

Policy of the Heimerle + Meule GmbH regarding laws, human rights, environment and health

Heimerle + Meule GmbH is the leading company of the 2013-formed HM Precious Metals with more than 1300 employees in nine countries.

Heimerle + Meule GmbH is Germany's oldest gold and silver refinery and employs more than 330 employees at three sites in Pforzheim, Germany (*Dennigstraße 16, Dennigstraße 8a* and *Am Mühlkanal 3*), and one site in *Vienna/Austria*.

Heimerle + Meule GmbH is a member of the Responsible Jewellery Council (RJC) since 2015. The RJC was founded to ensure compliance with ethical and social standards in the supply chain of gold, silver, diamonds and platinum group metals. To achieve this, RJC has developed the Code of Practices (CoP), compliance with is verified by a 'Third Party Audit'. As certified member of the RJC we do all our businesses in accordance with the provisions of the "Code of Practices".

In addition, Heimerle + Meule GmbH has committed itself to comply with the Responsible Gold Guidance of the London Bullion Market Association (LBMA). In accordance with the guidelines of the LBMA, Heimerle + Meule GmbH takes comprehensive precautions to prevent corruption, money laundering, child and forced labour, to protect the environment and, of course, to ensure a responsible ("conflict-free") supply chain for gold.

This means for us and our suppliers:

- Compliance with the existing general legislation, in particular regarding:
 - VAT tax fraud
 - Money laundering prevention
 - Fight against corruption
 - Safety and Environmental Protection
 - Minimum wages
- obligation to comply with the basic principles of business ethics in particular:
 - Outlawing any kind of human rights violations
 - Outlawing any kind of human trafficking
 - Zero tolerance of child labor and exploitation
 - Zero tolerance to all forms of discrimination
 - Protection of the right to freedom of expression and association
 - Tolerance towards other cultures

- Active operation of environmental and health protection. Laws regarding either of these topics (water, waste, immission, H&S, etc.) must be strictly adhered to
- Conservation of resources (energy, water, etc.). In general, the stress on the environment has to be kept as low as possible
- Compatibility to social responsibility by protecting jobs and fair payment
- and to respect World Heritage Sites and Protected Areas.

Heimerle + Meule GmbH has anchored the requirements to comply with her duties of care deeply in her internal procedures. The employees are trained and stakeholders informed accordingly. This policy is validated annually on timeliness and appropriateness and adjusted if necessary.

sgd. Georg Steiner
Managing Director

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