

## **SUPPLY CHAIN DUE DILIGENCE POLICY:**

**DEBOYCO Limited-LLC** supports worldwide efforts and cooperates actively with various panels to ensure that Gold Metals come from legitimate, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our firm conviction and our unalterable policy to refuse any business proposal which might be connected with any illegitimate activity.

Our supply chain due diligence policy and practices, and our congruent commitment, are consistent with the **OEOD** due diligence guidance on conflict minerals as well with the LBMA Responsible Gold Guidance.

We employ this policy by having implemented a program of strict due diligence procedures and our commitment to conduct our activities and business are as follows;

- A. Honest and transparency
- B. We do not support fraud, corruption or any other illegal activity
- C. Maintain high moral, ethical and social standards
- D. Cultivate proper business relationships with all our counterparts
- E. Seek good and transparent relationships with government and non-governmental organizations
- F. Have fair and responsible relations with employees and all other stakeholders.

We implemented this policy through an effective and comprehensive management system which is based on strong local and international KYC due diligence practices in order to identify our upstream and downstream partners.

In that regard we are strongly committed to:

1. Not tolerating or nor profiting from, contributing to , assisting or facilitating the commission of ;
  - A. Torture, cruel, inhuman and degrading treatment
  - B. Forced or compulsory labor
  - C. Any kind of child labor
  - D. Human rights violations and abuses
  - E. War crimes, violations of international humanitarian law, crimes against humanity or genocide.
2. Not engaging and to immediately discontinue engagement with, customers or suppliers where we identify a reasonable risk that they are committing or are sourcing from or linked to any party committing any abuses described above or any other illegal party.

3. Not tolerating 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 affiliated who illegally
  - A. Control mine sites, transportation routes, precious metals trade or any other factors in the supply chain; and/or
  - B. Tax or extort money or precious metals at mine sites, along transportation routes or at points where they are traded, or from intermediaries, export companies or international traders.
4. Not engaging with, respectively immediately to 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 non-state armed groups as described above.
5. Not offering, promising, giving or demanding bribes or kickbacks in any form to individuals, including government officials, customers' contractors and suppliers or any other organization.
6. Not misrepresenting taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold. Likewise we will not conceal the origin of precious metals.
7. Supporting efforts and contribute to avoid and disclose money-laundering and financing of terrorism where we identify a reasonable risk of money –laundering and financing of terrorism resulting from, or connected to the supply and distribution chain of precious metals.
8. To adopt a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces as identified.
9. To suspend or discontinue engagement with upstream suppliers that support public or private security forces for illegal activities as on.
10. Not to offer, promise, give or demand bribes or kickbacks in any form to individuals, including government officials, customers, contractors and suppliers or any other origin of precious metals.
11. To support efforts and contribute to avoid and disclose money-laundering and financing of terrorism, tax evasion or tax fraud where we identify a reasonable risk of money laundering and financing of terrorism, tax evasion or tax fraud resulting from, or connected to the supply and distribution chain of precious metals.

We perform annual training sessions with relevant employees and partners and encourage them to raise any suspicious relation and/or transactions to management and/or compliance officer.

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

**For and on behalf of DEBOYCO Limited-LLC**