate governance, and responsible sourcing requirements.

For purposes of this Declaration, an **Ultimate Beneficial Owner (UBO)** includes any natural person who:

- directly or indirectly owns or controls **10% or more** of the ownership interests in the entity (or such other threshold as may be required by applicable law);
- exercises effective control through voting rights, contractual arrangements, or other means;
- exercises significant influence over the management or operations of the entity; or
- is the individual on whose behalf a transaction is ultimately conducted.

SECTION 1 – COMPANY DETAILS

Registered Company Name

Trading Name (if applicable)

Company Registration Number

☐
Country of Incorporation

Registered Office

Principal Place of Business

SECTION 2 – OWNERSHIP STRUCTURE

Is the Applicant:

☐ Privately Owned Company

Public Company

☐ Government-Owned Entity

☐ Trust

☐ Partnership

☐ Foundation

☐ Cooperative

☐ Other

Specify

☐

Is there a parent company?

☐ Yes

☐ No

If yes:

Parent Company Name

Country of Incorporation

Ultimate Parent Company

Attach a Corporate Structure Chart.

☐ Attached

SECTION 3 – ULTIMATE BENEFICIAL OWNERS

Complete a separate row for **each** Ultimate Beneficial Owner.

Full Legal Name	Date of Birth	Nationality	Country of Residence	Passport/ID No.	Ownership

☐ ______________________________

Nature of Control
may include:

- Direct Shareholding
- Indirect Shareholding
- Voting Rights
- Board Appointment Rights
- Trust Beneficiary
- Settlor
- Protector
- Senior Managing Official
- Other (specify)

____

SECTION 4 – OWNERSHIP CHAIN
Describe the ownership chain from the Applicant to each Ultimate Beneficial Owner.

____
____
____

Attach:

☐

☐ Corporate Structure Chart

☐ Shareholding Diagram

☐ Group Organisation Chart

SECTION 5 – CONTROL WITHOUT OWNERSHIP

Does any individual exercise effective control despite holding no ownership interest?

☐ Yes

☐ No

If yes:

Name

Position

Nature of Control

Reason

SECTION 6 – TRUST ARRANGEMENTS (If Applicable)

Trust Name

Country of Establishment

Settlor

Trustees

☐

Protector

Beneficiaries

Trust Deed Attached

☐ Yes

☐ No

SECTION 7 – NOMINEE ARRANGEMENTS

Are any shares held by nominee shareholders?

☐ Yes

☐ No

If yes:

Nominee Name

Actual Beneficial Owner

Reason for Nominee Arrangement

Nominee Agreement Attached

☐
☐ Yes

☐ No

SECTION 8 – POLITICALLY EXPOSED PERSONS (PEPs)
Is any Ultimate Beneficial Owner:

☐ A Politically Exposed Person

A Former Politically Exposed Person

☐ A Family Member of a PEP

☐ A Close Associate of a PEP

☐ None of the Above

If yes:

Complete **Annexure E**.

SECTION 9 – SANCTIONS SCREENING
To the best of your knowledge, has any Ultimate Beneficial Owner:

Been sanctioned?

☐ Yes

☐ No

Been convicted of financial crime?

☐

☐ Yes

☐ No

Been investigated for corruption?

☐ Yes

☐ No

Appeared on international sanctions lists?

☐ Yes

☐ No

If yes, provide details.

SECTION 10 – SOURCE OF WEALTH

State the principal source of wealth for each Ultimate Beneficial Owner.

☐ Mining

☐ Trading

☐ Investments

☐ Employment

☐ Property

☐ Inheritance

☐ Dividends

☐ Manufacturing

☐

☐ Agriculture

☐ Other

Provide supporting documentation.

☐ Attached

SECTION 11 – REQUIRED SUPPORTING DOCUMENTS

For each UBO, attach certified copies of:

☐ Passport

☐ National Identity Card

☐ Proof of Residential Address

☐ Tax Identification Number (where applicable)

☐ Curriculum Vitae / Professional Profile

Source of Wealth Evidence

☐ Share Certificates (if applicable)

☐ Register of Members / Share Register

☐ Trust Documentation (if applicable)

☐ Nominee Agreements (if applicable)

☐ Organisation Chart

SECTION 12 – DECLARATION

☐

I, the undersigned, being duly authorised to act on behalf of the Applicant, hereby certify that:

1. The information contained in this Declaration is true, accurate, and complete.
2. All Ultimate Beneficial Owners have been fully disclosed.
3. No material ownership interest or controlling influence has been omitted.
4. The Applicant undertakes to notify BMIG immediately of any change in ownership, control, or beneficial ownership.
5. BMIG is authorised to verify the information contained herein with regulators, financial institutions, corporate registries, government authorities, and any other competent body.
6. The Applicant acknowledges that failure to disclose Ultimate Beneficial Ownership may result in refusal to establish or continuation of a business relationship. Authorised Representative

Name

____

Position

____

Signature

____

Date

____

☐

Company Stamp

SECTION 13 – BMIG COMPLIANCE VERIFICATION

Application Reference Number

Compliance Officer

Number of UBOs Identified

Corporate Structure Reviewed

☐ Yes

☐ No

Ownership Verified

☐ Yes

☐ No

Independent Registry Search Conducted

☐ Yes

☐ No

PEP Screening

☐ Passed

☐
☐ Further Review Required

Sanctions Screening

☐ Passed

☐
Failed

Adverse Media Screening

☐ Clear

☐ Further Investigation Required

Risk Classification

☐ Low

☐ Medium

☐ High

☐ Prohibited

Enhanced Due Diligence Required

☐ Yes

☐ No

Recommendation

☐ Approve

☐ Conditional Approval

☐ Reject

Compliance Officer

Signature

Date

Managing Director Decision

☐ Approved

☐ Conditionally Approved

☐ Rejected

Managing Director

Signature

Date

SECTION 14 – CHANGE OF BENEFICIAL OWNERSHIP

The Applicant shall notify BMIG in writing within **30 calendar days** of any change affecting:

- ownership percentage;
- voting rights;
- beneficial ownership;
- controlling interests;
- trustees, protectors, or beneficiaries (where applicable);
- senior management exercising effective control.

Failure to provide timely notification may result in suspension or termination of the business relationship.

SECTION 15 – RECORD RETENTION

This Declaration and all supporting documentation shall be maintained as part of the
Applicant's permanent compliance file and retained in accordance with BMIG's Record Retention Policy, applicable AML/CFT legislation, and regulatory requirements. These records shall be available for internal audit, independent assurance reviews, and inspection by competent regulatory authorities where legally required.

ANNEXURE E

POLITICALLY EXPOSED PERSON (PEP), SANCTIONS AND REPUTATIONAL RISK DECLARATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

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Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document **Department:**

Compliance

PURPOSE

This Declaration is designed to identify and assess whether an individual or any person connected with an applicant qualifies as a **Politically Exposed Person**

(PEP) or presents an elevated sanctions, corruption, bribery, fraud, or reputational risk.

Being a PEP **does not automatically disqualify** an applicant from doing business with Bullion Metallics International Group (Private) Limited ("BMIG"). However, PEP status requires **Enhanced Due Diligence (EDD)** and approval by senior management in accordance with the Company's AML/CFT and Responsible Sourcing Manual.

SECTION 1 – APPLICANT DETAILS

Full Legal Name

Company (if applicable)

Position/Title

Nationality

Country of Residence

Passport/Identity Number

Application Reference Number

SECTION 2 – POLITICALLY EXPOSED PERSON (PEP) STATUS

Are you now, or have you within the last 10 years been, a Politically Exposed Person (PEP)?

☐ Yes

☐ No

If **Yes**, specify your position:

☐ Head of State or Government

☐ Deputy Head of State

☐ Cabinet Minister

☐ Deputy Minister

☐ Member of Parliament

☐ Senator

☐ Provincial Governor

☐ Mayor

☐ Senior Political Party Official

☐ Judge of a Superior Court

☐ Prosecutor-General

☐ Senior Military Officer (Brigadier or equivalent and above)

☐ Senior Police Officer

☐ Ambassador

☐ Diplomat

☐ Executive of a State-Owned Enterprise

☐ Director of a Central Bank

☐ Executive of an International Organisation

☐ Royal Family Member

☐ Other Public Office

Specify

SECTION 3 – POSITION DETAILS

Official Title

Government / Organisation

Country

Date Appointed

Date Left Office (if applicable)

Current Status

☐

Current

☐

Former

SECTION 4 – FAMILY MEMBERS

Is any immediate family member a Politically Exposed Person?

☐ Yes

☐ No

If yes, provide details.

Name	Relationship	Position Held	Country

Immediate family includes:

- Spouse
- Civil Partner
- Parents
- Children
- Siblings
- Parents-in-law
- Children-in-law

SECTION 5 – CLOSE ASSOCIATES

Are you closely associated with any Politically Exposed Person?

☐ Yes

☐ No

If yes:

Name	**Position**	**Nature of Relationship**	**Country**

Examples include:

- Business Partner
- Business Associate
- Joint Venture Partner
- Trustee
- Nominee
- Advisor
- Significant Shareholder

SECTION 6 – SOURCE OF WEALTH

Primary Source of Wealth

☐ Salary

☐ Business Ownership

☐ Mining Operations

☐ Trading

☐ Investments

☐ Property

☐ Agriculture

☐ Inheritance

☐ Dividends

☐ Other

Explain fully.

Supporting Documentation Attached

☐ Yes

☐ No

SECTION 7 – SOURCE OF FUNDS

Funds intended for transactions with BMIG originate from:

☐ Business Income

☐ Mining Revenue

☐ Investment Income

☐ Loan Facility

☐ Personal Savings

☐ Sale of Assets

☐ Other

Provide explanation.

____

____

____

SECTION 8 – SANCTIONS DECLARATION

To the best of your knowledge:

Have you ever:

Appeared on any sanctions list?

