

REVIEWER ASSURANCE REPORT



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**Reviewer's Assurance report for Reasonable Assurance review of EBC
Rules
on Risk Based Due Diligence in the Gold Supply Chain**

For

Company name: TITAN COMPANY LIMITED, Jewellery Division

**SITE(s): 29, SIPCOT INDUSTRIAL COMPLEX,
HOSUR - 635126, TN, INDIA**

AUDIT DATE(s): 8th to 12th December 2025

Reporting Period: 1st April 2024 to 31st March 2025



Independent Reasonable Assurance Report to TITAN COMPANY LIMITED, Jewellery Division on its Refiner's Compliance Report dtd: 01/10/25 for the Emirates Bullion committee rules for risk based due diligence in the Gold Supply Chain

To the Board of Directors of

Titan Company Limited- Jewellery division (TCL-JD)

1.The assurance scope and level of assurance:

We were engaged by Titan Company Limited- Jewellery division (TCL-JD) to provide Reasonable Assurance on its Refiner's Compliance Report for the period 1st April 2024 to 31st March 2025.

The assurance scope consists of the Refiner's Compliance Report dated: 01/10/25.

2. Management's Responsibilities

The Compliance Officer and the Senior Management of Titan Company Limited- Jewellery division (TCL-JD) is responsible for the preparation and presentation of the Refiner's Compliance Report in accordance with the Emirates Bullion Market Committee Rules for Risk Based Due Diligence in the Gold Supply Chain Version 1/2021

This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the directors/management as relevant for demonstrating compliance with the EBC Rules for RBD in the Gold Supply Chain are the activities described within the Refiner's Compliance Report and the Refiner's Supply Chain Policy.

3.Auditor's Responsibilities

Our responsibility is to carry out a Reasonable Assurance engagement in order to express a conclusion based on the refiner's activities described in the Refiner's Compliance Report. Within the scope of our engagement, we did not perform an audit on external sources of information or expert opinions, referred to in the Refiner's Compliance Report. Our assignment is limited to the historical information that is presented and does not cover future-oriented information.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board and the EBC Rules for RBD in the Gold Supply Chain / Review Protocol (ANNEX 2).

This report has been prepared for Titan Company Limited- Jewellery division (TCL-JD) for the purpose of assisting the compliance officer and the Senior Management in determining whether Refiner has complied with the EBC Rules for RBD in the Gold Supply Chain and for no other purpose. Our assurance report is made solely to Titan Company Limited- Jewelry division (TCL-JD) in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than Titan Company Limited- Jewelry division (TCL-JD) for our work, or for the conclusions we have reached in the assurance report.



4. Reasonable assurance procedures performed

We planned and performed our work to obtain all the evidence, information and explanations considered necessary in relation to the above scope. These procedures included:

- Enquiries of management to gain an understanding of refiner's processes and risk management protocols in place.
- Enquiries of relevant staff responsible for the preparation of the Report
- Site visits to the Refiner
- Assessing the suitability of the policies, procedures and internal controls that the Refiner has in place to conform to the EBC rules.
- Review of a selection of the supporting documentation, including gold supplier counterparty due diligence file and transaction's documentation
- Test a selection of the underlying processes and controls that support the information in the Report.
- Review of the presentation of the Report to ensure consistency with our findings.

5. Subject matter

This report covers the ***Titan Company Limited- Jewelry division (TCL-JD)*** general level of compliance with the "EBC Rules for Risk Based Due Diligence in the Gold Supply Chain" issued by Emirates Bullion Market Committee and in accordance with the EBC Review Protocol as described in your report as at ***01/10/25***

6. Any significant or inherent limitations or areas not covered:

Please list here any significant or inherent limitations or areas that have not been covered.

Non-financial information, such as that included in the Refiner's Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the Refiner and the methods used for determining such information. The methods used by Refiners to comply with the EBC Rules may differ. It is important to read the Titan Company Limited- Jewelry division (TCL-JD) Supply Chain Policy available on their website.

We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 and with EBC Rules for RBDG / Review Protocol (ANNEX 2).

Our work has been undertaken so that we report to the Titan Company Limited- Jewelry division (TCL-JD) *to the engagement* on those matters that we have agreed to state to them in this report. Our tests are related to Titan Company Limited- Jewelry division (TCL-JD) as a whole rather than performed to meet the needs of any particular customer.

Our report must not be recited or referred to in whole or in part in any other document nor made available, copied or recited to any other party, in any circumstances, without our express prior written permission.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Titan Company Limited- Jewelry division (TCL-JD) for our work, for this report or for the opinions we have formed.

7. Independence and competency statement

In conducting our engagement, we have complied with the applicable requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for



Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We confirm that we satisfy the criteria for assurance providers as set out in the Audit Guidance to carry out the assurance engagement.

8. Emphasis of matter - None

9. Assurance observations, findings, and recommendations for improvement:

The review procedures undertaken by us cover the following:

i. Review whether Titan Company Limited- Jewellery division (TCL-JD) has established robust sustainable supply chain management systems as detailed in and referring to Rule 1 of the EBC rules and fulfilling objectives of the review program as detailed in the EBC review protocol.

The Policy is well defined and robust, and the KYC requirements found adequate taking into consideration the application of Rule 1.1 to 1.19.

The Implementation of the SC and KYC policy and procedures were verified and found adequate in satisfying the requirements laid out under rule 1.1 to 1.19

ii. Review whether the Titan Company Limited- Jewellery division (TCL-JD) is able to identify and assess the risks in the supply chain as detailed in and referring to Rule 2 of the EBC Rules and fulfilling objectives of the review program as detailed in the EBC review protocol.

In respect of Rule 2, details as below verified:

(a) in relation to transactions: during 1/04/2024 to 31/03/2025

No Mine gold was sourced from AM/LSM during the assessment period, All the gold were of low risk and received from company's own showroom located across India, which are used Jewellery collected for exchange of new jewellery and return of jewellery from outlets.

(i) Number of transactions audited:

35 Samples of the Recycle Gold,

(ii) %age of transactions audited:

Approx. 5% of Sample representing an adequate coverage of transactions were picked from these and reviewed on a risk-based approach.

(iii) Number of customer onboarding (KYC) files reviewed: 25

(iv) total volume of Mined Gold and/or Recycled Gold in relation to the transactions audited
Transaction from supplies above 50Kgs were audited

(ii) the sampling rules or methods used:

Samples basis used to consider the high-volume transactions and high value Customers / suppliers including new suppliers.



(iv) the total volumes of cash transactions (if any) and its usage in excess of government thresholds as applicable in the Accredited Member's place of domicile:

No cash payment made as the gold collected at the stores is only against exchange for the purchase of new jewellery. Any cash paid for the excess amount is accepted only at the stores as per the Law not exceeding 2lakhs.

There are no cash transactions at the Refinery. Only through bank transfers.

Verified the transactions made against vouchers traceable to supply of gold and sale of gold Usage in excess of government thresholds as applicable in the Accredited Member's place of domicile was verified and found none.

Titan Company Limited- Jewellery division receives recycled Jewellery gold from their stores collected across India, refines it and deliver back to their Jewellery manufacturing. No Mined gold received during the year 2024-2025

(v) the total volumes of unrelated third-party payments (i.e. cash, bank transfers and metal accounts held with bullion banks) and physical gold and/or precious metal deliveries in unusual circumstances that are not consistent with local and/or international market practices (for example, value, quantity, quality, profit):

This was verified and found none.

(vi) adequacy and implementation of track and trace mechanism from mine/supplier to Sale and/or physical delivery to the Accredited Member's suppliers:

This was verified on the sampled transactions; they were found adequate and satisfactory.

(b) in relation to geographical considerations:

(i) Gold and/or precious metal sourced from different geographical locations based on Physical form; quantity; actual or declared purity; country of origin and transportation.

as described in the country of origin.

All the gold are received from the company stores across India which are collected from walk in customers in exchange for sale of new jewellery.

(ii) any transaction which is related to a sanctioned and/or embargoed country, entity, Or individual.

No, the gold for refinery is received through the direct customers from countries as listed in the COO, the documentation towards the supply was verified and was found adequate on the samples verified.

(c) in relation to risk assessment, the alignment of the risk assessment methodology with Rule 2 and any deviations from those requirements of Rule 2:

None. The risk assessment verified and found to be adequate

(d) the number of transactions and/or suppliers where enhanced due diligence was conducted during the period subject to Review:



There were no supplies received from Cahra or any form of ASM/LSM. All supplies during 2024-2025 are RC Gold and Fine gold, GD Bars. However detailed CDD has been done.

iii. Review whether the *Titan Company Limited- Jewellery division* has developed and implemented a risk mitigation and/or control plan as detailed in and referring to Rule 3 of the EBC Rules and fulfilling objectives of the review program as detailed in the EBC review protocol.

In respect of Rule 3, the adequacy and implementation of the Risk Control Plan was verified and found adequate.

iv. Reviewed whether the *Titan Company Limited- Jewellery division* is reporting annually on its measures implemented for responsible supply chain due diligence and that the measures being reported are consistent with the independent 3rd party audit review program findings as detailed in and referring to Rule 5 of the EBC Rules and fulfilling objectives of the review program as detailed in the EBC review protocol (Annex 2).

Titan Company Limited- Jewellery division has performed the Reasonable assurance review for the period 1st January to 31st December 2024 with Bureau Veritas as independent 3rd party reviewer and has reported the compliance report to the EBC.

Further the Reasonable assurance review for the period 1st January 2024 to 31st December 2024 has been conducted with Bureau Veritas as independent 3rd party reviewer and will be reporting the compliance report to the EBC annually and also make it available in their portal upon receipt of the report.

V. Reviewed the *Titan Company Limited- Jewellery division* activities related to conducting due diligence for adherence to EBC' s Review Protocol in Annex 2 and Policy as described in Rule 1.3. Anti-Money Laundering and Combating Financing of Terrorism Policy (as the minimum acceptable standard for AML/CFT due diligence policy).

Titan Company Limited- Jewellery division has established AML/CFT and a robust KYC due diligence Policy:

Titan Company Limited- Jewellery division Policy & procedure for Supply chain, Anti money Laundering and combating the financing of Terrorism policy and general procedures [supply chain risk identification & assessment].

The implementation of the same was verified and found to be adequate

Assurance observations:

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Recommendations for improvement

Role based specific training to be planned and provided. An Annual training calendar shall be established to plan and execute the same.

The tools for screening of counter parties and entity as part of KYC are presently done at the group level by different departments, establish a process to make the relevant information available to the compliance on a timely manner for the Compliance officer and the relevant employees under the supply chain.

This shall be reviewed and updated annually and as and when any changes.

The Periodic KYC verification done for the employees & Suppliers (Franchisee and Stores) engaged in the supply chain as identified during the OCG audit at stores and the periodic review of



KYC of Staff at Jewellery division shall be formally integrated into the records for KYC, within the Responsible sourcing system though these are available at different departments

The process of Record maintenance and retrieval in support of compliance shall be improved, as accessing this information is very time consuming and very difficult as the same is retained and managed by different departments.

10. Specific observations with respect to the Refiner’s Corrective Action Plan and implementation progress:

Please list here any specific observations with respect to the Refiner’s Corrective Action Plan and implementation progress.

None

11. Countries of Origin Annex for mined and recycled Precious Metal including the amounts (Gms) received from each origin

Please refer to 8. Annex Country of Origin Mined and Recycled gold.

12. Other relevant information

The organisation has implemented Quality, Environment, and Occupational Health & Safety management system as per ISO and is certified.

