
RESPONSIBLE GOLD SUPPLY CHAIN POLICY

CONTEXT

PX PRECINOX SA is a company specialized in precious metals refining, gold trading and manufacturing of precious metals semi-finished goods for the luxury industry. At PX PRECINOX we are fully committed to ensure that all our sources of supply chain are ethical, legitimate, from conflict free areas and respecting human rights. PX PRECINOX complies with the high standards published by OECD, LBMA and RJC as well as the Swiss laws of Anti-Money Laundering / Countering the Financing of Terrorism (AML/ CFT). These high standards are designed to fight against money laundering, terrorism financing and human right abuses at any point along the precious metals supply chain. Our compliance with these standards is certified by recognized third party audits.

HOW DO WE DEAL WITH COMPLIANCE ISSUES

We conduct our business with high ethical, moral and social responsibility standards, proposing a fair price to our partners. High integrity, honesty and transparency are the foundations on which our business is built and we require from our employees involved in the precious metals supply chain to comply with our gold supply chain policy and to implement it thoroughly, through the appropriate management systems in place. Our Gold Supply Chain policy is implemented through a comprehensive management system that encompasses strict risk-based due diligence approach. PX PRECINOX risk management policy has been designed and implemented to ensure that our commitments and operating procedures are rigorously in line with OECD Diligence's guidance for supply chains responsible for minerals in high risk areas, the "Gold Supplement", the "LBMA Responsible Gold Guidance", RJC standards and respecting the Anti-Money Laundering / Countering the Financing of Terrorism (AML/ CFT) law.

PX PRECINOX by applying its Gold Supply Chain Policy, participates and cooperates in global efforts to combat money laundering, terrorism financing, armed conflict, human rights abuses. PX PRECINOX condemns formally any human rights abuse and any child right abuse and expect from all actors in the supply chain to be in line with these fundamentals. Our policy prohibits any employee from offering or receiving of a bribe or facilitation payment. In addition PX PRECINOX requires from all partners in the supply chain, a clear, transparent and full compliance with local and international regulations, to ensure that our precious metals sourcing is legitimate, conflict free, ethical and social responsible.

An on-going training program is performed on a regular basis in order to bring all counterparties and all relevant employees up to date on standards and due diligence, know your customer (KYC) and know your product (KYP) best practices. Our due diligence process includes the transportation and logistics as part of the supply chain. Therefore we work with the world's leading high security transportation and logistics companies adhering to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Supplement on Gold.

BEYOND THE REGULATIONS

Our ultimate goal is to supply our customers with responsible gold, which is why compliance with the RJC standards for environmental protection and corporate social responsibility are particularly important. These are essential for local communities and for that reason we take care about the supplier's process environmental impact, promoting responsible and sustainable practices. Responsible gold is, for us, not only synonym of compliance with standards but means also involvement in local community development. PX PRECINOX is the initiator of several initiatives for artisanal scale mining support, education development for miners and their families and improvement of medical care especially for children and mothers. In addition PX PRECINOX is involved in projects aiming to fight against uncontrolled usage of chemical substances responsible of environment injuries.

Through our on-site presence, we encourage and assist suppliers to understand and implement appropriate due diligence process and criteria for selecting sources that meet high standards. PX PRECINOX promotes ethical standards during meetings, exhibits, and through all commercial supports.

GRIEVANCE MECHANISMS

PX PRECINOX has established a company-wide internal and external communication mechanism.

PX PRECINOX has set up the following e-mail address: compliance@pxgroup.com allowing any stakeholders to anonymously voice concerns regarding PX PRECINOX's supply chain and risks.

If anyone knows or has a genuine suspicion of a violation, is aware of a situation that he or she believes may be illegal or unethical, he or she should speak up and report the violation by contacting the Legal and Compliance Department or send an email to: compliance@pxgroup.com

The Compliance Officer is responsible for handling all external supply chain and risk communications and keeps management informed of any new risks identified.

Depending on the nature of the complaint, management will carry out an action plan to obtain the best solution quickly.

Internal communication mechanisms are managed by the Employee's Code of Conduct and Ethics.