



Executive Summary:

1. Introduction & Commitment

Multi Met Trading LLC ("the Company") commits to upholding the highest ethical, social, and environmental standards across its global supply chain. This policy outlines the framework for ensuring integrity, transparency, and responsibility in all supply chain activities, with a particular focus on high-value transactions like precious metals and strict adherence to Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) regulations. This commitment is vital for building trust, mitigating risk, ensuring sustainability, and meeting regulatory requirements.

- **Leadership Commitment:** Senior Management must champion and integrate ethical supply chain principles into the Company's core strategy and operational decisions.

2. Scope & Application

This policy applies globally to all Company operations, subsidiaries, employees, contractors, suppliers, customers, and partners involved in any stage of the supply chain. It covers all transactions, with specific emphasis and enhanced measures for precious metals trading and AML/CFT compliance, regardless of geographic location.

- **Universal Application & Communication:** Ensure the policy is effectively communicated to and enforced across all relevant internal and external stakeholders, clarifying its comprehensive scope and mandatory nature.

3. Ethical Standards & Principles

The policy mandates adherence to core ethical principles across the supply chain.

- **Uphold Human Rights & Labor Standards:**
 - Enforce zero tolerance for child labor, forced labor, and any form of exploitation.
 - Require suppliers to provide safe and healthy working conditions.
 - Mandate fair wages, benefits, and non-discriminatory practices.
 - Ensure respect for workers' freedom of association and collective bargaining rights.
 - Conduct regular audits to verify supplier compliance.
- **Promote Environmental Responsibility & Sustainability:**
 - Require suppliers to implement practices for resource efficiency (energy, water, materials) and waste minimization/recycling.
 - Mandate measures to reduce pollution and environmental impact.
 - Encourage suppliers to reduce carbon footprint and protect biodiversity.
 - Promote sustainable sourcing, especially for precious metals, verified through documentation.
- **Enforce Anti-Corruption & Business Ethics (Integrated with AML/CFT):**
 - Maintain and enforce a strict zero-tolerance policy against bribery and all forms of corruption.
 - Ensure all financial transactions are transparent, documented, and auditable.
 - Integrate AML/CFT protocols (KYC, EDD, risk-based monitoring) into all relevant supply chain and financial processes.
 - Require prompt reporting of suspicious activities to relevant authorities.
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MULTI MET TRADING L.L.C. is a Limited Liability Company Registered with the UAE Department of Economic Development, certificate number: 4992516.

The registered office address is Office 505, Montazah Tower, Khalidiyah, Abu Dhabi, United Arab Emirates

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- **Ensure Transparency & Accountability:**
 - Establish and promote confidential reporting channels for unethical behavior (linking to the Whistleblowing Policy).
 - Conduct regular internal and external audits to verify compliance.
 - Define and track Key Performance Indicators (KPIs) for ethical, environmental, and compliance performance.
 - Maintain open communication with stakeholders regarding policy adherence and performance.

4. Supplier Selection, Due Diligence & Risk Management

Robust processes must be in place to manage supplier relationships ethically and effectively.

- **Implement Rigorous Supplier Selection:** Evaluate all potential suppliers based on defined criteria including reputation, financial stability, operational capability, ethical compliance (human rights, environment, anti-corruption), and transparency.
- **Conduct Comprehensive Due Diligence:**
 - Perform standard due diligence on all suppliers.
 - Apply Enhanced Due Diligence (EDD) for suppliers involved in precious metals trading or operating in high-risk jurisdictions/sectors.
- **Mandate AML/CFT Screening:** Implement mandatory Know Your Customer (KYC) procedures and risk-based AML/CFT screening for all suppliers, with heightened scrutiny for relevant transactions (e.g., precious metals).
- **Verify Source & Traceability (Precious Metals):** Require detailed documentation and implement chain-of-custody protocols to ensure ethical and legal sourcing of precious metals.
- **Establish Corrective Action & Remediation Process:**
 - Define clear steps for addressing supplier non-compliance (investigation, suspension).
 - Require non-compliant suppliers to develop and implement time-bound Corrective Action Plans.
 - Conduct enhanced monitoring and follow-up audits post-remediation.
 - Establish criteria and processes for supplier relationship termination in cases of persistent non-compliance or significant risk.

5. Implementation, Training & Continuous Improvement

Effective implementation requires ongoing effort and adaptation.

- **Assign Responsibility:** Clearly designate roles (e.g., Supply Chain Officer) responsible for overseeing policy implementation, supplier management, and compliance verification.
- **Provide Comprehensive Training:** Conduct regular, mandatory training for relevant employees and supply chain partners on policy requirements, ethical standards, anti-corruption, AML/CFT compliance, and reporting procedures.
- **Integrate into Operations:** Embed policy requirements into procurement processes, contracts, and supplier relationship management practices.
- **Perform Regular Reviews & Updates:** Conduct periodic (at least annual) reviews of the policy and its implementation effectiveness. Update the policy to reflect regulatory changes, industry best practices, audit findings, and stakeholder feedback.
- **Foster a Culture of Integrity:** Promote an organizational culture where ethical conduct and accountability within the supply chain are prioritized and reinforced by leadership.



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