

BUSINESS POLICY - SCHIFF GOLD PRECIOUS METALS TRADING LLC

1.1 Background

Established in 1974 in Dubai, United Arab Emirates, the renowned hub of precious metals, Schiff Gold Precious Metals Trading LLC is an esteemed entity within the UAE's top gold, silver, and precious metals trading companies. With experienced management Schiff Gold Precious Metals Trading LLC holds a distinguished global reputation within the industry. Its operational strength lies in a robust network bridging precious metals-producing nations with their consuming counterparts. Conducting business with the utmost ethical and moral standards, Schiff Gold Precious Metals Trading LLC maintains a steadfast commitment to responsible sourcing practices.

Schiff Gold Precious Metals Trading LLC firmly embraces gold and silver as invaluable commodities of the future.

The senior management espouses the symbiotic relationship between growth and sustainability, prioritizing comprehensive environmental, social, and governance considerations. The company significantly invests in both industry advancement and the broader community welfare.

1.2 Legislation and Regulatory Compliance

- a. Schiff Gold Precious Metals Trading LLC shall rigorously conduct its operations in strict conformity with pertinent national and international legislations and regulations applicable within the jurisdictions of its operations.
- b. All personnel are bound to adhere meticulously to the spectrum of applicable laws, regulations, and internal policies delineated by Schiff Gold Precious Metals Trading LLC, governing their business conduct.
- c. Staff members are mandated to possess a comprehensive understanding of and adherence to legal, regulatory, and internal requirements germane to their roles and responsibilities.
- d. The compliance team assumes responsibility for meticulous record-keeping, ensuring an updated inventory of pertinent legal and regulatory obligations and their compliance status.

1.3 Anti-Money Laundering, Terrorism Financing, and Financial Offenses (AML/CFT)

- a. Schiff Gold Precious Metals Trading LLC acknowledges its paramount responsibility to assess vulnerabilities to money laundering inherent to the gold and precious metals sector and to proactively implement measures to thwart the nefarious exploitation of these vulnerabilities.
- b. Strict adherence to national and international laws and regulations pertaining to money laundering, terrorism financing, bribery, corruption, smuggling, fraud, embezzlement, racketeering, transfer pricing, and tax evasion is obligatory at all times.
- c. Schiff Gold Precious Metals Trading LLC commits to unwavering compliance with national auditing requirements for financial accounts and the establishment of robust internal controls, guided by pertinent regulatory frameworks.
- d. Personnel are entrusted with the responsibility to exhibit a comprehensive grasp of and adherence to legal, regulatory, and internal requisites concerning money laundering and financial offenses. Willful neglect or non-reporting of suspicious activities that raise questions regarding their legitimacy may be subject to scrutiny under the ambit of Business Principles, contingent upon the gravity of non-compliance.

- e. The compliance officer is tasked with ensuring meticulous execution of critical processes such as Know Your Customer (KYC) and Know Your Supplier (KYS), identification of transactions that arouse suspicion, systematic reporting to the management, and diligent maintenance of requisite records.
- f. Comprehensive insights into the "Responsible Precious Metal Suppliers Policy" are accessible through our official website.

1.4 Anti-Bribery and Facilitation Payment Policy

- a. Schiff Gold Precious Metals Trading LLC unequivocally and categorically prohibits the pernicious practices of bribery and facilitation payments across its entire spectrum of operations and affiliations.
- b. The company solemnly abstains from offering, accepting, or endorsing any form of payment, gift, hospitality, or promise that could potentially compromise the integrity of equitable competition.
- c. A complete embargo on bribery and facilitation payments shall be enforced, accompanied by rigorous adherence to diverse legal norms and regulations.
- d. Periodic instructional sessions and consciousness-raising endeavors shall be undertaken to edify employees about the multifaceted dimensions of bribery and facilitation payments, coupled with precise delineation of the internal procedures instituted for unwavering compliance.

