



WHISTLE BLOWING POLICY

SCOPE:

This policy applies to all employees of Asahi Refining USA, Inc. including Asahi Refining Florida, and Asahi Refining Canada Limited, (hereby know as Asahi Refining) including part time, temporary and contract employees, allowing any employee to voice concerns in a confidential manner.

PURPOSE:

Asahi Refining is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and Asahi Refinings' commitment to open communication, this policy aims to provide:

- An avenue for employees to raise ethical or compliance concerns or improper behavior.
- Reassurance that they will be protected from reprisals or victimization for reporting concerns in good faith.

Employees are required to report ethical or compliance concerns or other improper behavior, such as the kinds of concerns listed below. Employees may report such concerns to their immediate supervisor, to the compliance officer or other manager, or through the independent hotline service. Employees who make a report through the hotline service may choose to make the report anonymously.

POLICY:

The whistleblowing policy is intended to cover serious concerns such as:

Ethical Violations	Money Laundering
Human Rights Abuse	Unsafe Working Conditions
Sexual Harassment	Discrimination
Alcohol & Substance Abuse	Fraud
Theft & Embezzlement	Violation of the Law
Threats	Violation of Company Policy
Misuse of Company Property	Bribery & Corruption

The above list is not exhaustive; however, the policy is intended to cover issues involving unethical or illegal conduct or similar kinds of improper behavior within Asahi Refining and our precious metal supply chains. Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

SAFEGUARDS:

Harassment or Retaliation

Harassment or retaliation against individuals submitting reports will not be tolerated and may be subject to disciplinary action up to and including termination of employment.

Confidentiality

Reports made pursuant to this policy will be handled in a confidential manner. Every effort will be made to protect the reporter's identity to the extent possible and subject to local law. Please note that the information provided under this policy whether or not through a hotline report may be the basis of an internal and/or external investigation by the company into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to the company during the course of the investigation.

Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Malicious allegations may result in disciplinary action up to and including termination of employment.

If the reporting employee is involved in the improper activity which is being reported, the company may decide or be required to take disciplinary action against that employee. In that event, the employee's choice to make the report will be considered when determining the appropriate disciplinary response.

PROCEDURE:**Reporting using Hotline**

A third party service providing a confidential hotline is available for employees and external stakeholders to use if the whistleblower prefers to make the report anonymously. Information about the procedures for making a report using the hotline is posted around the facilities, additionally a form is available for employees and external stakeholders on the company website.

Timing

Employees who are aware of misconduct covered by this policy should make a report as soon as possible. The earlier a concern is expressed, the easier it is for the company to take action.

Evidence

Although an employee is not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate that there are sufficient grounds for concern.

Reports should be based on facts not speculation and employees should include as much detailed information as possible to allow investigation of their concerns.

HOW THE REPORT WILL BE HANDLED:

All complaints will be treated seriously and with respect, and the action taken will depend on the nature of the concern. Reports may or may not be investigated at the sole discretion of the company. The



relevant Asahi Refining Board of Directors receives a copy of each report and follow-up reports on actions taken by the company. These reports provide a source to identify lessons for improving both the whistleblowing mechanism and preventing future grievance and harm.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Feedback to Reporter

Whether a report is made directly to Asahi Refinings' personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on his/her concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Advising whether initial inquiries have been made;
- Advising whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and those investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the reporter remains accessible for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

Asahi Refining reserves the right to modify or amend this policy at any time as it may deem necessary.