

420 MADISON AVENUE, 16TH FLOOR,
NEW YORK, NY, 10017

SUPPLY CHAIN DUE DILIGENCE POLICY

Treliss Worldwide Inc. participates in, cooperates with, and enhances worldwide efforts to ensure that precious metals come from legitimate, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our policy to do business only with legitimate, law-abiding customers, and to deny our products and services to all others.

This policy, and the program and due diligence procedures that implement it, are founded upon our general standards of business conduct, a commitment to:

- • Conduct our business in a culture of honesty and opposition to fraud and corruption;
- • Maintain high moral, ethical and social standards in our business and activities; and
- • Maintain proper business relationships with all individuals, including government

officials and employees.

We will implement this policy through a comprehensive management system. In that regard we commit to the following:

1. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - • torture, cruel, inhuman and degrading treatment;
 - • forced or compulsory labor;
 - • the worst forms of child labor;
 - • human rights violations and abuses;
 - • war crimes, violations of international humanitarian law, crimes against humanity or genocide.
2. We will not deal with, and will immediately discontinue engagement with, upstream

suppliers where we identify a reasonable risk that they are committing, or are sourcing from or linked to any party committing, abuses described above.

3. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring precious metals from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally

- ● control mine sites, transportation routes, points where precious metals are traded and upstream actors in the supply chain; and/or
 - ● tax or extort money or precious metals at mine sites, along transportation routes or at points where they are traded, or from intermediaries, export companies or international traders.
4. 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 as described above.
 5. 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 as described above.
 6. We will not attempt to improperly influence others or offer, promise, give or demand bribes or kickbacks in any form, and will resist their solicitation, and will not permit Company funds, assets or property to be used to benefit any individuals, including government officials, our customers, contractors and suppliers illegally or in ways that violate this policy.
 7. We will not disguise the origin of precious metals, or misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold.
 8. 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 precious metals.

We require our employees, agents, consultants, and business partners to comply with this policy, and will enforce it with appropriate disciplinary measures, up to and including termination of employment or contracts.

CONTACT INFORMATION

If you have any questions or concerns regarding this policy, please contact:

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