

## SUPPLY CHAIN DUE DILIGENCE POLICY

GGR herein cooperate with, and enhance worldwide efforts to ensure that precious metals come from legitimate, ethical sources, and that they are and have not been associated with crime, armed conflict or human rights abuse. Our policy aims to do business with law-abiding and legitimate customers only, and to deny our product 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.

As a result we are committed to:

- - Conducting our business in a culture of honesty and opposition to fraud and corruption;
- - Maintaining high moral, ethical and social standards in our business and activities;
- - Maintaining proper business relationships with all individuals, including government officials and employees.

We implement this policy throughout the firm and are committed to the following code:

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 labour;
  - the worst forms of child labour;
  - 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, or are sourcing from or linked to any party committing, abuses described above.
3. We will not tolerate support, direct or indirect, 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 participants in the supply chain; and/or 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. We will not deal with, and will immediately discontinue a relationship 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 maintain that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide support, may it be direct or indirect, to public or private security forces that commit abuses or that act illegally as described above.

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

[admin@ggrs.gold](mailto:admin@ggrs.gold)