

WHISTLEBLOWING POLICY - SCHIFF GOLD PRECIOUS METALS TRADING LLC

OBJECTIVE

This Policy (hereinafter referred to as the "Policy") outlines the protocols for reporting potential illegal actions or omissions that may constitute a breach of, or an incentive to breach, UAE laws and regulations, the core values and principles as enshrined in the Code of Business Ethics of Schiff Gold Precious Metals Trading LLC and its affiliated entities (hereinafter collectively referred to as "Schiff Gold" or the "Company"), internal control frameworks, corporate policies/procedures, and/or that might result in any form of harm (e.g. commercial, economic, environmental, harm to worker safety or third parties, or reputational harm) to Schiff Gold companies and their stakeholders, including customers, shareholders, partners, third parties, and the community at large (hereinafter a "Report"). This Policy serves as the guiding document for all Schiff Gold entities while recognizing that specific local laws on the same subject take precedence in cases of conflict. The principles outlined herein do not diminish the obligation to report to competent judicial, regulatory, or supervisory authorities in jurisdictions where Schiff Gold operates, or to internal oversight bodies within each Company entity.

RECIPIENTS

This Policy applies to the recipients ("Recipients" and/or "Whistleblowers") defined as:

- a) members of company boards, Schiff Gold employees;
- b) customers, suppliers, partners, consultants, shareholders, and other stakeholders of Schiff Gold (collectively referred to as "Third Parties").

REPORTING

Recipients who become aware of potential unlawful conduct or irregularities involving parties associated with one or more Schiff Gold entities during their professional engagements, or actions that impact such engagements, are required to invoke this Policy by promptly reporting actions, events, and circumstances believed, in good faith and with reasonable grounds, to have resulted in violations and/or actions inconsistent with Schiff Gold's guiding principles. The term "Report" denotes communication of suspected unlawful actions or omissions constituting, or potentially constituting, breaches of laws and/or regulations, values, and/or principles established in Schiff Gold's Code of Business Ethics, internal control standards, and company policies/procedures.

Matters that may warrant reporting encompass, but are not limited to:

- financial misconduct or impropriety, including fraud;
- failure to adhere to legal obligations or applicable laws;
- violations of Human Rights, including health and safety risks and child labor;
- substantial environmental harm;
- criminal activities;
- improper conduct or unethical behavior;
- endeavors to conceal violations of Schiff Gold Gold Supply Chain and AML/CFT policies (early risk awareness mechanism);
- forgery of documents or engagement with fraudulent suppliers;
- direct or indirect links to conflict-affected or high-risk area gold financing.

Reports can also be submitted anonymously. However, Schiff Gold recommends that Reports include the Whistleblower's identity to facilitate effective resolution while ensuring necessary protections. Regardless of anonymity, Reports must be detailed and substantiated, providing pertinent information for validating the reported incidents.

When known to the Whistleblower, the Report should particularly encompass:

- a comprehensive account of the incident, including how the Whistleblower obtained knowledge;
- date and location of the occurrence;
- names and roles of involved individuals, or information aiding their identification;
- names of other potential witnesses;
- reference to supporting documents verifying the alleged actions.

The Schiff Gold Internal Audit Department ("Audit Department") is responsible for receiving and reviewing Reports. Reports should be sent via email, in English to compliance@Schiff Gold.ae.

Recipients who receive information about suspected violations must:

- maintain confidentiality;
- guide the Whistleblower to adhere to the reporting procedures outlined in this Policy
- if provided in writing, forward the Report exclusively to the upper management refraining from independent analysis and/or investigation.

Upon identifying the sender, the Audit Department will acknowledge receipt of the Report from the email address compliance@Schiff Gold.ae, confirming registration. During the validation of the Report, the sender might be contacted for additional necessary details.

CONFIDENTIALITY AND NON-RETALIATION

Schiff Gold encourages Recipients to promptly report potential unlawful conduct or irregularities. Schiff Gold ensures the confidentiality of the Report and its contents, as well as the anonymity of the Whistleblower, even if the Report is subsequently proven unfounded. Any form of threat, retaliation, penalty, or discrimination against the Whistleblower, Reported Party, or those involved in Report validation will not be tolerated.

Schiff Gold reserves the right to take appropriate actions against individuals retaliating or threatening retaliation against Whistleblowers complying with this Policy. This is without prejudice to affected parties seeking legal recourse if a Whistleblower is found criminally or civilly liable for false statements. It's understood that Schiff Gold entities may take disciplinary and/or legal measures to safeguard rights, assets, and reputation against those submitting false, baseless, or malicious Reports.

VALIDATION OF REPORTS

The Audit Department, representing the entire Schiff Gold, is responsible for validating Reports while respecting local laws. It conducts impartial, fair, and confidential investigations, and may involve relevant company functions where necessary. External consultants specialized in relevant areas might be engaged to ensure validation accuracy and confidentiality.

Following an investigation, the Audit Department prepares a summary report and evidence gathered. This report is shared with relevant internal functions for intervention planning and protective actions. Results of investigations are communicated to affected entities. If insufficient evidence or unproven claims are determined, the Audit Department archives the Report, including reasons for such action. Periodic reports on report types and investigative results are provided to the Schiff Gold Audit, Risk, Sustainability, and Corporate Management Board.

PERSONAL DATA HANDLING

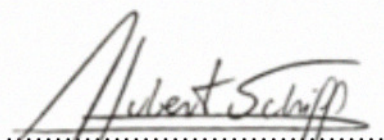
Schiff Gold assures that the personal data of Whistleblowers and involved parties obtained during Report handling (including sensitive data) will be processed in compliance with data protection legislation and the Schiff Gold Personal Data Protection Policy. Only essential data for Report validation and handling will be processed.

The Audit Department, as Data Controller (considering local laws), processes personal data solely for implementing procedures outlined in this Policy. Data is managed to respect the privacy, rights, liberties, and dignity of involved parties. Processing is carried out by trained data processors, supervised by the Audit Department, focusing on security and privacy.

Personal data may be shared with relevant boards, internal functions, and judicial authorities to facilitate legal and/or disciplinary actions against Reported Parties, provided Reports are substantiated. External parties might also receive data. Measures prevent accidental/unlawful destruction, loss, or unauthorized disclosure during Report validation.

Documents concerning Reports are retained in hard and digital copies for necessary durations.

[End of Policy]


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Hubert Jacob Henry Schiff
Chief Executive Officer