



NATURAL PRECIOUS METALS (PTY) LTD

POLICY DOCUMENT

Document Title: Supply chain

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1	22 October 2014	Sept 2015	Nikki Pavlakis
2	02 Feb 2016	March 2017	Nikki Pavlakis
3	23 Sept 2019	Oct 2020	Nikki Pavlakis
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SUPPLY CHAIN POLICY

1. Since commencing business in 2004 Natural Precious Metals (Pty) Ltd (“NPM”) has obtained a refinery license. It is our company policy to be transparent with regards to business dealings with our suppliers and clients.

This policy confirms NPM commitment to respect human rights, avoid contribution to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

2. NPM is a certified 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 Organisation Fundamental 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; and
 - e. enable stakeholders to voice concerns about the jewellery supply chain.
3. We also commit to using our influence to prevent abuses by others. It is NPM policy to purchase precious metals from legitimate and ethical sources. NPM KYC procedure will ensure suppliers adhere to NPM Supply Chain Policy. In view of the role of the precious metals trade with regards to abuse of human rights, its contribution to conflict, money laundering and combating terrorist financing, NPM hereby commits itself to uphold the principles of The OECD Due Diligence Guide for the Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.

4. Regarding serious abuses associated with the extraction, transport or trade of gold

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. human rights violations and abuses; and
 - 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 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 is traded and upstream actors in the supply chain; and
 - b. tax or extort money or gold at mine sites, along transportation routes or at points where gold is 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 provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4 or that illegally as described in paragraph 6.

9. Regarding bribery and fraudulent misrepresentation of the origin of gold

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

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.

The Members and employees of NPM will be required to confirm their commitment and compliance to NPM Supply Chain Policy.

SIGNATURE

NAME

DATE

COMPANY