



The SASPY Group LLC



Responsible Sourcing Policy and Procedure

RESPONSIBLE SOURCING POLICY AND PROCEDURES of: The SASPY Group LLC

Implementation date: January 31st, 2018

POLICY STATEMENT

These are the Responsible Sourcing (RS) Policy and Procedures adopted by **The SASPY Group LLC (TSG)** in compliance with the United Nations and United States Department of State (<https://www.un.org/sc/suborg/en/sanctions/information>, <https://www.state.gov/e/eb/tfs/tfc/minerals/>). We actively participate and cooperate to enhance worldwide efforts to ensure that precious metals come from legal, 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 services to any person or company who do not meet this requirement.

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 with transparency, honesty and opposition to fraud and corruption;
-) Maintain high moral, ethical and social standards in our business and activities; and
-) Maintain long term business relationships with all individuals and organizations.

We will implement this policy through a comprehensive management system. This system will carry forward the general standards of business conduct set forth above and will direct our compliance procedures both internally and in our relations with customers and business partners.

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;
-) child labor as defined in Convention 182 of the International Labor Organization;
-) human rights violations and abuses;
-) war crimes, violations of international humanitarian law, crimes against humanity or genocide.



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2. We will not deal with and will immediately discontinue engagement with any suppliers or customers where we identify a reasonable risk that they are committing abuses described above, or sourcing from any party committing or linked to such abuses.

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; and/or
-) tax or extort money or precious metals from intermediaries, export companies or international traders.

4. We will not deal with, and will immediately discontinue engagement with, any suppliers or customers 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 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.

6. 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 precious metals.

7. 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 with anyone we identify are in violation of this policy.





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The SASPY Group LLC has prepared, reviewed, and implemented the above Responsible Sourcing Policy and Procedure as of January 31st, 2018.

On Behalf of The SASPY Group LLC I, Jovanni Philbrick, the active Managing Member and signatory for the company accept and acknowledge the above Policy and Procedure implementation.

Signature: 
Printed Name: Jovanni Philbrick
Title: Managing Member

Signature: 
Printed Name: Serjio Philbrick
Title: Operations Manager


The SASPY Group LLC
A Gold & Diamond Company
REG# 764485
FED# 82-0640080
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USA. UAE. S.Africa