☐ Yes

☐ No

Been subject to asset freezing?

☐ Yes

☐ No

Been denied banking facilities due to sanctions?

☐ Yes

☐ No

Been investigated for sanctions violations?

☐ Yes

☐ No

Provide details where applicable.

SECTION 9 – CRIMINAL,
REGULATORY AND ETHICS DECLARATION

Have you ever:

Been investigated for corruption?

☐ Yes

☐ No

Been investigated for bribery?

☐ Yes

☐ No

Been investigated for fraud?

☐ Yes

☐ No

Been convicted of a criminal offence?

☐ Yes

☐ No

Been subject to disciplinary proceedings by a regulator?

☐ Yes

☐ No

Been disqualified from acting as a director?

☐ Yes

☐ No

If “Yes”, provide full details.

SECTION 10 – ADVERSE MEDIA

Are you aware of any published media reports linking you to:

☐ Corruption

☐ Bribery

☐ Fraud

☐ Money Laundering

☐ Terrorist Financing

☐ Environmental Crime

☐ Human Rights Abuse

☐ Illegal Mining

☐ Smuggling

☐ Tax Evasion

☐ None

Explain where applicable.

SECTION 11 – DECLARATION OF INTERESTS

List any current interests in:

Government Contracts

Mining Rights

Public Procurement

State-Owned Enterprises

Public Office

SECTION 12 – ENHANCED DUE DILIGENCE DOCUMENTS

Attach certified copies of:

☐ Passport

☐ National Identity Card

☐ Proof of Residential Address

☐ Curriculum Vitae

☐ Asset Declaration (where available)

☐ Source of Wealth Evidence

☐ Source of Funds Evidence

☐ Bank Reference Letter

☐ Professional References

☐ Public Office Appointment Letter (if applicable)

☐ Resignation Letter (Former PEPs)

☐ Other Supporting Documentation

SECTION 13 – APPLICANT DECLARATION

I declare that:

1. The information contained in this Declaration is true, complete and accurate.
2. I understand that Politically Exposed Person status does not automatically prevent me or my organisation from doing business with BMIG.
3. I undertake to notify BMIG immediately should my political exposure, public office, sanctions status or any material information change.
4. I authorise BMIG to conduct independent verification, sanctions screening, adverse media searches and other Enhanced Due Diligence enquiries.

5. I acknowledge that providing false or misleading information may result in refusal of onboarding, suspension of business, termination of contractual relations, or reporting to competent authorities.

Applicant Name

Signature

Date

Company Stamp (if applicable)

SECTION 14 – BMIG COMPLIANCE ASSESSMENT
Compliance Reference Number

PEP Classification

☐ Domestic PEP

☐ Foreign PEP

☐ International Organisation PEP

☐ Family Member

☐ Close Associate

☐ Not a PEP

Sanctions Screening

☐ Passed

☐ Failed

Adverse Media Screening

☐ Clear

☐ Review Required

Source of Wealth Verified

☐ Yes

☐ No

Source of Funds Verified

☐ Yes

☐ No

Enhanced Due Diligence Completed

☐ Yes

☐ No

Overall Risk Rating

☐ Low

☐ Medium

☐ High

☐ Prohibited

Compliance Officer Recommendation

☐ Approve

☐ Conditional Approval

☐ Reject

Comments

Compliance Officer

Name

Signature

Date

SECTION 15 – SENIOR MANAGEMENT APPROVAL

Where Enhanced Due Diligence is required, the following approval shall be completed.

Managing Director

☐ Approved

☐ Approved Subject to Conditions

☐ Rejected

Conditions (if any)

Managing Director

Signature

Date

Board Approval Required

☐ Yes

☐ No

If Board approval is required:

Board Resolution Number

Date

Chairperson

Signature

SECTION 16 – ONGOING MONITORING

Where a relationship involving a PEP is approved, BMIG shall conduct:

☐ Annual Enhanced Due Diligence Review

☐ Quarterly Sanctions Screening

☐ Quarterly Adverse Media Screening

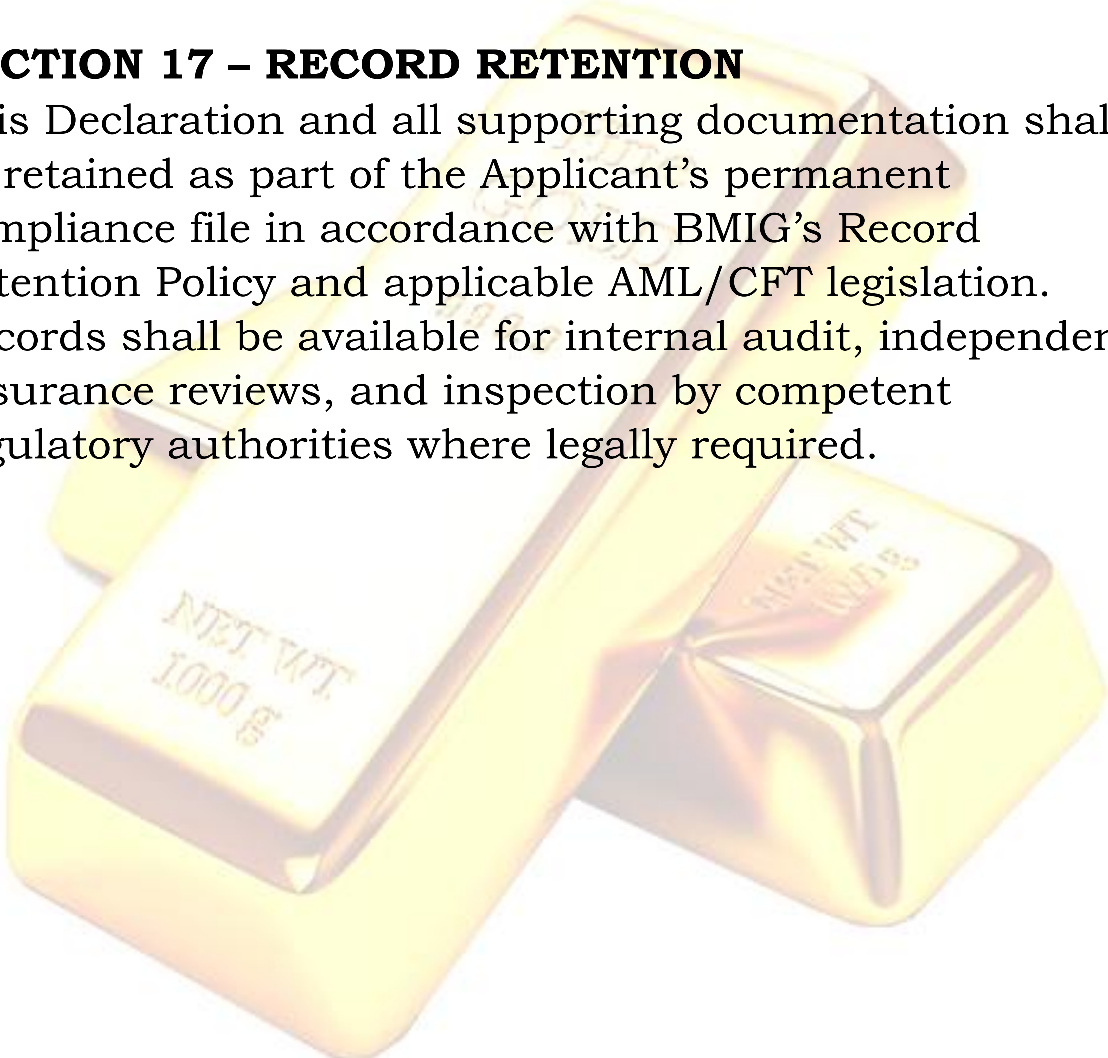
☐ Annual Source of Wealth Review

☐ Continuous Transaction Monitoring

The Compliance Officer shall immediately escalate any material changes in risk to the Managing Director and, where appropriate, to the Board of Directors.

SECTION 17 – RECORD RETENTION

This Declaration and all supporting documentation shall be retained as part of the Applicant's permanent compliance file in accordance with BMIG's Record Retention Policy and applicable AML/CFT legislation. Records shall be available for internal audit, independent assurance reviews, and inspection by competent regulatory authorities where legally required.



ANNEXURE F

SOURCE OF FUNDS (SOF) AND
SOURCE OF WEALTH (SOW) DECLARATION
Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

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DOCUMENT CONTROL
Document Reference: BMIG-RS-ANN-F

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document **Department:**

Compliance

PURPOSE
This Declaration is designed to enable Bullion Metallics International Group (Private)
Limited ("BMIG") to establish the legitimacy of the Source of Funds ("SOF") and Source of

Wealth (“SOW”) of all counterparties, in compliance with applicable Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), sanctions, and responsible sourcing obligations.

Completion of this Declaration is mandatory where required by BMIG’s risk-based due diligence procedures, including Enhanced Due Diligence (EDD).