The material testing Lab is accredited to NABL, The jewellery plant is BIS hallmark that guarantees the purity and quality of precious metal jewellery through official stamps indicating the BIS logo, gold purity (karats/fineness like 22K916),

Conclusion

In our opinion, in all material respects:



- i. Based on the Reasonable assurance procedures performed as above, Titan Company Limited- Jewellery division Compliance Report for the period 1st April 2024 to 31st March 2025, in all material respects, fairly describes the activities undertaken during the year to demonstrate compliance, and management’s overall conclusion contained therein, is in accordance with the requirements of EBC Rules on Risk Based Due Diligence in the Gold Supply Chain .
- ii. The compliance controls that were tested, as set out in the attachment to this report, were operating with sufficient effectiveness for us to obtain Reasonable Assurance that the related level of compliance was achieved in the period 1st April 2024 to 31st March 2025.

ASSESSMENT CONCLUSIONS					
		Compliance Level		Non-Compliance – risk level	
	CATEGORY	Fully Compliant	Compliant with Low risk	Medium	High
A.	General Information – Overall rating		X		
B.	RULE 1. SUPPLY CHAIN MANAGEMENT SYSTEMS		X		



C.	RULE 2. SUPPLY CHAIN RISK IDENTIFICATION AND ASSESSMENT	X			
D.	RULE 3. RISK CONTROL PLAN	X			
E.	RULE 4. INDEPENDENT THIRD-PARTY AUDITS	X			
F.	RULE 5. ANNUAL REPORTING ON RESPONSIBLE SUPPLY CHAIN DUE DILIGENCE	X			

	Compliance level		Non-Compliance Risk level	
	Fully Compliant	Compliant with Low Risk	Medium	High
Based on the assessment conclusions, the overall rating of the Refiner's performance is determined to represent:				

<p>Bureau Veritas Location: Dubai</p> <div style="text-align: center; margin-top: 50px;">  Signature </div>	<p>Date: 31/12/2025</p> <div style="text-align: center; margin-top: 20px;">  Company Seal </div>
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Company Name:	Titan Company Limited Jewellery Division (Factory)
Address :	No.3, Sipcot Industrial Complex, Hosur 635126
Location:	Hosur, Tamil Nadu
Reporting year-end:	1 st April-2024 to 31 st March,2025
Date of Report	01 st October,2025
Senior management responsible for this report	Name : Ms. Sowmya Chandrasekar Title: Compliance Officer Contact details: 9892487923

Audit Team	
Team Leader:	Team Member:
Nitin Pandya	Ms. Sowmya Chandrasekar
	Mr. Sampath
	Mr. Baskaran M

[Refiner]'s evaluation

The following table lists the minimum requirements that must be satisfied by Refiners in accordance with the EBC Rules for

Risk Based Due Diligence in the Gold Supply Chain Version 1/2021 requirements to demonstrate compliance. Refiners should complete the table and provide reasons for their responses in the space provided.

Summarized conclusion

The Titan Factory has complied EBC Rules for Risk Based Due Diligence in the Gold Supply Chain Version 1/2021 requirements and self assessment compliance status is "Compliance with low risk deviation"

Evaluation

The refining facility is located at No.29, Sipcot Industrial Complex, Hosur, Tamil Nadu 635126, India is the physical boundary and covers all the gold purchase by the Titan company limited.

This does not include silver refining under EBC scope. Usually silver is recovered from the scrap Jewellery and production waste, which is not meant for sales and only use for internal purposes. That is the reason, silver is out of audit scope.

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Compliance Assessment Summary			
EBMC Rule	Title	Compliance Status	Remarks
Rule-1	Supply Chain Management Systems	Compliant with Low-Risk	Nil
Rule-2	Supply Chain Risk Identification & Assessment	Compliant with Low-Risk	Nil
Rule-3	Risk Control Plan	Fully compliant	Nil
Rule-4	Independent Third-Party Audit	Fully compliant	Nil
Rule-5	Annual Reporting on Responsible Supply Chain Due Diligence	Fully compliant	Nil

Rule 1: Supply chain managements systems.

1.1. Overriding Principle

Each Accredited Member conducting business in the supply chain relating to Mined Gold and/or Precious Metals and Recycled Gold and/or Precious Metals must implement and maintain systems and procedures which are sufficiently robust to conduct effective due diligence on the Accredited Member's supply chain. The complexity of the management system should depend on the volume of business, location, type of supplies processed, and complexity in the supply chain. Members should evaluate the objectives of their management system against performance to ensure attainment of the expected outcome in a periodic manner.

1.2. Supply Chain

Any reference to the "supply chain" or "suppliers" in these Rules shall include clients, suppliers, agents, intermediaries and any other relevant entities participating in supply of gold to the Accredited Member.

Any reference to an "ultimate beneficial owner (UBO)" shall mean any natural person holding 25% or more of the share capital in any corporate entity or in the case of a publicly listed company a notifiable ownership share under the rules of relevant exchange or holding a controlling ownership interest.

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Compliance statement:

Overriding Principle

Titan Company Limited – Jewelry Division has implemented and maintains a robust, risk-based supply chain due diligence management system covering mined and recycled gold and precious metals. The system is designed in alignment with Emirates Bullion Committee (EBC) requirements and is proportionate to the volume of business, geographic footprint, sourcing locations, material types, and overall complexity of the jewelry supply chain. It incorporates defined policies, supplier onboarding and KYC procedures, risk assessment and categorization, AML/CFT screening, traceability controls, and ongoing monitoring of suppliers. The effectiveness of the management system is periodically reviewed through internal controls, management oversight, and performance evaluation to ensure that due diligence objectives are achieved and that identified risks are appropriately mitigated in line with EBC expectations.

SUPPLY CHAIN

The company's gold supply chain is broadly categorized into two segments:

- **Upstream Supply Chain:** This includes procurement of bullion from reputable and regulated entities such as **Banks, Bullion Suppliers, and Refiners** who are compliant with national and international due diligence standards.
- **Reverse Supply Chain:** This encompasses the purchase of **scrap and old gold jewelry** directly from end consumers through Titan's **owned retail stores and franchised showrooms**, typically as part of exchange or buyback transactions.

Through these structured processes, Titan ensures full traceability, transparency, and compliance with ethical sourcing principles, preventing any association with high-risk or conflict-affected sources.

Demonstration of Compliance:

1.3 Policy and Process Implementation

Each Accredited Member must implement and maintain a robust documented policy and detailed processes (Policy) to include common principles, standards and processes for responsible supply chain management. The Policy should be consistent with the standard set forth in the model supply chain policy in Annex II of the OECD Guidance and should, as a minimum, include the following:

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- a. Scope
- b. Responsibilities
- c. Criteria for supply chain due diligence:
- d. Main elements of Know-Your-Customer (KYC) process
- e. Risk management
- f. Monitoring and surveillance:
- g. Training:

Reference Document: Supply Chain Policy – Titan/Supply Chain/Pol/01, Version 01, Dated: 01/07/2025

Titan Company Limited has formally implemented its **Supply Chain Policy**, developed in accordance with the **EBMC Rules Version 1/2021** and aligned with global best practices for responsible and ethical gold sourcing.

The **Supply Chain Policy** has been published on the company's official website <https://www.titancompany.in/investors/policies> to ensure transparency and accessibility for all relevant stakeholders, including supply chain partners, regulated refiners, and other interested parties.

The policy is reviewed by the **Compliance Officer** or earlier if necessitated by regulatory updates, operational changes, or risk findings. It clearly defines the **scope of the gold supply chain**, covering both upstream and reverse supply channels.

The document outlines the **roles and responsibilities** of key personnel, including the **Compliance Officer, Supply Chain Officer, and Bullion Compliance Team**, ensuring accountability for ethical sourcing practices.

Additionally, the policy establishes the framework for **risk assessment, due diligence, and monitoring mechanisms** to identify and mitigate

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	<p>potential ethical, legal, or reputational risks within the supply chain. It also specifies the training frequency and competency requirements for compliance and operational staff involved in responsible sourcing and supply chain oversight (Titan supply chain POL/01 & 02)</p> <p>Through this structured implementation, Titan reinforces its commitment to maintaining integrity, transparency, and accountability in its gold supply chain operations.</p> <p>As a principle decision Titan Company does not deal in mined gold directly and purchased bullion bars from the LBMA/ DGD approved refineries only.</p>
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1.4. Minimum KYC Requirements

For the purposes of these Rules for RBDG, the standards of KYC requirements set out in the Applicable Laws and Regulations shall be considered as the minimum KYC standards (Minimum KYC Standards) to be achieved by the Accredited Members

Titan Company Limited operates under the regulatory framework of the **Prevention of Money Laundering Act (PMLA), 2002**, and has fully adopted the **Know Your Customer (KYC)** procedures in alignment with both **PMLA requirements** and the **Emirates Bullion Market Committee (EBMC) Rules**.

The company has established **minimum KYC criteria** applicable to all categories of supply chain partners, including **Banks, Bullion Suppliers, Franchise Partners, and End Consumers**. These standards ensure the identification, verification, and ongoing monitoring of all counterparties based on their respective risk profiles.

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Titan ensures that **KYC and Ultimate Beneficial Ownership (UBO)** information is reviewed at **defined intervals**, and the **risk classification** of each counterparty is updated **annually or as warranted by material changes** in their profile or ownership.

A structured **Re-KYC protocol** is implemented, with frequency determined by the assessed risk level of the partner. All KYC and Re-KYC records are securely maintained and readily available for audit or regulatory review.

Reference Document: *KYC Procedure – Titan/Supply Chain/Pol/02, Version 01, Dated: 01/07/2025*

1.5. Rule 1.5 Implementation of KYC Systems and Processes

Each Accredited Member shall ensure that its Policy and the implementation of its Policy shall fully satisfy the Minimum KYC Standards and any other KYC requirements set out in these Rules for RBDG..:

As part of its due diligence framework, **Titan Company Limited** ensures the **identification and verification of the Ultimate Beneficial Owners (UBOs)** of all supplier entities. During the KYC review process, details of each UBO holding **25% or more ownership or control** are mandatorily obtained and documented in accordance with **PMLA guidelines** and **EBMC Rule requirements**.

Titan Company mainly deals with RBI approved Bullion Banks, who are regulated by RBI. This considering the compliance framework as Nationalized bank, certain KYC compliance Relaxations has been provided such as KYC of Directors etc. (As no individual UBO and all directors as per Banking rules and SEBI regulations only). However details of executive board of directors etc is checked and records are maintained.

The company conducts **PMLA screening** for each bullion supplier and its qualifying UBOs to assess ownership transparency and potential compliance risks. For suppliers assessed as **Medium or High Risk** during the KYC risk evaluation, **Enhanced Due Diligence (EDD)** is implemented.

The EDD process includes a comprehensive review of **financial and legal structures**, along with verification of **income tax filings, financial compliance records, and source of funds** to ensure legitimacy and regulatory adherence. Findings from these assessments are duly recorded, and suppliers' compliance statuses are updated in the company's internal due diligence database.

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1.6 Specific KYC Requirements

Each Accredited Member shall ensure that its Policy and the implementation of its Policy shall be adequate and shall be completed before commencing the first transaction and identify:

-
- (a) each supplier's including
 - i. financial structures;
 - ii. legal and operating structure;
 - iii. UBO(s)
- (b) each supplier's suppliers (where applicable)
 -
 - iv. financial structures;
 - v. legal and operating structure; and
 - vi. UBO(s)
- For gold sourced from ASM, each Accredited Member shall ensure that its Policy and the implementation of its Policy shall be adequate to identify:
 - (a) ASM supplies originating from non-Conflict-Affected or High-Risk Areas identifying and the area from where the supply originated with, at least, the following information:
 - (i) KYC on the immediate counterparty;
 - (ii) the export license/permit for the aggregator who exports the supply;
 - (iii) proof of the supply being legally exported from the origin country with appropriate weight, purity and adequate tax/royalty being paid; and
 - (iv) the mine location.
 - (b) the origin of each ASM's supply
 - (i) to the extent possible, each ASM's legal and operating structure conforming to the applicable legal framework (where it exists) as well as their engagement in opportunities for formalization as they become available; and
 - (c) the origin of each ASM's supply from Conflict-Affected or High-Risk Areas
 - (i) each ASM's legal and operating structure conforming to the applicable legal framework as well as their engagement in opportunities for formalization as they become available; and
 - (ii) each ASM's third party service provider(s) (i.e. logistics, processors, transportation, intermediaries, security, etc.) UBO(s) for ASM located in Conflict Affected or High-Risk Areas.

