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3.7. Independent Audit of Internal Controls, AML-CFT and Supply Chain Control.	July/22	V3.0	1 / 1

Marsam will contract an independent auditor's firm with the objective of conducting annual audits of internal controls, anti-money laundering, preventing the financing of international terrorism and anti-bribery procedures, precious metals origins verifications and supply chain controls.

The Independent Auditors must have access to updated Internal Controls Manuals, Policies and Procedures in force, client records, Declarations of Origin, minutes of meetings of the Internal Compliance Committee, records of internal control systems to be able to verify the adherence of actual procedures with the principles and policies defined by Marsam's Manuals.

The Independent Auditors must deliver analytical findings reports, including all vulnerabilities and non-conformities that have been found within the analysis period, if any, resting on Marsam's Executive Board the responsibility of risk mitigation procedures definitions and execution, aligned with Chapter 3.10 of this MCI. Auditor's should monitor risk mitigation actions results, asking for evidence of non-conformities solutions if necessary.

The Internal Compliance Committee should review procedures and internal policies, based on Auditor's findings, within a maximum period of 180 (one hundred and eighty) days after receiving the annual independent audit report.

Eventual updates in this Internal Controls Manual resulting from external Auditor's findings, must be disclosure to all staff members and service providers of Marsam. New training sessions may be require, resting on CIC responsibility the definition of communication form, content, and dates of the new training sessions.