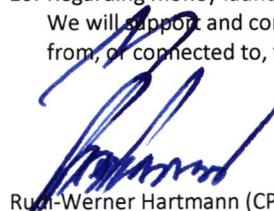
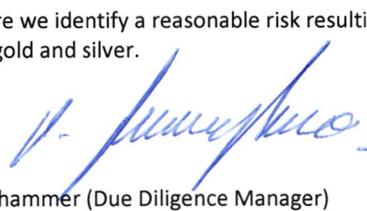


SOURCING POLICY FOR CONFLICT MINERALS AND CONFLICT COUNTRIES

1. This policy of DODUCO Holding GmbH, DODUCO Contacts and Refining GmbH and DODUCO Solutions GmbH (in sum called DODUCO) confirms their commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
2. DODUCO is a Conformant Gold Refiner in accordance with the RMI (Responsible Minerals Initiative) and a certified Good Delivery Refiner by the LBMA (London Bullion Market Association). 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;
 - f. are implementing the OECD five-step framework as a management process (and Supplement on Gold if 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. It's mandatory for us to keep this issue on the agenda of each meeting we have with both, suppliers and customers.
We point out our responsibility towards the whole supply chain. Our clear aim is to do whatever possible in regard to a legal and transparent supply chain. We created an independent address where everyone can anonymously express their concerns concerning materials with eventual dubious origins.
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. 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 is traded and upstream actors in the supply chain; or
 - b. tax or extort money, or gold and silver at mine sites, along transportation routes or at points where gold and silver 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 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.



Rudi-Werner Hartmann (CPO)



Harald Berghammer (Due Diligence Manager)