

Suppliers Code of Ethics.

1. Purpose

This Standard governs the conduct of all Suppliers of all types and forms of precious metals to the Memas Commodities DMCC. It sets the standards of ethical conduct that is required from the supplier community, provides for self-certification against all standards, validation of the self-certification, and procedures for proceeding or terminating contracts with suppliers that do not meet these standards.

2. Application

Social responsibility guides the operation Memas Commodities DMCC in the conduct of its business in the global precious metals industry. This Standard has been designed to help Suppliers understand their responsibilities and to create an awareness of the business and ethical standards that they must follow in their business dealings with Memas Commodities DMCC. The key attributes that we expect from our Suppliers are:

- Integrity
- Honesty and,
- The highest ethical standards

3. Administration and Interpretation

Enquiries, comments and recommendations related to this Standard and supporting Procedures must be communicated to the Compliance Officer of Memas Commodities DMCC.

Definitions applicable to the understanding and application of the requirements contained in this Standard are located in Appendix A and Appendix B.

Suppliers must read, understand and accept in writing the following conditions of dealing with the Memas Commodities DMCC

4. Compliance with Laws

Suppliers must comply with all applicable laws, rules and regulations in every jurisdiction in which they do business with Memas Commodities DMCC. Local laws might change in restriction to this Standard in some instances. In such events, Suppliers are expected to comply with this Standard, even if the conduct would otherwise be legal under applicable laws. If local laws are more restrictive than this Standard, Suppliers are expected to, at a minimum, comply with applicable local laws.

5. UN Global Compact

The ten principles of the Global Compact are based on internationally recognized norms and conventions in four critical areas: Human Rights, Labor Standards, the Environment, and Anti-corruption. In all business dealings with Memas Commodities DMCC, Suppliers must comply with the principles of the UN Global Compact (see appendix A for reference).

6. OECD Guidance/DMCC rules for Responsible Supply Chains for Gold and Other Precious Metals

In 2012 the OECD issued a "Supplement on Gold" to its paper on Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area. This provides a common reference for all participants in the supply chain.

This is to ensure responsible sourcing and chain of custody of gold and other precious metals and to eliminate or at least mitigate the risk of direct or indirect support to any kind of conflict in accordance with international standards. Memas Commodities DMCC is committed to adopting these practical guidelines and is also fully committed to uphold the DMCC rules for the ethical supply chain at all times.

It is the responsibility of every one of our suppliers to fully understand the OECD guidelines and DMCC Rules for RBD in the Gold and Precious Metal Supply Chain in order to ensure that they are in full compliant with the principals of responsible supply chain management of precious metals. (See Appendix B for reference

7. Certification

Memas Commodities DMCC will certify and approve suppliers and accept their products once the supplier has passed our specialized assessment process, verification, and monitoring procedures. Post certification, the supplier becomes a nominated entity to enter any deal with Memas Commodities DMCC whenever required. The certification will occur at the outset of the relationship with the supplier and will be an ongoing process and subject to review at least annually.

Memas Commodities DMCC has the right, but not the obligation, at its sole discretion to terminate the business relationship at any point if the standards required are not met by the supplier for any business-related reasons. At the time of any termination for the business relationship with the supplier, Memas Commodities DMCC will decide at its sole discretion whether or not to disclose the reasons for any such action.

8. Acknowledgement of Policy by The Supplier

I / WE acknowledge that I / WE have read and understand Memas Commodities DMCC Suppliers Code of Ethics and Appendices and agree to always comply with its provisions during the business relationship with the company.

Name:

Supplier:

Authorized Signature: