



# Precious Metals Sourcing Policy

Version 1.6

Voima Gold Ltd - 04-2024

# Table of Contents

<b>Table of Contents</b>	<b>2</b>
<b>1. Introduction</b>	<b>3</b>
<b>2. Principles</b>	<b>4</b>
<b>3. Due Diligence Processes and Risk Management</b>	<b>5</b>
<b>4. Sourcing Operations &amp; Process</b>	<b>8</b>
<b>5. Supply Chain Policy</b>	<b>10</b>
<b>6. Reporting Mechanism on Breaches</b>	<b>11</b>
<b>7. Attachments</b>	<b>12</b>



# 1. Introduction

As a company engaged in trading, receiving, and distributing gold, Voima Gold Oy acts as an intermediary between consumer interfaces and refineries. We recognize our pivotal role and responsibility in managing gold supply chains, particularly within the local market context of our operations.

## **Guiding Principles and Requirements**

Our internal policies, while a foremost priority, are informed and guided by international standards and transnational regulations. Where applicable, Voima Gold Oy commits to adhering to the following key guidelines in its operations:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas,
- EU Conflict Minerals Regulation 2017/821,
- London Bullion Market Association (LBMA) and London Platinum and Palladium Market (LPPM) Responsible Guidance,
- Responsible Minerals Assurance Process (RMAP) of the Responsible Jewellery Council (RJC),
- Responsible Jewellery Council (RJC) Standards.

This Precious Metals Sourcing Policy guides Voima's sourcing of precious metals, with a focus on gold. It sets standards regarding where, how, and from whom Voima sources precious metals and according to which internal standards.



## 2. Principles

The principles for setting goals and standards in Voima's sourcing must adhere to the following core principles, which are periodically reviewed and assessed by management. These core principles summarize and follow the standards set in supranational industry guidance and regulation:

### **Core principles**

The company cannot tolerate, profit from, contribute to, assist in, or be associated with parties involved in:

- Illegal activities such as bribery or money laundering,
- Non-payment of taxes, fees, and royalties to governments,
- Fraudulent misrepresentation of the origin of materials and minerals,
- Unacceptable use of child labor and/or the withholding of minimum wages provided for under applicable law,
- Harmful soil contamination, water or air pollution, and other gross neglect of environmental health,
- Violations of international humanitarian law, war crimes, genocide, the direct or indirect support of non-state armed groups,
- The involvement of public or private security forces, if their use leads to cruel or inhumane treatment of workers,
- The unlawful taking of land,
- Unauthorized sourcing from world heritage sites and protected areas,
- Grossly insufficient safety standards or a working environment with an unacceptably high risk of occupational accidents.

The company must perform enhanced due diligence if there is the slightest possibility of any breach of these principles and withdraw from any existing business activities with parties found to be in violation.

The company must from time to time, review its due diligence and operational activities to assess their current effectiveness in supporting the observation of the adherence to the core principles.



### 3. Due Diligence Processes and Risk Management

Voima provides services by offering customers a metal account in gold, known as the Voima Account. All customers are subject to the company's regular Know Your Customer (KYC) and Customer Due Diligence (CDD) processes. Enhanced KYC and CDD processes are applicable to recurring sourcing and recycling customers, in line with Voima's general Anti-Money Laundering and Counter-Financing of Terrorism Policy ("General AML/CFT Policy").

Our policy ensures that adequate processes are in place to mitigate risks of our service being used for illegal activities such as money laundering, terrorist financing, fraud, or other financial crimes, as well as any breach of core principles.

**The following are essential elements of Voima's AML/CFT Policy for sourcing customers:**

- All sourcing customers, not only the recurring sourcing customers or recycling gold customers need to specify the origins of their gold material and the means of acquiring the gold.
- All recurring sourcing customers and recycling customers must verify their identity and submit certain information for understanding the reasons for using the service (KYC).
- All sourcing customers must go through Voima's screening of applicable sanction lists and Politically Exposed Persons as further defined in Voima's General AML/CFT Policy.
- After customer relationship has been established, customer relationship must be monitored in a way that is sufficient with regard to the nature and extent of the customer's operations, performance and duration of the customer relationship, as well as risks, to ensure that the customer's operations correspond to its experience and information Voima has about its customer and its operations.
- The Company must pay particular attention to transactions which are unusual due to their activity structure or size. If the transactions have no obvious financial purposes or if they are incompatible with Voima's experience of or information on the customer, the origin of the transacted funds must be ascertained.
- If the obtained clarification does not yield an explanation for an abnormal transaction, Voima must immediately inform the Financial Intelligence Unit (FIU - Rahanpesun selvittelykeskus) about the suspicious transaction and/or suspicion of terrorist financing ("STR report") as further defined in Voima's General AML/CFT Policy.
- Voima must store KYC/CDD information as defined in Voima's General AML/CFT Policy and for five years time, unless their continued retention is necessary for a criminal investigation or pending court case.



- Voima must take into consideration the European Commission's list of countries with weak anti-money laundering and terrorist financing regimes, when considering accepting customers from any of the countries contained in the aforementioned list.
- As of now, Voima does not accept cash transactions.

## **Risk management**

The processes and operating principles for the reduction and effective management of money laundering and terrorist financing risks are substantially connected to customer risk assessment. Customer Due Diligence measures are taken in proportion to the customer's risk class. For the customer due diligence process, Voima takes into account, utilizes, and adheres to materials provided by the LBMA in the KYC questionnaire forms it uses.

