



"The Golden Rules:" Gold and Precious Metals Sourcing Policy

Our company is concerned about the environmental and social impacts of irresponsible mining practices. We are committed to sourcing gold and other metals produced under the highest social, human rights, and environmental standards. We are working to ensure that the gold and other metals in our products were not produced at the expense of communities, workers, or the environment. Therefore, our company is pleased to announce that we will join the industry's environmental and social leaders by taking the following steps:

We will immediately undertake an audit to determine the sources for all of our gold products. Our supply chain audit will include information about how gold is being mined, refined, and manufactured. We will share the relevant results of this audit with the No Dirty Gold campaign.

We will work to ensure that the gold and metals we purchase come from sources that meet the highest human rights, social, and environmental criteria at all stages in the supply chain (mining, processing, refining, recycling, etc). These criteria include, but are not limited to:

- Ensuring that gold or other metals were not obtained from operations using submarine or riverine tailings disposal (i.e., the dumping of mine wastes in the ocean, coastal waters, and rivers).
- Ensuring that basic human rights (as outlined in international conventions and declarations such as the UN "Universal Declaration of Human Rights," and others) are being respected by all parties involved in the mining, processing, and manufacturing of the products we sell.
- Ensuring that gold is being sourced from mines that were built and are being operated with the free, prior, and informed consent of local communities.
- Ensuring that workers' rights and labor standards (including the eight core ILO conventions) are being respected by all parties involved in the mining, processing, and manufacturing of the products we sell.
- Ensuring that gold is not being sourced from areas of armed or militarized conflict.
- Ensuring that gold has not been sourced from protected areas or areas of high conservation or other ecological value.
- Ensuring that gold has not been sourced from mines that have been responsible for the forced displacement of communities.
- Ensuring that gold has not been sourced from operations that will result in sulfuric acid or toxic chemical contamination into soil, surface waters, groundwater, or the environment.
- Ensuring that gold is being sourced from mines that have provided full financial guarantees to cover the costs of clean-up and mine closure.



We will seek independent, third party verification that gold and other precious metals we purchase meet these and other criteria.

We will immediately inform suppliers of gold and other precious metals at all our facilities worldwide that we intend to purchase these metals from sources that meet the above criteria. We will include relevant language in all contracts with suppliers.

We are committed to increasing our sourcing of gold from recycled and secondary sources, and we will set targets for increasing the use of these sources. We will seek independent, third-party verification of secondary content.

Our corporation is committed to implementing policies that promote the more responsible production of gold and precious metals. We are committed to serving as a leader within our sector, not only through our purchasing behavior, but by encouraging other companies within our industry to do the same.

Signed,

A handwritten signature in blue ink, appearing to read "JP", positioned above the printed name.

Jason Payne
Founder and CEO
12 February 2016