



**For a responsible working relationship –
Genuine. Honest. Valuable.**

Code of Conduct for Heimerle + Meule GmbH



Gold- and silver refinery since 1845

Foreword to the Heimerle + Meule GmbH Code of Conduct

Dear Employees,

For more than 175 years, Heimerle + Meule GmbH has been fulfilling a wide range of requirements in the field of processing precious metals, trading with precious metals and providing a host of services relating to precious metals. Since it was founded in 1845, Heimerle + Meule GmbH has undergone and completed the transformation from a mainly regionally operating scrap metal factory based in Pforzheim to what is now an internationally active corporate group. Tradition and innovation merged to form a solid, socially driven international group of companies, the Heimerle + Meule Group.

Since the formation of the Heimerle + Meule Group in 2013, Heimerle + Meule GmbH has acted as the parent of now nine independently operating companies, currently employing more than 1.200 people, in seven European countries.

All companies in the Heimerle + Meule Group are geared towards long-term value creation where, alongside trustworthiness, reliability and a special appreciation of people and resources, compliance with legal regulations and ethical standards are particularly important.

Regardless of which country we operate in or which role we perform, all of us – company directors, managers and employees – are responsible for practising and nurturing a culture of honesty and sincerity, for presenting managers as role models, and for promoting lawful and ethical conduct.

The Code of Conduct developed by us underlines our focus and objectives. It also illustrates our expectations of ourselves and of all employees and at the same time is a promise to the outside world.

We take our responsibility for our employees, our business partners, the environment and society very seriously. We will not tolerate violations of legal requirements and our Code of Conduct.

We call on all employees to: live according to our values together, develop valuable solutions together, and abide by the content of our rules of conduct in our day-to-day work. True to our motto: Precious metals unlimited. Strong as a team.

Thank you very much for your support.

Heimerle + Meule GmbH



Directory

1	Introduction	5
2	We are fair market participants	5
	2.1. Our success is based on our performance	6
	2.2. Competition and antitrust law	6
	2.3. Prevention of corruption	9
3	We abide by the law & legislation	10
	3.1. Basic rule of business activities	10
	3.2. Taxes and customs duties	10
	3.3. Foreign trade law, sanctions & embargoes	10
	3.4. Data protection	13
4	We act with integrity	14
	4.1. Genuine. Honest. Valuable	14
	4.2. Conflicts of interest	14
	4.3. Accounting & reporting	14
	4.4. Protecting sensitive and confidential information	17
5	We take responsibility	18
	5.1. Dealing with precious metals	18
	5.2. Conflict-free precious metals	18
	5.3. Environmental protection and sustainability	21
	5.4. Prevention of money laundering	21
	5.5. How we treat each other	22
6	Other information	25
	6.1. Issuer of the Code of Conduct	25
	6.2. Compliance organisation	25
	6.3. Contact person	25
	6.4. Whistle-blower system	25

1. Introduction

Why a Code of Conduct?

Since the beginning of recorded history, precious metals have been a symbol of prosperity and splendour in different places around the world and in many cultures. Precious metals guarantee power. But the desire for precious metals, especially gold, has also led to the destruction of cultures, to wars, and the spread and consolidation of political and cultural influence.

At the same time, precious metals symbolise wealth and luxury on an individual level. Precious metals are used to produce beautiful, exquisite and unique creations. Precious metals also encourage people to take risks. It is not uncommon for precious metals to be the cause of criminal activity, to be used as an excuse or as a means of carrying out such activities.

We at Heimerle + Meule are aware of this. We operate in a challenging environment. We recycle, trade, process and finish precious metals. For over 175 years. For over 175 years, we have been confronted with ever-changing external and internal influences.

However, our decisions and actions must be lawful, ethically correct and responsible at all times.

We want and we do what is right, even if it is sometimes not easy and not always the easiest way. Sometimes it is not immediately clear what is legally permissible and what is ethically correct.

But it is important.

