



# ASAHI REFINING

## Asahi Refining Gold Procurement Policy

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Asahi Refining as an LBMA Good Delivery Refiner, supports and follows the principles and procedures set out within the LBMA Responsible Gold Guidance. <http://www.lbma.org.uk>

In accordance with Asahi Refining's support of such principles and procedures, Asahi Refining will monitor the source of all materials accepted into our Salt Lake City and Brampton refineries to ensure that we comply with all of the requirements laid out in the LBMA Responsible Gold Guidance.

As a leader in the precious metals industry, Asahi Refining recognizes the unique opportunity we have to play a leading role in the development and implementation of a system designed to detect and prevent commercial activities that contribute to the financing of armed groups, human rights violations, and money laundering activities. It is Asahi Refining's policy to not transact business with any counterparties that may directly or indirectly be linked to or participate in such activities.

Asahi Refining commits to take a leading role in working with our industry and commercial partners in finding viable solutions to these important issues. Asahi Refining will work with our supply chain to ensure our suppliers of materials are aware of this Gold Procurement Policy and will urge them to ensure that all of the materials they deliver come from socially responsible sources. In addition, Asahi Refining requires all of its clients to deliver gold that is "conflict free" (including but not limited to gold that is "DRC conflict free" as defined in Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission rules related thereto).

David Dorris  
Compliance Officer  
Asahi Refining  
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