Titan Company Limited has established **specific Know Your Customer (KYC) requirements** for each category of its gold supply chain partners to ensure compliance with **EBMC due diligence standards** and the **Prevention of Money Laundering Act (PMLA), 2002**.

The company's gold supply chain is structured into two primary categories:

1. **Bullion Supply Chain** – Procurement from regulated upstream partners such as **Banks, Bullion Suppliers, and Refiners**.
2. **Reverse Supply Chain** – Purchase of **scrap or used jewelry** from end consumers through Titan's **owned retail stores and franchise outlets**, typically in exchange for new jewelry purchases.

For each supply chain category, **minimum KYC documentation requirements** have been defined and implemented. These include:

- Verification of the **legal entity's identity and registration documents**.
- Collection and verification of **Ultimate Beneficial Ownership (UBO)** details

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	<p>for all individuals holding 25% or more ownership/control.</p> <ul style="list-style-type: none">• PMLA-based screening of the entity and its UBOs against relevant sanction and watchlists. <p>All KYC documentation is collected, verified, and securely maintained by the company's Compliance Team, which ensures periodic reviews and updates as per the defined risk-based re-KYC schedule.</p> <p>For bullion suppliers, Titan sources only from LBMA-accredited or Dubai Good Delivery (DGD) approved refiners through regulated banking and bullion trading channels. Since these bullion bars are directly supplied to Titan's jewelry manufacturing contractors or occasionally traded in the bullion market/MCX, and not processed at Titan's EBMC-approved refinery, the company obtains and review the sub-suppliers (refiner's compliance and certification status) status as part of its due diligence. No KYC data collected for sub-suppliers that is regulated refineries and its compliance status is monitored on ongoing basis.</p> <p>In the reverse supply chain, every transaction involving the purchase of scrap or used jewelry from retail consumers is subject to mandatory KYC verification. The</p>
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	<p>following documents are obtained prior to acceptance of the gold:</p> <ul style="list-style-type: none"> • Photo identification proof and Permanent Account Number (PAN) (as per Indian Income Tax regulations). • A signed customer consent form confirming the source and ownership of the gold, declaring it as used jewelry or inherited (“grandfather”) gold. • Detailed TEP & GEP procedure followed by each retain entity during exchange of gold with end consumer and basic KYC is obtained for end consumer as specified in the above said procedures, <p>Titan Company Limited does not engage in the purchase or processing of Dore bars or mined gold. Accordingly, the company’s supply chain has no exposure to Artisanal and Small-Scale Mining (ASM), Medium-Scale, or Large-Scale Mining sources, thereby minimizing risks associated with conflict-affected or high-risk mining operations.</p>
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<p>Rule 1.7 Record Keeping and Updating of Information</p>	
<p>Each Accredited Member shall keep records of, and continually on an ongoing basis update, the following information:</p>	
<p>(a)for every supplier or ultimate beneficial owner that is a natural person, his/her:</p> <ul style="list-style-type: none"> (i) full name (as shown on a national identity card or passport); (ii) nationality; (iii) place of residence and original domicile 	<p>Titan Company Limited has established a robust record-keeping and information management system to ensure the integrity, completeness, and traceability of all</p>

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(iv) employer details (if any)
 (v) a complete and an accurate copy of a valid identity card or passport; copy should be certified
 (b) for every supplier or ultimate beneficial owner of a supplier that is a corporate entity:
 (i) its legal status and category of entity;
 (ii) its full name;
 (iii) its domicile or country of registration;
 (iv) a description of its principal business activities;
 (v) the address of its registered office and principal place of business (if different);
 (vi) the KYC requirements of each legally authorised representative that is a natural person (in accordance with (a) above);
 (vii) a copy of the instrument(s) authorising each of its legally authorised representatives;
 (viii) the KYC requirements of each ultimate beneficial owner (in accordance with (a) above for natural persons and in accordance with this (b) for corporate entities); except for government entities and publicly listed companies for which such information is publicly available;
 (ix) a copy of its constitutional documents;
 (x) a copy of its valid commercial or professional licence or registration.

due diligence documentation in line with the requirements of **EBC Rule 1.7**.

The company maintains **comprehensive KYC records** for each supplier, including the **legal entity, Ultimate Beneficial Owners (UBOs)**, and relevant **authorized representatives**. All KYC data is systematically recorded, indexed, and stored in secure physical and digital copies are maintained.

Each supplier record includes:

- Verified KYC documents of the entity and its UBOs (e.g., incorporation certificates, licenses, passports, driving licenses, and identification cards).
- Details of **UBO shareholding percentages** and **control structure**.
- **PMLA screening records**, including results from sanctions and adverse media checks.
- Lists of **authorized personnel** permitted to sign or acknowledge official documents and receive consignments on behalf of the entity.

Titan has implemented an **active monitoring process** to track the **validity and expiry** of key documents such as business licenses, agreements, and identity

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	<p>proofs. The compliance team ensures timely renewal and replacement of expired records through systematic follow-ups with suppliers.</p> <p>All KYC and due diligence records are retained for a minimum of five (5) years, as stipulated under EBMC Rules, and may be preserved for a longer duration where required under Income Tax regulations or for business continuity and audit purposes.</p> <p>This structured record management framework ensures that Titan maintains complete, current, and verifiable documentation, enabling effective regulatory compliance, traceability, and risk management across its gold supply chain.</p>
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<p>Rule 1.8 KYC Requirements for Politically Exposed Persons</p>	
<p>If a supplier or any UBO of a supplier is considered to be a politically exposed person (PEP), each Accredited Member must document and follow specific internal escalation procedures to ensure that the matter is addressed at the appropriate internal authority level and dealt with in accordance with the Minimum KYC Standards.</p> <p>In addition to meeting the Minimum KYC Standards, each Accredited Member must establish the source of wealth of PEPs and their families and associated persons and are required to implement adequate transaction monitoring systems for the transactions of PEPs, as further described in the Applicable Laws and Regulations</p>	<p>PEP Identification and Management</p> <p>a. Procurement from Banks (Approx. 65% of Total Gold Supply):</p> <ul style="list-style-type: none"> • Titan sources the majority of its gold from Indian government-recognized banks, which are publicly listed financial institutions regulated by the Reserve Bank of India (RBI). SEBI registered public limited banks.

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- These banks operate under **strict governance and compliance frameworks**, where the ownership structure is institutional, and no individual Ultimate Beneficial Owners (UBOs) exist.
- Banks' boards and key executives are **elected or nominated** through transparent and regulated processes, minimizing the risk of undisclosed PEP involvement.
- Titan's compliance team reviews the **list of current executive directors** and key officials, which are publicly available on the respective banks' official websites, and conducts **independent PEP screening** through both **internal databases** and **external compliance platforms** (e.g., regulatory watchlists, sanction lists).
- No PEP association or risk has been identified with

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any banking counterparty to date.

b. Procurement from Bullion Suppliers (Approx. 2% of Total Gold Supply):

- For all bullion suppliers and refiners, Titan collects and verifies KYC documentation, including signed declarations on PEP status as part of the onboarding process.
- Each supplier is required to submit a periodically updated declaration confirming that neither the entity, its UBOs, nor its directors are PEPs.
- In cases where indirect or potential PEP exposure is indicated, Titan initiates Enhanced Due Diligence (EDD) measures in line with internal policy

Enhanced Due Diligence (EDD) Procedure for Identified PEPs

Titan has defined a formalized procedure to address situations where a counterparty, UBO, or associated person is identified as a PEP. The following measures are undertaken:

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	<p>1. Escalation, 2. Verification, 3. Risk Assessment, 4. Senior Management Approval & 5. Enhanced Monitoring:</p> <ul style="list-style-type: none"> • All KYC and PEP verification records are maintained in digital and physical form, ensuring audit readiness and traceability. • Periodic reviews and updates are conducted at least once annually or upon any significant change in supplier ownership or management. • Compliance findings are reported during internal compliance reviews (once in six month) and reported to senior management.
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Rule 1.9 Appointment of a Dedicated Supply Chain Officer	
<p>Each Accredited Member must appoint a person to carry out the role of a dedicated compliance or risk officer (Supply Chain Officer). The Supply Chain Officer must:</p> <p>(a) be a senior member of staff of the Accredited Member;</p> <p>(b) have the necessary competence, knowledge, experience and training in supply chain due diligence and KYC processes;</p> <p>(c) be provided with all resources necessary to perform his/her functions and role in accordance with these Rules for RBDG; and</p> <p>(d) be able to communicate critical information to senior management, staff and suppliers.</p>	<p>Titan Company Limited operates as a responsible gold supply chain participant, committed to the ethical sourcing of recycled gold. The company's compliance structure is designed to ensure adherence to national laws, international standards, and the EBMC's risk-based due diligence framework.</p> <p>Titan's governance model integrates Supply Chain Management, Compliance, and Internal Audit functions to provide transparency and accountability across the gold sourcing and trading process.</p>

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Appointment of Compliance Officers and Bullion Committee

a. Appointment of Compliance Officer:

Titan has formally appointed a **Compliance Officer** responsible for implementing and supervising all compliance-related activities under the EBMC and other regulatory frameworks.

The Compliance Officer possesses extensive knowledge of **KYC/AML regulations, ethical sourcing standards, and international bullion market compliance practices.**

This appointment has been formally approved by senior management and documented in the company's internal governance charter.

b. Appointment of Supply Chain Officer

A Supply Chain Officer has been appointed to ensure operational control, supplier due diligence, and risk management across the gold procurement and transaction chain. The officer coordinates between procurement teams, compliance functions, and suppliers to ensure continuous conformance with DGD and OECD regulations for procurement of bullion bars and recycled gold

c. Formation of Bullion Compliance Committee:

Titan has constituted a Bullion Compliance Committee (BCC) consisting of members from Bullion

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	<p>procurements who looks after supplier onboarding, reviewing red flags, and endorsing enhanced due diligence (EDD) cases.</p>
<p>Rule 1.10 Functions and Duties of the Supply Chain Officer</p>	
<p>The Supply Chain Officer shall: (a) review and sign off on each gold and/or precious metals supply chain due diligence exercise; (b) continually monitor and assess the Accredited Member's supply chain due diligence processes; (c) ensure that the Policy and each associated due diligence exercise carried out by an Accredited Member are adequate for the purposes of these Rules for RBDG; (d) train staff and promote awareness within the Accredited Member's organisation with respect to responsible supply chain due diligence, the Accredited Member's Policy, KYC requirements and applicable laws; and (e) update the Policy and related processes as and when required.</p>	<p>Titan Company Limited – has appointed the compliance officer, supply chain officer and bullion compliance committee has been formed and detailed roles and responsibilities have been documents and communications through training, awareness and circulation of roles and responsibilities to the concern persons. Internal and external trainings has been provided and trainings are found effective.</p>
<p>Rule 1.11 Appointment of a Compliance officer</p>	
<p>Each Accredited Member may be required to appoint a "compliance officer" (Compliance Officer) to carry out the functions of such role as set out in the Applicable Laws and Regulations. For the purposes of these Rules, the Compliance Officer may be the same person as the Supply Chain Officer</p>	<p>The Company has formally appointed both a Compliance Officer and a Supply Chain Officer in line with Applicable Laws and EBC Rules. Their roles, responsibilities, authority, and reporting lines are clearly defined and documented within the Supply Chain Policy, with provision that the functions may be performed independently or, where applicable, in a coordinated manner to ensure effective compliance and supply chain due diligence.</p>

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Rule 1.12 Functions and Duties of the Compliance officer	
Each Accredited Member shall ensure that its Compliance Officer is familiar with and carries out its role and function in accordance with the requirements of the applicable laws and regulations.	Titan Company Limited ensures that the appointed Compliance Officer is adequately trained, familiar with, and performs all functions in accordance with applicable laws, regulations, and EBC requirements. The roles, responsibilities, and functional duties of the Compliance Officer are formally defined and documented in <i>Titan/Supply Chain/Pol/01, Version 01, dated 01/07/2025</i> , and are implemented and reviewed to ensure effective compliance oversight.

