

SUPPLY CHAIN POLICY

(_____) observes the highest ethical standards and best practices in carrying out business. We and our valued counterparties are mutually committed to acting to attain a conflict-free supply chain. Our company is committed to complying with the responsible sourcing of precious metals guidance issued by the OECD, DMCC and the LBMA.

As a part of our responsibility, (_____) is committed to:

1. Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities.

- *Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source is from, or linked to, any party committing serious abuses as defined above.*

2. Not tolerate any of its suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

i) Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or

ii) Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

iii) Illegally tax or extort intermediaries, export companies or international traders.

- *Not to accept and directly discontinue transactions with upstream suppliers which were identified as high risk due to involvement and or participation in any of the above-mentioned points.*

3. Contribute and participate in the promotion of Responsible Sourcing of Precious Metals to our suppliers by:

i) Creating a long-term association with suppliers and establishing strong relationships with our customers.

ii) Supporting our suppliers of gold to adhere with the provision of this policy and encourage them to impart or convey it to its staff and their supply chain.

iii) Disseminating the precious metal gold guidance by local and international bodies in which this policy was created such as the DMCC, LBMA and OECD.

4. Not to offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.

5. Play a part and contribute to elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti - Money Laundering and Combating Financing Terrorism.

- *To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.*

6. Ensure that effective Due Diligence on a risk-based approach is carried out before starting any transactions and continuous monitoring of existing clients to assess the level of risk and plan to mitigate the risk identified.

7. Create and keep proper and adequate records of all precious metals transactions and activities that demonstrates the due diligence has been strictly followed.

8. Train relevant staff and educate its employees through formal education, training or seminars and conferences with the provision of this policy and the responsible sourcing of precious metals.

For Bullion Street Gold Trading LLC,

Acknowledgment:

We would like to thank the OECD for Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to which parts of this policy is adapted.