SECTION 1 – APPLICANT DETAILS

Applicant Name / Company

Trading Name (if applicable)

Application Reference Number

Country of Incorporation / Nationality

Registered Address / Residential Address

Contact Person

Telephone

Email

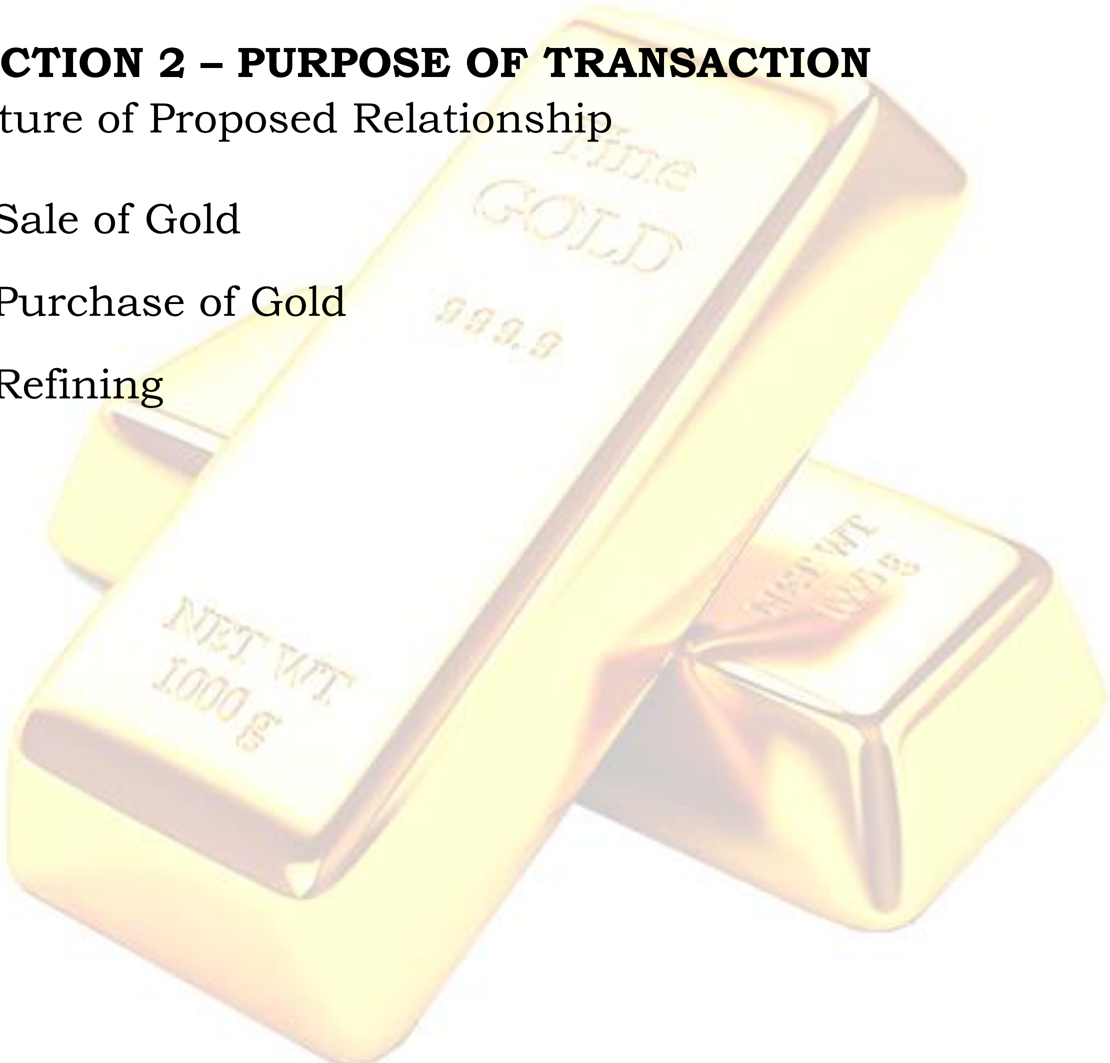
SECTION 2 – PURPOSE OF TRANSACTION

Nature of Proposed Relationship

☐ Sale of Gold

☐ Purchase of Gold

☐ Refining



Logistics

Storage

Joint Venture

☐ Investment

☐ Other

Specify

Expected Annual Transaction Value (USD)

Expected Monthly Transaction Value (USD)

Expected Annual Gold Volume (kg)

SECTION 3 – SOURCE OF FUNDS

Identify the immediate source of funds that will be used in transactions with BMIG.

Tick all that apply.

☐ Mining Revenue

☐ Precious Metals Trading

☐ Business Profits

☐ Bank Loan

☐ Shareholder Capital

☐ Retained Earnings

☐ Investment Income

Property Sale

Agricultural Income

Manufacturing

☐ Salary

☐ Pension

☐ Inheritance

☐ Gift

☐ Government Funding

☐ Other

Specify

Provide a detailed explanation.

SECTION 4 – SOURCE OF WEALTH

Describe how the Applicant accumulated overall wealth.

Primary Source

☐ Mining Operations

☐ Precious Metals Trading

☐ Business Ownership

☐ Property Development

☐ Agriculture

☐ Manufacturing

Investments

Employment

Dividends

☐ Inheritance

☐ Family Wealth

☐ Other

Specify

____

Detailed Explanation

____

____

____

Year Wealth Accumulation Commenced

Estimated Net Worth (USD)

SECTION 5 – SUPPORTING DOCUMENTATION

Attach documentary evidence supporting the Source of Funds and Source of Wealth.

☐ Audited Financial Statements

☐ Bank Statements (Last 12 Months)

☐ Tax Clearance Certificate

☐ Tax Returns

☐ Mining Licence

Gold Production Records

Export Permits

Sales Contracts

☐ Purchase Agreements

☐ Investment Portfolio Statements

☐ Property Sale Agreements

☐ Share Certificates

☐ Dividend Statements

☐ Loan Agreements

☐ Inheritance Documents

☐ Probate Documents

☐ Employment Contract

☐ Salary Slips

☐ Other

Specify

SECTION 6 – BANKING DETAILS

Primary Bank

Branch

Country

Account Name

Account Number

SWIFT/BIC

IBAN (where applicable)

Length of Banking Relationship

Relationship Manager (if applicable)

SECTION 7 – PAYMENT DETAILS

Payments to BMIG will originate from:

☐ Applicant’s Own Bank Account

☐ Parent Company

☐ Subsidiary

☐ Escrow Account

☐ Financial Institution

☐ Other

Specify

Will third-party payments be made?

☐ Yes

No

If yes:

Third Party Name

Relationship to Applicant

Reason

Supporting Documentation Attached

☐ Yes

☐ No

SECTION 8 – HIGH-RISK FACTORS

Please indicate whether any of the following apply.

Funds originate from a high-risk jurisdiction.

☐ Yes

☐ No

Funds originate from a Conflict-Affected or High-Risk Area (CAHRA).

☐ Yes

☐ No

Complex ownership structure.

☐ Yes

☐ No

Cash-intensive business.

Yes

☐ No

Politically Exposed Person involved.

☐ Yes

☐ No

Third-party payment arrangements.

☐ Yes

☐ No

Cryptocurrency involvement.

☐ Yes

☐ No

If any answer is “Yes”, provide details.

SECTION 9 – DECLARATIONS

The Applicant confirms that:

☐ Funds are derived from lawful activities.

☐ Funds are not connected with money laundering.

☐ Funds are not connected with terrorist financing.

☐ Funds are not connected with organised crime.

☐ Funds are not derived from corruption or bribery.

☐ Funds are not connected with sanctions evasion.

☐ Funds are not derived from illegal mining.

☐ Funds are not connected with tax fraud.

Funds are not connected with customs offences.

☐ Funds are free from any criminal interest.

SECTION 10 – APPLICANT DECLARATION

I, the undersigned, declare that:

1. The information provided in this Declaration is true, accurate, and complete.
2. I understand that BMIG may independently verify all information provided.
3. I authorise BMIG to obtain information from banks, financial institutions, regulators, auditors, government authorities, and other competent bodies.

4. I undertake to notify BMIG immediately of any material change affecting this Declaration.
5. I acknowledge that providing false or misleading information may result in rejection of this application, termination of any business relationship, and reporting to competent authorities.

Applicant Name

Position

Signature

Date

Company Stamp (if applicable)

SECTION 11 – BMIG COMPLIANCE REVIEW

Compliance Reference Number

Source of Funds Verified

☐ Yes

☐ No

Source of Wealth Verified

☐ Yes

☐ No

Supporting Documentation Complete

☐ Yes

☐ No

Independent Verification Conducted

☐ Yes

☐ No

Bank Reference Obtained

☐ Yes

☐ No

Third-Party Payments Approved

☐ Yes

☐ No

Enhanced Due Diligence Required

☐ Yes

☐ No

Overall Risk Rating

☐ Low

Medium

☐ High

☐ Prohibited

Compliance Officer Comments

Recommendation

☐ Approve

☐ Conditional Approval

☐ Reject

Compliance Officer

Name

Signature

Date

SECTION 12 – MANAGEMENT APPROVAL

Managing Director Decision

☐ Approved

☐ Approved Subject to Conditions

☐ Rejected

Conditions

Managing Director

Signature

Date

Where required under BMIG's Risk Rating Matrix, High-Risk or Prohibited classifications shall be referred to the Board of Directors for review and determination.

SECTION 13 – PERIODIC REVIEW

This Declaration shall be updated:

☐ Annually

☐ Upon any material change in ownership or funding

☐ Before commencement of any transaction classified as High Risk

☐ At the request of BMIG's Compliance Department

SECTION 14 – RECORD RETENTION

This Declaration and all supporting documentation shall form part of the Applicant's permanent compliance file and shall be retained in accordance with BMIG's Record Retention Policy, applicable AML/CFT legislation, and regulatory requirements. Records shall be available for internal audit, independent assurance reviews, external auditors, banking counterparties conducting due diligence, and competent regulatory authorities where legally required.

VOLUME II

ANNEXURE G

SOURCE OF WEALTH (SOW) DECLARATION AND VERIFICATION FORM Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

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DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-G

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Classification: Internal Confidential – Controlled Compliance Document

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PURPOSE

This Declaration establishes the legitimate origin of the Applicant's accumulated wealth and enables Bullion Metallics International Group (Private) Limited ("BMIG") to satisfy Enhanced Due Diligence (EDD), Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), sanctions compliance, and responsible sourcing obligations.

This form shall be completed whenever required by BMIG's risk assessment procedures.

