

Provenance Claim Complaints Mechanism

Anaya Gems Incorporated (d/b/a OTC International & Dialuck Corporation) has established this complaints procedure to hear concerns about circumstances in the supply chain involving gold and/or platinum group metals from conflict affected areas. Mr. Michael Pasqual is responsible for implementing and reviewing this procedure. Concerns can be raised by interested parties via email or telephone to: Michael Pasqual, Vice President, (718) 391-7400 or mapasqual@anayagems.com.

Upon receiving a complaint, we will aim to:

- get an accurate report of the complaint
- explain our complaint procedure
- find out how the complainant would like it handled
- decide who is the appropriate person internally to handle the complaint, or assist with redirecting the complaint to another entity, such as the relevant supplier, or an institution, such as a relevant industry body
- where the issue can be handled internally, seek further information where possible and appropriate
- identify any actions we should take, or monitor the situation
- advise the complainant of any decisions or outcomes
- keep records on complaints received and the internal process followed, for at least 5 years.

Details of our Provenance Claim Complaint Mechanism will be kept on our corporate website www.otcinternational.com for public viewing.