

## Supply Chain Due Diligence Policy and Declaration

### 1. Purpose

From the first days of the group's operation in 1990, Metal Concentrators SA (Pty) Ltd ("MetCon") has been regarded as one of the leaders and innovators in the Jewellery and Precious Metals Industry in South Africa. Our commitment to honesty and integrity has resulted in a company that is held in high regard with not only our clients but our competitors, Government and the South African Precious Metals Industry in general.

In view of the role of the precious metals trade with regard to abuse of human rights, its contribution to conflict, money laundering and combating terrorist financing, MetCon hereby commits itself to uphold the principles of The OECD Due Diligence Guide for the Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

### 2. Policy

It is our policy to only purchase precious metals from legitimate and ethical sources and that the purchases of such precious metals have not been associated with corruption, crime, armed conflict, misrepresentation of tax and royalty payments or human rights abuse. We will continue to operate our company with honesty and the highest of moral standards in all aspects of our business.

MetCon has implemented the abovementioned policy and appointed an RJC Compliance Officer, who will be responsible to oversee our policy, management systems and due diligence process regarding the purchase of precious metals.

The Shareholders, Management and Staff of MetCon all commit to the following principles:

- a) We will not tolerate nor profit from, contribute to, assist or facilitate:
  - i) child labor or any form of forced labor;
  - ii) human rights violations and abuses;
  - iii) torture, cruel inhuman and degrading treatment; or.
  - iv) war crimes, violation of international humanitarian laws, crimes against humanity or genocide.
  
- b) We will cease to deal with any supplier that is identified as being involved or sourcing from or linked to any party committing the abuses outlined above.
  
- c) We will not deal with any supplier that either directly or indirectly supports non-state armed groups through extraction, purchase, logistical support, making payments or supplying equipment to non-state armed groups or their associates who:
  - i) illegally control mines or transportation routes;
  - ii) illegally tax or extort money from mines, transportation routes or trading points; or
  - iii) illegally tax or extort intermediaries, export companies or traders.

- d) We will not purchase any Krugerrands or any other local or international legal tender coins.
- e) We will not trade with any supplier that is accused, found guilty or involved in the melting of Krugerrands or any other local or international legal tender coins.
- f) We will immediately suspend suppliers that are identified as a high risk or that are sourcing from or supporting, either directly or indirectly, non-state armed groups as defined above.
- g) We will immediately suspend suppliers that are flagged on illegal or suspicious transactions dealing either directly or indirectly within our supply chain.
- h) We confirm that the role of public and private security forces at mine sites, transportation routes and surrounding areas is to maintain rule of law, provide security to workers, facilities and equipment. We will not support, either directly or indirectly, any security force that commits abuses as described above.
- i) We will not offer or demand any bribes and will resist the solicitation of bribes to conceal or disguise the origin of precious metals, to misrepresent taxes and royalties paid to governments.
- j) We will take steps to contribute to the elimination of money-laundering connected to or resulting from the extraction, trade, illegal export, illegal taxation or extortion at mines sites, transportation routes or points where gold is traded.

The Shareholders, Management and Staff will be required to confirm their commitment and compliance to the MetCon Supply Chain Due Diligence Policy.

We require all business partners and suppliers to confirm their commitment and compliance to the MetCon Supply Chain Due Diligence Policy by signing below and, where business partners and suppliers do not have formal policies in place, MetCon will provide assistance in this regard where possible.

  
\_\_\_\_\_  
Signature

Grant N Crosse  
Name (Duly Authorised)

26 October 2020  
Date

Director  
Position