Rule 1.13 Records of Internal Inventory and Transactional Documentation	
<p>Each Accredited Member must develop internal documentation and records of supply chain due diligence to cover internal inventory and transactional documentation which shall include:</p> <p>(a) details of physical form, type (i.e. Mined Gold and/or Recycled Gold) and physical description of gold including any imprints and/or hallmarks;</p> <p>(b) details of weight and purity of gold and/ after proper internal verification and/or third party verification; through assaying (X-Ray / Fire / Wet).It is encouraged that facilities used by third-parties be certified by international certification bodies/ standards (e.g., ISO, etc)</p> <p>(c) full KYC due diligence of all suppliers including their due diligence practices, e.g. information on suppliers' due diligence process and KYC requirements. Accredited Members shall encourage their suppliers to, adopt processes and policies similar to the Policy and the Minimum KYC Standards;</p> <p>(d) the unique reference number of each entry/input and exit/output;</p> <p>(e) the name, stamp and logo of the refiner/producer/manufacturer (if applicable);</p> <p>(f) the year of refining/production (if applicable);</p> <p>(g) the dates of applicable purchases and sales including financial transaction information (such as payment amount, currency, mode of payment, etc);</p> <p>(h) an inventory list classified as per supplier;</p> <p>(i) a "Track and Trace" mechanism for tracing products back to purchased material, which shall includewhere applicable:</p> <p>(i) shipping/transportation documents;</p> <p>(ii) sales documents with specific lot numbers;</p>	<p>Titan Company Limited is a responsible participant in the gold supply chain, maintaining full transparency and documentation across its bullion procurement, refining, and jewellery manufacturing operations. The company's record-keeping system encompasses not only gold received for refining but the entire procurement process—covering both bullion bars for internal consumption and scrap gold received for refining and reuse.</p> <p>This holistic approach ensures end-to-end traceability, integrity of material flow, and compliance with EBMC's record-keeping and auditability standards.</p> <p>Records and Inventory Management</p> <p>A. Bullion Bars Procured for Jewelry Manufacturing</p>

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- (iii) mining licence(s) and related permissions;
- (iv) proof of payment of all dues in the producing country (royalties/export taxes)
- (v) import/export licence(s) and form(s);
- (vi) reconciliation of documentation.

Accredited Members shall avoid, where practicable, cash purchases and ensure that all unavoidable cash purchases of minerals are supported by verifiable documentation and preferably routed through official banking channels. Cash purchases shall, in any event, be made in compliance with Applicable Laws and Regulations.

All bullion bars received at Titan Company Limited are 100 % sourced **from LBMA or DGD-approved refiners** only.

The **authenticity and compliance status** of each refiner is verified through its **current LBMA/DGD compliance certification** prior to procurement.

Each supply of bullion bar is accompanied by:

- A **refiner's purity certificate** and **bar serial number**,
- Cross-verification of **bar number and certificate details** against Titan's goods-received notes and purchase orders.

Only verified and documented bars are released to Titan's manufacturing facilities for further processing into jewelry (Both for inhouse and contract manufacturing of gold jeweller)

All records—including supplier invoices, bar certificates, assay reports, and internal transfer notes—are retained in Titan's ERP-based inventory management system, ensuring traceability and audit readiness.

B. Scrap Gold Received for Refining and Reuse

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Scrap gold enters Titan's system through two channels:

1. TEP (Titan Exchange Product):
Consumers exchanging old Titan jewelry for new pieces.

2. GEP (Gold Exchange Program):
Scrap or used jewelry received from other manufacturers or market sources sold by consumer under exchange of new jeweler purchase.

Each channel follows a defined and documented verification process.

Retail-Level Controls for Scrap Gold (TEP / GEP)

At the **retail store level**, the following steps are undertaken before accepting gold for exchange or refining:

- **KYC of the Consumer:** Full identification of the individual as per company KYC procedure for retail consumers.
- **Signed Consent Form:** Customer confirming that gold is owned by customer and it is sold at his/her discretion and in compliance with applicable laws and regulations.
- **Photograph of Jewelry:** Taken and attached with the exchange record.

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- **Old Gold Purchase Invoice issued by original seller of old gold titan/others to consumer:** Collected (where available) and maintained as part of transaction records.

These measures ensure that the origin of received gold is transparent, traceable, and compliant with responsible sourcing standards.

Titan Store-Level Verification Before Refining (Hosur Factory)

Before transferring the collected gold to refining, Titan stores perform the following verification and documentation steps:

- **Weight & Purity Check:** Each item is weighed and tested for purity.
- **TEP Quality Assurance (QA):** QA confirmation of metal authenticity.
- **Assay Lab Verification:** Purity validation through an internal assay laboratory.
- **Aggregation of Day Stock:** Daily consolidation of received gold by category (TEP / GEP).
- **Metal Reconciliation:** Day-end reconciliation between physical stock, system records and metal

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	<p>receipt in store before dispatch to the refinery.</p> <ul style="list-style-type: none"> • Segregated Transfer Records: Separate documentation and transfer memos for TEP and GEP metal lots to maintain traceability of origin. <p>Inventory & Transaction Record System</p> <p>Titan employs an integrated ERP system that captures and tracks each transaction from scrap procurement through processing to internal refinery. All records are maintained for a minimum of 5 years or as mandated by applicable regulations.</p> <p>Monitoring and Review</p> <p>The Bullion Compliance Committee, along with the Quality Assurance team, regularly conducts internal audits to ensure compliance across both bullion and retail supply chains.</p>
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<p>Rule 1.14 Record Keeping</p>	
<p>Each Accredited Member must keep relevant records, files, documents, papers, communications and forms related to its compliance with these Rules for RBDG and its KYC obligations for at least five (5) years from the latest of:</p> <p>(a) the date of the most recent transaction in respect of the latest material intake from a supplier;</p> <p>(b) the date of conclusion of a complete inspection by an EBC approved reviewer;</p> <p>(c) the date of closing of the account of the supplier or termination of the relationship with the supplier; and</p>	<p>Titan Company Limited operates as a responsible participant in the gold supply chain, ensuring complete traceability, transparency, and compliance with all due diligence and documentation requirements. The company recognizes</p>

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(d) date of closing of an investigation on a particular transaction or supplier.

Each Accredited Member is advised to keep relevant records, files, documents, papers, communications and forms related to relations with potential suppliers that were not entered into or progressed due to a high-risk evaluation by the Accredited Member, for at least two (2) years from the date the decision was taken not to enter into or progress the relationship.

record keeping as a critical component of its internal control and compliance framework and has implemented robust systems to manage and preserve documentation in line with EBMC and local statutory requirements.

Record-Keeping Policy and Scope

Titan Company Limited maintains all relevant records and supporting documents for a minimum period of **five (5) years**, or longer where mandated by Indian laws and tax regulations.

The records include but are not limited to:

- **Supplier and Customer KYC Files** (including KYC Documents, ownership structure, and risk classification)
- **Bullion Purchase and Refining Records** (invoices, bar certificates, assay reports, transfer memos)
- **Scrap Gold Receipts and Transaction Records** (TEP / GEP programs, consumer declarations, and consent forms) purchase involved & consumer old gold invoice(where available)
- **Compliance Review Reports, Risk Assessments, and Internal Audit Findings**

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- **Training and Awareness Records for Compliance and Supply-Chain Teams**
- **Correspondence and Approvals Related to Enhanced Due Diligence (EDD)**

All records are maintained in accordance with EBMC requirements and applicable **local data-retention and record-keeping laws.**

Titan Company Limited is a responsible gold supply chain participant committed to maintaining a **conflict-free and ethically sourced supply chain.** The company adheres to the principles of transparency, accountability, and continuous improvement in its supplier relationships in accordance with EBMC and OECD guidance.

Titan works closely with all its gold suppliers—including LBMA/DGD-accredited bullion suppliers and scrap gold sources—to ensure full compliance with regulatory and ethical sourcing obligations.

Rule 1.15 Enhanced Relationships with Suppliers

Each Accredited Member must continually attempt to enhance communications and relationships with each of its suppliers and encourage each supplier to commit to a supply chain policy consistent with the Rules for RBDG and Annex II of the OECD Guidance. This can be achieved through the following means:

- Basic KYC Procedure followed**
- Procurement from Banks (Approx. 65% of Total Gold Supply):**

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(a) maintaining adequate KYC due diligence processes for suppliers in accordance with these Rules for RBDG, and reviewing suppliers' own due diligence practices
 (b) establishing long-term relationships with each supplier;
 (c) sharing with each supplier the Rules for RBDG and the Accredited Member's obligations under the Rules for RBDG;
 (d) communicating expectations that each supplier commits to the compliance and undertakes mineral supply chain due diligence and risk management consistent with the Rules for RBDG and Annex II of the OECD Guidance including managing environment and social risks in their operations;
 (e) incorporating the provisions of the Rules for RBDG and audit and monitoring rights into contracts and/or agreements and KYC forms with each supplier; and
 (f) considering ways to support and build capabilities of suppliers to ensure compliance with the Accredited Member's Policy and the Rules for RBDG.

- Titan sources the majority of its gold from **Indian government-recognized banks**, which are **publicly listed financial institutions** regulated by the **Reserve Bank of India (RBI)**. SEBI registered public limited banks.
- These banks operate under **strict governance and compliance frameworks**, where the ownership structure is institutional, and no individual Ultimate Beneficial Owners (UBOs) exist.
- Banks' boards and key executives are **elected or nominated** through transparent and regulated processes, minimizing the risk of undisclosed PEP involvement.
- Titan's compliance team reviews the list of current executive directors and key officials, which are publicly available on the respective banks' official websites, and conducts independent PEP screening through both internal databases and external compliance platforms (e.g., regulatory watchlists, sanction lists).
- No PEP association or risk has been identified with any banking counterparty to date.

b. Procurement from Bullion Suppliers (Approx. 2% of Total Gold Supply):

- For all bullion suppliers and refiners, Titan collects and verifies KYC

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	<p>documentation, including signed declarations on PEP status as part of the onboarding process.</p> <ul style="list-style-type: none"> • Each supplier is required to submit a periodically updated declaration confirming that neither the entity, its UBOs, nor its directors are PEPs. • In cases where indirect or potential PEP exposure is indicated, Titan initiates Enhanced Due Diligence (EDD) measures in line with internal policy <p>C. Procurement of Scrap from Retail own units and Franchise (Approx 37 %)</p> <ul style="list-style-type: none"> • For all won and retail franchises KYC documents are obtained and necessary screening record are maintained. • Each supplier is required to submit a periodically updated declaration confirming that neither the entity, its UBOs, nor its directors are PEPs. • In cases where indirect or potential PEP exposure is indicated, Titan initiates Enhanced Due Diligence (EDD) measures in line with internal policy <p>To promote responsible business conduct and strengthen supplier relationships, Titan Company Limited has implemented a structured Supplier Awareness and</p>
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Engagement Program as part of its ongoing compliance framework.

The following key initiatives are undertaken to enhance supplier relationships and awareness:

- **Awareness Communication:**
Regular emails and communication are sent to suppliers explaining Titan's expectations under the **Emirates Bullion Market Committee (EBMC)** and **OECD Due Diligence Guidance** requirements.
- **Ethical Sourcing Policy Publication :**
Company has published policy on the company website.
- **Supplier Training & Capacity Building:**
This activity will be carried out on annual basis.
- **Targeted Supplier Engagement:**
Suppliers whose performance is rated as **medium risk**—based either on **KYC risk rating** or **OECD risk category**—are subject to additional engagement. This includes direct communication, clarification of compliance gaps, and the provision of advisory support to achieve compliance.

