Conflict – Free Mineral Management Policy

Japan Mint

We, the Japan Mint, have established the following system for managing conflict minerals in order to have no involvement with conflict, terrorist-financing, abuses of human rights and money laundering, and in order to commit to Environmental, Social and Governance (ESG) responsibilities:

1. Scope

The Scope of management is gold and silver ("managed mineral").

2. Management system and responsibility

We appoint the Promotion Manager in charge of promotion of non-use of conflict mineral.

We also appoint the Compliance Manager in charge of promotion of compliance, who provides guidance and direction about promotion of non-use of conflict mineral under the supervision by the Promotion Manager.

Board members monitor and oversee the results of conflict-free minerals management efforts.

3. Criteria for high-risk managed mineral

We deem the managed mineral involving the following risks to be high-risk;

- Systematic or widespread human rights abuses associated with the extraction, transport or trade of managed mineral,
- Direct or indirect support to illegitimate non-state armed groups, or public or private security forces,
- Bribery and fraudulent misrepresentation of the origin of managed mineral,
- Non-compliance with taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs),
- Money laundering or terrorism financing,
- Contribution to conflict or
- Inadequate response to Environmental, Social, and Governance (ESG) risk.

4. Due diligence on managed mineral

We conduct due diligence through risk assessment of managed mineral.

As a result, if the managed mineral is found to be high-risk, we do not conduct business with those managed mineral.

5. Monitoring of managed mineral

We check actual goods of managed mineral to ensure their consistency with the information acquired by due diligence.

6. Maintaining records

We properly maintain records of managed mineral for predetermined period.

7. Implementation of education and training

We implement necessary education and training for our executives and employees involved in the promotion of non-use of conflict mineral.

8. Third-party audit

We periodically undergo an independent third-party audit of our management system on conflict-free mineral and the state of it.

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Revised: January 1, 2023

Promotion Manager in charge of promoting non-use of conflict mineral President

Kenji Goto