

ANTI-BRIBERY AND CORRUPTION POLICY OF SCHIFF GOLD PRECIOUS METALS TRADING LLC

This policy applies to all personnel employed by Schiff Gold Precious Metals Trading LLC as well as its management, shareholders, and business partners.

Schiff Gold Precious Metals Trading LLC is steadfast in its commitment to responsible and equitable business conduct, a central tenet of its foundational principles. The company is fully dedicated to fostering and upholding the highest echelons of ethical norms in connection with all its business operations. The preservation of its reputation as a bastion of lawful business practices is of paramount significance, and this policy has been formulated to safeguard these principles. Thus, Schiff Gold Precious Metals Trading LLC maintains a stringent policy of absolute intolerance towards acts of anti-bribery and corruption. The company is firmly resolute in its resolve to engage in all business transactions and affiliations with equity and integrity.

This policy delineates Schiff Gold Precious Metals Trading LLC's standpoint on all manifestations of anti-bribery and corruption and offers directives aimed at:

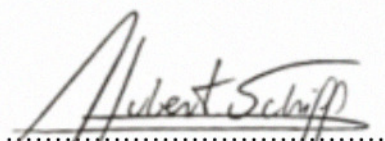
- Ensuring unwavering adherence to laws, regulations, and rules pertaining to anti-bribery and corruption, not only within the United Arab Emirates but across any other jurisdiction within which Schiff Gold Precious Metals Trading LLC operates or maintains business relationships.
- Equipping employees and affiliates of Schiff Gold Precious Metals Trading LLC with a clear understanding of the risks associated with anti-bribery and corruption. This comprehension is intended to galvanize vigilance and facilitate the identification, prevention, and reporting of any instances of wrongdoing, whether perpetrated by themselves or others.

Employees and Management of Schiff Gold Precious Metals Trading LLC are obligated to:

- Abide by all anti-bribery and corruption statutes that are applicable within any jurisdiction worldwide where they engage in business activities.
- Conduct themselves in a manner characterized by integrity, responsibility, and honesty.
- Safeguard and uphold the fundamental values of the company by consistently adhering to ethical, professional, and legal conduct in all circumstances.

Any personnel whose actions contravene the stipulations outlined in Schiff Gold Precious Metals Trading LLC's Anti-Bribery and Corruption Policy will be subject to disciplinary measures in accordance with the company's prescribed disciplinary protocol and the pertinent laws of the United Arab Emirates.

[End of Policy]


.....
Hubert Jacob Henry Schiff
Chief Executive Officer