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Rule 1.16 Uncooperative Suppliers

If any Accredited Member reasonably concludes that a supplier is not providing a sufficient degree of cooperation to enable it to carry out its obligations under the Rules for RBDG (Uncooperative Supplier), the Accredited Member is recommended to seek disengagement from such supplier and is required to:

(a) document the Accredited Member's efforts in accordance with these Rules (including Rule 1.15);

(b) report the matter to the Executive Office of the EBC, upon request by the Executive Office of the EBC; and

(c) details of such disengagement of suppliers should be included in the management report by the EBC approved reviewer.

Communication and Clarification:

- The compliance team identifies areas of concern and formally communicates them to the supplier.
- Adequate time and support are provided for the supplier to address the gaps and implement corrective actions.

Enhanced Monitoring and Warning:

- If the supplier's response or corrective actions are insufficient, Titan may issue a final warning and temporarily suspend supplies.
- Additional monitoring and verification may be conducted during this period.

Disengagement and Termination:

- If the supplier fails to cooperate or continues non-compliance after reasonable follow-up, Titan will initiate disengagement procedures and delist the supplier from its approved vendor list.

Corrective and Preventive Action (CAPA):

- Titan has documented various red flag scenarios and corresponding CAPA measures in its Supply Chain

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	<p>Policy (Ref: Titan/Supply Chain/Pol/01).</p> <ul style="list-style-type: none"> Each red flag case requires supplier acknowledgment, corrective action within a specified timeline, and verification before reinstatement. <p>Note: During the year all 7 suppliers were cooperative and no case of noncooperation has been reported . 2)One EDD was performed based on OECD Risk assessment and necessary CAPA records are maintained.</p>
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Rule 1.17 Security Requirements
Each Policy must include adequate security requirements to ensure compliance with these Rules for RBDG, in particular, in relation to material sourced from LSM or ASM mining companies. These requirements must include the following:

<p>(a) using identifiable sealed security boxes for each shipment to avoid any tampering or removal of content;</p> <p>(b) physically segregating different shipments until verification is adequately completed and confirmed in accordance with Rule 1.13;</p> <p>(c) reporting any inconsistencies to senior management, the Supply Chain Officer and/or the Compliance officers (as appropriate);</p> <p>In addition to the above points, each policy may include any or all of the following:</p> <p>(a) regarding any supplier with whom problematic issues recur as an Uncooperative Supplier in accordance with these Rules for RBDG;</p> <p>(b) ensuring that any assessor of a shipment is independent from any conflict of interest.</p> <p>(c) if applicable, verify a supplier's participation in the Extractive Industry Transparency Initiative (EITI).</p>	<p>Titan Company Limited operates as a responsible participant in the gold supply chain, adhering to the Emirates Bullion Market Committee (EBMC) standards for secure handling and traceability of precious metals. The company ensures that all gold movements — from procurement to in-store processing — are executed under stringent security protocols and monitored by authorized personnel and trusted logistics partners.</p> <p>Titan's operations primarily involve the procurement of refined bullion bars and recycled gold. The company does not engage in purchasing or importing</p>
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gold doré bars, and therefore, supply chain security risks associated with **ASM (Artisanal and Small-Scale Mining), aggregators, exporters, or customs clearing chains** do not apply to its operations.

Security Management Framework

Titan Company Limited has established a **comprehensive security management framework** designed to prevent any unauthorized access, theft, or tampering across all stages of gold handling and logistics.

Key features of Titan's security framework include:

- **Use of Certified Logistics Partners:**

All gold movement activities are handled exclusively through reputed, professional logistics service providers such as **Sequel, and other approved secure logistics partners**, each of whom are specialized in the transportation of high-value goods.

- **Controlled Handover and Documentation:**

Each transfer of gold is documented with a **chain-of-custody record**, including weight, purity, bar numbers, and serial identification details. Handover acknowledgments and

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	<p>secure delivery confirmations are maintained within Titan's ERP system.</p> <ul style="list-style-type: none">• Quality Assurance and Authenticity Verification: Upon receipt of bullion bars or refined metal, Titan's factory store and quality teams conduct authenticity and quality assurance tests, including:<ul style="list-style-type: none">• Visual inspection of bar numbers and refiner certificates• Purity verification using assay or XRF testing• Cross-verification with supplier documentation and purchase orders• Security of Storage Locations: Gold and jewelry stock are stored in vaulted, access-controlled facilities monitored by CCTV, electronic locks, and internal audit mechanisms. Only authorized personnel have access, as per Titan's internal security policy.
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Rule 1.18 Cooperation with law enforcement agencies
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Each Accredited Member must cooperate fully and transparently at all times with law enforcement agencies and customs officials (Officials) regarding gold transactions. Each Accredited Member must provide any necessary access to information required by Officials, regarding shipments that cross international borders, or shipments to which an Official has jurisdiction, in compliance with applicable laws.

Titan Company Limited operates as a responsible and compliant participant in the gold supply chain, upholding the **highest standards of integrity, transparency, and legal compliance.**

The company recognizes its responsibility to fully cooperate with **law enforcement agencies, regulators, and oversight authorities** to prevent illegal activities such as money laundering, terrorism financing, smuggling, or trade in conflict gold.

Titan's compliance philosophy is grounded in ethical business conduct, proactive engagement with authorities, and continuous monitoring of supply chain integrity.

Rule 1.19 Training of staff and KYC

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<p>Each Accredited Member must perform a KYC check on its relevant staff for example the compliance/supply chain officer, members of operations directly involved in the intake of material etc. during the staff on-boarding process and thereafter an update, on an on-going basis, at least every twelve months. Such KYC checks shall include checking an employee's full name, date and place of birth, nationality, residence, contact details, previous activities and occupations, copy of identity document and searches on sanctions list.</p> <p>Each Accredited Member must implement a training programme (Training Programme) for all persons involved in the responsible supply chain due diligence, which shall include regular training for new staff and refresher sessions for existing staff to be conducted based on the level of risks and job profiles in engaging with the supply chain participants. This training can be provided either internally or external professional bodies</p>	<p>Titan Company Limited has implemented a structured employee KYC and training framework covering Compliance Officers, Supply Chain Officers, and all personnel directly involved in material intake and supply chain operations. KYC checks are conducted at the time of staff onboarding and are updated at least annually, including verification of identity details, employment history, and sanctions screening. A risk-based training programme is in place, with induction and periodic refresher sessions delivered internally and/or through external professional bodies. Internal assessments have confirmed that the training programme is effective and that staff demonstrate adequate awareness and understanding of responsible supply chain due diligence requirements in line with EBC expectations.</p>
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Rule 1.19 Grievance Mechanism	
<p>Each Accredited Member must establish a grievance mechanism for internal and external stakeholders who are impacted by the Accredited Member's operations to enable those stakeholders to voice concerns relating to an Accredited Member's risk management processes and supply chain policy to the senior management. The grievance lodging points should be accessible for internal and external stakeholders and must include the ability for anonymous reporting.</p>	<p>Titan Company Limited, as a responsible and compliant participant in the gold supply chain, has established a formal grievance mechanism to address any concerns related to ethical sourcing or compliance. The mechanism is publicly available on the company's website and is effectively implemented and monitored by the Compliance Office to ensure timely and transparent resolution of grievances.</p>

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Rule 2: Supply Chain Risk Identification And Assessment

2.1 Overriding Principle

Each Accredited Member conducting business in the gold supply chain is required and must be individually responsible for applying and implementing its Policy and management system and mapping its supply chain in order to identify and assess the risks of contributing to conflict, Money Laundering, Terrorism Financing serious Human Rights abuses or environmental and social issues associated with gold which they produce, distribute, transport, export, sell and/or purchase.

If the Accredited Member can reasonably determine on the basis of the information collected under Rule 1 that it does not deal in gold mined, transported or traded in a Conflict-Affected and High-Risk Area, no additional due diligence is required. The management systems established in Rule 1 should be maintained and regularly reviewed and the Member is expected to improve its due diligence practices and risk assessment process over time.

If the Accredited Member is not able to reasonably determine on the basis of the information collected under Rule 1 that it does not deal in gold mined, transported or traded any in a Conflict-Affected and High-Risk Area, it is mandatory to carry out an additional, more in-depth due diligence in accordance with Rule 2.

Compliance statement:

Titan Company Limited applies and maintains a comprehensive policy and management system to map its gold supply chain and assess risks related to conflict, AML/CFT, human rights, and environmental and social impacts. Approximately 65% of bullion is sourced from regulated refineries with traceability to LBMA/DGD standards, while the remaining 35% comprises recycled gold scrap sourced through TEP and GEP buy-back programmes from end consumers. Based on information collected under Rule 1, these sourcing channels are assessed as low to medium risk, with no reasonable indication of CAHRA exposure. Where residual risks are identified, appropriate enhanced due diligence and mitigation actions are implemented, and management systems are periodically reviewed and strengthened.

Demonstration of Compliance:

Rule 2.2	Risk-based Approach	
	<p>Each Accredited Member must conduct an internal risk assessment carried out on a risk-based approach (Risk Assessment) on each party, included or third parties involved in the supply chain for gold from the mine(s) to the Accredited Member including third party service providers (i.e. logistics, transporters, processors and intermediaries).</p>	<p>Titan Company Limited operates as a responsible and compliant participant in the gold supply chain and has adopted a structured risk-based approach in accordance with the Emirates Bullion Market Committee (EBMC) guidelines. The company applies this framework across its two primary supply chain channels:</p> <ol style="list-style-type: none"> 1. Bullion Procurement: Gold sourced from upstream suppliers

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	<p>such as banks and recognized bullion dealers. Further bars are traceable to regulated refiners. Titan purchase only LBMA/DGD bars.</p> <p>2. Scrap Gold Procurement: Used or old gold jewelry received from end consumers through exchange programs at Titan's retail outlets.</p> <p>This dual approach ensures that both upstream and downstream supply chains are assessed, monitored, and managed proportionately to their respective risk levels</p>
<p>Rule 2.3 Considerations of Risk Assessments</p>	<p>Risk Assessment Framework Based on Supply Chain Position</p> <p>A. Bullion Suppliers – Risk Framework</p> <p>Titan conducts a comprehensive risk assessment for all bullion suppliers based on the following key parameters:</p> <p>Risk Factors Considered:</p> <ul style="list-style-type: none"> • Geographical Location: Country of supplier and sub-suppliers (primarily refiners). • Mode of Payment: Assessment of financial transaction channels and adherence to anti-money laundering (AML) requirements. • Conflict or Human Rights Risks: Review of supplier locations for any history of conflict, human rights violations, or unethical sourcing practices.
<p>In carrying out any Risk Assessment, each Accredited Member shall consider the following considerations (as applicable to the circumstances of the Risk Assessment):</p> <p>(a) the geographical origin and location of gold, based on reasonable and good faith efforts, including consideration of: (i) the origin, location and transportation;</p> <p>(ii) the level of government regulation and supervision;</p> <p>(iii) the extent of cash transactions used in the country;</p> <p>(iv) the level of conflicts or human rights abuses in any location comprising part of the supply chain;</p> <p>(v) the progressive reduction and phasing out of mercury usage in line with the commitments of Minamata Convention</p> <p>(vi) payment systems used;</p> <p>(vii) the level of involvement or potential involvement of any criminal organisation;</p> <p>(viii) the level of involvement or potential involvement of any high risk businesses (such as gaming and casinos, etc.);</p>	

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(ix) the level of access from a location comprising part of the supply chain to nearby markets or processing operations that are termed as conflict and/or high risk areas;

(x) the level of enforcement of laws addressing significant criminal activity; and

(xi) the existence of sanctions and/or embargoes that have been directed against the country and/or individuals/entities in that country;

(xii) the level of environmental and social issues due to mining activities including loss of vegetation cover, mass destruction of water bodies, loss of biodiversity, land-use changes, food insecurity, air pollution, mercury pollution, child labour, gender-based violence, forced labour etc.

