

# Responsible minerals and precious metals supply chain policy.

This policy confirms Cendres+Métaux's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

## 1. Our commitments

This policy applies to all companies of the Cendres+Métaux Group that are located in Switzerland. Certified members of the Responsible Jewellery Council (RJC) within the Group commit to prove, through independent third-party verification, that they in particular:

- respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Fundamental Rights at Work;
- do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
- support transparency of government payments and rights-compatible security forces in the extractives industry;
- do not provide direct or indirect support to illegal armed groups;
- enable stakeholders to voice concerns about our minerals and precious metals supply chain;
- are implementing the OECD 5-Step framework as a management process for risk based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (CAHRAs) and to assess the risks of child labour within supply chains.

We also commit to using our influence as a corporate group to prevent abuses by others.

## 2. Regarding serious abuses associated with the extraction, transport or trade of minerals and precious metals

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labour;
- the worst forms of child labour<sup>1</sup>;
- human rights violations and abuses; or
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described above or are sourcing from, or linked to, any party committing these abuses.

<sup>1</sup> See ILO Convention No. 182

## 3. Regarding direct or indirect support to non-state armed groups

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who illegally:

- control mine sites, transportation routes, points where minerals and precious metals are traded and upstream actors in the supply chain; and/or
- tax or extort money or minerals at mine sites, along transportation routes or at points where minerals or precious metals are traded, and/or
- tax or extort intermediaries, export companies or international traders.

We will immediately discontinue engagement with upstream suppliers if we identify a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described above.

## 4. Regarding public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 2 or that act illegally as described in paragraph 3.

## 5. Regarding bribery and fraudulent misrepresentation of the origin of minerals and precious metals

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals and precious metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of trade, handling, transport and export of minerals and precious metals. Our policy explicitly prohibits employees and suppliers from offering or receiving bribes or facilitation payments.

## 6. Regarding money laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the trade, handling, transport or export of minerals and/or precious metals.

## 7. Business principles for the Cendres+Métaux Group

With regards to our supply chain due diligence, the following business principles apply to the companies of the Cendres+Métaux Group:

- Cendres+Métaux Lux SA is the only entity within the group to operate a precious metal foundry to homogenise precious metals from industrial scraps and scrap gold (precious metal recycling). All refining activities are outsourced. We exclusively work with certified Swiss refiners. Cendres+Métaux Lux SA is subject to the Anti-Money Laundering Act and rejects any risky business in the purchase of precious metals and scrap material and consistently refrains from direct business relationships with mines.
- The procurement of precious metals as raw material in the form of fine metals is carried out exclusively via Cendres+Métaux Lux SA in Biel. The company must be certified according to RJC COP / COC as proof that the national and international regulations mentioned in paragraph 2 are complied with.
- All other companies of the Cendres+Métaux Group procure semi-finished products made of precious metals, if possible, exclusively through Cendres+Métaux Lux SA, to which the exercise of due diligence in procurement is thus assigned. If Cendres+Métaux Lux SA is unable to deliver the required raw materials, the purchasing company must ensure itself that all ethical standards required by this responsible supply chain policy are met.
- Diamonds and coloured gemstones are usually provided directly by the customer in the quantity required for order fulfilment. The exercise of due diligence thus lies in the responsibility of the client. In rare cases, companies of the Cendres+Métaux Group also procure diamonds or gemstones on behalf of the customer. If the choice of supplier is not determined by the client, the due diligence obligation lies with the procuring company.

## 8. Implementation

We implement this policy through an effective and comprehensive management system including annual training to all employees involved in the due diligence process. We require suppliers that are deemed critical for our minerals or precious metal sourcing or for the circular economy of our precious metals to acknowledge this responsible Supply Chain Policy and to sign our Code of Conduct. In the event of suspected fraud, the supplier may be requested to allow us to carry out a thorough investigation, e.g. by means of on-site inspections carried out by us or by commissioned third parties. We undertake to report any violations or reasonable suspicions which we become aware of to the competent Swiss authorities and to assist them in their investigations.

Unless initiated by specific events, our risk analysis related to human rights and environmental risks in the supply chain is conducted annually at Group level and appropriate implementation measures are initiated or adapted and documented in a traceable manner. We are actively involved in optimising our due diligence system by participating in industry associations and certification schemes.

We also encourage our employees and other stakeholders within the minerals and precious metals supply chain, to report suspicious relationships and/or transactions and raise concerns about materials that may have originated from conflict-affected high-risk areas.

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### Meaning of minerals

An mineral is a rock that contains valuable minerals/ metals in sufficient quantity to render their extraction economical. In the context of this supply chain policy, we therefore understand minerals to include diamonds and coloured gemstones.