

BAIRD & CO. LTD



Baird & Co.
Bullion Merchants
Est. London 1967

SUPPLY CHAIN DUE DILIGENCE
POLICY

1. Supply Chain Due Diligence Policy

1.1 Introductory Scope

This Policy provides framework for support of worldwide efforts & active cooperation with stakeholders to ensure that precious metals come from legitimate, ethical sources, & that they have not been associated with crime, armed conflict or human rights abuse. It is our firm conviction & our unalterable policy to refuse any business proposal which might be connected with any illegitimate activity.

Our supply chain due diligence & congruent commitment, policies & practices, are consistent with OECD Due Diligence Guidance on conflict minerals, the LBMA Responsible Gold Guidance the Responsible Jewellery Council, & with the RAGs Forum.

We employ this policy by having implemented a program of strict due diligence procedures, with our commitment to conduct our activities & business:

- With Honesty & transparency;
- To not support fraud, corruption or any other illegal activity;
- Maintaining high moral, ethical & social standards;
- Cultivating proper business relationships with all counterparts;
- Seeking good & transparent relations with governmental & non-governmental organisations;
- Having fair & responsible relations with employees & all other stakeholders.

1.2 Our Commitments

We implemented this policy through an effective & comprehensive management system which is based on strong local & international KYC due diligence practices in order to identify our upstream & downstream partners, & if necessary, even our partners' partner. In that regard, we are strongly committed:

1.1.1 *Commitment #1*

Not to tolerate nor profit from, contribute to, assist or facilitate the commission of:

- Torture, cruel, inhuman & degrading treatment;
- Forced or compulsory labour;
- The worst forms of child labour;
- Human rights violations & abuses; &
- Genocide, war crimes, violations of international humanitarian law or crimes against humanity.

1.1.2 *Commitment #2*

Not to engage with, & to immediately discontinue engagement with, customers or suppliers where we identify a reasonable risk that they are committing, or are sourcing from or linked to, any party committing abuses described above, or any other illegal party.

1.1.3 *Commitment #3*

Not to tolerate direct or indirect support to non-state armed groups, including, but not limited to, producing precious metals from, making payments to or otherwise providing assistance or equipment for, non-state armed groups &/or their affiliates who illegally:

- Control mine sites, transportation routes, precious metals trade or any other factors in the supply chain; &/or
- Tax or extort money or precious metals at mine sites, along transportation routes or at points where they are traded, or from intermediaries, extort companies or international traders.

1.1.4 Commitment #4

Not to engage with, & immediately to discontinue engagement with, any business opportunity or business partner where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as described above.

1.1.5 Commitment #5

Not to tolerate direct or indirect support to public or private security forces who illegally:

- Control mine sites, transportation routes or upstream actors in the supply chain; &/or
- Tax or extort money or minerals at points of access to mine sites along transportation routes, or at points where they are traded, or from intermediaries.

1.1.6 Commitment #6

To support efforts to engage with public or private security forces in accordance with the Voluntary Principles on Security & Human Rights, recognising that the role of such security forces at the mine sites &/or surrounding areas &/or along transportation routes should be solely to maintain the rule of law.

1.1.7 Commitment #7

To support efforts to engage with local authorities, international organisations & civil society organisations to avoid the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

1.1.8 Commitment #8

To adopt a risk management plan with upstream suppliers & other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces as identified in paragraph 4, if it will be identified that such a reasonable risk exists.

1.1.9 Commitment #9

To suspend, or discontinue, engagement with upstream suppliers that support public, or private, security forces for illegal activities, if the attempts at mitigation fail within six months from the adoption of the mitigation measures.

1.1.10 Commitment #10

Not to offer, promise, give or demand bribes or kickbacks in any form to/from individuals, including government officials, customers, contractors & suppliers or any other organisation.

1.1.11 Commitment #11

Not to misrepresent taxes, fees & royalties paid to governments for the purposes of extraction, trade, handling, transport & export of gold. Likewise, we will not conceal the origin of precious metals.

1.1.12 *Commitment #12*

To support efforts, & contribute to the avoidance & disclosure of money-laundering & financing of terrorism, tax evasion or tax fraud resulting from, or connected to, the supply & distribution chain of precious metals.

1.3 Training

We perform annual & ad hoc training with relevant employees & partners, encouraging them to raise any suspicious relation &/or transaction to management &/or the compliance officer(s).

