



*Client Acceptance and Overview Policy  
Responsible Precious Metals Policy*

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Version

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**1.0**



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## RESPONSIBLE PRECIOUS METALS POLICY

AgaBullion participates in, cooperates with, and enhances worldwide efforts to ensure that precious metals come from legitimate, 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 its products and services to all others.

Fighting serious abuses of human rights, avoiding contributing to conflict over its supply chain, complying with high standards of antimoney laundering (AML) and combating terrorist financing (CFT), and addressing environmental and sustainability responsibilities are the key components of the AgaBullion's operating procedures.

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflictsensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

AgaBullion and its counterparties, which refine, manufacture, trade or distribute precious metals will apply this policy and comply with the LBMA Responsible Gold/Silver Guidance and the LPPM Responsible Platinum/Palladium Guidance for any type of precious metals handled. The LBMA Responsible Gold Guidance follows the five steps framework for risk based due diligence of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.

This policy has been implemented through a comprehensive management system that encompasses strict risk based due diligence before entering into new commercial relationships as well as continuous monitoring of transactions on a risk based approach.

As part of our Responsible Precious Metals Policy, we commit to:

- Neither tolerate, contribute to, assist with or facilitate the commission of:
  - ▶ Any forms of torture, cruel, inhuman and degrading treatment;
  - ▶ Any forms of forced or compulsory labor;
  - ▶ Illegal and/or unacceptable forms of child labor;
  - ▶ Other human rights violations and abuses such as widespread sexual violence
  - ▶ War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Immediately suspend or discontinue engagement with our counterparty where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.
- Support measures to build secure, transparent, fair-trade and verifiable gold supply chains from artisanal miners to market.
- Never source from illegal mining operations.
- Not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals who:

- ▶ Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain, and/or
- ▶ Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- ▶ Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Immediately suspend or discontinue engagement with upstream suppliers where we identify a probable occurrence that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined above.
- Eliminate direct or indirect support to public or private security forces with illegal practices. Recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
- Immediately suspend or discontinue engagement with upstream suppliers where we identify a probable occurrence that they are sourcing from, or linked to, any party providing direct or indirect support to public or private security forces with illegal practices or committing human rights abuses.
- Not offer, promise, give or demand any bribes, and resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of minerals extraction, trade, handling, transport and export.
- Establish strong company management systems to fight serious abuses of human rights, to avoid contribution to conflict over our supply chain, to comply with high standards of antimoney laundering (AML) and combating terrorist financing (CFT), and to address environmental and sustainability responsibilities.
- Not source precious metals from an area designated as a World Heritage Site.
- Perform appropriate due diligence on a risk based approach over our counterparties before doing any business and ongoing monitoring of the relationship in order to assess the risk of contribution to conflict, money laundering, terrorist financing and serious human rights abuse and noncompliance with environmental and sustainability legal requirements, and implement a strategy to respond to identified risk.
- Ensure that appropriate scrutiny and monitoring of transactions are undertaken applying a risk based approach. - Maintain adequate records to demonstrate that appropriate and ongoing due diligence have been followed.
- Make and receive payments for precious metals transactions through official banking channels.
- Take steps to contribute to the effective elimination of money laundering and terrorism financing. Should we suspect or have reasonable grounds to suspect that the funds or the precious metals are the proceeds of a criminal activity, and/or are related to terrorist financing we shall promptly report our suspicions to the local financial intelligence unit (FIU).
- Establish long-term relationships with precious metals suppliers and customers in order to build and support a responsible supply chain.
- Encourage our suppliers of precious metals to take appropriate steps to ensure that the provisions of this policy are communicated to their employees and their own supply chain and to urge our suppliers to



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commit to a gold supply chain policy consistent with Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains.

AgaBullion has put in place the following email address **compliance@agabullion.com** allowing any employee, supply chain actor, or stakeholder to voice any concerns over the supply chain or newly identified risk.

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.