This is the only way to maintain our reputation. This is the only way our business partners, our customers and our colleagues can trust us. This is the only way to build sustainable business relationships. And this is the only way we will continue to do plenty of business successfully in the future.

Hence the Code of Conduct.

What are the benefits of the Code of Conduct?

This Code of Conduct provides an overview of the most important principles and rules at Heimerle + Meule. It provides guidance for decisions and actions and is intended to support us when it comes to legal and ethical issues.

However, it is not enough simply to take note of the Code of Conduct. It is crucial that the principles are also taken to heart and, above all, constantly practised. Everyone is personally called upon. This is the only way we can achieve a responsible working relationship.

Who must abide by the Code of Conduct?

Each of us is responsible for adhering to the principles and rules of the Code of Conduct. Each of us should be able to expect everyone else to abide by these principles and rules.

The Code of Conduct therefore applies to all persons working at Heimerle + Meule in Pforzheim and at the Austrian branch, regardless of the hierarchical level or position within the company. It applies equally to management, executives and non-executives, employees and salaried staff, people in the sales field, temporary workers, trainees and work placement students.

What happens if you don't abide by the Code of Conduct?

Even the misconduct of one person can have consequences for everyone. Misconduct on the part of individuals can cause Heimerle + Meule considerable financial damage and sustainably damage the reputation it has built up over 175 years. However, misconduct also affects the way we deal with each other. Trust and respect for each other are lost. A responsible working relationship and cooperation for mutual success are hampered.

Legal infringements, breaches of the law and violations of the principles and rules of this Code of Conduct are therefore not tolerated. Violations must have consequences in order to protect everyone. Depending on the seriousness of the action, these may range from disciplinary measures (e.g. verbal caution, written warning or extraordinary dismissal) to the assertion of claims for damages or criminal measures against the person committing the act.

Where can I look for advice?

Often, however, breaches of the rules do not occur if advice is sought at an early stage or questionable situations are addressed openly.

So ask questions, express your concerns and get advice. This will help you and us.

Heimerle + Meule offers you various options and people to contact for this. You can find out more at the end of the Code of Conduct under '6. Other information.'

2. We are fair market participants

2.1. Our success is based on our performance

Fair, free and functioning competition is an essential prerequisite for prosperity, growth and employment in Germany and the world. It promotes innovation, ensures the optimum distribution of resources, protects against excessive prices and strengthens our independence as consumers.

In a competitive environment, we survive from the advantages of our services and products. With our ideas, innovations and professionalism, we win over our customers and thus assert ourselves on the market.

Competition is strenuous and demanding. But that only spurs us on even more.

We stand for fair and well-functioning competition and do not engage in conduct that is detrimental to competition.

We always adhere to the applicable laws to promote and protect competition. We expect the same from our competitors and business partners.

2.2. Competition and antitrust law

Fair and free competition is regulated by competition and antitrust laws. These laws are designed to ensure that there is no distortion of or interference with competition on the market. In particular, coordinated practices with competitors regarding prices, market sharing, coordinated participation in tenders, artificial restrictions on products and services, customer/supplier boycotts and the passing on of information relevant to competition to competitors are unlawful. Written agreements, verbal arrangements and tacitly coordinated conduct are all prohibited.

Violations of these rules not only result in damage to Heimerle + Meule's good reputation; significant fines and compensation payments, the nullity of contracts and criminal sanctions may also be a consequence.

In all discussions with competitors, we strictly avoid topics that may have an impact on competition.

We do not talk to competitors about prices, price calculations, price components, delivery conditions and supply relationships, capacities or any other sensitive market issues, whether in the business or private sphere.

We do not share territories or customers with competitors.

We also pay attention to compliance with the regulations of competition law when entering into agreements with suppliers and customers. We do not come to anti-competitive arrangements with suppliers or customers. For example, an agreement on minimum selling prices or maximum discounts between a supplier and an intermediary is not permissible.

