

Risk Committee Policies and Procedures

Risk Committee Procedures

Version

1.1

Controller

Xxxx Xxxxxx

Approved by

Sarp TARHANACI

Date

Feb. 2023

Next Review



1. OVERVIEW AND RESPONSIBILITIES

The purpose of this document is to provide the groundwork for the establishment and operation of the Risk Committee of the company.

The main responsibilities of the committee will be:

- The establishment, management and modification of the Responsible Precious Metals policy of the company.
- The establishment, management and modification of the Client Acceptance and Overview Policy of the company.
- The establishment, management and modification of all KYC Forms and Account Opening Forms of the company.
- The tracking and adaptation of new risk and compliance measures to the company when needed.
- Overview and vetting of new trading partners to be presented to Board of Directors.
- Employee training on risk management and compliance issues.

Risk Committee will have an advisory and investigative role in the company and will provide suggestions to manage the Risk and Compliance related issues to all levels.

Risk Committee will report to Board of Directors (BoD for short).

All final approvals of the decisions of the committee will

2. APPOINTMENT CRITERIA AND TENOR

The members of the Risk Committee will be appointed by the BoD based on professional experience, education and character of candidates.

Members must not have any criminal records.

The Risk Committee will consist of three members.

Each appointment will be for one year – subject to extension by mutual agreement.

The members can be both company employees and outside professionals.

All decisions will be taken by majority decision of the Risk Committee.

Should a member quit/discharged from the committee, the committee can function for another one month with two active members while a replacement is found.

If more than one member resigns or if an empty position can not be filled within one month the committee will stop operation until such vacancies are filled.



3. MEETING PROCEDURES

All findings, suggestions and decisions must be noted in a Risk Committee Meeting Minutes book.

All decisions can be taken by 2/3 majority vote as long the committee is operational and staffed according to this policy.

Members votes, comments and objections must be noted in the Minutes.

Meetings can be held online or at company premises as needed, but the decisions must be noted in the Minutes.

4. OTHER ISSUES

This procedure is prepared, modified and put into circulation by the Board of Directors of Aga Bullion.

All amendments and/or discontinuation of these policies can only take place by the written consent of the Board of Directors of Aga Bullion.

These procedures will be reviewed on an annual basis.