

# **Ample Pro**

**Policy Consistent with DMCC Practical Guidance**

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## 1. Introduction

Ample Pro Inc. (“the Company”) is committed to ensuring that its gold trading operations adhere to the highest standards of ethical sourcing, environmental responsibility, and compliance with international and local regulations. In alignment with the Dubai Multi Commodities Centre (DMCC) Practical Guidance for Market Participants in the Gold and Precious Metals Industry, this policy outlines the Company’s commitment to responsible gold sourcing and trading practices that are applicable to its operations 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 and precious metals supply chain. It covers all activities related to the sourcing, trading, refining, and transportation of gold and other precious metals, ensuring full compliance with DMCC Guidance.

## 3. Compliance with DMCC Practical Guidance

The Company is dedicated to adhering to the five-step framework set forth in the DMCC Practical Guidance:

### 3.1 Establish Strong Company Management Systems

- **Policy Commitment:** Formally commit to responsible sourcing and trading of gold and precious metals, clearly documented and communicated throughout the Company and its supply chain.
- **Internal Management Structure:** Appoint a dedicated compliance officer responsible for the implementation and monitoring of adherence to the DMCC Practical Guidance.
- **Supplier Code of Conduct:** Develop and enforce a Supplier Code of Conduct that aligns with the principles of the DMCC Practical Guidance, covering human rights, environmental protection, and anti-corruption.

### 3.2 Identify and Assess Risks in the Supply Chain

- **Risk-Based Due Diligence:** Implement a comprehensive risk assessment process to identify and evaluate risks related to money laundering, terrorist financing, human rights abuses, and environmental impact within the supply chain.
- **Supplier Screening:** Perform due diligence on all suppliers to ensure they comply with responsible sourcing standards, focusing on high-risk areas such as conflict-affected regions.
- **Country and Counterparty Risk Assessment:** Evaluate the risks associated with countries of origin and the parties involved in the supply chain, ensuring compliance with DMCC standards.

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

- **Risk Mitigation Measures:** Develop and implement a risk mitigation plan that addresses identified risks, including discontinuing relationships with non-compliant suppliers or countries of concern.
- **Supplier Engagement:** Collaborate with suppliers to improve their practices and ensure alignment with the Company's responsible sourcing policy and DMCC standards.
- **Corrective Action Plans:** Establish corrective action plans for suppliers who fail to meet the required standards, providing them with the opportunity to address and rectify issues.

### 3.4 Carry Out Independent Third-Party Audits

- **Annual Independent Audits:** Engage independent third-party auditors to conduct annual audits of the Company's gold supply chain practices, ensuring compliance with DMCC requirements.
- **Audit Findings and Transparency:** Publicly disclose audit findings and address any areas of non-compliance, committing to continuous improvement in responsible sourcing practices.

### 3.5 Report on Supply Chain Due Diligence

- **Transparency and Public Reporting:** Regularly publish detailed reports on the Company's website, outlining due diligence efforts, risk assessments, and the steps taken to ensure a responsible supply chain.
- **Stakeholder Communication:** Maintain open lines of communication with stakeholders, including employees, suppliers, customers, and regulators, to ensure transparency and build trust in the Company's sourcing practices.

## 4. Commitment to Human Rights and Environmental Stewardship

In line with the DMCC Practical Guidance, the Company commits to:

- **Respect for Human Rights:** Uphold and protect human rights across the supply chain, including the prohibition of forced labor, child labor, and discrimination.
- **Environmental Responsibility:** Implement environmentally sustainable practices in the sourcing, refining, and trading of gold and precious metals, minimizing the ecological impact of the Company's operations.
- **No Conflict Gold:** Ensure that the gold and precious metals sourced do not contribute to financing armed conflict or human rights violations.

## 5. Supplier Due Diligence and Monitoring

- **Supplier Due Diligence:** Conduct rigorous due diligence on all suppliers, ensuring compliance with the Company's ethical standards and DMCC requirements.
- **Ongoing Monitoring:** Continuously monitor supplier practices to ensure ongoing adherence to responsible sourcing standards.
- **Supplier Audits:** Conduct regular audits of suppliers, focusing on high-risk suppliers and regions, to verify compliance with the Company's responsible sourcing policy.

## 6. Training and Capacity Building

- **Employee Training:** Provide regular training to all employees on the DMCC Practical Guidance and the Company's related policies, ensuring they understand their roles and responsibilities in maintaining a responsible supply chain.
- **Supplier Training:** Offer training and resources to suppliers to help them meet the Company's and DMCC's ethical and environmental standards.
- **Capacity Building:** Support capacity-building initiatives for suppliers, particularly in high-risk regions, to promote responsible practices and compliance with international standards.

## 7. Grievance Mechanisms and Reporting

- **Whistleblower Hotline:** Provide a confidential whistleblower hotline for reporting concerns related to non-compliance with the DMCC Practical Guidance or the Company's responsible sourcing policy.
- **Formal Grievance Process:** Implement a formal grievance process to address and resolve issues related to the gold and precious metals 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 DMCC Practical Guidance, regulatory requirements, or the Company's operations. The Company is committed to maintaining a responsible supply chain that aligns with DMCC standards and contributes to the ethical, sustainable development of the gold and precious metals industry.

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By implementing this policy, Ample Pro Inc. ensures that its operations in New York and Dubai align with the DMCC Practical Guidance for Market Participants in the Gold and Precious Metals Industry, promoting ethical, conflict-free, and sustainable sourcing practices throughout its supply chain.