



UNITED PRECIOUS METAL REFINING SUPPLY CHAIN DUE DILIGENCE POLICY

United Precious Metal Refining, Inc. (“UPMR”) has always been committed to ensuring that our supply chain is free of any metal which was gathered for the support or benefit of armed conflict groups or involving serious abuses of human rights. Further, abusive practices from public or private security forces or support to non-state armed groups will not be tolerated. As part of our supply chain due diligence, UPMR shall be watchful for and assess the severity of various risks as recommended in the OECD Guidance Annex II Model Supply Chain Policy;

Specifically:

- Serious abuses associated with the extraction, transport or trade of minerals:
 - Any forms of torture, cruel, inhuman and degrading treatment
 - Any forms of forced or compulsory labor
 - The worst forms of child labor
 - Other gross human rights violations and abuses such as widespread sexual violence
 - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
- Direct or indirect support to non-state armed groups
- Direct or indirect support to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
 - Money laundering
 - Non-payment of taxes, fees and royalties to governments

UPMR strongly condemns such activity and will refuse any material which we believe was obtained involving serious human rights violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities. This is in accordance with U.N. resolutions and Section 1502 of the Dodd Frank Act. In addition, the (“OECD”) Organization for Economic Cooperation and Development has released guidelines for due-diligence for sourcing from Conflict-Affected and High-Risk Areas (“CAHRAs”). We endorse their guidance and use their recommendations as the model for our own due-diligence.

In order to ensure our compliance with our commitment to a “non-conflict affected” and OECD aligned supply chain, UPMR has integrated the following due-diligence protocol for analyzing and assessing our metal suppliers and supplies:

Establish strong management and reporting systems to be in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affect and High-Risk Areas (Annex II). This process will include a system of ongoing customer and transaction due diligence, enhanced due diligence for areas in which material would potentially originate from or transit through a conflict affected high-risk area (“CAHRA”), and strategies for mitigating risks that are identified in our supply chain. UPMR will ensure that training of management and all relevant employees is done at least annually. UPMR further commits to a review of the supply due diligence process annually for effectiveness and to explore and implement possible improvements to our strategy. A senior manager and current compliance officer, William C. Merkle, has been assigned responsibility for ensuring supply chain compliance.

UPMR is also committed to be audited by an independent third party to ensure adequate testing of the system to ensure that the verification and documentation process is secure. Through these audits, UPMR displays transparency and our customers gain audit-based assurance that UPMR’s supply chain due diligence policy is verifiable and effective. It also provides UPMR with additional direction for enhancement and opportunities to provide feedback to the outside auditors for continued improvement. Our next audit is scheduled to be performed by the Responsible Materials Initiative September 2018.

UPMR communicates this sourcing policy to our suppliers and customers and make it publicly available for review. Additionally, UPMR requires the customer to acknowledge the policy and commit to providing information, documentation, and accommodations for site visits as necessary to complete our due diligence as outlined in our basic due diligence and enhanced due diligence policies.

If UPMR should discover, through its ongoing due-diligence that our customer is engaging in suspect practices or practices do not meet our responsible sourcing requirements, we would immediately suspend sourcing from the identified supplier and develop a plan to mitigate the identified risks. Should the mitigation fail to resolve a matter to our satisfaction or we uncover activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due-diligence, UPMR will immediately discontinue any activity with that entity.

UPMR continues to work with our advisory organizations and agencies to continue to upgrade our practices and improve our processes to safeguard our supply chain from “conflict affected” materials and to only obtain material which are sourced in a legitimate and ethical manner.

Finally, UPMR publishes and makes publicly available an annual summary due diligence report to include the following:

1. Third Party Assessment Summary
2. Company Supply Chain Policy
3. Company Management System
4. Risk Identification
5. Risk Mitigation