

Responsible Gold Supply Chain Policy

SEPTEMBER 1ST 2024



CONTEXT

PX Précinox SA is a company specialised in precious metals refining, gold trading, and manufacturing semi-finished precious metal goods for the luxury industry. At PX Précinox, we are fully committed to ensuring that all our sources of supply are ethical, legitimate, from conflict-free areas, and respect human rights. PX Précinox complies with the high standards set by the OECD, LBMA, and RJC, as well as, notably, the Swiss law on Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT), the Control of Trade in Precious Metals and Precious Metal Articles (PMCA), and the Due Diligence and Transparency regulations concerning Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO). These high standards and laws are designed to combat money laundering, terrorism financing, and human rights abuses at any point along the precious metals supply chain. Our compliance with these standards and laws is certified by recognised third-party audits.

HOW WE HANDLE COMPLIANCE ISSUES

We conduct our business with high ethical, moral, and social responsibility standards, offering fair prices to our partners. Integrity, honesty, and transparency are the foundations upon which our business is built. We require our employees and business partners involved in the precious metals supply chain to comply with our Gold Supply Chain Policy and implement it thoroughly through the appropriate management systems. Our policy is enforced via a comprehensive management system that includes a strict, risk-based due diligence approach. PX Précinox's risk management policy has been designed and implemented to ensure our commitments and procedures are rigorously aligned with the OECD's Due Diligence Guidance for responsible supply chains of minerals from conflict-affected and high-risk areas, the "Gold Supplement", the LBMA Responsible Gold Guidance, the RJC Code of Practices and Chain of Custody, and Swiss law.

We are committed to aligning our practices with international standards of responsible sourcing, fully integrating the United Nations Sustainable Development Goals.

We uphold human rights by adhering to the UN Guiding Principles on Business and Human Rights and the core labour standards of the International Labour Organization, with a strong focus on safety and health. We carefully consider the impact of our activities on indigenous peoples and other vulnerable populations, while working to reduce our greenhouse gas emissions in line with the Paris Agreement. We also encourage industry-wide collaboration to advance Environmental, Social, and Governance (ESG) principles, regularly reporting on progress.

SEVERE ABUSES RELATED TO MINERAL EXTRACTION, TRANSPORT, OR TRADE

When sourcing or operating, we will not tolerate or profit from, contribute to, assist with, or facilitate any party's commission of:

- i) Any forms of torture, cruel, inhuman, or degrading treatment;
- ii) Any forms of forced or compulsory labor, which involves work or service extracted from a person under the threat of penalty and without voluntary consent;
- iii) The worst forms of child labor;
- iv) Other gross human rights violations and abuses, including widespread sexual violence ;

War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

SUPPORT FOR ILLEGITIMATE NON-STATE ARMED GROUPS OR PUBLIC/PRIVATE SECURITY FORCES

We will not tolerate any direct or indirect support to illegitimate non-state armed groups or illegitimate public/private security forces in the extraction, trade, processing, or export of minerals. "Direct or indirect support" includes sourcing minerals from, making payments to, or providing logistical or material assistance to such groups or their affiliates who:

- i) Illegally control mine sites, transport routes, trading points of minerals, and upstream actors in the supply chain; and/or ;
- ii) Illegally tax or extort money or minerals at access points to mine sites, along transport routes, or at trading points of minerals; and/or ;
- iii) Illegally tax or extort intermediaries, export companies, or international traders.

We recognize that the role of public or private security forces at mine sites or along transportation routes should be solely to maintain the rule of law, safeguard human rights, and protect legitimate extraction and trade.

routes from interference with legitimate extraction and trade.

BRIBERY AND FRAUDULENT MISREPRESENTATION OF MINERAL ORIGINS

We will neither offer nor accept bribes and will actively resist any attempts to solicit bribes intended to obscure or falsify the origin of minerals, or to misrepresent taxes, fees, and royalties paid to governments in connection with mineral extraction, trade, handling, transport, or export. Our policy prohibits employees from offering or receiving bribes or facilitation payments. We also require transparency and full compliance from all partners in the supply chain to ensure that our sourcing is legitimate, conflict-free, ethical, and socially responsible.

MONEY LAUNDERING

We actively support initiatives to eliminate money laundering whenever we identify a reasonable risk of its occurrence in connection with mineral extraction, trade, handling, transport, or export. This includes illegal taxation or extortion at mine site access points, along transport routes, or at trading points managed by upstream suppliers.

TRAINING

An ongoing training program is regularly conducted to keep relevant employees up to date on standards, due diligence, Know Your Customer (KYC), and Know Your Product (KYP) best practices.

BEYOND REGULATIONS

Our ultimate goal is to supply our customers with responsible gold. Compliance with LBMA and RJC standards for environmental protection and corporate social responsibility is particularly important for us and the local communities we serve. We ensure that our suppliers' processes minimize environmental impact, promoting responsible and sustainable practices. Responsible gold, for us, means not only compliance with standards but also active involvement in local community development. PX Précinox initiates several projects to support artisanal mining, improve education for miners and their families, and enhance healthcare, especially for children and mothers. We are also involved in projects aimed at reducing the uncontrolled use of harmful chemicals.

Through our on-site presence, we assist suppliers in understanding and implementing due diligence processes. PX Précinox promotes ethical standards during meetings, exhibits, and in all commercial interactions.

GRIEVANCE MECHANISM

PX Précinox has established internal and external communication mechanisms. Concerns regarding our supply chain can be voiced anonymously through the email: complaints@pxgroup.com. Any suspicion or awareness of illegal or unethical practices should be reported to the Legal and Compliance Department or by email. The Compliance Officer handles all external communications related to supply chain risks and informs management of any new risks identified. Management will then devise an action plan for a swift resolution.

Internal communication mechanisms are governed by the Employee Code of Conduct and Ethics.

ANNUAL REPORTING

PX Précinox has exercised due diligence regarding the precious metals supply chain as required by various laws and standards such as the DDTro. In 2023, the company identified no risk of sourcing precious metals from Conflict-Affected and High-Risk Areas (CARAHs).

PX Précinox also exercised its duty of care concerning human rights, identifying no adverse impacts in 2023, either among its employees or its direct suppliers. Similarly, no instances of child labour were identified in 2023.

PX Précinox's LBMA Compliance report and third-party audit report are available on its website. The PX Group's supplier code of conduct can be requested via complaints@pxgroup.com.

PX Précinox is annually audited by the Swiss Central Office for Precious Metals Control and an accredited independent audit firm to verify compliance with its duty of care and validate its procedures.

Approved on September 1st, 2024, by the CEO Philippe Chave and the Director Christophe Nicolet.