Example:

You are taking part in an association meeting. During the break, a participant begins to complain to you about the insufficient margin for the semi-finished products produced. He then begins to say: 'If all other producers also charged a processing surcharge of ...'

Actively stop the participant from making further statements here at the latest or otherwise end the conversation with this person. Do not let yourself passively engage in such a conversation either. You may not discuss such topics with competitors. Even the mere receipt of competition-relevant data may be impermissible. Report this conversation to the Legal & Compliance department.

You will receive further information on the regulations of competition and antitrust law as well as on mandatory and prohibited conduct during company training courses. If you have any questions or would like to check critical projects, please contact the Legal & Compliance department.





2. We are fair market participants

2.3. Prevention of corruption

Corruption is prohibited worldwide. Due to corruption, decisions are no longer made on the basis of objective reasons. Corruption distorts competition. For example, contracts are no longer awarded to the bidder with the best offer, but to the bidder who bribes the decision-makers. The consequences are rising costs and, as a result, more expensive products, fewer opportunities for investment, growth and innovation, and a lower level of social prosperity. Corruption therefore harms competition, the common good, our company and, ultimately, ourselves.

We don't give corruption a chance. We are not open to bribery, nor do we accept bribes.

We stand for fair competition and we stand by the principle of performance.

The best services and products should prevail on the market. This is where we come in.

In day-to-day work, however, individuals may repeatedly encounter situations in which a critical matter has to be assessed, such as invitations from business partners. Heimerle + Meule therefore provides assessment tools, such as fixed value limits when accepting gifts and reservations of consent in certain circumstances.

The assessment tools and further information on corruption prevention are available to you at regular company training sessions and in the "Anti-Corruption Guidelines of Heimerle + Meule GmbH" as well as the appendices "Gift Policy – Guidelines for Handling Gifts and Invitations" and "Example Cases and Scenarios."

Example:

You are responsible for the purchasing department. You get an invitation from a business partner who has recently placed an initial order for high-priced consumer goods to attend a "business meeting" at the VIP lounge of your favourite Bundesliga football club next weekend. How do you react?

First, take a look at the appendix "Gift Policy – Guidelines for Handling Gifts and Invitations" from the Heimerle + Meule GmbH anti-corruption guidelines for the permissible value limit for invitations to an entertainment event (football match).

As you will see, the value of an invitation to the VIP box of a Bundesliga football club exceeds the internal value limit for one-off gratuities from business partners.

Therefore, reject the business partner's invitation and abide by the further instructions in the appendix entitled "Prevention of corruption – examples and scenarios".

We are extremely restrictive when it comes to accepting and giving gifts, invitations and other gratuities.

We are already avoiding the appearance of undue influence. In this way, we protect Heimerle + Meule and ourselves from negative consequences.

3. We abide by the law & legislation

3.1. Basic rule of business activities

The basic rule of our business activities is to comply with the applicable laws. Compliance with statutory regulations always takes top priority. This also applies if the rule to be observed appears inappropriate or economically unfavourable.

A breach of law and legislation – whether committed intentionally or negligently – can have significant consequences for Heimerle + Meule or the individual employees. The consequences range from reputational damage, fines and claims for compensation amounting to millions of euros, to prison sentences lasting several years.

We are therefore familiar with the regulations that apply in our area of activity. We regularly refresh our knowledge.

We do not carry out business that aims to violate or circumvent statutory regulations. This means that we do not engage directly or indirectly in transactions of (potential) business partners or third parties that are based on fraud, infidelity, extortion, theft, embezzlement, tax evasion, money laundering or any other crime committed intentionally.

3.2. Taxes and customs duties

Taxes are used to generate revenue for the general government. In addition, taxes and customs duties are used to reduce unwanted behaviour. Revenue from taxes and customs duties can be used to carry out government tasks in the public interest. This revenue is therefore used to build roads, libraries, hospitals, schools and universities, pay for national defence costs and provide social benefits.

We observe the provisions of tax and customs law.