SECTION 1 – APPLICANT INFORMATION

Applicant Name

Company (if applicable)

Application Reference Number

Nationality / Country of Incorporation

Residential / Registered Address

Telephone

Email

SECTION 2 – DECLARATION OF NET WORTH

Estimated Total Net Worth (USD)

Estimated Annual Income (USD)

Estimated Annual Business Revenue (USD)

Date Wealth Accumulation Commenced

SECTION 3 – PRIMARY SOURCE OF WEALTH

Tick all applicable.

☐ Mining Operations

☐ Precious Metals Trading

☐ Manufacturing

☐ Agriculture

☐ Real Estate

☐ Investments

☐ Employment

☐ Financial Services

☐ Inheritance

☐ Dividends

☐ Business Ownership

☐ Government Contracting

☐ Other

Specify

Provide a detailed explanation of how the wealth was accumulated.

SECTION 4 – ASSET PROFILE

Estimated Value of Assets

Real Estate

USD ______________________

Mining Assets

USD ______________________

Plant & Equipment

USD ______________________

Vehicles

USD ______________________

Bank Deposits

USD ______________________

Investment Portfolio

USD ______________________

Shares & Securities

USD ______________________

Other Assets

USD ______________________

Total Estimated Net Assets

USD ______________________

SECTION 5 – BUSINESS INTERESTS

List all companies in which you hold a direct or indirect ownership interest of 10% or more.

Company	Country	Nature of Business	Ownership %

SECTION 6 – SUPPORTING EVIDENCE

Attach certified copies of:

☐ Audited Financial Statements

☐ Tax Returns

☐ Bank Statements

☐ Property Title Deeds

☐ Share Certificates

☐ Dividend Statements

☐ Investment Statements

☐ Mining Licences

☐ Production Records

☐ Sale Agreements

☐ Probate / Inheritance Documents

☐ Other Supporting Evidence

SECTION 7 – DECLARATION

I declare that:

1. My accumulated wealth originates solely from lawful activities.
2. My wealth has not been derived from corruption, fraud, money laundering, terrorist financing, sanctions evasion, illegal mining, tax fraud, bribery, or any other criminal activity.
3. The information provided is complete, accurate and true.
4. I authorise BMIG to independently verify the information provided.

Applicant Name

Signature

Date

SECTION 8 – COMPLIANCE REVIEW

Source of Wealth Verified

☐ Yes

☐ No

Independent Verification Conducted

☐ Yes

☐ No

Risk Rating

☐ Low

☐ Medium

☐ High

☐ Prohibited

Compliance Officer Recommendation

☐ Approve

☐ Conditional Approval

☐ Reject

Compliance Officer

Signature

Date

Managing Director

Signature

Date

RECORD RETENTION

This Declaration shall be retained in the Applicant's permanent compliance file together with all supporting documentation and verification records.

ANNEXURE H

SUPPLIER RISK ASSESSMENT MATRIX, DUE DILIGENCE SCORECARD AND APPROVAL FORM

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

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DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-H

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Effective Date: 15 December 2025

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Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential – Controlled Compliance Document

Department: Compliance and Risk Management

PURPOSE

This Risk Assessment Matrix establishes BMIG's methodology for evaluating every supplier before onboarding and throughout the business relationship.

Every supplier shall receive a documented risk score before approval.

No supplier may be added to the Approved Supplier Register without completion of this assessment.

This Annexure applies to:

- Mining Companies
- Gold Aggregators
- Precious Metals Traders
- Refineries
- Exporters
- Transport Companies
- Logistics Companies
- Security Companies
- Warehousing Companies
- Brokers
- Agents
- Intermediaries

SECTION 1

SUPPLIER INFORMATION

Supplier Name

Trading Name

Registration Number

Country

Business Type

☐ Large Scale Mine

☐ Medium Scale Mine

☐ Artisanal Mining Cooperative

☐ Gold Trader

☐ Aggregator

☐ Refiner

☐ Exporter

☐ Logistics Company

☐ Security Company

☐ Other

Application Number

Compliance Officer

Assessment Date

SECTION 2
COUNTRY RISK ASSESSMENT

Assessment Criteria	Low (1)	Medium (3)	High (5)	Score
Political Stability	☐	☐	☐	
Rule of Law	☐	☐	☐	
Corruption Index	☐	☐	☐	
AML/CFT Effectiveness	☐	☐	☐	
Conflict Risk	☐	☐	☐	
Terrorism Exposure	☐	☐	☐	
Sanctions Exposure	☐	☐	☐	
Regulatory Quality	☐	☐	☐	

Country Risk Score

SECTION 3
CORPORATE RISK

Assessment Criteria	Yes	No	Score
Valid Incorporation Documents	☐	☐	
Good Standing Confirmed	☐	☐	
Registered Office Verified	☐	☐	

Business Premises Verified	☐	☐	
Organisational Structure Transparent	☐	☐	
Beneficial Ownership Verified	☐	☐	
Audited Financial Statements Available	☐	☐	
Assessment Criteria	**Yes**	**No**	**Score**
Independent Bank Reference Obtained	☐	☐	

Corporate Risk Score

SECTION 4

BENEFICIAL OWNERSHIP RISK

Assessment

Risk Indicator	Low	Medium	High
Ownership Structure	☐	☐	☐
Complex Group Structure	☐	☐	☐
Nominee Shareholders	☐	☐	☐
Offshore Companies	☐	☐	☐
Undisclosed Ownership	☐	☐	☐

Comments

SECTION 5

AML/CFT RISK

Assessment	Yes	No
AML Policy Exists	☐	☐
Compliance Officer Appointed	☐	☐
Internal AML Procedures	☐	☐
Assessment	**Yes**	**No**
Transaction Monitoring	☐	☐
Staff AML Training	☐	☐
Internal Audit	☐	☐

ANNEXURE I

COUNTRY RISK ASSESSMENT MATRIX

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-I

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance and Risk Management

PURPOSE

This Country Risk Assessment Matrix establishes BMIG's methodology for evaluating the inherent risks associated with the jurisdictions in which its suppliers, customers, intermediaries, and transactions are located.

The purpose is to identify, assess, and mitigate risks related to political instability, conflict, corruption, weak governance, sanctions, terrorism, and financial crime that could compromise the integrity of BMIG's supply chain or expose the Company to legal, regulatory, or reputational harm.

This assessment is a mandatory component of the supplier and customer onboarding process, as well as the ongoing monitoring of all business relationships.

SECTION 1 – COUNTRY PROFILE

Country of Assessment:

Date of Assessment:

Assessed By (Compliance Officer):

Assessment Reference Number:

SECTION 2 – COUNTRY RISK INDICATORS

For each of the following indicators, assign a risk score based on the provided criteria.

A. POLITICAL STABILITY

Score Definition

1 (Low) Stable, democratic government with peaceful transitions of power.

2 (Low-Medium) Generally stable, but with some political tensions or minor civil unrest.

3 (Medium) Significant political volatility, frequent protests, or risk of instability.

4 (Medium-High) Active conflict, civil war, or a failed state with no effective central government.

5 (High) State of war, foreign occupation, or ongoing violent insurgency.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

B. RULE OF LAW & GOVERNANCE

Score Definition

1 (Low) Strong, independent judiciary; effective law enforcement; high government effectiveness.

2 (Low-Medium) Generally functional legal system with some minor issues of corruption or inefficiency.

3 (Medium) Weak judicial independence; government institutions are moderately ineffective or corrupt.

4 (Medium-High) Pervasive corruption; judicial system is largely dysfunctional or controlled by state interests.

5 (High) No effective rule of law; state is captured by criminal or corrupt interests; arbitrary governance.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

C. CORRUPTION PERCEPTION

Score Definition

1 (Low) Score of 70 or higher on Transparency International's Corruption Perceptions Index (CPI).

2 (Low-Medium) CPI score between 50 and 69.

3 (Medium) CPI score between 30 and 49.

4 (Medium-High) CPI score between 10 and 29.

5 (High) CPI score of less than 10. No effective anti-corruption framework.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

D. AML/CFT REGULATORY EFFECTIVENESS

Score Definition

1 (Low) Compliant with FATF Recommendations; effective supervision and enforcement.

2 (Low-Medium) Largely compliant with some minor strategic deficiencies.

3 (Medium) Significant strategic AML/CFT deficiencies (e.g., grey listed by FATF).

4 (Medium-High) High-risk jurisdiction with major deficiencies; subject to FATF monitoring.

5 (High) Identified as high-risk by FATF, or has no AML/CFT regime in place.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

E. CONFLICT RISK

Score Definition

1 (Low) No history or current risk of armed conflict.

2 (Low-Medium) Some regional tensions but low likelihood of widespread conflict.

3 (Medium) Identified as a CAHRA by international bodies; localized or sporadic conflict.

4 (Medium-High) Ongoing conflict with potential to spread; high risk for human rights abuses.

5 (High) Active, widespread conflict; area of intense military operations.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

F. TERRORISM EXPOSURE

Score Definition

1 (Low) No known terrorist activity or significant threat.

2 (Low-Medium) Low-level threat; isolated incidents.

3 (Medium) Known presence of terrorist groups or significant risk of attacks.

4 (Medium-High) Active terrorist campaigns; government is unable to control terrorism.

5 (High) High concentration of terrorist groups; state sponsorship of terrorism.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

G. SANCTIONS EXPOSURE

Score Definition

1 (Low) Not subject to any international, regional, or national sanctions.

2 (Low-Medium) Subject to limited, non-significant targeted sanctions.

3 (Medium) Subject to some comprehensive sanctions (e.g., arms embargo).

4 (Medium-High) Subject to significant economic sanctions and financial restrictions.

5 (High) Subject to comprehensive embargoes and is listed as a sanctioned jurisdiction.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

H. FINANCIAL CRIME RISK

Score Definition

1 (Low) Well-regulated financial system with low financial crime rates.

2 (Low-Medium) Some minor instances of financial crime; generally effective controls.

3 (Medium) Notable levels of fraud, tax evasion, or money laundering.