The company strives to develop processes and internal systems related to customer identification and recognition as part of its broader business development efforts. These efforts are kept up in order to enhance the identification process itself and to increase the traceability of ongoing monitoring.

Voima's Due diligence process, the enhanced due diligence process, and customer risk classifications are described in more detail in the following documentation:

- Internal Instructions for Anti-Money Laundering and Combating the Financing of Terrorism
- Risk Assessment for Money Laundering and Financing of Terrorism
- Customer Risk Classification



## 4. Sourcing Operations & Process

As its core business, Voima Gold Oy purchases and sells gold and stores and administers the gold on behalf of its Voima Account customers. Together with these services, the company operates a recycling line with which the company provides the local market, both private investors and companies involved in recycling activities with a point of sale. With these recycling activities, the company also receives and purchases minor amounts of silver. Together with the gold recycling, the company also pays its customers for the platinum and palladium content in the gold batches. The company does not however receive or recycle platinum or palladium material alone.

### **Source 1 - Trading partners and refineries**

The company has two source flows for the gold that enter Voimas ecosystem.

First, the company has made the decision to establish and hold refinery and trading partnerships with counterparties within the European Free Trading Association area (EFTA). Currently, Voima's main trading partners reside outside of the European Union, but within the EFTA area in Switzerland and Great Britain.

As a significant amount of the gold sourced (over 100kg annually) is traded with these partners and then produced and imported from the Swiss refineries, these partnerships make Voima Gold Oy subject to regulation 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

When it comes to trading partners and the refining and production of the precious metals, as of 2024 Voima only partners with reputable market leaders residing within the EFTA area.

### **Source 2 - Local recycling market**

The company provides a service for local private investors and recyclers to deposit gold and silver. As part of the conversion process to investment grade gold and silver, these materials are then processed and analyzed by Voima in order to determine the pure content of the delivered materials. During the process, the material is melted into rudimentary cast bars which are then analyzed and the Client's Voima Account is deposited with the corresponding amount of pure content.

A clear majority of the gold sourced through the recycling activities comes in the form of gold jewellery scrap, with the other part being bullion bars and coins. A majority of the silver material sourced from the local market comes in the form of silverware and coins.



**In short, the recycling customers sourcing process is as follows:**

1. Customer onboarding process
  - a. Client assessment
  - b. Know Your Customer and Due Diligence Process
  - c. Voima Account opening
2. Material delivery by the client and batch analysis
  - a. Melting and casting
  - b. Drilling cast melted bars
  - c. XRF-Analysis
  - d. Crediting the Customers Voima Account for the pure gold content
3. Lot shipment to Voima's LBMA refinery partner for further refining and production

Voima's recycling sourcing business includes receiving precious metal material, and turning it into melted bars. The melted bars are then drilled and analyzed through XRF-analysis. After the process, pure content is calculated and the exact amount of gold is deposited into a Customers Voima Account. Afterwards, the melted bars are sent to Voima's LBMA accredited refinery partner and the bars are purified and produced into gold bars and delivered back to Voima's Helsinki vault.

The sourcing customers can sell the gold once it has been deposited to their Voima Account and for the most part these customers sell their gold without delay.



## 5. Supply Chain Policy

### **Trading partners and refineries**

Voima adheres to responsible sourcing principles, which means that Voima aims to buy gold from reputable sources where environmental, social and governance aspects are taken seriously. With this, the company has made the decision to only engage with trading and refinery partners located within the EU or EFTA region.

### **Recycling market and local buyback activities**

In its local recycling activities and buyback activities, the company has chosen to engage only with private investors and local market participants within Finland, Sweden and the Baltic nations of Estonia, Latvia and Lithuania.

The vast majority of the recycling trade happens with gold brokers who act in a sense as intermediaries between individuals (consumers) and Voima. By sourcing recycling gold from the local market, Voima contributes to the environmental aspect of the ESG principles as the use of recycling gold significantly reduces the total emissions in gold's lifecycle.

In its recycling, Voima distinguishes all the gold material received according to their sourced form, being either

- A. recycled jewelry, or
- B. industrial waste, meaning bullion, coins and dental waste.

### **Mining companies**

Voima does not currently engage in cooperation with mining companies within Finland or abroad in its sourcing operations.

### **Restrictions on the forms of gold and geographical origin**

Voima does not agree to engage in any cooperation with counterparties sourcing gold from the continent of Africa in any form or from any source.

Voima does not agree to receive any gold that originates directly from artisanal small-scale mining abroad.



## 6. Reporting Mechanism on Breaches

Any failure to comply with this Sourcing Policy should be immediately reported to Voima's operative management. The failure to do so will be a breach of this Sourcing Policy.

Breaches may be reported directly to operative management personnel or to [whistleblower@voimagold.com](mailto:whistleblower@voimagold.com). At Voima, the whistleblower channel directs messages to the operative management, including the CEO.



## 7. Attachments

### **Recycling customers (trademarked “Voima Miners”) Know Your Customer Form**

Available:

[https://www.voimagold.com/assets/downloads/Application\\_Account\\_Opening\\_Miners\\_Fillable.pdf](https://www.voimagold.com/assets/downloads/Application_Account_Opening_Miners_Fillable.pdf)

### **Internal Instructions for Anti-Money Laundering and Combating the Financing of Terrorism**

Available: By request to applicable parties

### **Risk Assessment for Money Laundering and Financing of Terrorism**

Available: By request to applicable parties

### **Customer Risk Classification**

Available: By request to applicable parties

