

SUPPLY CHAIN DUE DILIGENCE POLICY

Metalor actively participates in, cooperates with, and enhances worldwide efforts to ensure that precious metals come from legal, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our policy to do business only with legitimate, law-abiding customers, and to deny our products and services to all others.

This policy, and the program and due diligence procedures that implement it, are founded upon our general standards of business conduct, a commitment to:

Conduct our business in a culture of honesty and opposition to fraud and corruption;

Maintain high moral, ethical and social standards in our business and activities; and

Maintain proper business relationships with all individuals.

We will implement this policy through a comprehensive management system. This system will carry forward the general standards of business conduct set forth above and will direct our compliance procedures both internally and in our relations with customers and business partners.



In that regard we commit to the following:

1. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

torture, cruel, inhuman and degrading treatment

forced or compulsory labor

child labour as defined in Convention 182 of the International Labour Organization

human rights violations and abuses

war crimes, violations of international humanitarian law, crimes against humanity or genocide.

2. We will not deal with, and will immediately discontinue engagement with upstream suppliers where we identify a reasonable risk that they are committing abuses described above, or sourcing from any party committing or linked to such abuses.

3. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring precious metals from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally:

control mine sites, transportation routes, points where precious metals are traded and upstream actors in the supply chain

tax or extort money or precious metals at mine sites, along transportation routes or at points where they are traded

tax or extort money or precious metals from intermediaries, export companies or international traders.

4. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as described above.



5. We will not attempt to improperly influence others or offer, promise, give or demand bribes or kickbacks in any form, and will resist their solicitation, and will not permit Company funds, assets or property to be used to benefit any individuals, including government officials, our customers, contractors and suppliers illegally or in ways that violate this policy.

6. We will not disguise the origin of precious metals, or misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of precious metals.

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of precious metals.

We require our employees, agents, consultants, and business partners to comply with this policy, and will enforce it with appropriate disciplinary measures, up to and including termination of employment or contracts.

CONTACT INFORMATION

If you have any questions or concerns regarding this policy or its implementation, please contact one of our Compliance Officers in your region:

Europe: Tel: +41 32 720 61 11
 email: compliance-europe@metalor.com

Americas: Tel: +1-508-699-8800
 email: compliance-americas@metalor.com

Asia: Tel: +86 512 6917 1723
 email: compliance-asia@metalor.com