4 (Medium-High) High prevalence of financial crime and weak financial regulatory system.

5 (High) Jurisdiction is a haven for financial crime; no effective regulation or oversight.

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

SECTION 3 – TOTAL COUNTRY RISK SCORE CALCULATION

Risk Indicator Score

Political Stability

Rule of Law & Governance

Corruption Perception

AML/CFT Regulatory Effectiveness

Conflict Risk

Terrorism Exposure

Sanctions Exposure

Financial Crime Risk

Total Score

Average Score (Total Score / Number of Indicators)

SECTION 4 – COUNTRY RISK RATING

Average Score Country Risk Rating

Required Due Diligence 1.0 - 1.99 Low

Standard Customer Due Diligence

(CDD)

2.0 - 2.99 Medium Standard CDD with enhanced monitoring

3.0 - 3.99 High Enhanced Due Diligence (EDD)

4.0 - 5.0 Critical / Prohibited Board Approval or Sourcing Prohibition

Country Risk Rating: ☐ Low ☐ Medium ☐ High ☐ Critical

SECTION 5 – RECOMMENDATIONS AND CONDITIONS

Based on the assessed Country Risk Rating, please provide specific recommendations and conditions for doing business in this jurisdiction.

Recommendation:

☐ Approve without conditions.

☐ Approve with conditions (specify below).

☐ Reject.

☐ Prohibit sourcing from this jurisdiction.

Conditions (if applicable):

1.

2.

3.

SECTION 6 – APPROVAL

Compliance Officer:

Name:

Signature:

Date:

Managing Director (if required):

Name:

Signature:

Date:

RECORD RETENTION

This assessment and all supporting documentation shall be retained as part of the Country Risk Assessment file in accordance with BMIG's Record Retention Policy and applicable legal and regulatory requirements.

ANNEXURE J

TRANSACTION RISK ASSESSMENT FORM

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-J

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential – Controlled Compliance Document

Department: Compliance and Risk Management

PURPOSE

This Transaction Risk Assessment Form is to be completed for every proposed transaction involving precious metals, prior to execution. The purpose is to identify and evaluate any "red flags" or specific risks associated with the transaction, ensuring that it is consistent with the counterparty's profile and BMIG's compliance policies.

SECTION 1 – TRANSACTION DETAILS

Transaction Reference Number:

Supplier/Customer Name:

Transaction Date:

Type of Metal: ☐ Gold ☐ Silver ☐ Platinum ☐ Palladium ☐ Other:

Quantity (kg):

Value (USD):

Description of Goods: ☐ Doré ☐ Bullion ☐ Concentrate ☐ Recycled Material ☐ Other:

SECTION 2 – TRANSACTION RISK INDICATORS

For each of the following indicators, select "Yes" or "No" and provide a brief justification where required.

Indicator Yes No Comments / Justification

Is the transaction commercially rational based on the counterparty's known business profile? ☐ ☐

Is the price consistent with prevailing market rates, or are there significant discounts/premiums? ☐ ☐

Are the payment structures unusual or complex (e.g., multiple intermediaries, non-standard terms)? ☐ ☐

Are there third-party payment arrangements (i.e., payer is not the counterparty)? ☐ ☐

Are the shipment routes unusually circuitous, complex, or inconsistent with the stated origin? ☐ ☐

Does the documentation appear complete, authentic, and internally consistent? ☐ ☐

Are there unexplained intermediaries involved? ☐ ☐

Is there a sense of unusual urgency or pressure to complete the transaction? ☐ ☐

Is the transaction volume consistent with the counterparty's declared production capacity and history? ☐ ☐

Is the source of funds clearly identifiable and linked to a legitimate financial institution? ☐ ☐

Is the source of the precious metals verifiable and consistent with the counterparty's mining/operating profile? ☐ ☐

Is the counterparty located in, or are the metals sourced from, a High-Risk or CAHRA jurisdiction? ☐ ☐

Is the counterparty a Politically Exposed Person (PEP)? ☐ ☐

SECTION 3 – RED FLAG ASSESSMENT

Based on the indicators above, are any red flags present?

☐ No red flags identified. Transaction appears to be routine and low-risk.

☐ Potential red flags identified. The following areas require further investigation:

1.

2.

3.

SECTION 4 – RISK RATING AND RECOMMENDATION

Risk Level Criteria Recommendation

Low No red flags; consistent with profile. Proceed with transaction.

Medium Minor anomalies that are easily explained. Proceed with transaction after documenting the explanation.

High Significant anomalies or red flags. Do not proceed. Submit for Enhanced Due Diligence (EDD).

Critical Major red flags; potential for fraud, money laundering, or sanctions evasion. Do not proceed. Escalate immediately to the Compliance Officer and Managing Director.

Risk Rating: ☐ Low ☐ Medium ☐ High ☐ Critical

Recommendation: ☐ Proceed ☐ Proceed Subject to Conditions ☐ Do Not Proceed ☐ Escalate for Review

SECTION 5 – APPROVAL

Compliance Officer:

Name:

Signature:

Date:

Managing Director (if required):

Name:

Signature:

Date:

RECORD RETENTION

This assessment shall be retained in the transaction file, available for audit and regulatory review.

ANNEXURE K

CONFLICT-FREE GOLD DECLARATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-K

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Declaration is designed to ensure that gold supplied to Bullion Metallics International Group (Private) Limited ("BMIG") does not directly or indirectly finance, benefit, or contribute to armed conflict, human rights abuses, or illicit activities. This declaration aligns with BMIG's commitment to the OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Mine Name (if applicable):

Country of Sourcing:

Mining Licence/Export Permit Number:

Gold Type: ☐ Doré ☐ Bullion ☐ Scrap ☐ Other:

SECTION 2 – DECLARATION OF SOURCE

I, the undersigned, being duly authorised by the Supplier, hereby declare and certify on behalf of the Supplier that:

1. Origin of Gold: The gold supplied to BMIG originates from the following legitimate sources:

· Mine(s) Name: ______________________________

· Location(s) (Country/Region): ____________________

· Licence Number(s): ___________________________

2. Conflict-Free Sourcing: To the best of my knowledge, the gold supplied has not been sourced from, nor has it financed or benefited, armed groups, rebel militias, or criminal organisations in conflict-affected and high-risk areas (CAHRAs), as defined by the OECD.

3. No Illicit Activity: The gold has not been sourced from areas where:

· Illegal mining is prevalent.

· There are documented human rights abuses (e.g., child labour, forced labour, torture).

· There is active conflict.

4. Chain of Custody: We maintain a documented chain of custody for all gold supplied, from extraction to delivery to BMIG, and are prepared to provide this upon request.

SECTION 3 – CERTIFICATION

Responsible Sourcing Policy: ☐ Yes, we have a formal policy. ☐ No, but we are working on developing one.

Third-Party Verification: ☐ Yes, our supply chain has been verified by an independent third party. ☐ No, but we can facilitate BMIG's verification.

SECTION 4 – DECLARATION

I hereby declare that the information provided is true, complete, and accurate.

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 5 – BMIG COMPLIANCE REVIEW

Declaration Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

RECORD RETENTION

This Declaration shall be retained in the Supplier's permanent compliance file.

ANNEXURE L

RESPONSIBLE SOURCING DECLARATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-L

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance:

PURPOSE

This Declaration confirms that a supplier adheres to the responsible sourcing principles and international standards, including the OECD Due Diligence Guidance, the LBMA
Responsible Gold Guidance, and the UN Guiding Principles on Business and Human Rights.

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Country of Operation:

Company Registration Number:

SECTION 2 – RESPONSIBLE SOURCING DECLARATION

I, the undersigned, being duly authorised, do hereby declare and affirm the following:

A. General Policy

1. Our organisation operates a formal Responsible Sourcing Policy that is reviewed annually.
2. This policy applies to all our employees, agents, and subsidiaries.
3. We provide annual training on responsible sourcing to our personnel.

B. Due Diligence and Supply Chain

4. We have a documented Supply Chain Due Diligence framework in place.

5. Our due diligence process is risk-based and follows international standards (e.g., OECD Guidance).

6. We maintain records of all due diligence conducted and are prepared to share these with BMIG.

C. Human Rights

7. We respect and uphold human rights, as defined by the UN Guiding Principles.

8. We do not use child labour, forced labour, or any form of modern slavery in our operations.

9. We support the principle of freedom of association and the right to collective bargaining.

10. We are committed to providing safe, healthy, and fair working conditions.

D. Environmental Performance

11. We maintain a documented Environmental Management Plan.

12. We are committed to minimising pollution and rehabilitating disturbed land.

13. We adhere to all applicable environmental laws and regulations of the host country.

E. Anti-Corruption and Transparency

14. We have a zero-tolerance policy towards bribery and corruption.

15. We conduct our business transparently and are prepared to be audited.

16. All government payments (royalties, taxes, fees) are made in accordance with applicable law.

F. Community Engagement

17. We engage with local communities and indigenous peoples affected by our operations.

18. We respect the land rights and customary laws of local populations.

SECTION 3 – CERTIFICATION

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 4 – BMIG COMPLIANCE REVIEW

Declaration Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

RECORD RETENTION

This Declaration shall be retained in the Supplier's permanent compliance file.

ANNEXURE M

ENVIRONMENTAL COMPLIANCE DECLARATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-M

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Declaration is to confirm a supplier's commitment to environmental stewardship and compliance with all applicable environmental laws and regulations. This is a component of BMIG's commitment to ESG (Environmental, Social, and Governance) principles.

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Mine/Operation Name:

Country of Operation:

SECTION 2 – ENVIRONMENTAL DECLARATION

I, the undersigned, being duly authorised, do hereby declare and certify on behalf of the Supplier that:

1. We possess and maintain all necessary environmental licences, permits, and authorisations required by law for our operations.
2. A copy of our Environmental Impact Assessment (EIA) is on file and available for review.
3. We are in full compliance with all applicable environmental legislation, including regulations concerning air quality, water usage, waste disposal, and land management.
4. We operate a formal Environmental Management System (EMS) or are implementing a documented environmental plan.
5. We have specific procedures for:

· Managing tailings and waste rock to prevent acid mine drainage and structural failure.

