



Policy:

Elemetal Refining, LLC (fka Ohio Precious Metals, LLC) is deeply concerned with the exploitation of natural resources that contribute to illegally armed groups and human rights violations in the Democratic Republic of Congo and adjoining countries and affirms our commitment to responsible sourcing of gold and maintenance of our EICC/GeSI Conflict Free Smelter certification (or equivalent – with either LBMA or RJC), up to and including, third party audit of our gold supply chain. We consistently inquire about country of origin and specifically ask our business partners/suppliers to provide positive confirmation that they do not purchase “conflict material from the DRC or adjoining countries”. We will continue to work with industry consortia, regulatory bodies and strive to maintain a leadership role in this as well as many other aspects of the precious metals refining industry.

Elemetal Refining has a comprehensive supply chain due diligence system in place including a strict conflict minerals policy that is aligned with Annex II of the OECD Guidance.

Due diligence measures, including standards, peer-to-peer training and work instructions, provide reasonable assurance that material sourced by Elemetal Refining is conflict-free.

Furthermore, independent verification assessments are carried out from time to time when Elemetal Refining seeks re-certification as conflict-free refinery under the EICC-GeSI Conflict Free Smelter Program.

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