



Trading | Numismatics | Refining | Diamonds | Depository

## HUMAN RIGHTS POLICY

January 24, 2023

Recognizing that Dillon Gage has the responsibility to respect human rights and not contribute to conflict. Dillon Gage commits to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

### **Regarding serious abuses associated with the extraction, transport, or trade of minerals:**

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:

i) any forms of torture, cruel, inhuman, and degrading treatment.

ii) any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered himself voluntarily.

iii) the worst forms of child labor

iv) other gross human rights violations and abuses such as widespread sexual violence.

v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

### **Regarding risk management of serious abuses:**

2. Dillon Gage will immediately suspend or discontinue engagement with upstream suppliers where a reasonable risk has been identified that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

### **Regarding direct or indirect support to non-state armed groups:**

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

i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or

ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

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iii) illegally tax or extort intermediaries, export companies or international traders.

**Regarding risk management of direct or indirect support to non-state armed groups:**

4. Dillon Gage will immediately suspend or discontinue engagement with upstream suppliers where we identify any reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

**Regarding public or private security forces:**

5. Dillon Gage will eliminate, in accordance with paragraph 8, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. Dillon Gage recognizes that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where Dillon Gage or any company in our supply chain contracts public or private security forces, we commit to, or will require that such security forces be engaged in accordance with the Voluntary Principles on Security and Human Rights. We will support or take steps to adopt screening policies to ensure individuals or units of security forces that are known to have been responsible for gross human rights abuses not be hired.

**Regarding risk management of public or private security forces:**

8. In accordance with the specific position of Dillon Gage in the supply chain, we will immediately devise, adopt, and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.8 Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same manner. Should you have any questions or inquiries, please contact Ron Weaver at [rweaver@dillongage.com](mailto:rweaver@dillongage.com)

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Dillon Gage Metals

2/8/2023 | 6:58 AM PST  
Date

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