L'ORFEBRE SUPPLY CHAIN POLICY FOR A RESPONSIBLE GLOBAL SUPPLY CHAIN OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that L'ORFEBRE has the responsibility to respect human rights and not contribute to conflict, L'ORFEBRE commits to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. L'ORFEBRE commits to refraining from any action which contributes to the financing of conflict and L'ORFEBRE commits to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Regarding serious abuses associated with the extraction, transport or trade of minerals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, L'ORFEBRE will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

i) any forms of torture, cruel, inhuman and degrading treatment;

ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;

iii) the worst forms of child labour;

iv) other gross human rights violations and abuses such as widespread sexual violence;

v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. L'ORFEBRE will immediately suspend or discontinue engagement with upstream suppliers where L'ORFEBRE identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

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Regarding direct or indirect support to non-state armed groups:

3. L'ORFEBRE will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals 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.

Regarding risk management of direct or indirect support to non-state armed groups:

4. L'ORFEBRE will immediately suspend or discontinue engagement with upstream suppliers where L'ORFEBRE identifies a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:

5. L'ORFEBRE agrees to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. L'ORFEBRE recognises that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where L'ORFEBRE or any company in our supply chain contract public or private security forces, L'ORFEBRE commits to or L'ORFEBRE will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, L'ORFEBRE will support or take steps, to adopt screening

policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. L'ORFEBRE will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. L'ORFEBRE will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize 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.

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, L'ORFEBRE will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where L'ORFEBRE identifies that such a reasonable risk exists. In such cases, L'ORFEBRE will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where L'ORFEBRE identifies a reasonable risk of activities inconsistent with paragraphs 8 and 9, L'ORFEBRE will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. L'ORFEBRE will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:

12. L'ORFEBRE will support efforts, or take steps, to contribute to the effective elimination of money laundering where L'ORFEBRE identifies a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

13. L'ORFEBRE will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, L'ORFEBRE commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, L'ORFEBRE commits to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. L'ORFEBRE will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

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Bernat Migó Moliner

Sole Director