

PRECIOUS METALS SUPPLY CHAIN POLICY

(Supply Chain Policy for Responsible Sourcing of Gold)

DISCLAIMER

This Policy is the sole property of MASSIF TRADING LLC (MASSIF TRADING) and is meant exclusively for its internal use. It is strictly forbidden to make or reproduce a copy of this Policy in any form, in part or in whole, without the prior written consent of the Owner/ Senior Management.

CONFIDENTIALITY

The information contained herein is confidential and is addressed to the management, the employees, and the counterparties of MASSIF TRADING LLC.

The contents of this Policy are the intellectual property of the Compliance Department of MASSIF TRADING and any form and reproduction, dissemination, copying, disclosure, modification, distribution, or publication of this material without seeking approval from the Compliance Department is strictly prohibited.

Prepared by :	Legal and Compliance Officer		
Approved by:	Managing Partner		
Effective Date	15 July 2022		
Version Number	00	Revision Date	N/A

Revision History

Date	Version	Comments (including Review History)
15 July 2022	00	DESIGNED TO MEET THE LEGAL AND REGULATORY REQUIREMENTS OF OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS AND ACCOMPANYING GOLD SUPPLEMENT, THE LBMA RESPONSIBLE GOLD GUIDANCE, AND THE UAE FEDERAL DECREE LAW NO. 20 OF 2018 ON ANTI-MONEY LAUNDERING AND COMBATTING THE FINANCING OF TERRORISM AND ITS AMENDMENTS



PRECIOUS METALS SUPPLY CHAIN POLICY
(Supply Chain Policy for Responsible Sourcing of Gold)

MASSIF TRADING LLC (the Company) is fully committed to ensure that all sources of gold and other precious metals in the supply chain are ethical and legitimate, and to only source gold mined from operations in conformance with internationally accepted environmental practices. To this end, the Company shall continuously refuse to condone any and all activities which directly or indirectly finance or benefit armed conflict and violence and/or contribute to human rights abuses inclusive of child labour slavery in all its forms.

We endeavour to continuously run our business activities with integrity and compliance with laws and regulations. Hence, the Company operates strictly in accordance with, and ensures thorough implementation of, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Gold Supplement, the LBMA Responsible Gold Guidance, the UAE Federal Decree Law No. 20 of 2018 on Anti-Money Laundering and Combatting the Financing of Terrorism and its amendments, and all applicable laws and regulations. The Company rigorously applies enhanced local and international KYC Due Diligence practices in order to properly identify its clients and implements a strict risk-based due diligence approach in assessing the risks, recognizing the negative impacts which may be connected with extracting, trading, handling, and exporting minerals from conflict-affected and high-risk areas.

This Policy particularly enumerates the conscious efforts that the Company has put forward to show its cooperation in the global effort to combat money laundering, terrorism financing, armed conflict, and human rights abuses. This policy will be implemented through a comprehensive management system that encompasses strict risk-based due diligence during onboarding of clients and during the periodic monitoring of transactions.

As part of our responsibility, MASSIF TRADING is committed to:

1. Systemically perform due diligence practices, and conduct the Know-Your-Customer (KYC) processes using a risk-based approach, before entering a business relationship with any precious metals trading entity. The Company shall also conduct appropriate scrutiny and monitoring of (i) the transactions undertaken through the course of the relationship; and (ii) the governance structures in place, to prevent any risk of money laundering and other illegal activities.
2. Not to tolerate or profit from, contribute to, assist with or facilitate the commission by any party of serious abuses associated with the extraction, transport, trade, handling or export of minerals as indicated in Annex II of the OECD Guideline, any transactions arising from:
 - (i) Any form of torture, cruel, inhuman and degrading treatment;
 - (ii) Any form of forced or compulsory labour;
 - (iii) Any form of child labour;
 - (iv) Other gross human violations and abuses such as widespread sexual violence; and/or