(b) counterparties in the supply chain, including consideration of:

(i) KYC information of the Accredited Member's suppliers as identified under Rule 1 (including information about the origin and transportation of the gold);

(ii) any Red Flags (as defined in Rule 2.4 below) identified in any part of the entire supply chain;

(iii) the number of participants in the supply chain (i.e. the greater the number, the higher the risk);

(iv) the level of control that a counterparty has over its own suppliers;

(v) the level and adequacy of the due diligence practices of a counterparty;

(vi) whether a counterparty's due diligence practices have been audited by a qualified third party auditor;

(vii) for how long the counterparty has been carrying out activities in the gold business;

(viii) a counterparty's willingness to disclose its beneficial owners;

(ix) a counterparty's attempts to be or remain anonymous (e.g. through the use of third party intermediaries such as lawyers, accountants, etc.);

(x) the scale of mining operations of a supplier (ASM or LSM), if applicable; and

(xi) the involvement of any PEPs that have been entrusted with prominent public functions or individuals who are closely related to such persons;

(c) applicable transactions, including consideration of:

• **Criminal or Reputational Risk:**

Screening for any association with illicit trade, smuggling, or financial crime.

• **Sanctioned Countries:**

Verification against international sanctions lists and embargoed jurisdictions.

Control Measures Implemented:

• Procurement restricted to **approved and compliant refiners** only (i.e., **LBMA** or **DGD** accredited refiners). This significantly reduces risks related to human rights abuse, financial misconduct, sanctions, and social non-compliance.

• **100% of bullion transactions** are conducted through **official banking channels**, with **no cash dealings**, ensuring traceability and compliance with financial regulations.

• **Continuous monitoring** of supplier compliance through documentation review, certification verification, and supplier declarations.

• Periodic review of refiner status on LBMA and DGD compliance listings to confirm validity of sub-suppliers

B. Scrap / Used Gold Jewellery – Retail Exchange Programs

Titan manages the exchange of old or used gold jewelry through structured programs such as the **Titan Exchange Program**

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- (i) the proportionality of the due diligence to the identified risks and severability and probability of adverse impacts of the applicable transaction
- (ii) gold and/or precious metals that are transported and/or exported which are not reasonably reconciled with the declared location of the origin;
- (iii) unexplained geographic distance in the supply chain;
- (iv) the nature of the underlying assets (for example melted recyclable gold transactions may be higher in risk than unprocessed recyclable gold);
- v) the level of concentration of gold;
- (vi) any unusual circumstances that are not consistent with the local or market practices (amount, quality, potential profit, etc.);
- (vii) the use of cash in excess of government thresholds;
- (viii) payment by cash and/or physical delivery to unrelated third parties; and
- (ix) transaction structuring to make payments in smaller multiple transactions to avoid government thresholds.

(TEP) and Gold Exchange Program (GEP).

These processes involve sourcing gold directly from end consumers in exchange for new jewelry and therefore are subject to separate risk controls.

Risk Factors Considered:

- Source of gold (consumer or third-party manufacturer).
- Authenticity and verification of ownership.
- KYC verification of the seller/exchanger.
- Documentation supporting the transaction (invoices, consent forms, photographs, and assay verification).

Control Measures Implemented:

- **KYC documentation and consumer declarations** collected at the retail point of sale.
- **Purity and weight verification** conducted before accepting the metal.
- **Transaction records** maintained in Titan's ERP system for traceability.
- **Periodic reconciliation and internal audit of retail stores** to verify compliance and detect anomalies.

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Risk Categorization and Mitigation Framework

Titan Company Limited has implemented an effective **risk classification model** that combines **KYC risk levels** and **supply chain risk parameters** to categorize suppliers and transactions into:

- **High Risk:** Exposure to conflict areas, sanctions, or unverifiable supply chain documentation.
- **Medium Risk:** Moderate risk identified based on transaction monitoring or KYC Status change.
- **Low Risk:** Fully compliant suppliers operating under recognized regulations and international standards.

Each risk category has defined **mitigation procedures**, including escalation steps, enhanced due diligence (EDD) requirements, and ongoing monitoring measures.

The **effectiveness of the risk framework** is periodically reviewed through internal audits, supplier reviews, and compliance committee oversight to ensure continuous improvement. As per internal policy at least once in 12 months compulsory review is carried out.

Rule 2.4

Red Flags

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<p>For the purposes of these Rules, a Red Flag shall be any (including a combination or aggregate of more than one) of the following:</p> <p>(a) Location-based Red Flag, as further described below;</p> <p>(b) Supplier-based Red Flag, as further described below; or</p> <p>(c) Circumstances-based Red Flag, as further described below.</p>	<p>Titan Company Limited operates as a responsible and compliant participant in the gold supply chain. The company has established a structured red flag identification and escalation mechanism to monitor and address any potential risk indicators arising from its bullion or scrap gold supply chains.</p> <p>Red flags are identified through:</p> <ul style="list-style-type: none"> • Market information and industry updates • Media screening and background checks • Continuous transaction monitoring of bullion and scrap jewelry supplies <p>Identification of Red Flags</p> <p>Red flags are detected through the Titan Store Department Factory) across all four operational zones. When a potential risk or anomaly is identified, a Red Flag Alert is immediately raised and communicated to the Supply Chain Officer, who coordinates further review and action.</p>
<p>Rule 2.5 Location-based Red Flags</p>	
<p>A Location-based Red Flag shall be the occurrence of, or the reasonable suspicion of the occurrence of, any of the following circumstances:</p> <p>(a) the gold originates from or have been transported through a Conflict-Affected and High-Risk Area;</p> <p>(b) the gold is claimed to originate from a country that has limited known reserves or stocks, likely resources or expected production levels of gold (for example where the declared volumes of gold from that country are in excess of its known reserves and/or expected production levels);</p> <p>(c) the gold is claimed to originate from a country through which gold from Conflict-Affected and High-Risk Areas are known or reasonably suspected to transit;</p> <p>(d) the gold is claimed to originate from recyclable/scrap or mixed sources and has been refined in a country where gold from Conflict-Affected and High-Risk Area is known or reasonably suspected to transit; or</p> <p>(e) the gold originating from countries under sanction or embargos.</p>	
<p>Rule 2.6 Supplier-based Red Flags</p>	
<p>A Supplier-based Red Flag shall be the occurrence of, or the reasonable suspicion of the occurrence of, any of the following circumstances:</p> <p>(a) a supplier or other participant in the supply chain of gold operates in any location that could give rise to a Location-based Red Flag, or has a shareholder or other interests in any supplier of gold from one of the above-mentioned locations; or</p> <p>(b) a supplier or other participant in the supply chain of gold is known to have sourced gold from any location that could give rise to a Location-based Red Flag in the twelve (12) months previous to the applicable transaction. give rise to a Location-based Red Flag in the twelve (12) months previous to the applicable transaction</p>	
<p>Rule 2.7 Circumstances-based red flags</p>	

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A Circumstances-based Red Flag shall be the occurrence of any anomalies or unusual circumstances that are identified through the information collected under Rule 1 to give rise to reasonable suspicion that the gold applicable to any transaction of the Accredited Member may contribute to any conflict or serious abuses associated with the extraction, transportation of and/or trading in gold.

Rule 2.8 Procedures relating to Red Flags

- (a) Accredited Members must review all Red Flags in an in-depth and detailed manner;
- (b) if an Accredited Member has reasonable grounds to suspect that a prospective transaction with a supplier may result in a Red Flag, it must conduct enhanced research prior to engaging in and concluding the transaction. Such enhanced research is aimed at obtaining evidence of any factual circumstances of the supply chain in order to determine any risks. Such research should include the research methods specified below taking into account the risk-based proportionalities to the level of the risks identified in Rule 2.3 to 2.7;
- (c) the research methods that shall comprise Desk Research, On-Site Visits and Random Sample Verification;
- (d) Desk research includes (where available):
 - (i) identifying each company in the supply chain;
 - (ii) identifying the UBO(s) of each company in the supply chain;
 - (iii) obtaining financial information (such as balance sheets, annual reports, rating agencies' reports, insolvency information) on each company in the supply chain;
 - (iv) ensuring that each company in the supply chain holds the necessary permits and licences;
 - (v) ensuring that each company in the supply chain is not listed on any sanctions and/or embargoes list; and
 - (vi) reviewing research reports including those from governments, international organisations, NGOs and media, maps, UN reports and UN Security Council sanctions, industry literature relating to mineral extraction and its impact on conflict, Human Rights or environmental harm in the country of potential origin, or other public statements (e.g. from ethical pension funds).
- (e) On-Site Visits includes individual visits to gold suppliers, or joint on-the-ground assessment teams, teaming up with industry or multi-stakeholder mechanisms or initiatives, or using suitably qualified, knowledgeable and independent assessors, to generate

Material related to unresolved red flags is **not in-warded** and remains **on hold** until the issue is resolved or clarified. If necessary, consignments may be **returned to the supplier concerned**.

Types of Red Flags

A. Location-Based Red Flags

- Supplier or transaction linked to countries with ongoing conflict, political instability, or human rights abuses.
- Operations or transit through regions listed under international **sanctions or embargoes**.
- We are currently dealing with Indian Suppliers (purchased of scrap from end consumers) in non CAHRA region and all Bullion bars are procured from Bank and ensure that refineries used for supplies are regulated refineries only so risk of CAHRA is ruled out.

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and maintain information on the circumstances and processes of the following activities listed in the OECD Guidance. Though the on-site assessment can be completed in reasonable timeframe (documented, reviewed and approved by management) the EDD process should commence immediately if any red flags are identified:

(i) gold extraction (for LSM whether mined by medium and large-scale mining in red flagged operations or LSM gold purchased from other sources), physical access to mines, mine capacity against recorded mine production and discrepancies);

(ii) gold processing (consolidation, blending, crushing, milling, smelting, refining, etc. and recording any discrepancies in the processing and/or production and related capacity of the facility to perform relevant activities);

(iii) handling of gold (inventory, trans-shipment, relabelling, etc.);

(iv) transportation of gold;

(v) trading of gold (including importing and exporting); and

(vi) the weight and assayed quality characteristics of the gold that are used in the above-mentioned activities;

(vii) taxes, fees, royalties, compensation or other payments to governments which relate to the extraction, trade, transport and export of gold;

(viii) where applicable, request information from mining suppliers about their participation in the EITI, if the countries is a member of EITI;

(ix) payments made to public or private security forces or other armed groups;

(x) use or presence of security services, training of security personnel in accordance with the Voluntary Principles on Security and Human Rights, associated risks;

(xi) evidence of serious abuses of Human Rights;

(xii) relationships between LSM and ASM, information on ASM operating on the sites of, or selling through LSM;

(xiii) for ASM gold only, identification of the suppliers of ASM gold, mine of origin, transportation, processing, taxes, royalties and other payments to governments, KYC information, evidence of serious abuses of Human Rights, information on any direct or indirect support to non-state armed groups or public or private security forces;

- Supply chain routes through high-risk areas or jurisdictions with weak AML/CFT enforcement.

B. Supplier-Based Red Flags

- Suppliers have **complex ownership structures** or unverified UBOs.
- Non-cooperation in providing KYC or due diligence documentation.
- Suppliers are involved in adverse media, legal actions, or regulatory investigations.
- Supplier's refiner not listed under **LBMA or DGD** approved list.
- Titan only procure LBMA and DGD approved refiners only.

C. Circumstance-Based Red Flags

- Transactions inconsistent with normal business patterns or declared capacity.

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(xiv) for recyclable gold, value and place of transaction, type of material, type and organisation of supplier, manufacturing facilities, and unusual circumstances; and (xv) review of environmental and social practices associated with extraction, processing and handling processes. Random Sample Verification involves the verification of transactional records.

