

	<b>ZOE PRECIOUS METALS AND JEWELRY (FZE) GRIEVANCES &amp; WHISTLEBLOWING</b>	No	ZOE/GWP/001
		Rev No.	001
		Date	2025
		Email	Compliance@zoemetals.com

### Policy Statement

**ZOE METALS** is dedicated to upholding and maintaining high standards in work behavior, as outlined in its Code of Conduct.

The **ZOE METALS's** Code of Conduct encourages all employees and stakeholders, including shareholders, suppliers, and customers, to report genuine concerns about unethical behavior, malpractices, illegal acts, or regulatory compliance without fear of reprisal, provided they act in good faith when reporting such concerns.

This policy safeguards whistleblowers from adverse employment actions for reporting or complaint against employees or directors, stating that harassment or retaliation against genuine whistleblowers is considered gross misconduct and may lead to dismissal if proven.

The policy aims to protect whistleblowers from adverse employment actions.

### Whistleblowing

Our whistleblowing procedures require reporting genuine concerns in good faith, with a reasonable belief that the information and allegations are substantially true, and not for personal gain.

If an employee reports in good faith, no action will be taken, even if the complaint is not confirmed by subsequent investigations. However, employees should exercise care to ensure the accuracy of the information.

If an employee makes a mala fide report, disciplinary action may be taken, and **ZOE METALS** may consider lodging a police report and other necessary actions.

### Procedures

Complaints should be addressed directly with the immediate superior, if not possible or appropriate, to the **ZOE METALS** Management; if reporting to management is a concern, the report should be directed to the Chairman **ZOE METALS**.

### Action

**ZOE METALS** ensures that all reports are investigated promptly and the progress of the investigation is reported to the Management at the next scheduled meeting.

The whistleblower's identity and reports are treated confidentially and only disclosed to authorize investigators.

After the investigation, the management recommends appropriate action for their deliberation. Remedial actions will be implemented to prevent similar situations from arising in the future.

### Grievances

**ZOE METALS** is fully committed to:

- ✓ Up to date with the guidelines and follow the current regulations that are imposed to our business activities
- ✓ Maintain and operate a system of responsible sourcing in accordance with the London Bullion Market Association - LBMA, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Responsible Mining Initiatives – RMI, Dubai Multi Commodities Centre - DMCC, UAE Responsible Sourcing and not limited to the international efforts and policies

**The guideline for reporting is as follows:**

1. Who can report?
2. What kind of information can be reported?
3. How the report has to be performed?
4. How we are addressing reports?
5. Assessments and commitments

**1. Who can report?**

Any individual such as; suppliers, customers, employees, stakeholders and any other affected third-party companies can use this policy.

**2. What kind of information can be reported?**

Any kind of concern such as and not limited to:

- ✓ Bribery and corruption
- ✓ Financial malpractice
- ✓ Any Human Rights abuses
- ✓ Any kind of visualized danger in the work place
- ✓ Criminal activities
- ✓ Unethical behaviors
- ✓ Any kind of alterations and falsification of documents
- ✓ Failing to follow with the UAE Regulations

**3. How the report has to be performed?**

The individual who decides to raise a report/complaint can be done thru the following email [compliance@zoemetals.com](mailto:compliance@zoemetals.com) the report shall contain all the supporting evidence information to have a proper starting line of investigation.

If the information provided is accurate the corrective actions will take place and the authority will be notified.

For anonymous inquiries /concerns/ whistleblowing and grievances, please contact us through email [info@zoemetals.com](mailto:info@zoemetals.com)

**4. How we are addressing reports?**

All the information shall be collected and processed, **ZOE METALS** guarantees the evaluation and the investigation for such reports and notifications shall be delivered to the person who raised the concerns in case she/he choose the reveal its identity. The reporting person shall not in any way be prejudiced

**5. Assessments and commitments**

**ZOE METALS** will conduct regular audits of the Grievances and Whistleblowing mechanism, ensuring proper record-keeping of complaints and corrective actions if necessary.

**Changes to the Policy**

The Compliance Department along with the Board reserves the right to change this Policy from time to time as it considers necessary.

Board Approval Date: November 27, 2024

Effective Date: December 02, 2024

**Due for review: May 08, 2025**

**Signatures**

Kutluay Furkan Caner  
Managing Director

Luisa Fernanda  
Compliance Officer

Vishmi Nayanika  
Compliance Assistant