1.5 Ethical Gold Sourcing Policy

- a. Schiff Gold Precious Metals Trading LLC is profoundly committed to mitigating the environmental and social repercussions associated with imprudent mining practices.
- b. The company mandates stringent adherence of all gold suppliers to gold sourcing guidelines, encompassing but not limited to Dodd-Frank regulations, stipulations concerning the Democratic Republic of Congo (DRC), and other pertinent legislative enactments.
- c. The company's commitment extends to meticulous scrutiny of gold and precious metals ores and artifacts against the backdrop of the most exacting social, human rights, and environmental standards within the ambit of trade.
- d. Comprehensive adherence to AML/CFT, DRC, and other legislatively mandated compliance requirements pertaining to the gold and precious metal industry characterizes all sourcing activities.
- e. The profound commitment of Schiff Gold Precious Metals Trading LLC to responsible sourcing is encapsulated within the "Responsible Precious Metals Policy," an illuminating repository accessible via our official web presence.

1.6 Supply Chain Management / Optimal Efforts

The management of Schiff Gold Precious Metals Trading LLC undertakes an unflinching commitment to engender optimal collaboration and compliance among suppliers and customers, with an overriding focus on propagating anti-money laundering imperatives.

1.7 Employment

- a. Unwavering conformity with prevailing national and international employment and labor laws and regulations shall constitute the hallmark of Schiff Gold Precious Metals Trading LLC's workforce management practices.

- b. The company shall observe and enforce stipulated national weekly working hour thresholds without exception.
- c. Compensation and benefits offered for a standard workweek shall not only meet but exceed the baseline set by national minimum standards, ensuring the satisfaction of basic employee needs alongside provisions for discretionary income.
- d. Individual staff members are enjoined to familiarize themselves with the nuances of pertinent legal, regulatory, and internal requisites germane to employment and labor practices.
- e. Concomitant recognition shall be accorded to the extant affiliations and lawful undertakings of worker representative entities, with unfettered access granted to worker representatives for the fulfillment of their roles and obligations.
- f. The dismissal of employees shall scrupulously adhere to the protocols delineated in the Employee Manual, eschewing any arbitrary or capricious proceedings.
- g. Transparent and unequivocal communication of applicable employment policies and operational practices to all employees constitutes a fundamental tenet.

1.8 Health and Safety

Schiff Gold Precious Metals Trading LLC is acutely cognizant of the imperative to foster a business ethos characterized by sustainability and value creation. In this pursuit, the company commits to the following principles:

- The identification and elimination of potential adverse effects on the health and safety of personnel engendered by business operations are integral to our modus operandi. This entails a systematic review of operational contours to identify salient sources of health and safety risks.
- Said review shall be predicated upon the prism of established benchmarks mandated by extant laws, expert advisories, and exemplary industry best practices.
- The outcomes of these reviews shall serve as the bedrock for the formulation of clearly delineated work practices and standardized procedures.
- Concerted efforts shall be invested in capacitating all personnel with the requisite knowledge and training, thereby engendering their seamless adherence to the prescribed work practices and procedural norms.
- Employees exposed to potentially hazardous processes shall be subject to periodic medical evaluations, with expert insights pivotal in continual enhancements.
- Personnel shall neither labor under the influence of nor partake in the abuse of substances categorized as drugs, alcohol, or any other illicit agents.
- Deliberate substitutions shall be sought for materials known to yield deleterious health consequences, thereby safeguarding the health of workers and consumers alike.
- All workspaces shall be meticulously designed to meet or exceed stipulated safety benchmarks in consonance with prevailing local regulations.
- The appointment of Health, Safety, and Environment Committee members, designated by senior management representatives when exigent, shall be emblematic of an unequivocal commitment to operational metamorphosis consonant with these principles.

1.9 Non-Discrimination and Disciplinary Practices

- a. Schiff Gold Precious Metals Trading LLC abhors and categorically repudiates any manifestations of discrimination, and thereby pledges to uphold an ethos predicated on the foundational tenets of equity and respectful treatment for all personnel.
- b. Discriminatory practices with respect to hiring, termination, remuneration, promotions, and training are premised on considerations of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, migrant status, worker representation affiliations, political associations, or any other criteria proscribed by law are unequivocally proscribed.
- c. Schiff Gold Precious Metals Trading LLC ensures the equitable treatment of personnel afflicted by life-threatening maladies or medical conditions, extending the same terms of employment to them as other employees, contingent upon their ongoing fitness to discharge their regular duties.
- d. The company holds a steadfast and unwavering stance against the deployment of corporal punishment or any form of psychological or physical coercion.
- e. The company is committed to the swift and equitable redressal of genuine concerns voiced by personnel, demonstrating good faith in reporting violations of laws, regulations, or internal policies, including these Business Principles. Such employees are assured of fair and respectful treatment.

