



HUMAN RIGHTS POLICY - SCHIFF GOLD PRECIOUS METALS TRADING LLC

Schiff Gold Precious Metals Trading LLC ("Schiff Gold") is dedicated to the integration of sustainability into all aspects of its operations, as outlined in our Business Policy. Our primary focus lies in upholding human rights and ensuring the responsible sourcing of conflict-free gold, while concurrently collaborating with local authorities to safeguard human rights and prevent any infringements thereof.

Objective

This policy serves the purpose of delineating Schiff Gold's commitments to human rights, setting forth the Company's expectations for both its personnel and contractors, and reaffirming our dedication to engaging with stakeholders influenced by our undertakings, all in alignment with our Business Policy.

Scope

Our Human Rights Policy and management strategy have been informed by the subsequent international guidelines:

- · The International Bill of Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Declaration on the Rights of Indigenous Peoples
- The Ten Principles of the United Nations Global Compact
- The Voluntary Principles on Security and Human Rights
- World Gold Council Responsible Gold Mining Principles
- World Gold Council Conflict-Free Gold Standard

All staff members, business partners, and contractors are expected to conform to this Human Rights Policy and the corresponding requisites laid out in the aforementioned international bills. It is anticipated that employees, business partners, and contractors will be vigilant of human rights transgressions and comprehend the established channels to report instances of human rights apprehensions and violations.

Schiff Gold is firmly committed to:

- 1. Upholding human rights in consonance with the definitions furnished in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our operational conduct shall be designed to neither precipitate nor be complicit in human rights violations, be it through direct means or via business relationships.
- 2. Honoring the rights of our workforce, local community members, and all stakeholders with whom we engage. We anticipate our business associates, including security providers, contractors, and suppliers, to share this allegiance to rights, encompassing aspects of working conditions, freedom of association, freedom of expression, collective bargaining, maximal working hours, equitable remuneration and benefits, equal prospects, and immunity from discrimination.
- 3. Regularly reviewing the evolving dynamics in the regions of our operations, and performing comprehensive impact assessments and due diligence to pinpoint human rights hazards associated with our activities, with the aim of forestalling and alleviating adverse consequences.
- 4. Abstaining from any form of discrimination against individuals based on race, gender identity, religion, age, social stature, sexual orientation, or any other characteristic unrelated to the individual's job performance.







- 5. Having zero tolerance for impolite or inappropriate conduct, harassment, coercion, or unjust treatment, and refraining from any retaliatory actions, whether by our employees or those affiliated with our suppliers and business partners.
- 6. Demonstrating deference for the human rights of individuals necessitating special consideration, such as women, children, and other potentially susceptible or marginalized groups.
- Prohibiting the engagement of child labor, forced labor, and contemporary slavery within our operations
 and supply chains, while also advocating for the eradication of all manifestations of child and forced
 labor.
- 8. Managing human rights perils linked to security through the application of the Voluntary Principles on Security and Human Rights.
- 9. Refraining from causing, supporting, benefiting from, or contributing to illicit armed conflicts, human rights violations, or contraventions of international humanitarian law.
- 10. Instituting impartial, accessible, efficient, and timely grievance mechanisms that empower our stakeholders to raise human rights concerns and find resolutions without the risk of bias or retaliation.

[End of Policy]

Hubert Jacob Henry Schiff Chief Executive Officer



