

Grievance Mechanism Policy

CEO / Managing Director	Mr. Alec Elie Sellem	Signatures:
Effective Date: 22-Dec-2025		

1. Purpose

This Grievance Mechanism Policy establishes Unimetals Metal Industries – Sole Proprietorship L.L.C.'s formal process for receiving, assessing, investigating, and resolving grievances related to responsible sourcing, supply chain due diligence, and ethical business conduct.

This policy is adopted in accordance with:

- UAE Ministry of Economy (MOE) Due Diligence Regulations for Responsible Sourcing of Gold;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Gold Supplement;
- Applicable UAE laws and regulatory expectations.

This mechanism supports MOE requirements relating to stakeholder engagement, risk mitigation, escalation, and remediation where identified risks or grievances arise within the gold and other precious metals we deal within our supply chain.

2. Scope

This policy applies to all employees, management, suppliers, clients, contractors, and other stakeholders of Unimetals. It covers grievances related to:

- Responsible sourcing and supply chain integrity;
- Human rights, labour standards, and environmental compliance;
- Ethical conduct, fraud, corruption, and financial misconduct;
- Health, safety, and workplace practices; and
- Compliance with MOE, OECD requirements.

A grievance includes any complaint, allegation, concern, or expression of dissatisfaction relating to the Company's activities or conduct.

3. Principles

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Navit Cohen
Deputy General Manager

Unimetals' grievance mechanism is based on the following principles, consistent with MOE and OECD guidance:

- **Accessibility:** Open to all relevant stakeholders, including anonymous reporting;
- **Confidentiality:** Protection of identity and sensitive information;
- **Non-Retaliation:** Zero tolerance for retaliation against good-faith reporting;
- **Fairness and Objectivity:** Impartial assessment and investigation;
- **Timeliness:** Clear timelines for acknowledgement, investigation, and resolution;
- **Transparency:** Documented outcomes and corrective actions.

4. Grounds for Grievance

Grievances may be raised in relation to, but not limited to:

- Human rights abuses (forced labour, child labour, serious violations);
- Breaches of laws, regulations, or internal policies;
- Fraud, bribery, corruption, or financial manipulation;
- Falsification of documents or misrepresentation;
- Association with criminal activity or non-state armed groups;
- Employee misconduct or unfair labour practices;
- Health, safety, or working-condition concerns.

5. Submission Channels

Grievances may be submitted at any time via:

Email: compliance@unimetals.ae

Submissions should include, where possible:

- Description of the concern;
- Supporting documentation or evidence (if available);
- Contact details (optional).

Anonymous submissions are accepted.

6. Roles and Responsibilities

- **Compliance Officer:** Primary recipient of grievances, responsible for acknowledgement, coordination, monitoring, and reporting.
- **Grievances and Complaints Committee:** Conducts review, investigation, decision-making, and corrective action recommendations.
- **Senior Management / CEO:** Oversight, escalation decisions, and approval of significant remediation actions.





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Deputy General Manager

7. Grievance Handling Process (MOE-Aligned)

Step 1: Acknowledgement

- Acknowledgement issued within 3 working days.

Step 2: Preliminary Review and Risk Assessment

- Assessment of severity, relevance to responsible sourcing, and regulatory impact.
- Completed within 7 working days.

Step 3: Investigation

- Internal investigation conducted, including document review and interviews where applicable.
- Initiated within 10 working days and completed within 20 working days, subject to complexity.

Step 4: Escalation (if required)

- Escalation to Senior Management, Board-level oversight, or external authorities where required by MOE regulations.

Step 5: Decision and Remediation

- Written decision issued.
- Corrective or mitigating actions defined in line with MOE risk control expectations.

Step 6: Monitoring and Closure

- Follow-up at 30, 60, and 90 days to ensure effectiveness and prevent recurrence.

8. Confidentiality and Non-Retaliation

All grievances are handled confidentially. Information is disclosed strictly on a need-to-know basis. Retaliation against any individual raising a concern in good faith is strictly prohibited.

9. Recordkeeping and Reporting

All grievance records are securely retained by the Compliance function and are available for review by regulators or auditors upon request. Aggregated and anonymised summaries are reported to senior management on a quarterly basis.

10. Policy Review

This policy is reviewed periodically to ensure continued alignment with MOE regulations, OECD guidance, and industry best practices.