We require our employees, agents, consultants, & business partners to comply with our policy, & will – wherever possible – enforce it with appropriate measures, up to & including termination of, employment or contracts.

1.4 Due Diligence for the Supply Chain

1.4.1 *Relevant Actors*

Baird & Co. Ltd should obtain identification & Due Diligence information on all actors in the supply chain, including, but not limited to:

- Gold producers;
- Intermediaries;
- Aggregators;
- Gold traders;
- Exporters & re-exporters; &
- Third party service providers handling the gold (e.g. logistics, processors, security services & transportation companies).

1.4.2 *Identification of the Relevant Actors*

The identification of the above should comprise of the following measures (on a risk based approach):

- the identification of the ownership (including beneficial ownership) of the companies & corporate structure, including the names of corporate officers & directors)
- the identification of the related businesses, subsidiaries, parents, affiliates;
- the verification of the identity of the companies using reliable, independent source documents, data or information (e.g. business registers extract, certificate of incorporation);
- checking government watch list information (e.g. UN sanctions lists, OFAC Specially Designated Nationals Lists, World-Check search); &
- the identification of any affiliation of the company with the government, political parties, military, criminal networks or non-state armed groups, including any reported instances of affiliation with non-state armed groups &/or public or private security forces.

1.5 Due Diligence for Types of Suppliers

Metal sourced from suppliers varies in volume, form & risk. Based on these factors, suitable models for Due Diligence have been designed. The categorised supplier types that Baird & Co. Ltd deal with are as follows:

- Medium Scale Mines / Large Scale Mines;
- Artisanal Mines; &
- Retail Recycled Sources.

1.5.1 MSM/LSM Suppliers

When dealing with MSM/LSM Suppliers, a *Corporate Account Form*⁽³⁾ must be completed by the Supplier in addition to the *MSM-LSM Primary Metal Supplier Due Diligence Questionnaire* as part of the on-boarding process. The completion of the *Due Diligence Assessment Matrix* shall then be completed internally.

The above needs to include standard KYC procedures, including PEP/Sanction screening via Creditsafe^(1.2.6/7), & should the score result in EDD, an *Enhanced Due Diligence Checklist* to be completed^(1.2.4) with the MLRO/Head of Compliance to complete the EDD sign-off. A Supplier Risk Matrix^(1.7) will also need to be completed & placed on file, along with routine Site Visits^(1.6) conducted & recorded accordingly.

Baird & Co. Ltd should obtain evidence, where applicable, to the position of the company in the supply chain, including information requested within the *MSM-LSM Primary Metal Supplier Due Diligence Questionnaire* as follows:

- Organisation Structure⁽³⁾;
- Business Activity (Mine size, core business activity, location of current refining, form of metal, precious metals involved, governmental taxes/fees/royalties involved);
- Financial Information (Financial statements, source of funding, method of supplier payments);
- Regulatory Environment (Adherence to relevant regulations including visits, health & safety, security/armed groups, child labour, international humanitarian law, training, risk assessments, conflict free smelter documentation);
- Policies & Procedures (AML, CFT, Anti-Bribery, Supply Chain, Due Diligence, Monitoring);
- Origins of Precious Metals (which sites with locations, production levels, gold extraction methods);
- Processing Plant Information (Where is metal processed, methods involved, daily capacity);
- Supply Chain Adherence (OECD, RJC, LBMA, FairTrade, WGC, CFFP, RCM, other);
- Transportation (Method, across with countries, from mine to export to refinery, national chain of custody documentation);
- Appropriate Licenses (Mining, Export/Import); &
- Staff/worker count across the company & group.

1.5.2 ASM Suppliers

When dealing with ASM Suppliers, a *Corporate Account Form*⁽³⁾ must be completed by the Supplier in addition to the *ASM Metal Supplier Due Diligence Questionnaire* as part of the on-boarding process. The completion of the *Due Diligence Assessment Matrix* shall then be completed internally.

The above needs to include standard KYC procedures, including PEP/Sanction screening via Creditsafe^(1.2.6/7), & should the score result in EDD, an *Enhanced Due Diligence Checklist* to be completed^(1.2.4) with the MLRO/Head of Compliance to complete the EDD sign-off. A Supplier Risk Matrix^(1.7) will also need to be completed & placed on file, along with routine Site Visits^(1.6) conducted & recorded accordingly.