For all taxes, such as corporation taxes, payroll taxes and the import and export of goods, we make a correct declaration and pay the applicable taxes and duties properly.

We do not make use of aggressive and possibly illegal tax avoidance or tax saving models. Aggressive tax avoidance strategies are not in line with the values of Heimerle + Meule and Possehl.

3.3. Foreign trade law, sanctions & embargoes

In our international activities, we are confronted with numerous foreign trade regulations. These must always be observed when importing and exporting products, intangible goods and services.

Many of our products may not be exported to certain countries. Some of our other products may require a permit, license, report, end-of-life statement or other document before these products can be exported. The same applies to imports. Certain products, materials and commodities may not be exported from certain countries or imported from these countries.

Regardless of the specific goods, however, business activities with certain persons, companies or countries may also be prohibited because they are on a sanctions or embargo list, for example.

Foreign trade regulations are very detailed, complex and are constantly changing, as are sanctions and embargo lists.

We therefore act with particular care and foresight in our foreign trade activities.



3. We abide by the law & legislation

Prior to making commitments to customers to import or export products and materials, we will review whether this transaction may be subject to a restriction or whether certain special requirements need to be met. In case of doubt, we seek internal advice from the International Trade of Goods department, the Legal & Compliance department or the expert representative.

Violations of foreign trade regulations or breaches of sanctions and embargoes must be avoided at all costs. Exceptions are not permitted.

Example:

You receive an enquiry about the purchase of electroplating baths from a potential customer based in a country where we only do business very rarely.

In consultation with the relevant departments and representatives, clarify which conditions must be met for the delivery of the specific product to that country and whether and which export/import restrictions apply to the country being supplied. Do not make any binding commitments to the customer until you get final approval from the responsible departments and representatives.

3.4. Data protection

Advancing digitisation is creating innovative business models, changing competitive structures and new opportunities for collaboration. Modern forms and channels for internal communication and communication with business partners are being used, and the organisation of production and work processes as well as the behaviour of customers are adapting to the digital world. Data is becoming increasingly important in this context. Its optimum use creates added value for Heimerle + Meule and for our customers.

However, in order to protect the so-called "right to informational self-determination" (Art. 2 I GG [German constitution] in conjunction with Art. 1 I GG) and to protect the privacy of individuals, the use of personal data* is heavily regulated. For example, the collection, storage, processing and transmission of personal data is only permitted within the framework of the provisions of the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

We treat the personal data of customers, business partners, colleagues and other third parties with care and confidentiality.

Anyone who entrusts us with a wide range of personal data and details about their life should be able to rely on the responsible handling of their data.

We collect, process, use and store personal data only in accordance with statutory requirements.

Example:

Employees in the sales department would like to send information about Heimerle + Meule to (former) colleagues and ask the HR department to provide their personal address details for this purpose. Is the HR department allowed to pass on the private address details of (former) employees to the sales department?

In principle, personal data may only be used for the purpose for which it was obtained. Heimerle + Meule will generally only be provided with personal address data for the purpose of dealing with employment/service contract matters.

The HR department is therefore not permitted to pass on personal address data to the sales department unless the (former) employees have expressly consented to the disclosure of their address data for this purpose.

You will receive further details on how to handle data correctly and on the specific legal requirements during regular company training sessions on data protection. If you have any specific questions, please contact the Data Protection Officer or the Legal & Compliance department. You will also get further information directly from there.

*Data is personal if individual information about personal or factual circumstances can be attributed to a specific or identifiable natural person, e.g. name, email address, eye colour, religion, credit card number, online data such as IP address, etc.

4. We act with integrity

4.1. Genuine. Honest. Valuable

Our actions are not only based on what is legally permissible and what is not permissible. We act in a way that is right. Because that is just as important.

For us, integrity means more than just obeying legislation and the law. Integrity is doing the right thing, even when no one is looking. That is genuinely valuable.