- (v) War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide; and
 - (vi) Bribery and corruption.
3. Not to enter into any business relationship, or immediately suspend or discontinue engagement with Counterparties supplying precious metals to any party identified as committing serious abuses as defined above. MASSIF TRADING shall engage all its Counterparties to ascertain the circumstances of identified risks and violations, how the Counterparties handled these (through mitigation and remedial actions), and how the Counterparty has introduced reasonable control measures to prevent and better mitigate such risks in the future.
 4. Not to provide any direct or indirect support to non-state armed groups or their affiliates. This includes, but is not limited to, procuring minerals from, making payment to or otherwise providing logistical assistance or equipment to non-state armed groups or their affiliates who:
 - (i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
 - (ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes, or at any point where minerals are traded; and/or
 - (iii) illegally tax or extort from intermediaries, export companies or international traders.
 5. Refrain from entering into any business relationship, or immediately suspend or discontinue engagement with upstream suppliers, if there is found a reasonable risk that that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as listed above.
 6. Eliminate, in accordance with paragraph 10 of Annex II of the OECD Guidance, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine sites, along transportation routes, or at any point where minerals are traded; or illegally tax or extort from intermediaries, export companies or international traders.
 7. Recognize that the role of public or public security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to uphold the law. This includes protecting human rights, ensuring the safety of mine employees, facilities, and equipment, and preventing anyone from interfering with legitimate extraction and trade.
 8. Support initiatives, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved. Support initiatives or take action to interact with national or local governments, international organizations, and civil society groups to offer practical suggestions on how to increase transparency, proportionality, and accountability in payments made to public security forces for the provision of security.



9. Not to enter into any business relationship and to immediately suspend or discontinue engagement with any upstream participant/s should we identify a reasonable risk that the supply chain directly or indirectly supports illegally acting public or private security forces.
10. Not offer, promise, give, or demand any bribes, and resist the solicitation of bribes to conceal or disguise the origin of precious metals, to misinterpret taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.
11. Support efforts, and/or take steps, to contribute to the effective elimination of money laundering as well as terrorism financing where we identify a reasonable risk of such illegal practices resulting from, or connected to, the extraction, transport, trade, handling or export of precious metals at points of access to mine sites, along transportation routes or at points where precious metals are traded by upstream participants in the supply chain. In this regard, we will immediately report to the relevant authorities any suspicion of any illegal financial transactions we identify.
12. Contribute and participate in the promotion of Responsible Sourcing of Precious Metals to our suppliers by (i) creating a long-term association with suppliers and established strong relationship with our customers; (ii) supporting our suppliers of gold to adhere with the provision of this policy and encourage them to impart or convey it to its staff and their supply chain; and by (iii) disseminating the precious metal gold guidance by local and international bodies.
13. Adequately store and maintain all records and documentation relating to the precious metals supply chain in order to demonstrate appropriate and on-going due diligence has been performed. Storage of such information should be for a minimum of 5 years or as directed by applicable local laws, whichever is longest.
14. Require our Counterparties and, in particular, all Counterparties supplying precious metals, to mutually cooperate by committing to, and acknowledging in writing, compliance with a supply chain policy consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and accompanying Gold Supplement, the LBMA Responsible Gold Guidance, the UAE Federal Decree Law No. 20 of 2018 on Anti-Money Laundering and Combatting the Financing of Terrorism and its amendments, and all applicable laws and regulations.
15. Ensure continuous improvement of this Policy, designed to respond to identified risks within a supply chain presented by a certain customer or supplier to prevent or mitigate adverse impacts from a business relationship.
16. Train relevant staff and educate its employees through formal education, trainings or seminars and conferences with the provisions of this Policy and the responsible sourcing of precious metals. MASSIF TRADING requires all its staff involved in the gold supply chain to strictly comply with this Policy and implement it in the management system.



This Policy has been approved by the Management. All employees, suppliers and customers of the Company are required to abide by the provisions contained herein.

This document is not intended to be and does not create a contract, a contractual obligation, or any other rights (express or implied), nor does it serve as the foundation for any claim or legal action brought against or on behalf of any third party.

For any and all concerns and grievances, please contact the Compliance Department of Massif Trading LLC at compliance@massiftrafig.com.

- 0 -

