



Supply Chain Policy

Introduction

Argentor Essayeurs NV commits to ethical sourcing and responsible business practices across our global supply chain, focusing on the procurement of precious metals. This policy reflects our dedication to upholding human rights, preventing conflict financing, and adhering to international legal standards and guidelines.

Scope

This policy applies to all precious metals sourced, refined, traded, or handled by Argentor Essayeurs and extends to our business partners, including but not limited to jewellers, goldsmiths, jewellery manufacturers, brokers, gold exporters and traders, mining companies, currency traders, recovery companies, gold funds, commercial banks, and investors.

Compliance and Due Diligence

- Alignment with International Standards:** Our supply chain policy is in strict alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Responsible Minerals Initiative Gold Refiner Standard.
- Due Diligence Process:** We commit to a robust due diligence process that includes:
 - Supplier identification and verification based on a risk-based approach.
 - Assessing the type and source of gold to ensure compliance with our standards.
 - Collecting and verifying documentation to assess the origin and chain of custody of the minerals.
- Risk Assessment:** We continuously assess our supply chain for risks associated with sourcing from Conflict-Affected and High-Risk Areas (CAHRAs), employing measures to prevent the infiltration of smuggled or illegitimately sourced materials. Argentor collects all relevant documentation to assess origin and chain of custody of the minerals in accordance with its customer due diligence policy.

Ethical Commitments

- Human Rights and Conflict:** We pledge to neither tolerate nor profit from human rights abuses, forced or compulsory labor, child labor, sexual violence, or any forms of conflict financing.
- Support to Non-State Armed Groups:** Direct or indirect support to non-state armed groups through our supply chain activities is strictly prohibited.
- Public and Private Security Forces:** We ensure that any engagement with security forces adheres to the rule of law and respects human rights, aligning with the Voluntary Principles on Security and Human Rights.
- Bribery and fraudulent misrepresentation of the origin of minerals:** We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes.



5. **Money laundering:** We will contribute to the effective elimination of money laundering.

Transparency and Engagement

1. **Stakeholder Engagement:** We are committed to engaging transparently with our suppliers, partners, and other stakeholders to foster awareness and adherence to this policy.
2. **Reporting and Accountability:** Argentor encourages reporting of concerns related to the supply chain, ensuring mechanisms for anonymous reporting to our compliance officer.
3. **Continuous Improvement:** We commit to regular review and improvement of our supply chain practices to align with evolving international standards and best practices.

Governance

1. **Compliance Officer:** Our Compliance Officer oversees the implementation of this policy, with authority to deny transactions with high-risk parties.
2. **Training and Awareness:** We ensure that our employees are trained and aware of their roles in upholding this policy, encouraging proactive identification and reporting of risks.
3. **Supplier and Customer Communication:** We communicate our policy to suppliers and customers, emphasizing the importance of ethical sourcing and the consequences of non-compliance.

Conclusion

Argentor Essayeurs' Supply Chain Policy is a testament to our unwavering commitment to ethical business practices, responsible sourcing, and the protection of human rights within our supply chain. Through adherence to this policy, we aim to lead by example in the precious metals industry, fostering a more transparent, accountable, and sustainable global supply chain.