· Safe handling, storage, and disposal of hazardous chemicals (including mercury and cyanide).

· Reducing our carbon footprint and energy consumption.

· Mining rehabilitation and land reclamation.

· Spill prevention and emergency response.

SECTION 3 – INCIDENT REPORTING

Has the supplier had any significant environmental incidents (e.g., spills, tailings dam failures, or regulatory fines) in the past 5 years? ☐ Yes ☐ No

If Yes, please provide details:

SECTION 4 – CERTIFICATION

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 5 – BMIG COMPLIANCE REVIEW

Declaration Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

RECORD RETENTION

This Declaration shall be retained in the Supplier's permanent compliance file.

ANNEXURE N

HUMAN RIGHTS COMPLIANCE DECLARATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-N

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Declaration confirms a supplier's commitment to upholding internationally recognised human rights standards, specifically in line with the UN Guiding Principles on Business and Human Rights

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Mine/Operation Name:

Country of Operation:

SECTION 2 – HUMAN RIGHTS DECLARATION

I, the undersigned, being duly authorised, do hereby declare and certify on behalf of the Supplier that:

1. We have a formal Human Rights Policy that is made available to all employees.
2. We conduct our operations with respect for the dignity, culture, and rights of all people.
3. Child Labour: We do not employ anyone under the age of 15 (or the minimum age for work in the country, whichever is higher) and do not expose anyone under 18 to hazardous conditions.
4. Forced Labour: We do not engage in any form of forced, compulsory, or bonded labour.
5. Human Trafficking: We have a zero-tolerance policy regarding human trafficking and do not use any supply chain services associated with trafficking.
6. Freedom of Association: We support the right of workers to join trade unions and to bargain collectively.
7. Non-Discrimination: We are an equal opportunity employer and do not discriminate on any grounds.

8. Workplace Safety: We provide a safe and healthy working environment for all employees.

9. Community Relations: We respect the rights of indigenous peoples and local communities.

10. Security: We ensure that any private security personnel we employ are trained in human rights protocols and use force proportionately and lawfully.

SECTION 3 – INCIDENT REPORTING

Has the supplier been involved in any human rights incidents (e.g., forced displacement, violence against communities, sexual exploitation) in the past 5 years? ☐ Yes ☐ No

If Yes, please provide details and corrective actions taken:

SECTION 4 – CERTIFICATION

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 5 – BMIG COMPLIANCE REVIEW

Declaration Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

RECORD RETENTION

This Declaration shall be retained in the Supplier's permanent compliance file.

ANNEXURE O

ANTI-BRIBERY COMPLIANCE CERTIFICATE

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manua

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-O

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Download: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Certificate confirms that a supplier has a robust anti-bribery and anti-corruption framework in place, in line with BMIG's zero-tolerance policy.

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Company Registration Number:

Country of Operation:

SECTION 2 – ANTI-BRIBERY CERTIFICATE

I, the undersigned, being duly authorised, do hereby certify and declare the following on behalf of the Supplier:

1. Policy: Our organisation has a formal, documented anti-bribery and anti-corruption policy that is communicated to all employees, agents, and business partners.

2. Zero Tolerance: We operate a zero-tolerance policy towards bribery, including facilitation payments, kickbacks, and secret commissions, in all jurisdictions where we operate.

3. Due Diligence: We conduct due diligence on our own agents, intermediaries, and business partners to ensure they are not associated with bribery.

4. Financial Controls: We maintain accurate financial records and internal controls to prevent and detect improper payments.

5. Gifts and Hospitality: We have a policy governing gifts and hospitality which is transparent, reasonable, and documented.

6. Training: We provide regular anti-bribery training to our directors, employees, and relevant agents.

7. Reporting: We have a mechanism for employees to report suspected bribery or corruption confidentially (whistleblowing).

8. Incidents: To the best of my knowledge, our organisation, its directors, employees, and agents have not been involved in any act of bribery, corruption, or fraud.

SECTION 3 – CERTIFICATION

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 4 – BMIG COMPLIANCE REVIEW

Certificate Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

RECORD RETENTION

This Certificate shall be retained in the Supplier's permanent compliance file.

ANNEXURE P

ANNUAL SUPPLIER CERTIFICATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manua

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-P

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Annual Certification must be completed by all approved suppliers on an annual basis to confirm that they continue to comply with BMIG's policies and that there have been no material changes to their business or compliance status.

SECTION 1 – SUPPLIER INFORMATION

Supplier's Full Legal Name:

Registration Number:

Country of Operation:

Date of Last Review:

SECTION 2 – ANNUAL DECLARATION

I, the undersigned, being duly authorised, do hereby certify and declare the following:

A. Material Changes

1. Contact Details: There have been no material changes to our company name, registered address, principal place of business, or primary contacts. [If there have been changes, please attach an addendum with the new details].

2. Ownership and Control: There have been no material changes to our shareholding structure, ultimate beneficial owners, or directors.

3. Licences: All our operating licences (mining, export, environmental) remain valid and are in good standing.

B. Compliance Status

4. Legal and Regulatory: We continue to comply with all applicable laws and regulations.

5. AML/CFT: We continue to adhere to our AML/CFT policy and procedures.

6. Responsible Sourcing: We continue to source precious metals responsibly and do not source from conflict-affected or high-risk areas.

7. Sanctions: To the best of our knowledge, none of our directors, shareholders, beneficial owners, or employees have been sanctioned.

8. Incidents: We have not been involved in any material regulatory or compliance incidents (e.g., bribery, human rights abuses, money laundering, sanctions breaches) in the past 12 months.

SECTION 3 – CERTIFICATION

Name of Authorised Representative:

Position:

Signature:

Date:

Company Stamp:

SECTION 4 – BMIG COMPLIANCE REVIEW

Certificate Reviewed By:

Compliance Officer Signature:

Date:

Verification Notes:

Risk Rating Update (if applicable): ☐ Low ☐ Medium ☐ High

RECORD RETENTION

This Certification shall be retained in the Supplier's permanent compliance file.

ANNEXURE Q

CHAIN OF CUSTODY REGISTER

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-Q

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Operations

PURPOSE

This Register is used to document and track the complete chain of custody for every shipment of precious metals purchased by BMIG, from the point of extraction to final delivery.

REGISTER

Shipment Reference Number (SRN) Supplier Name Mine Name Date of Collection Assay
Ref. No. Shipping Company Transport Documentation (e.g., Air Waybill) Security Seals
Number Customs Clearance Number Date Received at BMIG Weight Received (kg) Status (Pending/In Transit/Received/Dispatched) Responsible Officer

RECORD RETENTION

This Register shall be retained in accordance with BMIG's Record Retention Policy and available for audit.

ANNEXURE R

SHIPMENT INSPECTION CHECKLIST

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-R

Version: 1.0

Effective Date: 15 December

SHIPMENT INSPECTION CHECKLIST

PURPOSE

This Checklist is to be completed by the Operations Department upon receipt of a shipment of precious metals. Its purpose is to verify that the physical shipment matches the accompanying documentation and that all security and quality controls have been met before the metal is accepted into BMIG's custody.

SECTION 1 – SHIPMENT DETAILS

Shipment Reference Number (SRN):

Supplier Name:

Date of Receipt:

Time of Receipt:

Mode of Transport: ☐ Air ☐ Road ☐ Sea ☐ Armoured Vehicle

Transport Company:

Driver/Transporter Name:

SECTION 2 – DOCUMENTATION VERIFICATION

Document Received? (Yes/No) Verified? (Yes/No) Comments

Purchase Agreement ☐ Yes ☐ No ☐ Yes ☐ No

Commercial Invoice ☐ Yes ☐ No ☐ Yes ☐ No

Packing List ☐ Yes ☐ No ☐ Yes ☐ No

Assay Certificate(s) ☐ Yes ☐ No ☐ Yes ☐ No

Export Permit / Customs Declaration ☐ Yes ☐ No ☐ Yes ☐ No

Air Waybill / Bill of Lading ☐ Yes ☐ No ☐ Yes ☐ No

Insurance Certificate ☐ Yes ☐ No ☐ Yes ☐ No

Chain of Custody Certificate ☐ Yes ☐ No ☐ Yes ☐ No

Security Seal Log ☐ Yes ☐ No ☐ Yes ☐ No

SECTION 3 – PHYSICAL INSPECTION

Inspection Point Pass / Fail Comments / Corrective Action

Packaging Integrity: Packaging is intact with no signs of tampering, damage, or moisture ingress. ☐ Pass ☐ Fail

Security Seals: All security seals are intact and their numbers match the documentation. ☐ Pass ☐ Fail

Gross Weight Check: The gross weight of the shipment has been checked and matches the packing list/documentation. ☐ Pass ☐ Fail

Number of Packages/Bars: The physical count of packages or bullion bars matches the packing list. ☐ Pass ☐ Fail

Bar/Package Identification: Serial numbers and markings on bars/packages match the documentation. ☐ Pass ☐ Fail

Visual Examination: No visible signs of contamination, unusual discolouration, or surface anomalies. ☐ Pass ☐ Fail

SECTION 4 – SECURITY OBSERVATIONS

Was the shipment accompanied by an armed escort? ☐ Yes ☐ No

Was the vehicle equipped with GPS tracking? ☐ Yes ☐ No

Were arrival procedures followed (e.g., verification of identity, vehicle search)? ☐ Yes ☐ No

Were there any security incidents or concerns during transit? ☐ Yes ☐ No

If Yes, please provide details:

SECTION 5 – COMPLIANCE OBSERVATIONS

Are all documents consistent with each other (e.g., names, weights, values match)? ☐ Yes ☐ No

Are the weights within an acceptable tolerance (e.g., +/- 0.1% of documented weight)? ☐ Yes ☐ No

Does the assay certificate appear authentic? ☐ Yes ☐ No

Are there any red flags (e.g., forged documents, inconsistent weights, unusual circumstances)? ☐ Yes ☐ No

If Yes, please detail any red flags and the immediate steps taken:

SECTION 6 – SIGN-OFF

I confirm that the above inspection has been completed. The shipment is: ☐ Accepted ☐ Accepted Subject to Condition ☐ Rejected

If rejected or accepted subject to condition, please explain:

Inspected By (Operations Officer):

Name:

Signature:

Date:

Reviewed By (Compliance Officer) (if required):

Name:

Signature:

Date:

RECORD RETENTION

This Checklist shall be retained in the Shipment File in accordance with BMIG's Record Retention Policy.

