



RELDAN[®]

An Abington Reldan Metals Company

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Supply Chain Due Diligence Policy

Reldan is strongly committed to ensuring that any metals sourced in our supply chain for manufacturing products or materials received by Reldan is done so in a manner that is ethical and humane. As part of our supply chain due diligence, as well as our intention in establishing long-term relationships with our immediate suppliers, Reldan shall be mindful and assess the severity as necessary of risks as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas Third Edition (OECD Guidance) and Section 1502 of the Dodd Frank Act.

Reldan's commitment includes but is not limited to:

- Serious abuses associated with the extraction, transport or trade of minerals:
 - Any forms of torture, cruel, inhuman and degrading treatment
 - Any forms of forced or compulsory labor
 - The worst forms of child labor
 - Other gross human rights violations and abuses such as widespread sexual violence
 - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
- Avoiding contributing to any conflict;
- Complying with anti-money laundering (Reldan) standards;
- Complying with standards on combatting the financing of terrorism (CFT);
- Excluding any direct or indirect support to state and non-state armed groups and/or illegally acting public or private security forces;
- Ensuring the payment of taxes, fees, and royalties due to governments;
- Avoiding bribery and fraudulent misrepresentation of the origin of precious metals;

In order to ensure compliance with our commitment to a "non-conflict affected" and OECD aligned supply chain, Reldan has integrated the following due-diligence protocols for analyzing and assessing our suppliers;

Systematically perform enhanced due diligence practices, including the Know Your Customer process, following a risk-based approach; looking at the supplier and country of origins: infrastructure, governance, financial stability and human rights practices and regulations before entering a business relationship with any precious metals supplier. To prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified, appropriate scrutiny and monitoring of the transactions undertaken through the course of the relationship and of the governance structures in place to prevent any risk of illegal activities and implement a management strategy to respond to identified risks. Reldan further commits to a review of the supply due diligence process by a qualified independent auditor annually for effectiveness and to explore and implement possible improvements to our strategy.

Reldan will provide, and expect our suppliers to cooperate in providing, due diligence information to confirm gold in our supply chain does not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance. Aim to establish long-term relationships with our immediate suppliers. Consider ways to support and build capacities of gold supplying counterparties to improve performance and confirm to this supply chain policy. Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public (as required).

9/23/2021



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Reldan will not enter into any business relationship, or immediately suspend or discontinue engagement with precious metals supplying counterparties supplying precious metals where we identify a reasonable risk that they are sourcing from, or are linked to, any party committing serious abuses as defined in the commitment above. Reldan's intention is also to engage the Counterparty to ascertain the circumstances of identified risks and violations, how the Counterparty has handled these (through mitigation and remedy actions), and how the Counterparty has introduced reasonable control measures to prevent and better mitigate such risks in the future.

Reldan will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of precious metals. This includes, but is not limited to, procuring precious metals from, making payments or otherwise providing logistical assistance or equipment to non-state armed groups or their affiliates who:

- a) illegally control mine sites or otherwise control transportation routes, points where precious metals are traded and upstream participants in the supply chain; and/or
- b) illegally tax or extort money or precious metals at points of access to mine sites, along transportation routes or at points where precious metals are traded; and/or
- c) illegally tax or extort intermediaries, export companies or international traders.

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

Reldan commits to the support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).

Reldan will adequately store and maintain all records and documentation relating to the precious metals supply chain in order to demonstrate that appropriate and on-going due diligence has been followed.

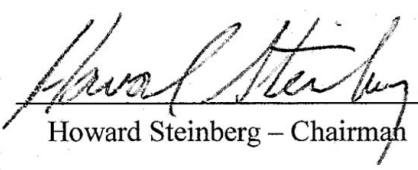
Reldan commits to having meaningful stakeholder engagement, including accepting and acting on complaints or recommendations on how to improve our due diligence program. Should you have a recommendation, concern or reason to believe that Reldan should be notified of any suspicious activity please email us compliance@reldan.com

Finally, Reldan publishes and makes publicly available an annual summary due diligence report to include the following:

1. Third Party Assessment Summary
2. Company Supply Chain Policy
3. Company Management System
4. Risk Identification
5. Risk Mitigation

Sincerely,


Alan Nadler – CEO


Howard Steinberg – Chairman

9/23/2021