

PRECIOUS METALS SUPPLY CHAIN POLICY

SEMPSA Jewelry Platería, SA. is based on principles aimed at establishing ethical relationships as a common guideline for the development of all its activities, thus avoiding the contribution in the development of armed conflicts, human rights abuses, organized crime, and / or money laundering .

As a consequence of the above, it is ensured that the origin of the precious metals that you receive are ethically acceptable.

With the internal and external promulgation of this document and the Precious Metal Origin Control procedure, all conducted by the Compliance Officer, the following is achieved:

- Show transparency in all our business processes, positioning ourselves against corruption, fraud and money laundering.
- Establish the ethical, moral and social guidelines to follow, in all our activities
- Safeguard the ethical integrity of our business relationships with any entity or individual

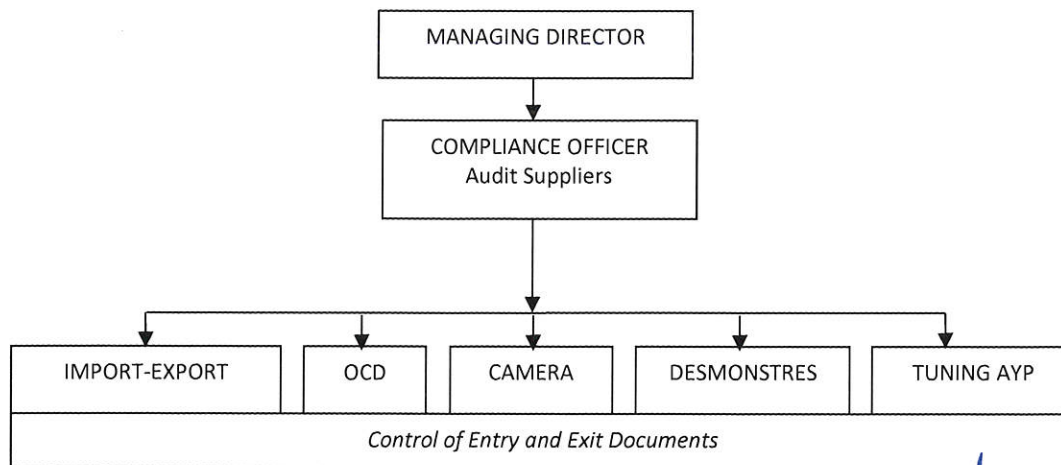
The scope of this policy is the supply chain of the precious metals that reach the company and is included in the Integrated Management System of SEMPSA Jewelry Platería SA, where the necessary actions are established to guarantee that the documentation and records of the supply chain Due Diligence supply is available and updated, as well as programming the necessary training for the staff of SEMPSA Jewelry Platería SA, thus satisfying the control requirements in the supply chain, complemented by the Code of Conduct, the Corporate Social Responsibility Policy and the Policy of the Integrated Management System, with which the company undertakes to:

- Not contribute, facilitate, tolerate or take part in:
 - Any form of torture, cruelty, or degrading humane treatment
 - Any form of forced labor
 - Abuse or violation of human rights
 - War crimes, violation of international humanitarian laws, crimes against humanity or genocide
- There will be no relationship with suppliers linked to any of the serious abuses mentioned in the previous paragraph
- Direct or indirect support to armed groups that do not belong to a State associated with the UN or associated with them, through payments, or by

providing assistance or equipment, to the firms or people that control the mines, the routes, will not be tolerated. of transport, the areas of trade of precious metals, or oblige the payment of taxes or extortions through import or export companies, agents, or other intermediaries of any kind.

- Likewise, no commercial relationships will be established with suppliers that present a reasonable risk of having some kind of connection with what is described in the previous point.
- We affirm that the role played by public or private State security forces is to provide security to workers, facilities and properties, in accordance with current legislation and guaranteeing human rights, not providing support to those who violate it.
- We will not exert inappropriate influence, offers, promises or coercion, in the same way that they will be rejected. It is not allowed to use company funds, obtain personal benefits through their use or violate this policy in any way
- The origin of the precious metal will not be supplanted, taxes, royalties and payments to governments will be distorted for its extraction, trade, handling, transport or export.

It will contribute to the eradication of money laundering linked to the trade, transport, export and extraction of precious metals, thanks to the following organizational structure:



In Madrid, May 17, 2018

Francisco Espinosa

General Director of SEMPSA Jewelry Platería SA