Baird & Co. Ltd should obtain evidence, where applicable, to the position of the company in the supply chain, including information requested within the *ASM Primary Metal Supplier Due Diligence Questionnaire* as follows:

- Organisation Profile;
- Regulatory Environment (Health & safety, security/armed groups, child labour);
- Origins of Precious Metals (Type of mining, tunnel/pit count, site locations, production levels, gold extraction methods);
- Transportation (Methods);
- Tenure Information (Title/Permit/License Holder); &
- Staff/worker count across the group.

1.5.3 Retail Suppliers

When dealing with Retail Suppliers;

- (i) should the initial transaction **fall below** £10,000, a *Retail Account Form*⁽³⁾ must be completed by the Supplier in addition to the *Retail Recycled Metal Supplier Due Diligence Questionnaire* as part of the on-boarding process. The completion of the *Retail Due Diligence Assessment Matrix* shall then be completed internally.
- (ii) should the initial transaction **exceed** £10,000, a *Corporate Account Form*⁽³⁾ must be completed by the Supplier in addition to the *Secondary Metal Supplier Due Diligence Questionnaire* as part of the on-boarding process. The completion of the *Due Diligence Assessment Matrix* shall then be completed internally.

The above needs to include standard KYC procedures, including PEP/Sanction screening via Creditsafe^(1.2.6/7), & should the score result in EDD, an *Enhanced Due Diligence Checklist* to be completed^(1.2.4) with the MLRO/Head of Compliance to complete the EDD sign-off. A Supplier Risk Matrix^(1.7) will also need to be completed & placed on file, along with routine Site Visits^(1.6) conducted & recorded accordingly.

Should an existing Retail Supplier's annual transactions exceed £25,000, Enhanced Due Diligence shall be applied, with additional enquiries made in line with the *Secondary Metal Due Diligence Questionnaire*.

Information requested within the *Retail Recycled Metal Supplier Due Diligence Questionnaire* are as follows:

- Origins of Precious Metals; &
- Customer Due Diligence.

Information requested within the *Secondary Recycled Metal Supplier Due Diligence Questionnaire* are as follows:

- Origins of Precious Metals (Location, type);

- Industry Initiatives a part of; &
- Organisation's policies & procedures, including AML, CFT, Anti-Bribery, Supply Chain, Customer Due Diligence & Monitoring.

1.6 Site Visits

In the interest of effective customer profiling, ensuring adherence to Baird & Co. Ltd Policies & Procedures, routine site visits will be conducted. In line with the OECD's Responsible Supply Chains Guidance, we conduct two types of site visits, each with unique questionnaires – where materials are either Mined or Recycled.

All new customers will incur such a site visit dependent on the outcome of the Supply Chain Risk Rating^(1.7), either occurring Yearly (High Risk), Tri-Yearly (Medium Risk) or every 5 years (Low Risk).

All completed Site Visit Reports are signed & filed within the appropriate account's file for future reference.

1.6.1 Mined Visits

The Site Visit Report for those supplying Mined material covers several topics, based on the LBMA's Site Visit Report template. Said report includes in-depth questioning of the following topics:

- Basic Customer Details;
- Permits;
- Miners;
- Health & Safety;
- Gold Extraction & Processing Methods;
- Artisanal Mining Next to the Mine Site;
- Community;
- Conflict Area & Security;
- Transportation; &
- An overall Relationship Manager Assessment.

A copy of the *Site Visit Report - Mined* is appended to the Compliance manual.

1.6.2 Recycled Visits

The Site Visit Report for those supplying Recycled material covers several topics, based on the LBMA's Site Visit Report template. Said report includes in-depth questioning of the following topics:

- Basic Customer Details;
- Business Activity;
- Origin of Metal & Sourcing;
- Regulatory Environment;
- Due Diligence Procedures;
- Workers;
- Security;
- Refining &/or Manufacturing Installations; &
- An overall Relationship Manager Assessment.

A copy of the *Site Visit Report - Recycled* is appended to the Compliance manual.

