



# SUPPLY CHAIN POLICY

## Ver. 02

**Effective Date:** 18/07/2025

**Approved By:** Management , Peak International TradingCo LLC

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### 1. INTRODUCTION

At PEAK International Trading Co LLC ("PEAK" or "Company"), we recognize our ethical and legal responsibilities in preventing the contribution to armed conflicts, human rights abuses, illicit financial flows, and environment harm in our supply chain. Our operations and sourcing practices adhere to the highest standards of due diligence as guided by international frameworks, particularly in dealing with conflict-affected and high-risk areas (CAHRAs).

We are committed to responsible sourcing of precious metals and other goods, upholding global norms including:

- OECD Due Diligence Guidance
  - LBMA Responsible Sourcing Program
  - UN, EU, UK, and US sanctions
  - FATF recommendations
  - Local laws on anti-money laundering and anti-terrorism financing
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### 2. PURPOSE AND SCOPE

This policy outlines the responsibilities, risk management procedures, and compliance obligations of PEAK and its partners regarding responsible supply chains. It applies to all employees, contractors, suppliers, and business partners.

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### 3. OUR COMMITMENTS

PEAK commits to the following principles:

- **Ethical Sourcing:** No purchase from suppliers involved in human rights abuses, money laundering, or armed conflict.

- **Zero Tolerance:** Immediate disengagement from suppliers violating international sanctions, sourcing from protected areas (e.g., UNESCO World Heritage Sites), or engaging in bribery or terrorism.
  - **Legal Compliance:** Adherence to all relevant law and international conventions.
  - **Environmental & Social Responsibility:** Commitment to sustainable and transparent practices throughout the supply chain.
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## 4. ORGANIZATION AND RESPONSIBILITIES

To enforce this policy:

- A **Compliance Officer** is appointed to oversee supply chain due diligence.
  - A **Supply Chain Risk Committee** reviews high-risk cases and recommends actions.
  - Management ensures sufficient resources, training, and internal control systems are in place.
  - An internal **Whistle blower and Grievance Mechanism** enables employees and external stakeholders to report concerns confidentially.
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## 5. RISK IDENTIFICATION AND ASSESSMENT

PEAK uses a **risk-based approach** to assess:

- **Geographic risks** (conflict zones, embargoed countries)
- **Supplier risks** (politically exposed persons, prior sanctions)
- **Product risks** (ASM-sourced metals, hazardous chemical use)
- **Transaction risks** (suspicious payment routes, forged documents)

Identified risks trigger enhanced due diligence and may lead to suspension or termination of engagement.

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## 6. KNOW YOUR CUSTOMER (KYC) AND DUE DILIGENCE

Before engaging with any supplier:

- KYC documentation (ID, origin, corporate structure, payment methods) must be verified.
  - Ongoing due diligence is maintained throughout the business relationship.
  - Enhanced scrutiny is applied to high-risk suppliers or inconsistent documentation.
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## 7. CRITERIA FOR HIGH-RISK SUPPLY CHAINS

PEAK considers supply chains high-risk if:

- Materials originate or transit through CAHRAs.
  - Suppliers are linked to arms trade, terrorism financing, or sanctioned entities.
  - Source countries lack transparency or have poor ESG records.
  - Recyclable metals originate from dubious sources or non-accredited refineries.
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## 8. RISK MANAGEMENT

For identified risks:

- A Risk Management Plan is developed in collaboration with the supplier.
  - Reasonable efforts and measurable improvements must be demonstrated within 6 months.
  - Engagement is suspended if no sufficient improvement is shown.
  - Immediate and Prompt **termination** and reporting of clients or suppliers classified as **high risk** from the area of operations
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## 9. MONITORING OF TRANSACTIONS

All precious metal transactions are monitored for:

- Consistency with expected origin, weight, and documentation.
  - Verification against invoices, purchase orders, and KYC data.
  - Suspicious shipments are segregated and investigated.
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## 10. RECORD KEEPING

All KYC and due diligence records are retained for a minimum of **5 years** and are securely stored to ensure data integrity and confidentiality.

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## 11. TRAINING

Annual training programs are conducted for staff involved in sourcing, compliance, and operations. Topics include:

- Responsible sourcing standards
  - KYC practices
  - Risk identification
  - Legal and ethical obligations
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## 12. STAKEHOLDER ENGAGEMENT AND FEEDBACK

We collaborate with:

- Government bodies
- Civil society organizations
- International initiatives (e.g., EITI, Voluntary Principles on Security & Human Rights)

Feed back from internal and external stakeholders is welcomed and handled confidentially.

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## 13. ENFORCEMENT AND POLICY REVIEW

- Breaches of this policy may lead to disciplinary action or termination of business relationships.
  - The policy is reviewed **annually** or upon major regulatory changes.
  - Updates are approved by the Management and communicated to relevant parties.
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Signed:

Sercan Samet Onder

General Manager

Signature:

Peak International Trading Co LLC

18/07/2025



A handwritten signature in blue ink, appearing to be "Sercan Samet Onder".

Prepared By Vishnu Shaji

Designation : Compliance Officer

Signature:

Peak International Trading Co LLC

18/07/2025