Even if there is no rule or no clear one in a situation, we can make correct decisions by following our inner compass and value system. Heimerle + Meule trusts each and every one of us to act with integrity and wants to create the framework conditions for "doing the right thing, even when no one is watching." This requires the support of each and every one of us. Address critical situations. Be a role model. Be genuinely valuable. For yourself, for us and for our business partners.

4.2. Conflicts of interest

In day-to-day business, situations may arise in which our personal interests are not in line with those of Heimerle + Meule. This can happen in many ways. For example, if there are personal or financial relationships with customers, suppliers or competitors, when carrying out a sideline activity or voluntary work, or in the case of personal and family relationships within the company.

Conflicts of interest affect one's professional judgement. Professional decisions are no longer made solely on the basis of objective criteria.

We identify and avoid conflicts of interest. We separate business and private interests. Where this is not possible, we disclose the conflict of interest transparently and discuss the next steps with our supervisor.

We make our decisions solely on the basis of objective criteria and do not allow ourselves to be influenced by personal interests and relationships.

Example:

You are supposed to organise the award of orders to subcontractors for contract processing and select the best company for the orders. Whilst looking through the quotations received, you discover your ex-partner's business.

How do you react?

Inform your supervisor about the situation and potential conflict of interest. Withdraw from the selection process in consultation with your supervisor.

To protect Heimerle + Meule's good reputation, we avoid giving the impression that a business decision has been due to private interests.

4.3. Accounting & reporting

Only through proper accounting and correct financial reporting can L. Possehl & Co. mbH, as the sole shareholder of Heimerle + Meule, correctly assess the business situation of Heimerle + Meule and make good decisions for Heimerle + Meule. But external business partners, such as banks and insurance companies, also trust our accounting and reporting. If discrepancies arise in accounting and reporting, this may have significant consequences for Heimerle + Meule and for the persons responsible.

We therefore always enter our business transactions correctly in the books. We record all our business activities and financial transactions accurately, completely and promptly with the utmost care.



4. We act with integrity

We prepare internal and external reports completely, correctly and we stick to the facts.

We organise all business transactions in such a way that they can be recorded correctly and in a timely manner in the accounts.

Example:

You have been asked not to reverse the accruals for a successful and fully completed court case this year, as the current financial year was already extraordinarily successful. Is that all right?

No, postponing the accruals to the next year would lead to an incorrect picture of the actual situation. Accruals are to be reversed whenever the reason for their formation no longer exists.

4.4. Protecting sensitive and confidential information

Information is valuable. Operational information is often at the heart of a company. This is also the case at Heimerle + Meule.

Know-how, inventions, formulas, manufacturing processes, design plans or quotation and contract information, profit margins, costing plans, customer and supplier data, purchase prices, market analyses, business strategies, business plans, personnel matters, marketing concepts and all such types of information are sensitive and confidential. They form the basis of our success. This means that the security and protection of this information is also part of the success.

We handle sensitive and confidential information responsibly and carefully.

In digital networks, we act with particular caution. We protect our sensitive and confidential information from unauthorised access and loss.

We treat internal matters confidentially and do not disclose them to unauthorised persons.

We only use third-party intellectual property rights with authorisation. Our business partners can rely on their confidential and sensitive information being handled responsibly. That is what we expect from them too.

Example:

You are on a business trip. While you are sitting in the waiting area of the airport, you receive a call from a work colleague. This person has sent you a presentation about the introduction of a new product by email and would like to briefly discuss a few details of the presentation with you. Can you use the waiting time to go through the details of the presentation with your colleague? What measures do you need to take?

First of all, before talking to your colleague, you must make sure that no unauthorised persons acquire information, whether intentionally or unintentionally. This applies to the spoken word as well as to images and texts. If you are unable to do this, you may not use the waiting time to discuss the presentation with your colleague over the phone.

