



M.D. OVERSEAS LTD.

Premier Trading House/Nominated Agency

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Responsible Gold Policy Statement

Declaration of Policy

M.D. Overseas Ltd. (MDO) commits to ensure that all source of gold, in any form, processed through our operations is 'Responsible Gold' and complies with the standards set forth by the London Bullion Market Association (LBMA) and Organization for Economic Co-operation and Development (OECD). The ultimate goal is to combat systemic abuses of human rights, avoid contributing to conflict, comply with high standards of anti-money laundering and negate terrorist financing practices.

Coverage

M.D. Overseas Ltd. (MDO) shall conduct gold transactions with small or large scale miners, gold traders and/or sellers, referred to in this policy as "gold-supplying counterparties", who comply with the MDO Responsible Gold Sourcing Policy.

Responsibilities

MDO shall:

1. Buy its gold only from known sources and areas that have not used gold to finance any form of crime or conflict, terrorism, human rights violations, and money laundering activities.
2. Apply a robust "Know Your Customer" policy in order to identify all upstream and downstream suppliers. Where dealings with such counterparties would potentially be in non-conformance of this policy, MDO will take all necessary steps to bring such activities to attention of the competent authorities.
3. Suspend or discontinue transacting with gold-supplying counterparties identified as operating in contravention of this policy.
4. Adhere to the laws and regulations against money laundering, any form of crime, human rights violations, and terrorism and its financing.
5. Provide relevant training on this policy to involved MDO employees and sellers.
6. Operate with only reputable transport firms which have in place strict risk management systems which adhere to the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and the Supplement on Gold.
7. Maintain a Quality Management System subject to audit by a third party certifying body.

Effectivity

This Policy shall take effect on April 1, 2016.