1.7 Supply Chain Risk Rating

The Supply Chain Risk Rating requires completion when effectively assessing the risks involved in regards to any given supplier. When completing the Rating Matrix, information collected during the Account Opening Stage, along with any changes upon re-assessments done on a yearly basis, will be assessed against the factors laid out below:

- Length of Relationship;
- Type of Material;
- Settlement Method;
- Supplier Relationship;
- Quantity Supplied;
- Mine Size;
- Heidelberg Conflict Barometer;
- Transparency International's Corruption Perception Index;
- Dodd-Frank Listed Country;
- LBMA Supply Chain Score;
- Sanctions;
- On-Site Visitation;
- Country of Origin; &
- Social & Environmental Guidance.

Each factor on the matrix possesses multiple choices, with a specific overall score awarded at the end. Dependent on the final score, taking an average of all other scores, the Supplier Relationship will either be deemed Low Risk (1 – 2.5), Medium Risk (2.5 – 1.3) or High Risk (1.3 – 1.0). Planned Visitations occur on either a 5-Yearly (Low Risk), 3-Yearly (Medium) or Yearly (High Risk) basis.

A copy of the *Supplier Risk Matrix* is appended to the Compliance manual.

1.7.1 Length of Relationship

When evaluating risk, new Suppliers invariably pose the highest risk due to lack of trading experience with Baird & Co. Ltd. Maintaining an extended relationship allows for more effective profiling & understanding of the Supplier, mitigating the risk based on evidenced & observed activity.

1.7.2 Type of Material

When evaluating risk, hard rock is considered the highest due to the environmental impact paired with the less regulated nature of ASM sites that may be attracted. Alluvial attracting ASMs more frequently, but mitigating the environmental impact, procures moderate risk, whereas recycled gold ensures the lowest risk in the supply chain due to the regulatory chains already traversed from source.

1.7.3 Settlement Method

When evaluating risk, cash brings with it considerable inherent risk due to money laundering potential from possibly untraceable & unexplained wealth. As a result, the expected form of payment would be that of Bank Transfer, providing lower risk.

1.7.4 Supplier Relationship

When evaluating risk, dealing with a mine through an intermediary poses the highest risk. This is due to the indirect line of contact with mine being sourced from. An aggregator possesses lesser, but

noticeable risk, due to again not dealing directly with the mine itself, though in most cases through a local overseer, normally, incorporating multiple ASM sites. Consequently, direct relationships allow the least risk to be exposed.

1.7.5 Amount Supplied

When evaluating risk, the highest stems from those providing larger volume into the supply chain, providing more potential for corruption & enabling of illicit activities. The less volume being processed, naturally reduces such risk.

1.7.6 Mine Size

When evaluating risk, ASM sites pose the greatest concern due to lack of regulatory adherence & formalisation. MSM sites are deemed moderate risk, invariably in the process of formalisation, with regulatory requirements being implemented alongside increased production. With the most regulation having been applied, LSM are rating accordingly as the lowest risk.

1.7.7 Heidelberg Conflict Barometer Score

When evaluating risk, locations of mines residing within specific countries are taken into account with the Heidelberg Conflict Barometer. Those experiencing Limited to outright War pose the highest risk, whereas those experiencing violent crisis' are of considerable risk, but those experiencing non-violent crisis' &/or disputes are considered the least in terms of risk evaluation.

Source: <https://hiik.de/conflict-barometer/current-version/?lang=en>

1.7.8 Transparency International's Corruption Perception Index Rating

When evaluating risk, locations of mines residing within specific countries are taken into account with the Corruption Perception Index. The upper tier of governmental corruption (70 – 100), considered the least corrupt from Transparency International's report, are deemed low risk. Those with a score residing within the medium tier (30 – 70) are noted for their moderate levels of corruption, whereas those with a low score (0 – 30) are considered as a high risk.

Source: https://www.transparency.org/news/feature/corruption_perceptions_index_2017

1.7.9 Dodd-Frank Listed Countries

When evaluating risk, locations of mines residing within specific countries are taken into account with the Dodd-Frank Act, Section 1502, consisting of the DRC & neighbouring countries. Those within said collection are deemed the highest risk based on the aforementioned Act.

The basis for risk within said countries is due to concerns of fuelling some of the world's most brutal conflicts & the weakening of already fragile states linked to Gold. Although no official report collection takes place due to being a non-US PLC, adhering to the Act with increased due diligence is completed.

