

MARSAM REFINADORA DE METAIS LTDA

Supply Chain Police

"Marsam Refiner is committed to ensuring that the processed material comes from conflict-free areas, produced in accordance with environmental constraints and free from human rights abuses. The company does not allow its actions directly or indirectly to contribute to the financing of war conflicts or money laundering.

Marsam Refiner has a continuous training plan for its employees, cooperative actions with its business partners and maintains Compliance procedures focused on getting to know its customers, avoiding money laundering operations and monitoring its supply chain as well as origin of the material processed. "

Supply Chain Policy

This Policy applies to all employees and suppliers involved in the processing, refining and marketing of gold and other precious metals for the Marsam business in Brazil.

We recognize our responsibility to respect the human rights and the possibility of significant adverse impacts associated with the extraction, marketing, handling and exporting of gold and other precious metals, and we are committed in refraining to take any action that contributes to the financing of armed conflicts.

Our principles to comply with the Supply Chain Policy are:

Do not tolerate and in no way benefit, contribute, support or facilitate the practice of abuses associated with the extraction, transportation or trade of gold that jeopardize the promotion of human rights and dignified labor, assuring to workers the freedom of association and the right to negotiate collectively, by combating child labor, forced labor and any form of discrimination in the company and its value chain;

Do not tolerate any direct or indirect support to armed non-governmental groups, public or private security forces, which act illegally within the supply chain;

To recognize that the role of security forces, whether public or private, at mine sites, surrounding areas and/or in transport routes should be to preserve the laws, safeguard human rights, provide security to the workers, equipment and facilities of the mines, and protect mines or transport routes from interferences in the extraction and legitimate trade;

To require that private contracted forces, including by any company within the supply chain, perform their functions in accordance with the Voluntary Principles on Security and Human Rights;

To not offer, promise, give or demand bribes of any kind and resist the solicitation of bribery for the purpose of covering up or presenting incorrect information on taxes, fees and royalties paid to governments for the right to extract and market the gold;

For the management of risks related to the Supply Chain Policy we implement the following measures:

Take all administrative and legal actions, when applicable, if it identifies situations of abuses associated with the extraction, transportation or trade of gold;

Suspend or discontinue the relationship with suppliers, including carriers, in the supply chain if it's identified the possibility that they are attached to any person, group or institution that directly or indirectly supports non-governmental armed groups;

Collaborate with suppliers, central or local government authorities, international organizations, civil society and third parties affected, according to the specific situation, in combating situations of bribery and fraudulent misinterpretation regarding the origin of minerals, money laundering and payment of taxes, fees and royalties to the governments in order to improve and monitor performance with the purpose to prevent or mitigate the risks of negative impacts.

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