

SUPPLY CHAIN DUE DILIGENCE POLICY

September 12, 2025 Issued by the Board of ZIJIN GOLD TRADING – FZCO

ZIJIN GOLD TRADING – FZCO (hereinafter referred to as “ZIJIN”), a precious metals service provider, is fully committed in providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing. We are fully committed to follow appropriate standards apply for human rights, labor standards, environmental impact, and business ethics to attain a responsible supply chain.

ZIJIN understands that Gold and Platinum Group Metals (Platinum, Palladium and Rhodium) recognizing that risk of significant adverse impact which may be associated with extraction, trading, handling, and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with supplier the following policy on responsible sourcing of minerals from conflict affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practice and supplier’s risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflicts and we commit to comply with relevant United Nations sanction resolutions or, where applicable, domestic laws implementing such resolutions.

We strongly recommend our suppliers and counterparties to operate in accordance with the OECD, RJC CoC Standard for Precious Metals Supply Chain, the LBMA Responsible Gold Guidance and DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain.

As a part of our Responsible Precious Metals Sourcing Policy responsibility, ZIJIN is committed to:

1. Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities:
 - Any forms of torture, cruel, inhuman and degrading treatment;
 - Any forms of forced or compulsory labor;
 - Illegal and/or unacceptable forms of child labor;

- Other human rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

We will immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source is from, or linked to, any party committing serious abuses as defined above.

2. Not tolerate any of its suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is not limited to:
 - Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain, and/or
 - Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
 - Illegally tax or extort intermediaries, export companies or international traders.
3. Not to offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.
4. Play a part and contribute in elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti - Money Laundering and Combating Financing Terrorism.
5. To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.
6. Ensure that effective Due Diligence on a risk-based approach is carried before starting any transactions and continuous monitoring to existing clients to assess the level of risk and plan to mitigate the risk identified.
7. Create and keep proper and adequate records of all precious metals transaction and activities that demonstrates the due diligence has been strictly followed.
8. Train relevant staff and educate its employees through formal education, trainings or seminars and conferences with the provision of this policy and the responsible sourcing of precious metals.
9. 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.

10. 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.

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 Details:

For questions and/or concerns related to the supply chain policy, please send an email to info@zijingoldtrading.com

Acknowledgment:

We would like to thank the OECD for the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict – Affected and High-Risk Areas to which parts of this policy is adapted.

Company Stamp: _____

