CHILLON
TRADING LIMITED

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Use of Security Personnel Policy

Policy Statement

Chillon Trading Limited is committed to protecting its people, premises, and precious metal assets in a manner that is lawful, proportionate, and respectful of human rights. Where the Company engages or employs security personnel — whether in-house staff or a contracted security services provider — those personnel are required to respect the human rights and dignity of all individuals, and to use only the minimum force proportionate to the perceived threat.

Purpose

This policy sets out the standards Chillon applies to any security personnel acting on its behalf, whether directly employed or engaged through a third-party security contractor, so that the Company's security arrangements do not result in, or contribute to, human rights abuses.

Scope

This policy applies to all security personnel deployed at Chillon's premises, in transit of gold, silver and valuables, or otherwise acting under the Company's instruction or on its behalf, including third-party contracted guards, cash-in-transit providers, and any armed or unarmed security escort.

Core Principles

1. **Respect for human rights and dignity.** Security personnel must treat all persons — staff, visitors, customers, suppliers, and members of the public — with respect and dignity at all times, and must not engage in or facilitate any form of harassment, intimidation, discrimination, or degrading treatment.
2. **Minimum force, proportionate to threat.** Force may only be used where strictly necessary to protect life, prevent a crime in progress, or protect Company assets, and must never exceed what is proportionate to the actual or reasonably perceived threat. De-escalation and non-violent means must be attempted first wherever possible.
3. **Lawful conduct.** Security personnel must act in compliance with Hong Kong law at all times, including the Security and Guarding Services Ordinance (Cap. 460), which governs the licensing and conduct of security personnel and security

companies operating in Hong Kong, and the Crimes Ordinance and Offences Against the Person Ordinance insofar as they govern the lawful use of force.

4. **No firearms absent lawful authorisation.** Security personnel engaged by the Company will not carry or use firearms unless specifically and lawfully authorised, licensed, and required for cash/bullion-in-transit functions in accordance with Hong Kong law.
5. **Selection and vetting.** Any third-party security provider engaged by the Company must hold a valid Security Company Licence (or equivalent) under the Security and Guarding Services Ordinance, and individual guards must hold valid Security Personnel Permits. The Company will conduct reasonable due diligence on a provider's human rights record and training standards before engagement.
6. **Training.** Security personnel acting for the Company — whether directly employed or contracted — must receive training that covers: applicable law on the use of force; de-escalation and conflict-avoidance techniques; respect for human rights and non-discrimination; and the Company's grievance mechanism for reporting concerns. Training records are retained by the Company or obtained from the contracted provider as evidence.
7. **Incident reporting and review.** Any use of force, restraint, or a security-related incident involving a member of the public, staff, or a counterparty must be reported to management without delay, logged in an incident register, and reviewed to identify whether the response was proportionate and whether any corrective action or retraining is required.
8. **Grievance channel.** Any person who believes they have been subject to disproportionate force or mistreatment by security personnel acting for the Company may raise this through the Company's grievance and whistleblowing mechanism, and the report will be investigated and, where substantiated, acted upon — including termination of the individual's or provider's engagement where warranted

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