

KYC POLICY - SCHIFF GOLD PRECIOUS METALS TRADING LLC

Schiff Gold Precious Metals Trading LLC conducts all of its operations as a Market Participant, as delineated by the LBMA Global Precious Metals Code, and operates in alignment with the fundamental tenets of the Code. Schiff Gold Precious Metals Trading LLC adheres to the subsequent benchmarks:

- LBMA Responsible Gold Guidance
- OECD Due Diligence Guidance for establishing responsible mineral supply chains in regions impacted by conflict and high-risk factors
- OECD Due Diligence Guidance Gold Supplement
- World Gold Council's standard for conflict-free gold

Schiff Gold Precious Metals Trading LLC acknowledges the potential for involvement in unlawful activities within the domain of precious metals extraction, processing, and trade, particularly within conflict-affected and high-risk zones. The company has implemented robust organizational management systems designed to recognize and assess these hazards within its supply chain.

Schiff Gold Precious Metals Trading LLC employs effective Know Your Customer (KYC) procedures for all its suppliers, customers, and third-party entities. Thorough information is collected for each client and reviewed on a periodic basis, employing a risk-centric methodology.

Risk categorization and due diligence are administered in accordance with the prescribed definitions.

Risk Categories	Definition	Due diligence to be applied
Low risk A	Gold with clean source from secure regions with secure transport routes. Customers with strong documents and records Risk-free/secure regions/countries.	Basic due diligence
Medium risk B	Gold from high risk regions or regions affected by conflict and gold with risk transport routes. High number of undocumented, unregistered commercial operations. Reasonable and well meaning customers Low risk regions	Enhanced due diligence
High risk C	Gold from high risk regions or regions affected by conflict and gold with risk transport routes. Mined gold is claimed to be originated from a country that has limited known reserves Recycled gold comes from a country where gold from high risk areas reasonably suspected to transit. Counterparty is located in a country representing high-risk for money laundering The mined gold originated from artisanal mining The mined gold is produced with the use of mercury Involvement of PEP	Enhanced due diligence

In accordance with UAE laws and regulations, Schiff Gold Precious Metals Trading LLC ensures thorough due diligence in its interactions with counterparties. The verification of company names, beneficial owners, and management is conducted utilizing reputable resources such as World-check. Transparency across the entire supply chain is a paramount requirement, accompanied by the submission of the following documents, among others:

- Documentation substantiating the origin of gold
- Valid mining concession records endorsed by the pertinent Mining agency or regulatory body in each respective country
- Valid mining licenses, mining titles, and licenses for precious metals trading
- Detailed information on mining capacity and precise GPS locations
- Legitimate mining agreements between the trader and the gold source
- Valid import and export licenses
- Authenticated tax number and associated certification for transactional activities
- Exclusively endorsed commercial registration issued by the Chamber of Commerce within the source country
- Scrutiny of partnership structures and validation of authorized signatories
- Comprehensive background checks of shareholders and authorized signatories, conducted through entities like "World Check," in addition to assessments by the national legal control authority of each country
- Comprehensive tax receipts explicitly identifying the company name and government-assigned tax number
- Verification of royalty fees, complemented by corresponding shipping documentation validated by the mining agency or tax authority control
- For artisanal mining, receipts confirming gold declarations along with identification documentation and site source
- Compliance with environmental standards as evidenced by an environmental study report and, when required, an environmental license issued by the Ministry of Environment
- Detailed records of bank channels, transactions, and payments

Furthermore, in compliance with an elevated level of due diligence, Schiff Gold Precious Metals Trading LLC undertakes a meticulous vetting process before initiating onboarding procedures. In instances of uncertainty, non-conformance, or violations, the company reserves the right to decline account opening or terminate existing relationships.

Schiff Gold Precious Metals Trading LLC remains steadfast in its commitment to ethical practices and responsible sourcing. Any engagement in international violations during business operations and mineral acquisition is strictly prohibited. The following issues are unequivocally unacceptable:

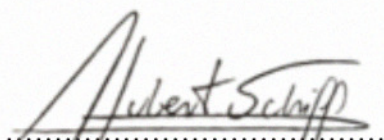
- Money Laundering (AML)
- Support for Armed Conflict and/or Terrorism Financing (CFT)
- Engagement with countries or individuals under sanctions
- Involvement in illegal mining or unauthorized extraction methods
- Association with illegal mining sources or unauthorized modifications of mining concessions
- Violations of Human Rights, encompassing inhumane behavior, torture, sexual violence, slavery, and oppression
- Commission of crimes such as race-based hatred and genocide
- Endorsement of forced labor or non-voluntary work
- Tolerance of child labor
- Direct or indirect participation in bribery
- Generation of negative environmental impacts, including breaches of restrictions in designated areas and world heritage sites
- Participation in illegal taxation and fabrication of unlawful documentation

Upon detection of grave violations as outlined above, transactions and commercial relationships will be promptly suspended or terminated without exception.

Schiff Gold Precious Metals Trading LLC maintains collaborative ties with international organizations present on the ground to access mining areas often inaccessible. Through this collaboration, the company can respond swiftly to any concerning indicators. Furthermore, support and education initiatives are extended to local communities to ensure their alignment with desired compliance standards.

For any inquiries regarding this policy, please contact our Compliance Department at compliance@schiffgold.ae.

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Hubert Jacob Henry Schiff
Chief Executive Officer