ANNEXURE S

GOLD RECEPTION REPORT

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-S

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Operations / Treasury

PURPOSE

This Report is generated upon the physical receipt of gold into BMIG's custody. It serves as the official record of the transaction, detailing the quantity, quality, and condition of the metal received, and is used for financial accounting, inventory management, and regulatory reporting.

SECTION 1 – RECEIPT DETAILS

Reception Reference Number:

Shipment Reference Number (SRN):

Date of Receipt:

Time of Receipt:

SECTION 2 – SUPPLIER INFORMATION

Supplier Name:

Mine of Origin:

Country of Origin:

SECTION 3 – GOLD SPECIFICATIONS

Specification Details

Type of Gold: ☐ Doré ☐ Bullion ☐ Nuggets ☐ Scrap/Recycled

Number of Bars / Packages Received:

Gross Weight (kg):

Net Weight (kg):

Purity / Fineness (as per supplier assay): % / Parts per Thousand

Purity / Fineness (as per BMIG verification): % / Parts per Thousand Method of Assay: ☐ Fire Assay ☐ XRF ☐ ICP-OES ☐ Third Party

Assay Certificate Reference Number:

SECTION 4 – INVENTORY AND VAULTING

Location where metal is stored:

Vault/Custodian Name:

Security Seal Number applied by BMIG:

Date Metal Placed into Storage:

Inventory Classification: ☐ In Process ☐ Available for Sale ☐ Allocated to Customer

SECTION 5 – FINANCIAL INFORMATION

Agreed Purchase Price (USD per oz/g):

Total Invoice Value (USD):

Payment Terms:

Payment Method: ☐ Wire Transfer ☐ Letter of Credit ☐ Other:

SECTION 6 – QUALITY AND CONDITION

Is the metal in good condition and of merchantable quality? ☐ Yes ☐ No

If No, please detail any quality issues or discrepancies:

SECTION 7 – SIGN-OFF

Received By (Operations):

Name:

Signature:

Date:

Verified By (Compliance):

Name:

Signature:

Date:

For Financial Accounting (Finance Manager):

Name:

Signature:

Date:

RECORD RETENTION

This Report shall be retained in the Transaction File in accordance with BMIG's Record Retention Policy.

ANNEXURE T

ASSAY VERIFICATION REPORT

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-T

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Operations / Quality Assurance

PURPOSE

This Report documents the results of BMIG's independent assay verification of a shipment of precious metals. The purpose is to confirm the purity, composition, and weight of the metal, ensuring it meets contractual specifications and to compare against the supplier's own assay certification.

SECTION 1 – ASSAY REFERENCE

Assay Reference Number:

Shipment Reference Number (SRN):

Supplier Name:

Date of Assay:

Assay Laboratory Name:

Laboratory Accreditation (e.g., ISO 17025):

SECTION 2 – SAMPLE DETAILS

Sample Collection Method: ☐ Fire Assay Cupellation ☐ Drill Sample ☐ XRF ☐ Melting and Stirring

Number of Samples Taken:

Sample Reference Number(s):

Date Sample Collected:

Witnessed By (Compliance):

SECTION 3 – ASSAY RESULTS

Metal / Element Supplier's Assay Result (%) BMIG's Verification Result (%) Difference / Tolerance Pass / Fail?

Gold (Au)

Silver (Ag)

Platinum (Pt)

Palladium (Pd)

Copper (Cu)

Iron (Fe)

Sulphur (S)

Mercury (Hg)

Arsenic (As)

Other Impurities:

Total Purity / Fineness: % %

SECTION 4 – COMPARISON AND CONCLUSION

Does BMIG's assay result confirm the supplier's assay result within an acceptable tolerance (e.g., +/- 0.5%)? ☐ Yes ☐ No

If No, please explain the discrepancy and any corrective action required:

Recommendation: ☐ Accept the metal at the supplier's documented purity. ☐ Accept the metal at BMIG's verified purity (revalue invoice). ☐ Reject the metal and escalate to the Compliance Officer. ☐ Send to independent referee for final determination.

SECTION 5 – SIGN-OFF

Assay Performed By (Laboratory Technician):

Name:

Signature:

Date:

Reviewed By (Operations Manager):

Name:

Signature:

Date:

Reviewed By (Compliance Officer):

Name:

Signature:

Date:

RECORD RETENTION

This Report shall be retained in the Transaction File in accordance with BMIG's Record Retention Policy.

ANNEXURE U

VAULT REGISTER

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-U

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Operations

PURPOSE

This Register is used to maintain a detailed and accurate record of all precious metals stored in BMIG's vaults. It ensures complete traceability of metal movements and supports physical inventory reconciliation.

VAULT REGISTER

Entry No. Date Transaction Type Shipment Reference Number (SRN) Supplier / Customer
Name Metal Type Number of Bars / Items Gross Weight (kg) Net Weight (kg) Purity (%)
Serial Numbers / Marks Vault Location / Rack Action By (Name & Sign) Witnessed By (Name & Sign)

☐ Receipt ☐ Dispatch ☐ Transfer ☐ Withdrawal

☐ Receipt ☐ Dispatch ☐ Transfer

☐ Withdrawal ☐ Receipt ☐

Dispatch ☐ Transfer ☐ Withdrawal

MONTHLY INVENTORY RECONCILIATION

Month Opening Balance (kg) Total Receipts (kg) Total Dispatches (kg) Closing Balance (kg) Reconciled By (Name) Signature Date

SECURITY AND ACCESS LOG

Date Time Person Entering Vault Purpose Time Exited Escorted By (Security)

RECORD RETENTION

This Register shall be retained as a permanent record in accordance with BMIG's Record Retention Policy.

ANNEXURE V

EXPORT READINESS CHECKLIST

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-V

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Operations / Logistics

PURPOSE

This Checklist is used to ensure that all necessary preparations and documentation are complete before a shipment of precious metals is exported by BMIG. Its purpose is to ensure compliance with all export controls and to prevent delays, penalties, or the rejection of goods at the point of export.

SECTION 1 – EXPORT DETAILS

Shipment Reference Number (SRN):

Customer/Recipient Name:

Destination Country:

Date of Export:

Port/Airport of Departure:

SECTION 2 – COMMERCIAL DOCUMENTATION

Document Complete? (Yes/No) Verified? (Yes/No) Comments

Purchase Order / Contract – signed and agreed by both parties. ☐ Yes ☐ No ☐ Yes ☐ No

Commercial Invoice – with correct value, description, and terms. ☐ Yes ☐ No ☐ Yes ☐ No

Packing List – detailing the contents, weights, and packaging. ☐ Yes ☐ No ☐ Yes ☐ No

Certificate of Origin – issued by the relevant Chamber of Commerce or authority. ☐ Yes ☐ No ☐ Yes ☐ No

Assay Certificate – independent verification of metal purity. ☐ Yes ☐ No ☐ Yes ☐ No

SECTION 3 – REGULATORY COMPLIANCE

Document Complete? (Yes/No) Verified? (Yes/No) Comments

Export Permit / Licence – valid and approved for the shipment. ☐ Yes ☐ No ☐ Yes ☐ No

Customs Declaration – accurately completed for the relevant customs authority. ☐ Yes ☐ No ☐ Yes ☐ No

Tax Clearance – proof of compliance with tax obligations. ☐ Yes ☐ No ☐ Yes ☐ No Exchange Control Approval – where applicable, for cross-border payments. ☐ Yes ☐ No ☐ Yes ☐ No

SECTION 4 – LOGISTICS AND SECURITY

Document / Control Complete? (Yes/No) Verified? (Yes/No) Comments

Air Waybill / Bill of Lading – issued by the shipping company. ☐ Yes ☐ No ☐ Yes ☐ No

Insurance Certificate – covering the shipment's value. ☐ Yes ☐ No ☐ Yes ☐ No

Security Seal Numbers – assigned and logged. ☐ Yes ☐ No ☐ Yes ☐ No

Transportation Security Assessment – completed by the Compliance Officer. ☐ Yes ☐ No ☐ Yes ☐ No

Approved Logistics Provider – the transporter is on the Approved Logistics Register. ☐ Yes ☐ No ☐ Yes ☐ No

Armed Escort – arranged and confirmed (if required by the security assessment). ☐ Yes ☐ No ☐ Yes ☐ No

SECTION 5 – COMPLIANCE REVIEW

Document Complete? (Yes/No) Verified? (Yes/No) Comments

Due Diligence – the recipient's KYC/EDD has been completed and approved. ☐ Yes ☐ No ☐ Yes ☐ No

Sanctions Screening – the recipient and all parties have been screened. ☐ Yes ☐ No ☐ Yes ☐ No

Transaction Assessment – the transaction risk assessment (Annexure J) has been completed and is approved. ☐ Yes ☐ No ☐ Yes ☐ No

SECTION 6 – CHECKLIST SUMMARY

Is this shipment ready for export? ☐ Yes ☐ No

If No, please specify what is outstanding:

SECTION 7 – SIGN-OFF

Prepared By (Operations):

Name:

Signature:

Date:

Verified By (Compliance):

Name:

Signature:

Date:

Authorised for Export By (Managing Director):

Name:

Signature:

Date:

RECORD RETENTION

This Checklist shall be retained in the Transaction File in accordance with BMIG's Record Retention Policy.