1.10 Child Labor

- a. Schiff Gold Precious Metals Trading LLC vehemently repudiates the deployment of child labor across its multifaceted operations, undergirding its ethos with a robust commitment to the highest ethical standards.
- b. Unless mandated otherwise by local legal stipulations, the minimal age for employment shall be stipulated at eighteen years.
- c. As enshrined within the precincts of our policy, the engagement of child labor or adolescent labor is categorically and uncompromisingly excluded.
- d. Schiff Gold Precious Metals Trading LLC stands resolved to implement meticulous policies and procedures for ascertaining the age of all newly inducted personnel.

1.11 Forced Labor

- a. The upper echelons of Schiff Gold Precious Metals Trading LLC's management hold an unequivocal commitment to the eradication of all forms of forced or involuntary labor across all corporate facilities. Any documented instances of forced labor shall be viewed through the prism of grave violations of these Business Principles.
- b. The following definitions, integral to international human rights frameworks, hold sway:
 - Universal Declaration of Human Rights: Mandates the absolute prohibition of slavery or servitude.
 - ILO Convention 29: Defines forced or compulsory labor as encompassing all labor or services procured under the threat of penalties, without voluntary consent.

1.12 Human Rights

- The hallowed principles of equality, respect, and dignity shall govern the treatment meted out to every employee within the realms of Schiff Gold Precious Metals Trading LLC.

- The company upholds employees' right to observe practices grounded in considerations of caste, race, national origin, gender, religion, disability, union membership, or political affiliation, without unwarranted intrusion.
- Intimidating, coercive, or exploitative behavior of any nature, inclusive of direct or indirect forms of harassment or abuse based on physical, sexual, racial, religious, psychological, or verbal attributes, shall find no quarter within the precincts of Schiff Gold Precious Metals Trading LLC, with prompt and unequivocal responses to such conduct.
- Oversight and compliance with these tenets shall be facilitated through the auspices of the Health, Safety, and Environment (HSE) and Anti-Sexual Harassment Committees, duly mandated with periodic reviews.

1.13 Environmental Conservation

Schiff Gold Precious Metals Trading LLC steadfastly subscribes to a vision of effective environmental stewardship as a core underpinning of its corporate ethos, channeling concerted efforts toward the realization of the ensuing commitments:

- Upholding strict adherence to all pertinent environmental laws and regulations governing the company's operational purview.
- Systematic analysis of the environmental impact emanating from every operational facet, supplemented by periodic evaluations aimed at mitigating or eliminating deleterious effects.
- Disposal modalities of generated waste shall scrupulously align with legal injunctions and best practices emblematic of the industry.

1.14 Product Security

The assurance of product safety traverses the entire supply chain, a commitment that Schiff Gold Precious Metals Trading LLC underpins with a spectrum of strategic measures:

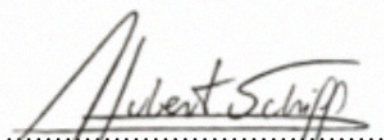
- Comprehensive insurance coverage, extended across all stages of product processing, shall serve as a robust bulwark against eventualities.
- Secure storage solutions, including safes, shall envelop every stage of product handling, assuring comprehensive safeguarding.
- Physical security apparatuses, including security personnel and closed-circuit cameras, shall assume sentinel roles across manufacturing sites.
- All relevant personnel shall be equipped with comprehensive training modules, enabling their adept adherence to stipulated safety and security protocols.
- A comprehensive emergency plan, encompassing contingencies such as theft or robbery, shall bolster the company's readiness for exigent situations.

1.15 Safety of Suppliers, Customers, Interested Parties, and Contractors

- The overarching imperative of ensuring safety is encapsulated within the vigilant surveillance of security personnel stationed across the expanse of company premises.

- Adequate and stringent safety and security protocols constitute foundational principles spanning all operational venues.
- Office spaces are vigilantly monitored through state-of-the-art CCTV surveillance, buttressed by systematic backup protocols for recorded data.
- The integration of cutting-edge technology, inclusive of Artificial Intelligence (AI), shall furnish a seamless nexus of protection, harmonizing the safety of personnel and corporate assets.

[End of Policy]


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Hubert Jacob Henry Schiff
Chief Executive Officer