- Discrepancies in purity, weight, or documentation.
- Frequent changes in supply route or declared origin of gold.
- No circumstance-based risk has been reported during the year.

Procedure Relating to Red Flags

Titan has established a **documented procedure** for handling red flags as part of its **Supply Chain Due Diligence Policy**:

- **Identification:**
Factory Store or compliance personnel identify anomalies or suspicious indicators during documentation review, transaction monitoring, or receipt verification.
- **Escalation:**
Red flag details are immediately communicated to the **Supply Chain Officer** and **Compliance Officer** for investigation.
- **Investigation:**
The Compliance Officer

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	<p>reviews transaction history, supplier background, and supporting evidence. Additional documents or clarifications are sought from the supplier.</p> <p>When a red flag is raised, Titan Company Limited follows a structured and evidence-based investigation process to determine the validity, cause, and impact of the identified concern. The Compliance Officer, in coordination with the Supply Chain Officer, conducts a thorough review using a combination of methods designed to ensure transparency, traceability, and factual accuracy.</p> <p>The investigation process includes the following key steps:</p> <ol style="list-style-type: none">1. Desk-Based Review:2. The Compliance Officer performs an in-depth desk review of all related records, including transaction documentation, supplier
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	<p>KYC files, invoices, delivery notes, and communication trails. This step also includes:</p> <ul style="list-style-type: none">• Verification of supplier registration, ownership details, and beneficial ownership structure.• Review of historical transactions with the same supplier to identify any abnormal volume, frequency, or pricing pattern.• Cross-verification of supporting documentation (e.g., bar certificates, transport documents, assay reports) for consistency and completeness.
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3. Media and Market Information Search:

An open-source and subscription-based media screening is carried out to identify any negative news, legal actions, sanctions, or reputational risks related to the supplier or its associated entities.

- Search includes government databases, sanction lists (e.g. PMLA screening & OFAC,) Search)
- Market intelligence and trade association alerts are also reviewed to capture any relevant compliance or ethical sourcing concerns.

4. Supplier Discussion and Clarification:

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Direct communication is established with the supplier to discuss the raised red flag and to provide them with an opportunity to explain or clarify discrepancies.

- The supplier may be asked to furnish additional supporting documents, such as shipment invoices, assay reports, refinery certificates, or clarifications on country of origin and transport route.
- Discussions are documented to maintain transparency and traceability of responses.
- If required, senior management or compliance representatives

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	<p>from the supplier are engaged to resolve critical issues.</p> <p>5. On-Site Visit (if required):</p> <p>For medium- or high-risk cases where documentary verification is insufficient, Titan may conduct or commission a site visit to the supplier's premises or operations.</p> <ul style="list-style-type: none">• Site visits help verify operational legitimacy, workplace conditions, and compliance with responsible sourcing and human rights standards.• Observations are recorded and reported to the Bullion Compliance Committee for
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	<p>review and decision-making.</p> <p>6. Regulatory and Peer Consultation (if applicable):</p> <p>In certain cases, Titan may consult industry peers, local trade associations, or relevant regulatory authorities for additional information or cross-verification. This ensures that decisions are based on a wider perspective and credible data sources.</p> <p>7. Analysis and Evaluation:</p> <p>All collected information—documentary, verbal, and observational—is analyzed to assess the nature and severity of the risk. The investigation determines whether the red flag is substantiated, mitigated, or unfounded.</p> <ul style="list-style-type: none">• A risk score is assigned based on the findings, aligned
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	<p>with Titan's internal risk rating framework (High, Medium, Low).</p> <ul style="list-style-type: none"> • Recommendations for corrective or preventive actions (CAPA) are documented. • Decision & Action: <ul style="list-style-type: none"> ○ If concerns are resolved, normal operations resume. ○ If unresolved, the material remains on hold or is returned to the supplier. ○ High-risk cases are escalated to the Senior Management for final decision. <p>Titan ensures that potential supply chain risks are identified, investigated, and resolved before any transaction proceeds—thereby upholding a conflict-free and ethically responsible gold supply chain.</p>
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Rule 2.9	Policy Updating and Suitability
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Each Accredited Member's Policy should contain suitable systems, procedures and processes for risk identification and assessment (including suitably addressing Red Flags) and such systems, procedures and processes should be updated continually on an ongoing basis upon the occurrence of the change of any relevant circumstances.

Policy Review and Update Mechanism

Titan Company Limited ensures that its **Supply Chain Policy** remains current and effective through a structured review process.

- The **Compliance Officer** and **Bullion Compliance Committee (BCC)** conduct a detailed policy review **every 12 months** or earlier if triggered by significant operational, legal, or regulatory changes.
- The review includes evaluation of:
 - Effectiveness of current risk assessment methods
 - Adequacy of red flag escalation and closure procedures
 - Applicability of control measures and supplier screening processes
 - Compliance with new EBMC or international sourcing guidelines

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- Updates are approved by **senior management** and communicated to all relevant departments and supply chain partners.

Stats of Red Flag

During the year few transaction based red Flags has been reported and closed immediately by the respective suppliers.

Continuous Suitability and Effectiveness

- The policy's **suitability** is ensured through ongoing feedback from compliance reviews, internal audits, and stakeholder engagement.
- The **effectiveness** of implementation is validated through periodic risk assessments, training programs, and internal monitoring reports.
- Any identified gaps or improvement areas are incorporated into subsequent policy revisions.

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Rule 3: Risk Control Plan

3.1. Overriding Principle – Development of Risk Control Plan

Each Accredited Member must develop and implement a plan and policy to evaluate and control any identified risk(s), including emerging risks and incident reporting, and mitigate against any adverse implications of such risk(s) (Risk Control Plan). The Risk Control Plan is designed to assist Accredited Members in making informed decisions in respect of:

- a) continuing to trade but with measurable risk mitigation for low risk situations;
- b) temporarily suspending trade while mitigation is implemented for medium risk situations; or
- c) ceasing to trade with a concerned supplier for high risk situations in accordance with the OECD Guidance.

Members are encouraged to consider the potential social and economic impacts of risk mitigation. Members should engage and support relevant industry programmes while understanding the impact that this may have on developing countries and the relevance to other existing international recognized standards.

Compliance statement:

Titan Company Limited has established and implemented a documented Risk Control Plan as part of its responsible sourcing and supply chain management system. The plan defines procedures for identifying, evaluating, controlling, and mitigating existing and emerging risks, including incident reporting and escalation mechanisms. Risk responses are aligned with OECD Guidance, enabling continued trade with measurable mitigation for low-risk situations, temporary suspension with corrective actions for medium-risk cases, and cessation of trade for high-risk suppliers. In implementing mitigation measures, Titan considers potential social and economic

impacts and engages with relevant industry programmes and internationally recognised standards to support responsible sourcing, particularly in developing country contexts.

Demonstration of Compliance:

<p>Rule 3.2 Alignment with International Standards</p>	<p>Titan Company Limited operates as a responsible and transparent participant in the gold supply chain. The company has developed a structured Risk Control Plan (RCP) covering both:</p>
<p>Each Accredited Member must develop or adapt on a continuing basis its Risk Control Plan to include internationally accepted common principles, standards and processes for responsible supply chain management. In particular, Accredited Members should carry out at least one annual review of the Policy and management systems, and</p>	

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a further review when there is a major change in circumstances, their business, operations or supply base, risk nature, or a major change in applicable rules and regulations. In developing Risk Control Plans, each Accredited Member should engage in or support, where appropriate, industry or other programmes on responsible supply chain management. For instance, Refiners are encouraged to support legitimate ASM producers to build secure, transparent and verifiable gold supply chains (consistent with the OECD Guidance).

Rule 3.3 Minimum Content Requirements

Each Risk Control Plan should include the following (Content Requirements):

- (a) reporting mechanisms for identified risks to the Accredited Member's senior management, Supply Chain Officer and Compliance Officer
- (b) enhanced engagement with the internal functions of the Accredited Member, in charge of transparency, information collection and control over the supply chain;
- (c) enhanced engagement with suppliers through establishing a chain of custody and/or traceability system where a Red Flag has been identified;
- (d) enhancement of the physical security practices as referred to in Rule 1.17;
- (e) physical segregation and security of shipments where a Red Flag has been identified;
- (f) incorporation of rights of the Accredited Member to conduct additional checks on any supplier or UBO where a Red Flag has been identified;
- (g) continuity of trading activities while developing risk mitigation controls (including measurable steps, monitoring, review of performance, and reporting to senior management), such as:
 - (i) building and/or exercising leverage over the participants in the supply chain who can most effectively mitigate the risks;
 - (ii) temporarily suspending trading activities with a specific supplier where a Red Flag has been identified; and
 - (iii) disengaging for at least 3 months, with a specific supplier who fails to comply with the mitigating controls within a period of 6 months, and/or disengaging entirely if such controls are not feasible and/or unacceptable in light of the cost-

- **Bullion Supply Chain Risks** – risks associated with sourcing gold bars from banks and recognized bullion dealers.
- **Recycled Gold Supply Chain Risks** – risks linked to used or scrap jewellery exchanged at Titan retail stores.

The plan is aligned with EBMC guidance, OECD due-diligence expectations and Titan's internal supply-chain policy.

The Risk Control Plan addresses:

- Identified incidents and historical compliance findings.
- Risks observed during routine monitoring and audits.
- Emerging risks based on market intelligence, regulatory updates, and geopolitical developments.

Key Elements of the Risk Control Plan

A. Risk Identification:

- Risks are identified through continuous transaction monitoring, supplier assessments, internal audits, and red-flag alerts.
- Both operational and reputational risks are captured in the Risk Register (Red

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benefit analysis and the capabilities of the Accredited Member conducting the due diligence;
 (h) consulting with suppliers and affected stakeholders and agreeing on the risk mitigation controls which should be adapted to the Accredited Member's specific suppliers and the contexts of their operations, state clear performance objectives and provide for sufficient time for affected stakeholders to review and implement;
 (i) reviewing on a regular basis the results of the mitigation measures, undertaking additional fact and risk assessment for risks requiring mitigation or after a change of circumstances, as per Rule 2;
 (j) communicating to senior management

Note : Where a Red Flag has been identified, the Accredited Member may consider the following as an indicative measure of an approach to activities with the relevant supplier:

Risk Level	Control Mechanism
Low	Start or continue trading activities
Medium	Start or continue trading activities whilst mitigating the identified risks
High	Suspend trading activities whilst mitigating the identified risks by obtaining additional information/data confirming or refuting the adverse risk assessments; OR disengage from the source(s) of the risk within a reasonable time frame (to be assessed on a case by case basis)

Flag) maintained by the Compliance Officer.

B. Risk Evaluation and Prioritization:

- Each risk is rated as High, Medium, or Low based on likelihood and impact.
- High-risk items are prioritized for immediate mitigation and management review.

C. Risk Mitigation Measures:

- For bullion supply, control measures include purchasing only LBMA/DGD-approved gold, ensuring all payments are through official banking channels, and verifying supplier compliance certificates.
- For recycled gold, controls include strict KYC checks, documentation review, and purity verification at store level.
- Enhanced Due Diligence (EDD) is applied for any supplier or transaction exhibiting unusual or high-risk characteristics.

D. Monitoring and Review:

- The Supply Chain Officer tracks implementation of risk-control actions and reports progress to the Bullion Compliance Committee (BCC).

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	<ul style="list-style-type: none">• Regular reviews are carried out Six monthly, and findings are incorporated into Titan's continuous-improvement plan. <p>E. Corrective and Preventive Actions (CAPA):</p> <ul style="list-style-type: none">• When non-conformities or red flags are identified, CAPA measures are initiated with clear timelines.• Effectiveness of CAPA is verified during internal audits and subsequent compliance reviews.
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Rule 4: Independent Third-Party Audits

4.1. Overriding Principle

Each Accredited Member is required to ensure its own compliance with these Rules for RBDG and arranging at their own cost for this compliance to be reviewed by an independent third-party reviewer as stipulated in Rule 4.2.