ANNEXURE W

SUSPICIOUS ACTIVITY REPORT (SAR)

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-W

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Strictly Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This form is used to report any suspicious activity, transaction, or attempted transaction to the Compliance Officer. This includes, but is not limited to, suspected money laundering, terrorist financing, bribery, corruption, sanctions evasion, illegal mining, fraud, and document forgery.

Note: This document is strictly confidential and its distribution is limited to BMIG's Compliance and Legal functions.

SECTION 1 – REPORTER DETAILS

Name of Reporter: (This can be left blank to protect anonymity if desired)

Department:

Position:

Date of Report:

Contact Details (optional): ☐ Email: ______________________________ ☐ Phone: ______________________________

SECTION 2 – DETAILS OF THE SUBJECT / COUNTERPARTY

Subject's Name:

Company Name (if applicable):

Known Address:

Country:

Identification / Registration Number:

Role / Relationship to BMIG:

SECTION 3 – DETAILS OF THE SUSPICIOUS ACTIVITY

Date of the activity / transaction:

Shipment / Transaction Reference Number (if applicable):

Type of Activity: ☐ Transaction ☐ Attempted Transaction ☐ Employee Conduct ☐ Supplier Conduct ☐ Other:

Description of the Suspicious Activity (Please be as specific and factual as possible. Describe what happened, who was involved, where it happened, when it happened, and why it is suspicious):

SECTION 4 – IDENTIFIED RED FLAGS

(Tick all that apply and provide specific examples)

Red Flag Tick Specific Example / Detail

Documentation: Incomplete, inconsistent, forged, or altered documents. ☐

Transaction: Unusual volume, price, or routing. ☐

Financial: Third-party payments, cash transactions, unusual source of funds. ☐

Sanctions: Positive sanctions screening result. ☐

PEP: Identified as a Politically Exposed Person. ☐

Adverse Media: Negative media coverage concerning the counterparty. ☐

Source of Gold: Unverifiable mine of origin or chain of custody. ☐

Illegal Activity: Suspected illegal mining, smuggling, or wildlife crime. ☐

Behaviour: Evasive behaviour, refusal to provide information, unusual urgency. ☐

Human Rights: Suspected child or forced labour, human trafficking. ☐

Environmental: Suspected environmental

destruction, illegal dumping. ☐ Other: ☐

SECTION 5 – INTERNAL ESCALATION AND INVESTIGATION

Report Acknowledged By (Compliance Officer):

Name:

Signature:

Date:

Investigation Findings (Summary):

Action Taken: ☐ SAR Filed with Regulator ☐ Suspension of Relationship ☐ Termination of Relationship ☐ No Action Required ☐ Referred to Law Enforcement

Date of Action:

Findings Reviewed By:

Signature:

Date:

RECORD RETENTION

This SAR and all related investigation documentation shall be retained as a permanent, confidential record in accordance with BMIG's Record Retention Policy.

ANNEXURE X

WHISTLEBLOWER COMPLAINT FORM

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-X

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Strictly Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This form is provided to enable BMIG employees, contractors, and other stakeholders to report, in a confidential manner, any suspected wrongdoing or misconduct within the Company or its supply chain. BMIG is committed to protecting whistleblowers from any form of retaliation.

SECTION 1 – COMPLAINANT INFORMATION

(This section is optional. You may choose to remain anonymous.)

Name:

Position:

Department:

Contact Telephone:

Email Address:

Preferred Method of Contact: ☐ Email ☐ Telephone ☐ In Person

SECTION 2 – NATURE OF THE COMPLAINT

Please provide a detailed description of the conduct you wish to report. Include as much specific information as possible, such as:

· Who: The person(s) involved (names, positions, department).

· What: A description of the wrongdoing (e.g., bribery, fraud, theft, corruption, abuse, safety violation, AML breach, sourcing violation, etc.).

· When: Date(s), time(s), and frequency of the incident(s).

· Where: The location(s) where the incident(s) occurred (e.g., office, mine site, during a transaction).

· How: A description of how the wrongdoing occurred (methods used, any documentation involved).

· Evidence: Details of any evidence that supports the complaint (e.g., documents, emails, photographs, witness names).

Detailed Description of the Complaint:

SECTION 3 – WITNESSES

Are there any other persons who have knowledge of this matter? ☐ Yes ☐ No

If Yes, please provide names and contact details if known:

1.

2.

3.

SECTION 4 – COMPLAINT HANDLING

I understand that BMIG will treat this complaint confidentially and will investigate it in accordance with its policies. I acknowledge that knowingly making a false or malicious complaint is a serious disciplinary matter.
☐ I agree ☐ I do not agree

Signature:

Date:

SECTION 5 – COMPLIANCE RECEIPT AND ACTION

Complaint Received By (Compliance Officer):

Name:

Signature:

Date:

Complaint Reference Number:

Initial Assessment: ☐ Substantiated – Proceed to Investigation ☐ Unsubstantiated – No Further Action

Investigation Findings (Summary):

Corrective Action Taken:

Action Reviewed By (Managing Director):

Signature:

Date:

RECORD RETENTION

This Complaint Form and all related investigation documentation shall be retained as a permanent, confidential record in accordance with BMIG's Record Retention Policy.

ANNEXURE Y

CORRECTIVE ACTION REGISTER

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-Y

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance

PURPOSE

This Register is used to document, monitor, and track all corrective actions identified as a result of internal audits, compliance reviews, incident investigations, and supplier or customer assessments.

CORRECTIVE ACTION REGISTER

Action ID Date Raised Source of Action Description of Deficiency / Non-Conformance Root Cause Analysis (Brief) Corrective Action Required Responsible Person(s) Target Completion Date Status (Open/In Progress/Closed) Completed By (Name & Date) Verified By (Compliance) Notes / Comments

CA-001

CA-002

CA-003

CLOSURE FORM (To be completed for each Closed action)

Action ID:

Evidence of Completion: ☐ Documentation Attached ☐ Screenshot ☐ Training Record ☐ Policy Updated ☐ Other:

Verification Performed By (Compliance):

Signature:

Date:

RECORD RETENTION

This Register shall be retained in accordance with BMIG's Record Retention Policy.

ANNEXURE Z

ANNUAL COMPLIANCE CERTIFICATION

Bullion Metallics International Group (Private) Limited

Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual

DOCUMENT CONTROL

Document Reference: BMIG-RS-ANN-Z

Version: 1.0

Effective Date: 15 December 2025

Review Date: 14 June 2026

Next Scheduled Review: 14 December 2026

Document Classification: Internal Confidential –

Controlled Compliance Document Department:

Compliance / Board of Directors

PURPOSE

This Certification is a formal, annual statement confirming that the Company has implemented, adhered to, and will continue to uphold the policies and procedures set forth in the BMIG Corporate Responsible Sourcing, Supply Chain Due Diligence, AML/CFT and Compliance Manual.

ANNUAL COMPLIANCE CERTIFICATION

We, the undersigned, being the Managing Director and the Compliance Officer of Bullion Metallics International Group (Private) Limited ("BMIG"), hereby certify, to the best of our knowledge and belief, that for the financial year ending 31 December [Year]:

A. Governance and Oversight

1. The Board of Directors and Management of the Company have provided effective oversight of the compliance programme.

2. The Compliance Manual has been reviewed and updated as necessary, and any amendments have been approved by the Board.

3. Adequate resources have been allocated to ensure the effective operation of the compliance programme.

B. Policy Implementation

4. The Company's policies and procedures regarding responsible sourcing, supply chain due diligence, AML/CFT, and compliance, as outlined in the Manual, have been implemented across the organisation.

5. All employees, directors, and relevant contractors have completed mandatory training on the Manual and related policies.

6. All employees, directors, and relevant contractors have certified that they have read, understood, and complied with the Manual.

C. Supplier and Customer Due Diligence

7. Supplier onboarding and due diligence procedures have been conducted in accordance with the Manual for all new suppliers.

8. Customer due diligence procedures have been conducted in accordance with the Manual for all new customers.

9. Ongoing monitoring of existing suppliers and customers has been performed in accordance with the Manual.

D. AML/CFT and Transaction Controls

10. AML/CFT controls are in place and functioning effectively.

11. Sanctions screening has been conducted continuously, with no known violations.

12. Transaction monitoring procedures have been followed, and all suspicious activity has been appropriately reported and escalated.

E. Audit and Reporting

13. The Company has completed a programme of internal audits, with all findings subject to corrective action as documented in the Corrective Action Register.

14. All reports due to management and the Board have been submitted and reviewed.

F. Incidents and Remediation

15. All compliance incidents have been investigated, and appropriate remediation actions have been taken.

16. Any identified deficiencies have been addressed or are subject to an approved remediation plan.

CERTIFICATION

Managing Director:

Name:

Signature:

Date:

Company Stamp:

Compliance Officer:

Name:

Signature:

Date:

BOARD OF DIRECTORS ACKNOWLEDGEMENT

This certification has been reviewed and received by the Board of Directors.

On Behalf of the Board of Directors:

Name (Chairperson): Eng. **Shingai Levison Muringi**

Signature:

Date: 29/07/2026

RECORD RETENTION

This Annual Compliance Certification shall be retained as a permanent record in accordance with BMIG's Record Retention Policy.

FOR AND ON BEHALF OF BULLION METALLICS INTERNATIONAL GROUP (PRIVATE) LIMITED.

ENG. LEVISON SHINGAI KING

Group Chief Executive Officer & President

IN PURSUIT OF EXCELLENCE