Generally speaking, the following applies when working outside the company premises:

- Ensure that no one can gain knowledge of sensitive and confidential information.
- Always use a secure network (e.g. VPN connection, SSL protocol, etc.) to log into the Heimerle + Meule system.
- Use a screen filter or privacy filter to prevent third parties being able to view the screen from the side.
- Do not leave your notebook or mobile phone, printouts, USB sticks, memory cards, etc. unattended.



5. We take responsibility

5.1. Dealing with precious metals

Precious metals are special. There is only a limited amount of them. The value of precious metals is very high compared to their mass. Even the smallest amounts can represent a considerable asset.

At Heimerle + Meule, we process several tonnes of these special metals a month. As with any other processing of materials, the processing of precious metals produces very small processing residues, often just a few millimetres in size (e.g. shavings and grinding particles). Unlike processing of other materials (e.g. wood or plastics), the high value of precious metals means that the small processing residues together represent a significant asset that needs to be protected.

We handle precious metals carefully. We don't consume precious metals, we use them.

We are aware of the special characteristics and high value of precious metals in all manufacturing and processing processes. We always act with particular care when handling precious metals. Like the precious metals themselves, the way we work is special.

Example:

When cleaning our production facilities, we don't throw the sweepings into the residual waste bin, but into specially marked containers to recover the precious metals contained in the sweepings.

The same applies to utility items potentially contaminated with precious metals, such as cleaning rags, brushes, filters, etc.

5.2. Conflict-free precious metals

Many countries around the world have natural deposits of precious metals. This can bring prosperity to those countries. However, the extraction, marketing and trade of precious metals can also trigger and promote violent conflicts, lead to child, forced or compulsory labour and entail serious human rights violations. It is not uncommon for the profits made from the extracted precious metal to be used to buy weapons and to support armed groups.

The protection of human rights is important to us. Human rights are indispensable and complying with them is non-negotiable.

We strongly reject any violation of human rights, the use of child, forced and compulsory labour, any form of modern slavery and the direct or indirect support of non-governmental armed groups.

We want to reduce the risk of human rights violations. We are therefore increasingly integrating human rights aspects into our business processes and our entire supply chain.

Before accepting materials containing precious metals, we always obtain sufficient information to assess the supply chain and the traders and beneficiaries.

Example:

A business partner offers you the opportunity to be the broker of a transaction for the purchase of non-LBMA-certified gold bars with a high gold content from abroad.

How do you proceed in this case?

The offer to purchase gold bars with a high gold content from abroad is a transaction that requires a risk-based assessment of the supply chain. Please forward this enquiry to our Responsible Gold Officer (RGO). He will take care of everything from this point and make a decision about the offer in consultation with the Precious Metals Compliance Board (PMCB).

Our principles for the procurement of precious metals are set out in our "Policy of Heimerle + Meule GmbH on the gold supply chain" and the "Policy of Heimerle + Meule GmbH on laws, human rights, environment and health."



5. We take responsibility



5.3. Environmental protection and sustainability

However, the natural occurrence of precious metals can affect not only the land and people, but also nature, flora and fauna. It is not uncommon for the mining of precious metals to be done with profound interference on the environment. This interference often leads to significant changes in natural conditions. Harmful substances and processes are also frequently used which, while facilitating the extraction of gold, have a negative impact on the environment, such as the use of mercury to extract gold from mineral solids.

We reject the purchase of precious metals obtained by means of profound interference in the environment and/or by using environmentally harmful processes or chemicals.

But not only when it comes to mining precious metals, but also during various processes for the manufacture of precious metal products, the recovery of materials containing precious metals and the processes for recovering precious metals, are resources used, chemicals employed, energy consumed and emissions such as exhaust gases and noise produced.

Our services, processes and products must not cause damage to our environment.

We are committed to continuously improving the environmental compatibility of our products and processes, to using natural resources responsibly and to continually increasing our resource and energy efficiency.

We design our processes for the production and recovery of precious metals as sustainably and resource-friendly as possible. We want to be valuable over the long term.

We also demand the same from our business partners. We are therefore also increasingly integrating environmental and sustainability considerations into our business processes and our entire supply chain.

Example:

At our Mühlkanal site, we use the waste heat from the residue incinerator as an energy source to heat the offices and recreation rooms as well as to heat the tap water for the company kitchen and for the shower and sanitary facilities.

5.4. Prevention of money laundering

Precious metals, especially gold, are often used for money laundering. The reason for the misuse of gold for money laundering purposes is based on its special characteristics. For example, gold is an easily accepted means of exchange all over the world, the intrinsic value of gold is relatively high compared to its mass, the weight and quality of gold can always be accurately determined, the price of gold is fixed daily on the world market and the shape of gold can be changed relatively easily.

As a result, people also act directly or indirectly on the gold market in order to channel the money obtained from criminal offences into the legal financial cycle. For us, this means: There is a possibility that we may come into contact with dubious individuals and companies that try to misuse us for money laundering purposes. This must be avoided.

We do not allow ourselves to be used for money laundering or other illegal purposes. Instead, we take precautions to prevent unwitting misuse.

We combat all forms of money laundering and do not support individuals or companies with a criminal background. Neither actively nor passively.

We fulfil our obligations under the German Money Laundering Act without exception.

5. We take responsibility

Prior to a risky business transaction, we always obtain insightful information about the business partner, their business environment and the purpose of the intended transaction.

Example:

An unknown customer contacts the sales department and says they would like to buy semi-finished products and deliver recycling material.

What do you need to bear in mind before entering into a transaction with the customer?

Before we can enter into a business relationship with a customer, we need a variety of information and documentation from each customer in order to meet our statutory and voluntary obligations.

Therefore, please ask the customer to first complete our customer master data sheet in full and submit all the necessary documents. If everything is in order, you will be given an approval for the customer.

For more information on money laundering problems, legal obligations to be complied with and typical money laundering techniques related to precious metals, you will receive regular company training sessions on money laundering prevention. If you have any specific questions, please contact the Anti-Money Laundering Officer or the Legal & Compliance department.

5.5. How we treat each other

Precious metals are valuable, but each and every one of us is even more valuable. The diverse individuality of every single person enriches Heimerle + Meule and makes the company unique. Individual strengths, talents and experience hold enormous potential for extraordinary creative and innovative ideas and solutions that are part of Heimerle + Meule's success and should continue to be so in the future.

In order to be able to make use of this enormous individual potential to create value, a working atmosphere is required that is based on acceptance, trust, appreciation and respect.

There is no place for discrimination, harassment and bullying at Heimerle + Meule.

No person must be disadvantaged, favoured or harassed on account of their ethnic origin, colour, nationality, sex, religion or belief, a disability, their age, veteran status, sexual orientation or other characteristics. Everyone is equal. Everyone should have equal opportunities.

We treat each other fairly, respectfully and responsibly. This is how we treat all people, regardless of the hierarchical level and no matter whether they are colleagues, business partners or customers.

For our mutual success. For a responsible working relationship.

Example:

During work breaks, two colleagues regularly chat in the break room in Italian, their native language. However, this is a thorn in their supervisor's side, as he doesn't understand what the colleagues are talking about. He therefore forbids them to talk in Italian during the breaks.

Is this instruction from the supervisor correct?

No, the prohibition of speaking in one's mother tongue during work breaks constitutes indirect discrimination on the basis of ethnic origin (§ 3 Para. 2 of the General Equal Treatment Act (AGG)). The mother tongue is linked to the ethnic origin of the colleagues and work breaks are part of how a person relaxes and conducts their personal lifestyle.

The prohibition would be judged differently if a particular language is required for the performance of specific work tasks.

You will find further information and case studies in company training courses on the topic of "anti-discrimination". If you have any questions, please do not hesitate to contact the HR department or the Legal & Compliance department.



