

Policy regarding due diligence for supply chain of gold

Heimerle + Meule GmbH, Germany's oldest gold and silver refinery is aware of its social and ethical responsibility. As an important part of the supply chain, Heimerle + Meule GmbH wants to and has to fulfill its due diligence.

We commit to implement the content of this policy. In the terms of delivery and payment of Heimerle + Meule GmbH we refer to this policy and to the policy of the Heimerle + Meule GmbH regarding laws, human rights, environment and health, therefore these policies are part of our business relationships (<http://www.heimerle-meule.com/en/company/responsibility/policy-concerning-conflict-minerals/>).

Therefore, we support the international efforts to prevent the financing of terroristic activities, military conflicts, bribery, money laundering and infringements of human rights in connection with precious metal transactions.

In order to achieve this, it is necessary, among other measures, to trace back incoming gold bearing material to its origin to prevent purchases from high risk areas.

Our contribution to this effort is:

- Participation in the "Responsible Gold Programme" of the London Bullion Market Association (LBMA) and the fulfillment of the related requirements
- Training of our employees on this subject
- Exercise supply chain due diligence including the "Know Your Customer" process
- Risk based monitoring and documentation of transactions
- Internal and external communication of both policies
- Document keeping for at least 6 years

Abuses associated with the extraction, transport or trade of gold

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- Torture, cruel, inhuman and degrading treatment,
- Forms of forced or compulsory labour,
- Forms of child labour,
- Gross human rights violations and abuses,
- War crimes or other serious violations of international humanitarian law,
- Crimes against humanity or genocide.

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 gold. This includes but is not limited to, procuring gold from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who control mines in the sense of the OECD Due Diligence Guidance for Responsible Supply Chains Annex II.

Regarding public or private security forces

The role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade. This includes transparent, proportional and fair payments made to public security forces for the provision of security.

Furthermore, we will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners.

Regarding bribery and fraudulent misrepresentation of the origin of gold

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of gold, to misrepresent taxes, fees and royalties paid to governments for the purposes of gold extraction, trade, handling, transport and export.

Regarding money laundering

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold derived from the illegal taxation or extortion of gold at points of access to mine sites, along transportation routes or at points where gold is traded by upstream suppliers.

We will not tolerate any violation in any case of the above mentioned ethical guidelines. We will immediately suspend or discontinue engagement with gold supplying counterparties which are not compliant with these standards even in case we identify a yet unproven but reasonable risk that a supplier might violate at least one of the above mentioned standards.

Pforzheim dated 17th October 2018

sgd. Thomas Frey
Managing Director

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Managing Director

Heimerle + Meule GmbH has anchored the requirements to comply with its due diligence in its internal procedures. A Responsible Gold Manager (Compliance Officer within the meaning of the LBMA) and a Senior Manager have been designated and are available for inquiries at your disposal. This policy, based on the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains, is validated annually regarding its up-to-dateness and appropriateness and is adjusted if needed.