



Gold Compliance Policy

1. Introduction

This Gold Compliance Policy is established to ensure that Aure8 Bullion adheres to the highest standards of ethical conduct, regulatory compliance, and sustainable practices in the procurement, handling, and sale of gold. This policy outlines the principles, responsibilities, and procedures to maintain compliance with all applicable laws and regulations.

2. Purpose

The purpose of this policy is to:

- Ensure compliance with international, national, and local regulations concerning the trade and handling of gold.
- Promote ethical sourcing and transparency in the gold supply chain.
- Prevent involvement in illegal activities such as money laundering, terrorism financing, and human rights abuses.

3. Scope

This policy applies to all employees, contractors, and third parties engaged in activities related to the procurement, handling, processing, and sale of gold Aure8 Bullion.

4. Regulatory Framework

Aure8 Bullion is committed to complying with the following regulatory frameworks and guidelines issued by the following entities:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Dubai Multi Commodities Centre (DMCC)
- The London Bullion Market Association (LBMA) Responsible Gold Guidance.
- Local laws and regulations in the jurisdictions where Aure8 Bullion operate.

5. Principles

5.1 Ethical Sourcing



- Conduct due diligence on all suppliers to ensure that gold is sourced responsibly and ethically.
- Avoid sourcing gold from conflict-affected and high-risk areas unless comprehensive due diligence is performed.

5.2 Transparency

- Maintain transparency in all transactions and supply chain activities.
- Disclose relevant information to stakeholders and regulatory bodies as required.

5.3 Human Rights

- Respect and uphold human rights in all operations.
- Ensure that suppliers and contractors adhere to human rights standards and do not engage in forced labour, child labour, or other human rights abuses.

5.4 Environmental Responsibility

- Implement practices that minimise environmental impact and promote sustainability.
- Ensure compliance with environmental regulations and standards.

6. Due Diligence Procedures

6.1 Supplier Evaluation

- Conduct a thorough risk assessment of all potential suppliers.
- Require suppliers to provide documentation and certifications proving the ethical and legal sourcing of gold.

6.2 Monitoring and Auditing

- Regularly monitor and audit the gold supply chain to ensure compliance with this policy.
- Conduct third-party audits as necessary to verify compliance.

6.3 Record Keeping



- Maintain accurate and comprehensive records of all transactions and due diligence efforts.
- Ensure records are readily available for inspection by regulatory authorities.

7. Reporting and Communication

7.1 Internal Reporting

- Establish a reporting mechanism for employees to report any violations or concerns regarding gold compliance.
- Ensure that reports are handled confidentially and investigated promptly.

7.2 External Communication

- Communicate the company's gold compliance policy to suppliers, customers, and other stakeholders.
- Publish an annual report on gold compliance efforts and performance.

8. Training and Awareness

- Provide regular training to employees on gold compliance requirements and ethical practices.
- Ensure that all relevant personnel are aware of their responsibilities under this policy.

9. Enforcement and Disciplinary Action

- Enforce this policy consistently and fairly.
- Take disciplinary action against employees, suppliers, or contractors who violate this policy, up to and including termination of employment or contracts.

10. Review and Revision

- Regularly review and update this policy to reflect changes in regulations, industry standards, and company practices.
- Seek feedback from stakeholders to improve the policy and its implementation.

11. Approval and Implementation



This policy is approved by the Board of Directors of Aure8 Bullion and is effective as of 20 June 2024. All employees, contractors, and third parties are required to adhere to this policy.

Approved by:

A handwritten signature in black ink, appearing to read 'S. Hawkins', written in a cursive style.

Steven Hawkins
CEO
20 June 2024

Contact Information:

For any questions or further information regarding this policy, please contact our Compliance Officer Tom Davies at tom@aure8.com