

**GANNON & SCOTT POLICY FOR A RESPONSIBLE GLOBAL SUPPLY CHAIN
FOR GOLD FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS**

Recognizing that significant adverse impacts may be associated with extracting, trading, handling and exporting gold from conflict-affected and high-risk areas, and recognizing our responsibility to respect human rights, we commit to refrain from action which contributes to the finance of conflict, to comply with relevant United Nations sanctions resolutions and laws implementing such resolutions, and to the following:

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

1. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labor;
- the worst forms of child labor;
- human rights violations and abuses;
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

2. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable risk that they are committing, or are sourcing from or linked to any party committing, abuses described in paragraph 1.

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

3. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally:

- control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain; and/or
- tax or extort money or gold at mine sites, along transportation routes or at points where gold is traded, or from intermediaries, export companies or international traders.

4. We will not deal with, and will immediately discontinue engagement with, upstream suppliers 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 in paragraph 3.

Regarding public or private security forces:

5. We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 1, or that act illegally as described in paragraph 3.

Regarding bribery and fraudulent misrepresentation of the origin of gold:

6. We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold.

Regarding money laundering:

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold.