CHILLON
TRADING LIMITED

Name of Company: CHILLON TRADING LIMITED.

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Supply Chain Policy

1. CHILLON TRADING LIMITED is a company incorporated in Hong Kong SAR engaged in the trading, purchase and sale of gold and silver, gold and silver bullion, gold and silver scrap and semi-fabricated gold and silver products. This policy confirms CHILLON TRADING LIMITED's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. CHILLON TRADING LIMITED is a member of the Responsible Jewellery Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;

b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;

c. support transparency of government payments and rights-compatible security forces in the extractives industry;

d. do not provide direct or indirect support to illegal armed groups;

e. enable stakeholders to voice concerns about the jewellery supply chain; and

f. are implementing the OECD five-step framework as a management process (and Supplement on Gold and Silver, where applicable) for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

3. We also commit to using our influence to prevent abuses by others. We assess and address the risk of non-compliance by our suppliers through our supply chain due diligence procedures, which include counterparty risk assessment, enhanced due diligence for higher-risk suppliers, and suspension or termination of the relationship where a reasonable risk of non-compliance with this policy is identified. Interested parties, including suppliers, employees and other stakeholders, may raise concerns about materials from conflict-affected areas, or any other supply chain concern, through our confidential grievance and complaints mechanism, details of which are available on request from the Compliance Officer.

4. Regarding serious abuses associated with the extraction, transport or trade of gold and silver: We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

a torture, cruel, inhuman and degrading treatment;

b forced or compulsory labour;

c the worst forms of child labour;

d other gross human rights violations and abuses; or

e war crimes, violations of international humanitarian law, crimes against humanity or genocide.

5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.

6. Regarding direct or indirect support to non-state armed groups: We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold and silver from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

a control mine sites, transportation routes, points where gold and silver are traded and upstream actors in the supply chain; or

b tax or extort money, gold or silver at mine sites, along transportation routes or at points where gold and silver are traded, or from intermediaries, export companies or international traders.

7. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

8. Regarding public or private security forces: We affirm 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 direct or indirect support to public or private security forces that commit abuses described in paragraph 4, or that act illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of gold and silver: We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold and silver, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold and silver.

10. Regarding money laundering: We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of gold and silver.

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