

CHAPTER	08 - VERIFICATION OF ORIGIN OF PRECIOUS METALS
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INTRODUCTION

LASTTRO TRADING's Verification of Origin of Precious Metals Policy aims to adopt the best market practices regarding the "origin control" of precious metals to be traded, in order to ensure that they have ethical, licit origin, from areas conflict-free, from which they have been extracted in accordance with environmental legislation and free from abuse or violations of human rights, mitigating the risks of commercial relationships with illegitimate suppliers, non-compliance with the law or violators of human rights.

Assuming liability in respecting human rights and the possibility of adverse impacts that may be associated with the extraction, commercialization, handling, transport, processing and export of precious metals from conflict-affected or high-risk areas, LASTTRO TRADING is committed to combating any action that contributes to the financing of armed conflicts in Brazil or abroad and to incorporate in its contracts with suppliers, the requirement that they also respect this Policy, the current Brazilian legislation and the resolutions and sanctions of the United Nations, when applicable.

LASTTRO TRADING's Verification of Origin of Precious Metals Policy is based on the following principles:

- Not tolerating, benefitting from, contributing to or facilitating any form of violation of human rights, torture, cruel, inhuman or degrading treatment, or abuse of any kind, environmental crimes, war crimes or crimes against humanity, associated with extraction, transport or commercialization of precious metals;
- Ensuring decent work for all our employees, with freedom of association and the right to collective bargaining, fighting any form of child or forced labor or any type of discrimination or abuse;
- Not tolerating, contributing, or facilitating any direct or indirect support to non-governmental armed groups, militias, or public or private security forces that act illegally along the precious

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metals trading chain, including in the illegal control of transport routes, the places of production or marketing;

- Recognizing that the function of security forces, public or private, at precious metals extraction sites, on transport routes, must be solely to preserve the rule of law, safeguard human rights and provide the safety of workers, equipment and facilities, as well as ensuring that the activities are carried out in a lawful and legitimate manner;
- Demanding that private security forces, hired by any agent within the precious metals trading chain, perform their functions in accordance with high ethical standards and in accordance with the Voluntary Principles on Security and Human Rights of the United Nations (UN), and that private security forces who have previously been held accountable for human rights abuses are not hired;
- Not offering, promising, giving or receiving bribes or any other pecuniary compensation of any nature to public or private agents, and requesting a declaration that their suppliers do not do so either, with the purpose of covering up or presenting incorrect information about taxes, fees and royalties paid to governments for the rights to extract, trade and process precious metals, or even to conceal or falsify the origin of precious metals;
- We will actively support any and all initiatives by the competent public authorities, control and inspection bodies, Brazilian and international non-governmental organizations, civil society and affected third parties, which contribute to improving transparency, legality, respect for human rights and preventing and combating situations that may characterize corruption, bribery, ideological falsehood regarding the declaration of origin of precious metals, money laundering, financing of international terrorism or evasion of taxes, fees or royalties.

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LASTTRO TRADING shall use its best efforts in order to identify the origin of the precious metals purchased from its suppliers, in order to prove, to the best of its knowledge, that they have a lawful and legitimate origin and that they are not linked to areas of conflict or to human rights violations.

Upon the purchase of precious metals by LASTTRO TRADING, its suppliers must present a "Declaration of Origin", which must be signed by the customer's legal representative, or by an attorney-in-fact with specific powers for this purpose, and forwarded together with the respective sales invoice.

In the "Declaration of Origin" the supplier must declare, among other things, that:

- It does not practice human rights abuses, forced labor, slave labor, child labor or any other degrading form in its labor relations;
- It does not directly or indirectly finance militias or any other type of private armed group;
- It does not pay or offer undue advantages to public agents in Brazil or abroad;
- That it has internal controls to prevent money laundering and combat the financing of international terrorism;
- That it has the necessary authorizations for the exercise of its activity, including the authorizations of the environmental agencies that supervise its activity;
- That it complies with the laws and regulations applicable to its activity;
- That the precious metals owned by it are not linked to the so-called risk and conflict areas (CAHRA) as defined by the Organization for Economic Cooperation and Development (OECD);
- In the case of suppliers Financial Institutions, which act in the acquisition of primary gold of prospector mining origin, which have internal procedures that ensure compliance with Law 12.844/13 and verification of the origin of the gold acquired in relation to the perfect identification and legality of its location of extraction.

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The declarations of origin will be analyzed by the Internal Compliance Committee, which must observe, among other things, that:

- They were signed by the company's legal representative or attorney-in-fact with specific powers for this purpose, whose power of attorney must be in force and the copy must have been attached to the supplier's registration;
- That the respective mineral production authorizations declared as origin, whether they are a Prospector Mining Permit (PLG) or a Mining Permit, are valid, in force and owned by the supplier, in the case of Mining Companies;
- That the necessary authorizations from the competent environmental bodies are valid, in force and owned by the supplier;
- That the place of origin of precious metals is not considered a high-risk or conflict-affected area (CAHRA), as defined by the Organization for Economic Cooperation and Development (OECD);
- That in the case of suppliers Financial Institutions that declare origins in Prospector Mining Permits (PLG), which have internal procedures that ensure compliance with Law 12,844/13 in the acquisition, transport and sale of precious metal;
- That the supplier has no history of criminal proceedings for violations of human rights, for crimes related to slave labor, for environmental crimes, for crimes of corruption, for tax crimes or against the national financial system, or for crimes related to money laundering or the financing of international terrorism.

Special attention should be given to situations that may constitute attempts to circumvent the perfect identification of the origin of precious metals, or even, the provision of incomplete or incorrect information in the declarations of origin, with the aim of falsifying or hiding the true origin of precious metals.

This Policy applies to all administrators, employees and suppliers of LASTTRO TRADING, and failure to comply with this Policy will lead to the investigation of the events that led to such disrespect, and may subject employees to disciplinary measures,

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including dismissal for cause and other penalties provided for in labor legislation, or the termination of commercial ties with suppliers, without prejudice to the application of the respective possible penalties.

Employees who deliberately fail to notify violations of this Policy to the Internal Compliance Committee, or omit relevant information, will also be subject to disciplinary measures.

Disciplinary measures and penalties applicable to specific cases of violation of this Policy will be defined by the Board of LASTTRO TRADING.

This Policy shall be revised at least every 3 (three) years, from the date of its last revision, or at any time, in the event of a material fact or changes in the applicable legislation.

This Policy must be disclosed to all employees and suppliers, and be made available, as well as its updates, on LASTTRO TRADING's website.