

#### POLICY ON MATERIALS FROM CONFLICT-AFFECTED AREAS

K.G.R. Group Company Limited is a gold and silver and silver refinery plant. This policy confirms K.G.R. Group Company Limited 's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.

K.G.R. Group Company Limited is a certified member of the Responsible Jewelry Council (RJC). As such, we commit to proving, through independent third-party verification, that we:

- a. respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Fundamental Rights at Work;
- b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- c. support transparency of government payments and rights-compatible security forces in the extractives industry;
- d. do not provide direct or indirect support to illegal armed groups; and
- e. enable stakeholders to voice concerns about the jewelry supply chain.

We also commit to using our influence to prevent abuses by others. We

- 1. establish management systems by setting
- a. supply chain policy,
- b. management systems
- c. Information gathering
- d. Supplier engagement and
- e. Grievance mechanism
- 2. Assess risks by
  - a. Red-flagged operation
  - b. Risk review and mapping
  - c. Risk assessment
- 3. For red flag manage by Findings report, Engagement and control Risk management implementation and follow-up

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#### For non red flag

- 4. we use due diligence and third party audit
- 5. and upload annual report

# Serious abuses associated with the extraction, transport or trade of gold and silver and silver

Regarding serious abuses associated with the extraction, transport or trade of gold and silver and silver

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

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labor;
- c. the worst forms of child labor;
- d. human rights violations and abuses; and
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- 5. We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described previous or are sourcing from, or linked to, any party committing these abuses.

## Direct or indirect support to non-state armed groups

Regarding direct or indirect support to non-state armed groups We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold and silver from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where gold and silver is traded and upstream actors in the supply chain; and
- b. tax or extort money or gold and silver at mine sites, along transportation routes or at points where gold and silver is traded, or from intermediaries, export companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described above.

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### Public or private security forces

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 described in paragraph 4 or
that act illegally as described above.

Bribery and fraudulent misrepresentation of the origin of gold and silver Regarding bribery and fraudulent misrepresentation of the origin of gold and silver. We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold and silver, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold and silver.

#### Money laundering

Regarding money laundering, We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of gold and silver.

Signed/endorsed:

Mr. Titipong Deemankongvanich

12/12/2024

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