Source: <https://www.gpo.gov/fdsys/pkg/PLAW-111publ203/pdf/PLAW-111publ201.pdf>

1.7.10 LBMA Supply Chain Assessment Score

When evaluating risk, the completed LBMA Supply Chain Assessment form values the Supplier accordingly, with either the high risk criteria being met, or not. This evaluation verifies where metal originates from, transits through or if involved parties include PEPs, high risk businesses or money laundering & corruption.

Source:

http://www.lbma.org.uk/assets/downloads/responsible%20sourcing/LBMA_Supply_Chain_Assessment_Form_January_201.pdf

1.7.11 Sanctions

When evaluating risk, locations of mines residing within specified countries are taken into account with the sanctions applied from, but not limited to, OFAC/US, OFSI/UK, the EU & the UN. Those with considerable sanctions in force are deemed that of high risk, with those possessing a moderate amount of sanctions receiving an appropriate score. Those with little to no sanctions incur low risk.

1.7.12 On-Site Visit

When evaluating risk, completed visitations to the Supplier denote low risk, whereas those unvisited procure high risk. Once completed, a much more in-depth & personally verifiable structure is able to be documented & assessed.

A copy of the noted *Mine/Secondary Site Visitation Questionnaire* is appended to the Compliance manual.

1.7.13 Country of Origin

When evaluating risk, locations of mines residing within specific countries are taken into account. Those within the UK/EU/EEA are deemed low risk, with members of FATF & those in compliance with FATF-Style Regional Bodies deemed moderate risk. Those outside of the previously outlined acquire the highest risk due to lacking regulatory regimes being adhered to.

Source: <http://www.fatf-gafi.org/about/membersandobservers/>

1.7.14 Responsible Gold Social & Environmental Guidance

When evaluating risk, how the operation of mineral extraction is conducted varies. Although LBMA's Responsible Gold Guidance is due to cover such topics in the near future, the lowest risk comes from those formally aligned with the Cyanide Code, *Minamata Convention on Mercury* or those utilising Placer Mining (Concentration Methods). Those not adhering, are considered moderate risk if appropriate use of Tailings are utilised, avoiding contamination & destabilisation of eco systems – especially locations away from water sources & within hot climates. Those using mercury or not displaying effective systems to mitigate environmental damage, especially locations within cold climates or near main water sources, are deemed that of considerably high risk.

2. Supply Chain Grievances & Whistleblowing Policy

2.1 Introductory Scope

This Policy provides framework for receiving, investigating & responding to grievances, promoting mutual confidence & trust with all relevant parties. Its application relates to collective & individual grievances/complaints. Those raised are inclusive of both external & internal allegations. All evidenced grievances/complaints shall be investigated.

2.2 Incident Report Guidance

Any whistleblower wishing to raise a complaint/grievance must adhere to the following reporting guidance that provides information on how to report an incident to facilitate its resolution.

2.3 Definition of Malpractice

This Policy encourages the reporting of any abuses, risks &/or behaviour that does not comply with the authorities, or Company Regulations, including but not limited to, the following:

- Corruption/Bribery.
- Fraud.
- Property Damage/Theft.
- Employee Misconduct.
- Health & Safety Violations.
- Inadequate Working Conditions.
- Inadequate Security (People, Metal, Property).
- Environmental Impacts.
- Child Labour.
- Human Rights Violations.

2.4 On Anonymity

The whistleblower does not need to be named if anonymity is necessary for privacy/protection. However, information & evidence needs to reach a satisfactory level to substantiate any claim.

2.5 On Evidence

Information provided must include, whenever possible/applicable:

- Name(s) of affected person, community &/or organisation;
- Factual description;
- Witnesses;
- Date;
- Time;
- Location; &
- Identity of buyers of minerals from the stated location.

Insufficient information may hinder any prevalent investigations, providing as much information as possible is strongly advised.

