

RESPONSIBLE PRECIOUS METALS SUPPLY CHAIN DUE DILIGENCE POLICY

ABC Refinery (Australia) Pty Ltd (“ABC Refinery”) is committed to the conduct of its business to the highest standard to ensure that all precious metals come from legitimate and ethical sources and do not contribute to conflict, human rights abuses, bribery, direct or indirect support to illegitimate non-state armed groups or public or private security forces, non-compliance with taxes and royalties due to governments, terrorist financing practices, money laundering or material breaches of environmental or health and safety regulations.

This Due Diligence Policy (“Policy”) and ABC Refinery’s practices for handling precious metals are consistent with Australian regulatory requirements, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected High Risk Areas and accompanying Gold Supplement and the London Bullion Market Association Responsible Gold Guidance and Responsible Silver Guidance.

Due Diligence Commitments

This Policy and the due diligence practices that support it, are implemented through a robust and comprehensive management system. In this regard, we commit to the following:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labour;
 - other gross 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; and/or
 - child labour.
2. We will not deal with upstream suppliers where we consider there is a reasonable risk that they are sourcing from, or linked to, any party committing any abuse of the above.
3. We will not tolerate direct or indirect support to illegitimate non-state armed groups or public or private security forces, including, but not limited to, procuring precious metals from, making payments to or otherwise providing assistance to, such groups or their affiliates who illegally:
 - control mines, sites, traders or other intermediaries, transportation routes, and upstream actors in the supply chain; and/or
 - tax or extort money or precious metals at mines, sites, along transportation routes or at points where minerals are traded; and/or
 - tax or extort intermediaries, export companies or international traders.
4. We will not engage with, and will immediately discontinue engagement with, any business opportunity or business partner where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to illegitimate non-state armed groups or public or private security forces as described above.

5. We will not offer, promise, give or demand bribes or kickbacks in any form to individuals including government officials, customers, contractors and suppliers or any other organisation.
6. We will not disguise or fraudulently misrepresent the origin of precious metals.
7. We will not misrepresent or fail to comply with taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of precious metals.
8. We will support efforts and contribute to the elimination of money laundering and financing of terrorism where we identify a reasonable risk of money laundering or financing of terrorism resulting from, or connected to, the supply and distribution chain of precious metals.
9. We will not support or otherwise further any activities which contribute to conflict.
10. ABC Refinery will take into consideration, and make enquiries about the policies and practices of its customers and upstream suppliers with respect to, the following environmental, social and governance (“ESG”) factors:
 - compliance with environmental, health, safety and labour regulations in the country of operation and/or company policy;
 - environmental management, including:
 - air, water, land pollution and incident management plans;
 - water stewardship, especially in water scarce and stressed areas; and
 - unauthorized sourcing from World Heritage Sites and Protected Areas;
 - storage handling and disposal of hazardous chemicals, including mercury and cyanide;
 - management of labour issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers;
 - community engagement and management programmes (land acquisition and community resettlement, cultural heritage sites and indigenous people, closure planning and safeguarding of vulnerable populations); and
 - management of business integrity and ethical conduct, and support of the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative.

Due Diligence Application Process

Each new customer requesting services from ABC Refinery is required to complete the refining application. The completed application form together with documents (“Due Diligence File”) is provided by the Relationship Manager to the Compliance Officer for review. The Compliance Officer reviews the Due Diligence File and assesses if it is adequate. Only complete Due Diligence Files may be accepted for consideration. The Compliance Officer may request additional documents or information if necessary. The Compliance Officer further performs a search of the UN Sanction list to confirm no customer representative nor shareholder is listed.

Supply Chain Risk Assessment

Once the Compliance Officer determines the Due Diligence File contains sufficient information for a decision to be made, the Compliance Officer assigns a risk profile rating (low, medium, high or extreme) using an internal risk matrix. For all customers deemed to be “high risk” and “extreme risk”, enhanced due diligence shall be performed. Enhanced due diligence includes the completion of a physical site visit by an ABC Refinery representative and completion of a report.



Risks assessed include, but are not limited to:

- the location of the origin of the precious metals;
- any sanctions;
- identification of the customer; and
- ESG matters.

Customer Approval

Once a risk profile rating has been allocated, the Supply Chain Assessment Form is completed, and the file submitted to the appropriate person for consideration. Each Due Diligence File shall either be “approved” or “rejected” for business on the basis of ABC Refinery’s risk-based approach to due diligence. No new customer may be approved for business until they have been subjected to ABC Refinery’s Due Diligence Process.

Responsibility

The Compliance Officer is responsible to oversee the due diligence process with the support of the ABC Refinery’s Compliance Committee. Senior Management retains the ultimate control and responsibility for the supply chain. Senior Management will carefully select and supervise the Compliance Officer and give him/her the necessary means to perform his/her duty. Senior Management should approve each new supply chain assessed as “high” or “extreme risk” and should revisit each year the decision whether to continue with these business relationships or not. The Compliance Committee shall provide Senior Management with a report and its recommendation of whether a “high” or “extreme risk” customer should be approved each year.

Gold Traceability

Once approved for business, each customer is assigned with a unique customer identification number. Each lot received from the customer is assigned with a sub-identification number before the gold-bearing material is processed for refining.

On-going Customer Due Diligence & Monitoring

Once the customer has been approved, all ABC Refinery employees that have contact with the customer have a duty to report any known change in information contained in the Due Diligence File, or any suspicious information, to the Compliance Officer in accordance with ABC Refinery’s Whistleblowing Policy.

Modification to Due Diligence File

All modifications regarding the customer including bank account, legal representation, legal structure etc, shall be submitted to the Compliance Officer. The Compliance Officer shall submit the modification request for approval by the appropriate party with ultimate responsibility for the customer.

Inactive Customers

In the case of customers who have been inactive for one (1) year, the Due Diligence File must be updated, validated and resubmitted for approval should they elect to recommence business.



Due Diligence Document Retention

All due diligence files must be maintained in a safe and secure manner and for a minimum of seven (7) years following the end of the fiscal year (30 June) after business ceases. This applies to both approved and rejected customers.

Employee Training

We provide training and require employees, agents, consultants and business partners to comply with our Policy and, wherever possible, will enforce it with appropriate disciplinary measures, up to and including termination of employment or contracts.

All employees must undertake an AML/CTF training module within one (1) month of commencing employment at ABC Refinery. Refresher training is conducted by the Compliance Officer on an annual basis, when required or upon legislative change, whichever is the earlier. A training log is to be maintained and retained for a minimum of seven (7) years.

Sustainability and Responsibility

Sustainability encompasses how ABC Refinery conducts its business through a commitment to an ethical supply chain, a pursuit of workplace health and safety, minimizing ABC Refinery's impact on the environment and maintaining ABC Refinery's reputation as the leading refinery in Australasia.

This Policy reflects ABC Refinery's Sustainability and Responsibility Charter which is reviewed on a monthly basis by the Internal Compliance Committee.

Contact Information

If you have any questions regarding this Policy or feedback regarding its implementation, kindly direct your comment to our Compliance Officer – compliance@abcrefinery.com