

Ample Pro

Responsible Supply Chain Policy

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1. Introduction

Ample Pro Inc. (“the Company”) is committed to conducting its business with the highest standards of ethics, integrity, and sustainability. As a gold trading business, the Company recognizes the potential risks associated with sourcing and trading precious metals and is dedicated to ensuring that its supply chain is free from human rights abuses, environmental harm, and unethical practices. This Responsible Supply Chain Policy outlines the Company’s commitment to responsible sourcing, transparency, and compliance with international standards, applicable in both the United States and Dubai.

2. Scope and Applicability

This policy applies to all employees, officers, directors, suppliers, contractors, and business partners involved in the Company’s supply chain. It covers all aspects of the Company’s operations related to the sourcing, trading, and transportation of gold, both in New York, the United States, and Dubai, UAE.

3. Commitment to International Standards

The Company is committed to adhering to the following international standards and guidelines:

- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.**
- **UN Guiding Principles on Business and Human Rights.**
- **Dubai Multi Commodities Centre (DMCC) Rules for Risk-Based Due Diligence in the Gold and Precious Metals Supply Chain.**

4. Ethical Sourcing

The Company is dedicated to ensuring that all gold and other precious metals in its supply chain are sourced responsibly and ethically. This includes:

- **Conflict-Free Sourcing:** Ensuring that the gold sourced is free from conflict and does not contribute to financing armed groups, human rights abuses, or corruption.

- **Human Rights:** Respecting and promoting human rights throughout the supply chain, including the prohibition of child labor, forced labor, and any form of discrimination.
- **Environmental Responsibility:** Committing to environmental stewardship by minimizing the environmental impact of mining, production, and trading activities, and supporting suppliers who adopt sustainable practices.

5. Supplier Due Diligence

The Company will conduct rigorous due diligence on all suppliers to ensure compliance with this policy. The due diligence process includes:

- **Supplier Screening:** Assessing potential suppliers against ethical, environmental, and human rights criteria before entering into business relationships.
- **Supplier Audits:** Conducting regular audits of suppliers to verify compliance with responsible sourcing standards. This includes on-site inspections and third-party audits where necessary.
- **Risk Assessments:** Identifying and assessing risks in the supply chain, particularly in high-risk areas, and implementing measures to mitigate these risks.

6. Transparency and Traceability

The Company is committed to maintaining transparency and traceability throughout its supply chain. This includes:

- **Chain of Custody:** Establishing and maintaining a transparent chain of custody for all gold and precious metals, ensuring that they can be traced back to their origin.
- **Record Keeping:** Maintaining detailed records of all transactions, supplier agreements, and due diligence efforts for a minimum of five years.
- **Disclosure:** Regularly disclosing information about the Company's supply chain practices, including sourcing policies, due diligence processes, and audit results, to stakeholders and the public.

7. Supplier Engagement and Capacity Building

The Company will engage with its suppliers to ensure they understand and comply with the Responsible Supply Chain Policy. This includes:

- **Training:** Providing training and resources to suppliers to help them meet the Company's ethical and environmental standards.
- **Collaboration:** Working collaboratively with suppliers to improve practices and address any issues related to responsible sourcing.
- **Remediation:** Implementing remediation plans for suppliers who do not meet the required standards, or discontinuing relationships with non-compliant suppliers where necessary.

8. Reporting and Grievance Mechanisms

The Company encourages employees, suppliers, and other stakeholders to report any concerns related to the supply chain, including violations of this policy. The Company provides the following mechanisms for reporting:

- **Whistleblower Hotline:** A confidential hotline available to report concerns related to unethical practices, human rights abuses, or environmental harm in the supply chain.
- **Grievance Mechanism:** A formal grievance mechanism for stakeholders to report and resolve issues related to the supply chain.

9. Monitoring and Continuous Improvement

The Company is committed to continuously improving its supply chain practices. This includes:

- **Regular Reviews:** Regularly reviewing and updating the Responsible Supply Chain Policy to reflect changes in industry standards, regulations, and best practices.
- **Performance Monitoring:** Monitoring the performance of suppliers and the effectiveness of due diligence processes, making improvements as needed.
- **Stakeholder Engagement:** Engaging with stakeholders, including employees, suppliers, customers, and industry groups, to gather feedback and improve the Company's responsible sourcing practices.

10. Compliance with Laws and Regulations

The Company is committed to complying with all applicable local, national, and international laws and regulations related to responsible sourcing and supply chain management. This includes compliance with U.S. and UAE laws, as well as international standards governing the trade and sourcing of gold and precious metals.

11. Policy Review and Updates

This Responsible Supply Chain Policy will be reviewed annually by the Company's Compliance Officer and updated as necessary to reflect changes in the law, regulatory requirements, or the Company's business operations. The Company is committed to maintaining a responsible supply chain that aligns with its values and the expectations of its stakeholders.

By implementing this Responsible Supply Chain Policy, Ample Pro Inc. ensures that its operations in New York and Dubai are conducted with the highest standards of integrity, transparency, and social responsibility, contributing to the sustainable development of the gold industry.