2.6 Stakeholder Intelligence

Information as to those informed about the grievance/complaint, other than Baird & Co. Ltd Ltd, needs to be relayed. Stating whom was informed, with contact details (e-mail address, phone number, postal address, etc.) & all correspondence had with them. These may include those from the below list:

- Local/Provincial/National Authority
- Non-Governmental Organisations
- Lawyers
- Members of Parliament
- Media
- Other (Please specify)

2.7 NGO Reports

When informing Baird & Co. Ltd of incidents pertaining to the Supply Chain in which we are associated with, include clear research methodology highlighting your educational & professional experiences, precise locations as to where the research was conducted & include those of which who were interviewed. Also ensure accurate referencing to all sources with correct & accurate dates. Sources need to avoid being concentrated, as to avoid weakly supported reports. Should confidentiality of sources be of concern, an appropriate system to mask, but still link them, should be adopted. Victim viewpoints should be included wherever possible, ensuring protection of all vulnerable interviewees in the process. Lastly, it's vital that information generating a link to the actors within the supply chain need to be established to aid in such reports, specifying where the incident took place, or who the trader/exporters were, or if any actors were members of a cooperative (with specifics to which one), & so forth.

2.8 Internal Reporting

Internal grievances/complaints are to be reported to their relevant manager. Should the individual(s) not find it possible/appropriate, grievances/complaints can be filed through the formal whistleblowing process denoted within Section 2.9.

2.9 Formal Reporting

Any whistleblower may make written or electronic disclosures via the following means:

- The dedicated mailbox compliance@bairdmint.com.
- Postal disclosures may be posted to Baird & Co. Ltd Ltd, PO Box 71581, London, E6 9NF.

2.10 Assimilation Management

The Compliance Department is responsible for processing all incoming communications & of keeping Senior Management informed about newly identified risks &/or concerns.

Dependent on the complaint, appropriate Senior Management/departments will be assigned to determine appropriate action for its resolution & for the engagement process with the interested parties.

Assignments will be made according to the type of complaints as follows:

- Commercial Issues: Head of Sales
- Sourcing Issues: Head of Sales & Head of Compliance
- Civil society & NGOs: Compliance Department & Executive Directors
- Authorities/Associations: Compliance Department & Executive Directors
- Internal stakeholders: HR, Compliance Department & Executive Directors

2.11 Report Processing

Once a complaint/grievance has been filed, the following steps shall be taken in respective order:

2.12.1 Step 1: First Contact

Within two weeks, an initial acknowledgement of receipt & an explanation to the proceeding actions will be provided to the relevant parties, also including timeframes within which the relevant parties can expect the complaint/grievance to be reviewed,

2.12.2 Step 2: Analysis

Within the indicated timeframe, an assessment will be made whilst taking into consideration the relevancy to this policy, the type of complaint/grievance, & whether the evidence provided establishes a foundation or not. Consequently, Baird & Co. Ltd will notify the relevant party as to the timeframe governing its resolution.

2.12.3 Step 3: Resolution

Within an acceptable period of time, any updates pertaining to the timeframe governing its resolution, or closures/resolution of the complaint/grievance, will be provided to all relevant parties.

2.12 Data Collection

Baird & Co. Ltd will ensure that all communication is recorded appropriately & tracked through to its closure/resolution. This information will include the:

- Senior Management/department(s);
- Registration date;
- Status – Open (Founded), Rejected (Unfounded) & Closed (Founded)

2.13 Definition

Whistleblower: Any employee, customer, contractor &/or third-party that raises a complaint/grievance related to the company or its contractor's activities &/or impacts

Affected Persons: Any individual or group of individuals affected by malpractice.

Relevant Parties: Affected persons &/or whistleblowers.

Complaints: Negative feedback raised in regards to the company &/or the activities & impacts of its contractors.

Grievances: Formal concerns/allegations brought forward as a result of malpractice, resulting in corrective action &/or a response.

Grievances & Whistleblowing Mechanisms: Processes to support implementation of this policy.

2.14 References

2.14.1 Internal

The following Policies are incorporated by reference into, & form part of, the Supply Chain Grievances & Whistleblowing Policy:

Baird & Co. Ltd Compliance & Ethics

Baird & Co. Ltd Human Rights Policy

Baird & Co. Ltd Financial Crime Policies & Procedures

2.14.2 External References

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected & High Risk Areas & the Supplement on Gold, 2013;
- LBMA Responsible Gold Guidance, 2018;
- The World Gold Council Conflict Free Gold Standard, 2012;
- UN Guiding Principles on Business & Human Rights, 2011;
- The Conflict-Free Sourcing Initiative: Five Practical Steps to Support SEC Conflict Minerals Disclosure, 2015;
- Responsible Jewellery Council –Standards Guidance, 2013;
- RAGS Forum;
- FATF Reports.