

Ample Pro

Policy Consistent with LBMA Gold Guidance

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1. Introduction

Ample Pro Inc. (“the Company”) is committed to conducting its gold trading operations in full compliance with the London Bullion Market Association (LBMA) Responsible Gold Guidance. The LBMA Gold Guidance sets the international benchmark for responsible sourcing of gold, ensuring that gold supply chains are free from human rights abuses, do not contribute to conflict, and adhere to the highest standards of environmental and ethical practices. This policy outlines the Company’s commitment to aligning its operations with the LBMA standards, applicable to its business activities in New York, the United States, and Dubai, UAE.

2. Scope and Applicability

This policy applies to all employees, officers, directors, suppliers, contractors, and business partners involved in the Company’s gold supply chain. It covers all activities related to the sourcing, trading, refining, and transportation of gold, both domestically and internationally.

3. Compliance with LBMA Responsible Gold Guidance

The Company is committed to adhering to the five-step framework set forth in the LBMA Responsible Gold Guidance:

3.1 Establish Strong Company Management Systems

- **Policy Commitment:** Implement a firm commitment to responsible gold sourcing, clearly documented and communicated throughout the organization and supply chain.
- **Internal Management Structure:** Designate a compliance officer responsible for overseeing the implementation and adherence to the LBMA Gold Guidance within the Company.
- **Record Keeping:** Maintain robust records and documentation of all gold sourcing activities, ensuring transparency and traceability throughout the supply chain.

3.2 Identify and Assess Risks in the Supply Chain

- **Risk-Based Due Diligence:** Conduct thorough risk assessments of the entire gold supply chain, focusing on potential risks related to conflict, human rights abuses, and financial crimes.
- **Supplier Screening:** Evaluate all gold suppliers, using a risk-based approach to assess their compliance with responsible sourcing standards.
- **On-the-Ground Assessments:** Where necessary, conduct on-the-ground assessments of high-risk suppliers to verify their practices and adherence to LBMA standards.

3.3 Design and Implement a Management Strategy to Respond to Identified Risks

- **Risk Mitigation Plan:** Develop and implement a risk mitigation plan for any identified risks in the supply chain, which may include reducing or eliminating transactions with high-risk suppliers.
- **Supplier Engagement:** Work closely with suppliers to improve their practices and align them with the LBMA Responsible Gold Guidance.
- **Contractual Agreements:** Incorporate clauses in supplier contracts that mandate compliance with the LBMA standards.

3.4 Carry Out Independent Third-Party Audits

- **Annual Audits:** Engage independent third-party auditors to conduct annual audits of the Company's supply chain and sourcing practices to ensure compliance with LBMA requirements.
- **Audit Transparency:** Make audit results available to relevant stakeholders and address any identified non-compliances promptly.

3.5 Report on Supply Chain Due Diligence

- **Public Reporting:** Regularly publish reports on the Company's website, detailing its due diligence practices, risk assessments, and actions taken to mitigate risks in the supply chain.
- **Stakeholder Communication:** Ensure that key stakeholders, including employees, suppliers, and customers, are informed about the Company's responsible gold sourcing efforts and LBMA compliance.

4. Human Rights and Environmental Commitment

In alignment with the LBMA Gold Guidance, the Company commits to:

- **Human Rights:** Uphold and respect human rights throughout the gold supply chain, including the prohibition of forced labor, child labor, and discrimination.
- **Environmental Responsibility:** Minimize the environmental impact of gold sourcing and trading activities, supporting suppliers who adopt sustainable and environmentally friendly practices.
- **No Conflict Gold:** Ensure that the gold sourced by the Company does not contribute to armed conflict or human rights abuses.

5. Training and Capacity Building

- **Employee Training:** Provide regular training to all employees on the LBMA Responsible Gold Guidance and the Company's related policies and procedures.
- **Supplier Training:** Offer training and resources to suppliers to help them understand and comply with LBMA standards.
- **Continuous Improvement:** Encourage a culture of continuous improvement in responsible sourcing practices across the supply chain.

6. Monitoring and Continuous Improvement

- **Ongoing Monitoring:** Regularly monitor the Company's gold supply chain for compliance with LBMA standards, making improvements as needed.
- **Feedback Mechanisms:** Establish mechanisms for receiving feedback from stakeholders and addressing any concerns related to the supply chain.

7. Reporting and Grievance Mechanisms

- **Whistleblower Hotline:** Provide a confidential whistleblower hotline for reporting concerns related to non-compliance with the LBMA Gold Guidance.
- **Grievance Process:** Implement a formal grievance process to address and resolve issues related to the gold supply chain.

8. Policy Review and Updates

This policy will be reviewed annually by the Company's Compliance Officer and updated as necessary to reflect changes in the LBMA Responsible Gold Guidance, regulatory requirements, or the Company's operations. The Company remains committed to maintaining the highest standards of responsible gold sourcing and contributing to a transparent, ethical, and sustainable gold industry.