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Compliance statement:

Titan Company Limited has formally appointed Bureau Veritas Quality International (BVQI) as an independent and accredited third-party auditor to conduct external assurance for DGD and EBMC compliance. BVQI possesses the required competence and independence to evaluate Titan’s supply chain due diligence system, risk controls, and responsible sourcing practices.

Demonstration of Compliance:

<p>Rule 4.2 EBC Review Protocol EBC Review Protocol (Annex 2) sets out the methodology EBC requires each auditor (when acting as a “reviewer” in the meaning given to that term in the EBC Review Protocol) (Reviewer) to comply with when conducting any independent third-party audit (if instructed to do so) of an Accredited Member (Review).</p> <p>Rule 4.3 Minimum Review Requirements In carrying out any Review, each Reviewer must verify the following: (a) the adequacy of the related policies and processes to implement these Rules for RBDG (as well as the obligations stemming from the Resolution); (b) the adequacy of external and internal controls to mitigate risks; (c) the conformity to and compliance with these Rules for RBDG in all communications with participants across the entire supply chain; (d) the establishment of the chain of custody and traceability of information for all activities; and (e) the implementation of on-going risk assessment using a risk-based approach including the adequacy (considering both timing and method) of the Accredited Member’s response to the outcome(s) of the risk assessments..</p> <p>Rule 4.4 Minimum Requirements of Reviewers Each Reviewer must have the following characteristics: (a) independence from the Accredited Member subject to the relevant Review; (b) no conflict of interest between the Reviewer and the Accredited Member subject to the relevant Review; (c) no specific services being provided by the Reviewer to the Accredited Member in relation to any due</p>	<p>The third-party assessment conducted by BVQI covers all operational areas relevant to EBMC compliance, including KYC processes, supplier due diligence, red flag management, and responsible sourcing controls.</p> <p>External audits are performed annually or more frequently if significant changes occur in Titan’s supply chain or risk exposure. The assessment ensures alignment with EBMC, OECD, and DGD requirements.</p> <p>Scope and Frequency of Assessment</p> <p>The third-party assessment conducted by BVQI covers all operational areas relevant to EBMC compliance, including KYC processes, supplier due diligence, red flag management, and responsible sourcing controls.</p> <p>External audits are performed annually or more frequently if significant changes occur in Titan’s supply chain or risk exposure. The assessment ensures</p>
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diligence exercise (other than general related guidance); and

(d) the competence to carry out the relevant Review. Each Reviewer must keep confidential the confidential information of the Accredited Member, subject to any legal requirements of disclosure or any other reasonable requirements of the Accredited Member, taking into account all circumstances (including the nature and ownership of the information and any previous dissemination of such information).

Any auditing entity that wishes to become a Reviewer must submit a completed EBC Approved Reviewer Application Form (Annex 1) and meet the minimum criteria for Reviewers as set out in EBC Review Protocol. Such application is subject to the terms and conditions of an EBC Approved Reviewer Application Form.

Rule 4.5 Composition of the Review

The following activities shall be included in each Review:

- (a) sufficient preparation of the Review, including the development of a detailed audit plan;
- (b) on-site investigations of the Accredited Member, including:
 - (i) review of the Accredited Member's facilities; and
 - (ii) review of a list of the Accredited Member's suppliers;
- (c) consultations with the Accredited Member's risk assessment team, Supply Chain Officer and Compliance Officer (as applicable);
- (d) audit conclusion, including the validation, reporting and recording of findings that determine the level of conformity of the Accredited Member's supply chain due diligence with the Rules for RBDG; and
- (e) provide recommendations to the Accredited Member to improve its due diligence practices.

Rule 4.6 Annual Report on Supply Chain Due Diligence

Each Accredited Member shall produce an annual report. This shall include a summary of the Review in accordance with Step 5 of the OECD Guidance and Sections 16 and Section 19 (as applicable) of EBC Review Protocol (Annex 2).

Rule 4.7 Review Programmes of Accredited Members

Each Accredited Member must demonstrate its compliance with these Rules for RBDG to the Executive Office of the EBC. In carrying out such obligation, each

alignment with EBMC, OECD, and DGD requirements for **Gold refining**.

Current Engagement is assessment for supply chain audit for the period of 1st April,2024 to 31st March,2025

Accessibility and Maintenance of Records

Titan Company Limited maintains comprehensive and traceable records of all compliance activities, policies, supplier due diligence files, and transaction data. These records are securely stored within the company's ERP-based compliance management system and are **readily available for BVQI auditors** during review or verification.

All documentation is retained for a minimum of **five years**, in accordance with EBMC Rule 1.14 and applicable legal requirements.

Auditor Independence and Cooperation

Titan fully cooperates with BVQI during all audit phases by providing unrestricted access to facilities, personnel, and documents. The appointed auditor functions independently, with no conflict of interest, ensuring objectivity and impartial evaluation. Titan's Compliance Officer and Bullion Compliance Committee oversee

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Accredited Member must implement an audit programme, which shall include:

- (a) ensure conformity with these Rules for RBDG;
- (b) selecting and engaging its Reviewer(s) in conformity with these Rules for RBDG;
- (c) observing and fully cooperating with each Reviewer;
- (d) implementing all recommendations provided by any Reviewer; and
- (e) upon request, providing a copy of any Review report to the Executive Office of the EBC or any authority that regulates or otherwise governs the Accredited Member.

coordination with BVQI to ensure a smooth audit process and timely resolution of any findings or recommendations.

Continuous Improvement and Corrective Actions

Findings and recommendations from BVQI's audits are reviewed by Titan's Bullion Compliance Committee (BCC) and senior management. Where non-conformities or improvement opportunities are identified, corrective and preventive actions (CAPA) are defined with clear responsibilities and target dates. Periodic follow-up reviews are conducted to verify implementation, ensuring ongoing improvement in Titan's responsible gold supply chain practices and sustained compliance with EBMC standards.

Audit Reporting and Management Review

Titan Company Limited ensures that the results of the independent third-party audit conducted by Bureau Veritas Quality International (BVQI) are formally documented in a comprehensive audit report.

The report includes details of the audit scope, methodology, observations, non-

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conformities, and recommendations for improvement. Upon receipt of the final report, Titan's Compliance Officer reviews all findings and presents them to the Bullion Compliance Committee (BCC) and senior management. Corrective and preventive actions (CAPA) are assigned with defined responsibilities, completion dates, and verification methods. Follow-up reviews are conducted to confirm closure and evaluate the ongoing effectiveness of implemented measures.

Communication and Disclosure of Audit Findings

Titan Company Limited maintains transparency in its responsible gold sourcing practices by communicating relevant audit outcomes to stakeholders

A summary of key audit findings, corrective actions, and improvements is shared internally with relevant departments and, where applicable, externally with regulatory bodies or the Emirates Bullion Market Committee (EBMC) Upon request. The company ensures that confidential business information is protected while

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	<p>demonstrating its continued compliance and commitment to responsible sourcing. All communication related to audit results and compliance status is documented and retained for verification during subsequent EBMC or BVQI reviews.</p>
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Rule 5: Annual Reporting On Responsible Supply Chain Due Diligence

5.1. Overriding Principle

Each Accredited Member is required to publicly report annually on its supply chain due diligence in compliance with Step 5 of the OECD Guidance, in order to generate public confidence in the measures that it has implemented.

Compliance statement:

Titan Company Limited is committed to maintaining transparency in its responsible gold supply chain operations. The company publishes its Responsible Sourcing and Supply Chain Policy and key elements of its due diligence framework on its official website, ensuring that stakeholders, customers, and regulators have access to relevant information. This includes disclosure of Titan's ethical sourcing commitments, compliance structure, and adherence to EBMC, OECD, and DGD standards.

All public communications are reviewed and approved by the Compliance Officer to ensure accuracy and alignment with regulatory and confidentiality requirements

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Demonstration of Compliance:

Rule 5.2 Minimum Requirements of Public Reporting	
<p>At minimum, each Accredited Member shall:</p> <p>(a) publicly acknowledge its requirements under these Rules; and</p> <p>(b) comply with Rule 4.6</p>	<p>Titan Company Limited prepares an annual internal compliance report summarizing the implementation of its risk-based due diligence, audit outcomes, and corrective actions. Key highlights and progress updates are included in the company's sustainability and compliance summary, which may be shared with relevant authorities or published upon request. The report outlines Titan's efforts to maintain a conflict-free supply chain, cooperation with third-party auditors (BVQI), and continuous improvement measures undertaken during the review period.</p> <p>All records and disclosures are maintained for verification during EBMC assessments or external assurance reviews.</p>

AN OVERVIEW OF THE MANAGEMENT ASSESSMENT OF ALL THE RULES OF THE EBC RULES

FRAMEWORK STEPS	RATING
<p>Rule 1: Supply Chain Managements Systems.</p>	<p><input type="checkbox"/> Fully compliant</p> <p><input checked="" type="checkbox"/> Compliant with Low Risk Deviations</p> <p><input type="checkbox"/> Non-compliance: Medium Risk Deviations</p> <p><input type="checkbox"/> Non-compliance: High Risk Deviations</p>
<p>Rule 2: Supply Chain Risk Identification And Assessment</p>	<p><input type="checkbox"/> Fully compliant</p> <p><input checked="" type="checkbox"/> Compliant with Low Risk Deviations</p> <p><input type="checkbox"/> Non-compliance: Medium Risk Deviations</p> <p><input type="checkbox"/> Non-compliance: High Risk Deviations</p>

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Rule 3: Risk Control Plan	<input checked="" type="checkbox"/> Fully compliant <input type="checkbox"/> Compliant with Low Risk Deviations <input type="checkbox"/> Non-compliance: Medium Risk Deviations <input type="checkbox"/> Non-compliance: High Risk Deviations
Rule 4: Independent Third-Party Audits	<input checked="" type="checkbox"/> Fully compliant <input type="checkbox"/> Compliant with Low Risk Deviations <input type="checkbox"/> Non-compliance: Medium Risk Deviations <input type="checkbox"/> Non-compliance: High Risk Deviations
Rule 5: Annual Reporting On Responsible Supply Chain Due Diligence	<input checked="" type="checkbox"/> Fully compliant <input type="checkbox"/> Compliant with Low Risk Deviations <input type="checkbox"/> Non-compliance: Medium Risk Deviations <input type="checkbox"/> Non-compliance: High Risk Deviations

[Refiner's] overall Management conclusion

The titan Refinery over all compliance status is **“Compliant with Low Risk Deviations”**

Table 3: Management conclusion	
Is the Refiner in compliance with the requirements of the EBC Rules for Risk Based Due Diligence in the Gold Supply ChainVersion 1/2021) ,for the reporting period?	
[Yes/No]	<p>[YES]</p> <p>[Example response: In conclusion, [Refiner] implemented effective management systems, procedures, processes and practices to conform to the requirements of the EBC Rules for Risk Based Due Diligence in the Gold Supply ChainVersion 1/2021, as explained above in Table 2, for the reporting year ended 31 December 20[xx].</p> <p>[Refiner] is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. Corrective Action Plans are communicated separately to the EBC Executive, in its role as administrator of the EBC Rules for Risk Based Due Diligence in the Gold Supply ChainVersion 1.1/2021</p>

Titan Company Limited

'INTEGRITY' No.193, Veerasandra, Electronics City P.O Off Hosur Main Road, Bengaluru - 560 100 India, Tel : 91 80 - 67047000, Fax : 91 80 - 67046262
 Registered Office No. 3, SIPCOT Industrial Complex Hosur 635 126 TN India, Tel 91 4344 664 199, Fax 91 4344 276037, CIN: L74999T21984PLC001456
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Table 4: Other report comments

[Comments]

[If users of this report wish to provide any feedback to [Refiner] with respect to this report, they can contact corporate relations on [email addresses].

Location: Bangalore

Date: 2nd January 2026

Sign and Company Stamp:



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