6. Other information

6.1. Issuer of the Code of Conduct

As part of the "Possehl Code of Conduct", our management holding company, L. Possehl & Co. mbH, has suggested the adoption of a binding, in-house code of conduct specific to Heimerle + Meule.

The "Code of Conduct of Heimerle + Meule GmbH – For a responsible working relationship – Genuine. Honest. Valuable." was prepared by the Legal & Compliance department, designed by Marketing and issued by the management.

6.2. Compliance organisation

Heimerle + Meule maintains a comprehensive compliance organisation in order to ensure compliance with laws, company-specific regulations and principles of conduct. The aim of the compliance organisation is to create organisational precautions and systematic measures to prevent violations of the rules or make it significantly more difficult to commit such violations, as well as to identify violations that have occurred and to counter them appropriately.

The aim of this is to support and strengthen all people working at Heimerle + Meule in their compliance with the rules. These measures include, for example, individual and topic-specific advice, training courses, instruction, various information and communication measures and this Code of Conduct.

These objectives are implemented methodically by maintaining a compliance management system based on the compliance standards IDW PS 980 and DIN ISO 37301.

The Legal & Compliance department has been entrusted with the establishment, maintenance and further development of the compliance management system. It reports directly to the management from an organisational point of view.

Further details on the compliance organisation, the compliance management system and its individual components can be found in the "Compliance Manual of Heimerle + Meule GmbH".

6.3. Contact person

The first point of contact for questions about individual principles of the Code of Conduct or if you are unsure how to act or make decisions is your supervisor in the respective work environment.

Employees and managers may also contact the HR department, the Legal & Compliance department or, depending on the topic, one of the responsible officers (see "**PERMANENT NOTICE – Officers**")

Regardless of whether you have a general question of understanding or whether a specific situation in day-to-day business needs to be assessed, please contact us. We are happy to support you.

HR department: personal@heimerle-meule.com
+49 7231 940 2113

Legal & Compliance department compliance@heimerle-meule.com
+49 7231 940 2161

6.4. Whistle-blower system

Violations of laws, internal regulations and other principles of conduct regularly lead to massive financial damages, criminal and administrative sanctions, as well as damage to reputation and image. The consequences of violations may affect Heimerle + Meule itself or personally affect individuals working for Heimerle + Meule. However, if violations are detected at an early stage, it is possible to respond to them in an active and targeted manner. Alerts can be used to respond to grievances in a timely manner and potentially prevent or at least reduce any damage.

L. Possehl & Co. mbH and Heimerle + Meule have therefore set up the WhistleFox whistle-blower system, which makes it possible to submit reports of breaches of the rules and to report suspicious cases and anomalies, both in person, by providing your name and contact details, and anonymously.

The whistle-blower system is open to all persons working for Heimerle + Meule, as well as business partners and third parties. The contact person is Dr Christoph Schork, lawyer.



6. Other information

The whistle-blower system can be contacted around the clock

1. via web form: <https://whistlefox.heuking.de/start/heimerle-meule-gmbh>
 2. by email: c.schork@heuking.de
 3. by post: Heuking Kühn Lüer Wojtek
z. Hd. Dr. Christoph Schork
Magnisstraße 13
D-50672 Köln
 4. by fax: 0049 (0) 221 2052-1
- or during normal office hours on weekdays
5. by telephone: 0049 (0) 221 2052-547.

Any person who makes a report with good intent through any of these channels shall be fully protected from retaliation, such as unjustified dismissal, denied promotion, modified delegation of duties, discrimination or other unjustified disadvantages. A good-intentioned report never results in retribution. Likewise, it is not tolerated for a whistle-blower to be pressured or threatened because they have reported or want to report a possible violation.

The person concerned shall be presumed innocent until a violation has been proven. This also means that an internal investigation is only initiated if there is sufficient evidence.

You will receive further information about the Heimerle + Meule whistle-blower system during company training courses and internal information events. If you have any questions, concerns or uncertainties about submitting reports or the whistle-blower system in general, you can contact the Legal & Compliance department.



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