



**POLICY**  
**MATERIALS FROM**  
**CONFLICT AFFECTED AREAS**





## **MATERIALS FROM CONFLICT AFFECTED AREAS POLICY**

### **PURPOSE**

The purpose of this policy is to confirm Zion Precious Metals (Pty) Ltd commitment to respect Human rights, refrain from action which contributes to the finance of conflict, and to comply with relevant sanctions resolutions and laws implementing such resolutions.

### **GENERAL PRINCIPLES**

Zion Precious Metals (Pty) Ltd is a Member of the Responsible Jewellery Council (RJC). The RJC standard setting organization that has been established to reinforce consumer confidence in the Jewellery industry by promoting responsible ethical, human rights, social and environmental practices throughout the Jewellery supply chain. The RJC and its members are opposed to activities which directly or indirectly finance, benefit or facilitate armed conflict, extreme violence and human rights abuses.

RJC (Responsible Jewellery Council) has two standard platforms which provide the mechanism for RJC Certified Members to support these commitments:

1. Code of Practice - Standard (CoP).
2. Chain of Custody – Standard (CoC).

Zion Precious Metals (Pty) Ltd commits that we:

- Respect human rights according to the Universal Declaration of Human Rights and Labour Rights.
- Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism.
- Support transparency of government payments and rights-compatible security forces in the industry.
- Do not provide direct or indirect support to illegal armed groups.
- Establish processes through which stakeholder can raise concerns about the Jewellery supply chain.

### **REGARDING SERIOUS ABUSES:**

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

1. Torture, cruel, inhuman and degrading treatment.
2. The worst form of child labor.
3. Human rights violations and abuses.
4. War crimes, crimes against humanity.



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### **REGARDING DIRECT OR INDIRECT SUPPORT TO ARMED GROUPS:**

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:

1. Control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain and,
2. 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.

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.

### **REGARDING PUBLIC OR PRIVATE SECURITY FORCES:**

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 or that act illegally.

### **REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF GOLD:**

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 purpose of extraction, trade, handling, transport and export of gold.


### **REGARDING MONEY LAUNDERING:**


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.

It is responsible to contact management should any person have any queries.



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