



BANGALORE REFINERY

Responsible Business Policy

1. BRPL is committed to the principle of responsible sourcing by
 - a. Establishing processes to prevent use of our organization in anti-money laundering operation.
 - b. Ensuring that minerals originating from notified regions that are mined to benefit armed groups to finance conflict, are not used in its products. This includes illegal financial support got by armed groups through the extraction, transport, trade or export of mineral. Our endeavour is to ensure that the actors in the supply chain do not involve in human rights abuse.
 - c. Implementing a comprehensive management system that encompasses strict risk based due diligence before entering into new commercial relationships as well as continuous monitoring of transactions on a risk based approach.
 - d. Suspending or discontinuing engagement with any counterparty where a reasonable risk is identified to indicate that they have sourced gold from, or linked to, any party committing serious abuses as defined above.
2. Further BRPL is committed to support measures to create a Gold Supply chain from mines to market that will be responsible, secure, transparent and verifiable by establishing long-term relationships with precious metals suppliers and customers.
3. BRPL will perform appropriate due diligence of our counterparties before conducting any business with them. We will also conduct periodic monitoring of the relationship in order to assess the risk of contribution to conflict, money laundering and serious human rights abuse and implement a strategy to respond to identified risk and maintain adequate records to demonstrate that appropriate and ongoing due diligence have been followed.
4. BRPL will encourage and assist its suppliers to be part of the larger global supply chain for responsible gold. If some suppliers are found to have minor infractions, steps will be taken to help them correct the same. If it's not feasible then such business relationships will be terminated.
5. Any action required to be undertaken under this policy shall be taken by the Compliance Officer in accordance with this Policy. The Compliance Officer shall have a functional reporting to the Designated Director. Aggravated cases of breach of this AML Policy shall be escalated to the Board of Directors of our Company through the designated Director.

Please send an e-mail to cmo@bangalorerefinery.com for any queries regarding this policy.