



RAND REFINERY

	Responsible Gold Policy
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Acknowledgement of Responsibility

It is necessary for all participants in the gold industry to adopt policies and processes that combat systemic or widespread abuses of human rights, avoid contributing to conflict, comply with high standards of anti-money laundering and negate terrorist financing practices.

Rand Refinery is committed to ensuring that ALL gold, in any form, that is processed through our operations is responsibly sourced and, hence, conforms to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (OECDG) and the London Bullion Market Association (LBMA) Responsible Gold Guidance.

Purpose

Statement

"Rand Refinery is opposed to activities which, directly or indirectly, finance or benefit armed conflict and the extreme levels of violence which contribute to abuses of human rights.

Consequently, Rand Refinery commits to refraining from knowingly sourcing gold bearing material from regions and operations which contribute to the financing of conflict and further commits itself to comply with the relevant United Nations sanctions, recommendations and protocols from other appropriate supra-national bodies in this regard.

In the event that gold bearing material is sourced from conflict affected and high risk areas, Rand Refinery will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of any forms of inhuman treatment, any form of forced labour, use of child labour, gross human rights violations, war crimes or other crimes against humanity.

Rand Refinery will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, logistical assistance, handling or export of gold bearing material by such groups or their affiliates.

Rand Refinery will apply a robust "Know Your Customer", "Know Your Product" and "Anti Money Laundering" policy in order to identify upstream participants s where dealings with such actors would



RAND REFINERY

	Responsible Gold Policy
--	--------------------------------

be in contravention of this policy, would represent money laundering or other related criminal activity. Rand Refinery will not engage with suppliers identified in this way and will not accept refining or smelting deposits from such suppliers."

Scope

The London Bullion Market Association (LBMA) has developed a Responsible Gold Guidance (RGG) which enables refiners to institute all of the requirements of the OECDG by following a five step risk based framework:

1. Establish strong company management systems,
2. Identify and assess risk in the supply chain,
3. Design and implement a management strategy to respond to identified risks,
4. Arrange for an independent third-party audit of the supply chain due diligence,
5. Report on supply chain due diligence.

Legislative and/or business context

Rand Refinery will adhere to the requirements of the LBMA RGG.

Note: Conformance with the LBMA RGG is mandatory for all Good Delivery refiners who wish to maintain LBMA accreditation.

Policy Content

Chain of Custody

Rand Refinery will develop and maintain systems that will allow full traceability throughout our processes to support a current and future product portfolio that represents our commitment to the development of Responsible Gold products.

Disclosure and Awareness



RAND REFINERY

	Responsible Gold Policy
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This Policy will be made available to the public and form part of public and employee awareness campaigns.

Related Policies

- Supply Chain, Anti-Money Laundering and Know Your Customer policy for depositing customers

References

1. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – *Supplement on Gold*.
3. LBMA Responsible Gold Guidance, Version 6 06/08/2015