

CHAPTER	PRECIOUS METAL SOURCING
SECTION	INSTITUTIONAL POLICY

1. INTRODUCTION

LASTTRO TRADING's Precious Metal Sourcing Policy aims to adopt the best market practices in terms of "sourcing control" of precious metals to be traded, in order to ensure that they have an ethical legal origin, are from conflict-free areas, are extracted in accordance with environmental legislation, and are free from abuses or violations of human rights, mitigating the risks of commercial relationships with illegitimate suppliers, who breaches the law or violates human rights.

Assuming responsibility for respecting human rights and the possibility of adverse impacts that may be associated with the extraction, marketing, handling, transportation, 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 incorporate into their agreements with suppliers, the requirement that they also respect this Policy, the Brazilian legislation in force, and the resolutions and sanctions of the United Nations, when applicable.

LASTTRO TRADING Precious Metal Sourcing Policy is based on the following principles:

- Do not tolerate, benefit from, contribute to, or facilitate, any form of human rights violation, torture, cruel, inhuman or degrading treatment, or abuse of any nature, environmental crimes, war crimes, or crimes against humanity, associated with the extraction, transport, or marketing of precious metals;
- Ensure decent work for all our employees, right of free association and collective bargaining, combating any form of child or forced labor or any type of discrimination or abuse;
- Do not tolerate, contribute to or facilitate any support, direct or indirect, to non-governmental armed groups, militias, or public or private security forces that act illegally throughout the precious metals trading chain, including the illegal control of transport routes, production or marketing locations;
- Recognize that the role 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 activities are carried out in a lawful and legitimate manner;
- Demand that private security forces, hired by any agent within the precious metals trading chain, perform their duties in accordance with high ethical standards and in accordance with the United Nations (UN) Voluntary Principles on Security and Human Rights, and that private security forces that have previously been held responsible for human rights abuses are not hired;

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- Do not offer, promise, give or receive bribes or any other pecuniary compensation of any nature to public or private officials, and request a declaration that its 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, sell and process precious metals, or to hide or falsify the origin of precious metals;
- We will actively support any and all initiatives by 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, criminal misrepresentation regarding the declaration of origin of precious metals, money laundering, financing of international terrorism or tax evasion, fees or royalties.

LASTTRO TRADING will make its best efforts to identify the origin of precious metals purchased from its suppliers in order to prove, to the best of its knowledge, that they have a legal and legitimate origin and that they do not relate to areas of conflict or human rights violations.

When purchasing precious metals by LASTTRO TRADING, its suppliers must present a “Declaration of Origin”, which must be signed by the client's legal representative, or by an attorney with specific powers for this purpose, and sent together with the respective sales invoice.

In the “Declaration of Origin”, the supplier must declare, among other things:

- It does not practice human rights abuses, forced 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 officials in Brazil or abroad;
- It has internal controls for preventing money laundering and combatting the financing of international terrorism;
- It has the necessary authorizations to carry out its activity, including authorizations from the environmental bodies that supervise its activity;
- It complies with the laws and regulations applicable to its activity;
- That the precious metals in its possession do not relate with the so-called Conflict Affected and High-Risk Areas (CAHRA) as defined by the Organization for Economic Cooperation and Development (OECD);
- In the case of suppliers in the capacity of Financial Institutions, which act in the procurement of primary gold of 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 perfect identification and the lawfulness of its location of extraction.

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The declarations of origin will be subject to analysis by the Internal Compliance Committee, which must observe, among other things, the following:

- They were signed by a company's legal representative or an attorney with specific powers for this purpose, whose power of attorney must be in force and that a copy must have been attached to the supplier's registration;
- The respective authorizations for mineral production declared as origin, whether a Mine Prospecting Permit (PLG) or a Mining Permit, are valid, in force and held by the supplier, for Mining Companies;
- The necessary authorizations from the competent environmental bodies are valid, in force and held by the supplier;
- The place of origin of the precious metals is not considered a Conflict Affected and High-Risk Area (CAHRA) as defined by the Organization for Economic Cooperation and Development (OECD);
- In the case of suppliers in the capacity of Financial Institutions that declare origins in Mine Prospecting Permits (PLG), which have internal procedures that ensure compliance with Law 12.844/13 in the procurement, transport, and marketing of the precious metal;
- The supplier does not have a criminal background of human rights violations, crimes related to forced labor, environmental crimes, corruption crimes, tax crimes, or crimes against the national financial system, or crimes related to money laundering or the financing of international terrorism.

Particular 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 declarations of origin, with the aim of falsifying or hiding the true origin of precious metals.

When purchasing gold financial assets directly from Financial Institutions, a declaration of origin will be requested for each negotiation, in relation to commodity gold and other precious metals purchased, for example, from mining companies, jewelry stores, etc.,

The declaration of origin must be requested as an integral part of the KYC, together with the other requested registration documents, as well as in the registration renewal.

This Policy applies to all managers, employees and suppliers of LASTTRO TRADING, and failure to comply with this Policy will lead to an investigation of the events that led to such disrespect, and may subject employees to disciplinary measures, including termination with a cause, and other penalties provided for in labor legislation, or the termination of commercial relationships with suppliers, without prejudice to the application of the respective possible penalties.

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

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

This policy must be subject to review at least every three (3), years, counting from the date of last review, or at any time, upon the occurrence of a relevant fact or changes to applicable legislation.

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