



## **Precious Metals Procurement Policy**

### **1. Scope:**

This policy is applicable to MS Gold Bullion Sdn Bhd. With a nationwide presence, MS Gold Bullion takes great pride in conducting business with integrity and honesty. We highly value our reputation, considering it one of our numerous competitive strengths. MS Gold Bullion is committed to collaborating with suppliers and staff at all levels to minimize risks and safeguard the integrity and reputation of our industry.

As a gold trader, MS Gold Bullion diligently monitors the origins of all precious metals received at our facility to ensure compliance with all relevant laws, including the Malaysian Anti Money Laundering Act (AMLA), Malaysian Anti-Corruption Commission (MACC), and Anti-Terrorism Financing regulations.

As a leader in the precious metals industry, MS Gold Bullion recognizes the unique role we must fulfil in developing, implementing, and continuously improving systems aimed at detecting and preventing commercial activities that support armed groups, human rights violations, money laundering, terrorist financing, and other illegal practices. MS Gold Bullion actively collaborates with our precious metal suppliers to ensure their awareness of our Precious Metals Procurement Policy and the exclusion of materials that contribute to such unlawful activities when delivering to MS Gold Bullion.

MS Gold Bullion upholds responsible sourcing policies that establish a robust company management system, capable of identifying and evaluating risks within our supply chain. We maintain a risk mitigation strategy to appropriately address identified risks. Additionally, MS Gold Bullion arranges for an independent third-party audit of our supply chain due diligence on an annual basis and reports our achievements each year.

Date: 16 June 2023



## **Commitments:**

### **In relation to grave abuses associated with the extraction, transportation, or trade of minerals:**

MS Gold Bullion has a strict policy of refraining from engaging in any business transactions with suppliers of precious metals who may directly or indirectly finance or benefit from slavery, forced or compulsory labour, human trafficking, torture, the worst forms of child labour, gross human rights violations, including widespread sexual violence, war crimes, serious violations of international humanitarian law, as well as crimes against humanity or genocide.

### **In regard to providing direct or indirect support to non-state armed groups:**

MS Gold Bullion unequivocally prohibits any form of direct or indirect support to non-state armed groups through activities such as the extraction, transportation, trade, handling, or export of minerals. This includes, but is not limited to, illegal control of mine sites or transportation routes, illegal taxation or extortion along routes or at mine sites, and encompassing intermediaries, export companies, or international traders.

### **Concerning the role of public or private security forces:**

MS Gold Bullion acknowledges the crucial role that public and private security forces play in upholding the rule of law at mine sites and their surrounding areas, including transportation routes. This encompasses the protection of mine works, facilities, equipment, and human rights. MS Gold Bullion actively supports or takes steps to engage with local authorities and international organizations to prevent or minimize the vulnerability of affected groups.

### **In relation to bribery and fraudulent misrepresentation of mineral origins:**

MS Gold Bullion strictly prohibits offering, promising, giving, or demanding bribes and resists any attempts to solicit bribes aimed at concealing or misrepresenting the origins of minerals, or misrepresenting taxes, fees, and royalties paid to governments in the context of mineral extraction, trade, handling, transportation, and export.

### **Concerning Money Laundering:**

MS Gold Bullion maintains a firm policy against the use of its businesses and services for money laundering, terrorist financing, or any other illegal activities involving commercial transactions, including those with suppliers of precious metals. MS Gold Bullion supports efforts or takes necessary measures to effectively combat money laundering risks within its supply chain.

### **Regarding the payment of taxes, fees, and royalties to governments:**

MS Gold Bullion ensures that all applicable taxes, fees, and royalties associated with mineral extraction, trade, and export from conflict-affected and high-risk areas are duly paid to governments through thorough verification of client declarations and import/export documentation.



### **In relation to environmental, social and governance matters:**

MS Gold Bullion is committed to minimizing its environmental footprint and pursuing operations that prioritize environmental consciousness while achieving an optimal balance between environmental practices and economic values.

As a fundamental policy, MS Gold Bullion refrains from conducting business with any supplier of precious metals that has demonstrated a direct disregard for regional environmental rules and regulations or an indirect disregard by knowingly permitting or supporting violations of such regulations within their supply chain. This encompasses various aspects, including but not limited to:

- Unauthorized extraction of minerals from Protected Areas
- Responsible water stewardship, particularly in areas facing water scarcity or stress
- Proper storage, handling, and disposal of hazardous materials
- Effective management of labour issues, encompassing remuneration, working hours, collective bargaining, non-discrimination, diversity, dispute resolution, and worker protection.
- Engagement in community programs and management initiatives such as land acquisition, community resettlement, protection of cultural heritage sites and indigenous peoples, closure planning, and safeguarding of vulnerable populations.
- Upholding business integrity and ethical conduct, and supporting the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).

### **Risk management:**

MS Gold Bullion conducts thorough investigations and reserves the right to suspend or terminate engagement with upstream suppliers if there is a reasonable risk that the supplier is involved in or linked to any party engaged in the aforementioned abuses, as stated in the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas, Annex II. We employ two risk management processes, initially during onboarding and subsequently through daily automated screening of counterparties, covering:

- Sanctions & Enforcements
- Politically Exposed Persons
- Adverse Media

### **3. Governance:**

We require full compliance with this policy from all MS employees, contractors, suppliers, and other third parties. In the event of identified issues, appropriate measures will be taken to safeguard our integrity and reputation, which may include termination of employment or contracts.

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