

Code of conduct – supply chain policy

Introduction

Management and employees of Andreas Daub are committed to acting according to ethical, human rights, social and ecological principles.

We expect our suppliers to apply the same philosophy to running their own businesses and, in turn, to expect it from their suppliers. We aim to work with suppliers who commit to complying with the requirements of this Code of Conduct. The principles of the conventions of the International Labor Organization, the UN Declaration of Human Rights, the OECD guidelines and the UN Global Compact shall apply to us and our suppliers.

A violation of these guidelines by our suppliers or their sub-contractors will immediately lead to the termination of the business relationship after verification. Due to the sensitivity that the processing of precious metals requires, the suppliers are checked before the start of the business relationship according to the KYC (Know your counterparty) principle.

As a responsible processor of gold, PGMs and silver, Andreas Daub firmly refuses to acquire, process or otherwise sell goods of any kind and form that come from conflict or high-risk areas. We are bound by the OECD due diligence guidelines for responsible supply chains for all materials from conflict-affected and high-risk areas and the Kimberly Process, in particular the OECD Annex II on gold, silver and PGMs, as detailed below.

- 1) Under no circumstances will we tolerate prohibited acts in connection with the extraction, transport or trade in minerals, gold and other precious metals, such as any form of torture, forced labour, child labour, human rights violations, war crimes and violations of international humanitarian law
- 2) An established risk management system ensures that if serious deficiencies are identified at a supplier company or one of its subcontractors, the business relationship is immediately suspended or terminated.
- 3) We will not tolerate any kind of direct or indirect support of non-governmental groups who, for example, illegally monitor transport routes or transshipment points, extort money or minerals at access points or on the trade route. Our suppliers are asked to check their supply chains for such actions and to report a possible risk

immediately. If there is any such action in the supply chain, we will immediately suspend or terminate the business relationship.

- 4) We will not support, directly or indirectly, public or private security forces who act in any way illegally or act against the violations described under point 4 of the OECD.
- 5) With respect to corruption and fraudulent misrepresentation as to the origin of minerals and precious metals, we will not offer, promise, give or solicit bribes and will resist solicitation of bribes. This applies to governments that require it for the purpose of extracting, trading or exporting precious metals, as well as to any other person or company.
- 6) We prevent any form of money laundering and strive to support its elimination. We do not comply with requests from government agencies to pay taxes, duties and license fees that are directly related to the mining and transport of minerals and precious metals.

Human Rights - Responsibilities

Forced Labor: The use of forced labor is strictly prohibited.

Child Labor: Labor by children under the age of 15 is strictly prohibited.

Harassment and Abuse: Employees are treated with respect and dignity. No corporal punishment, psychological harassment or other forms of abuse may be used.

Discrimination: All employees are treated equally and fairly. As for employees, it also applies to subcontractors that discrimination of any kind based on gender, race, religion, age, disability, sexual orientation, political views, nationality or social or ethnic origin is not tolerated.

Wages and Benefits: Wages and overtime are paid according to the legal conditions set by law in the country of manufacture. Deductions from wages may not be made for disciplinary action.

Working hours / freedom of association: The legal requirements in the country of manufacture relating to working hours, overtime and freedom of association are observed.

Health and Safety: Workplaces are designed to be safe to prevent accidents and injuries. Systems are in place to detect and prevent threats to the health and safety of their employees. The applicable regulations and laws are observed.

Environment - Sustainability

We expect our suppliers to share our commitment to a clean and safe environment. Local and international environmental regulations and standards are respected. Our suppliers pay special attention to the fact that

- Waste is properly managed with particular attention to hazardous waste and emissions.
- Employees whose work has a direct impact on the environment, are trained and have the necessary resources to carry out their work.
- there is a plan to continuously save resources and reduce emissions

Work Processes - Confidentiality

Subcontractors: Our suppliers have to obtain Andreas Daub's approval before subcontracting parts of their manufacturing process to other suppliers. Our approval is subject to compliance with these guidelines by the subcontractors.

Confidentiality - non-disclosure obligation: It must be ensured among employees and sub-contractors that all information about articles and customer names that become known in the work process is treated confidentially and that all employees confirm confidentiality in writing.

Complaints Procedure

Suppliers are encouraged to establish a grievance mechanism to allow external parties to report complaints, concerns or grievances regarding compliance with the Code of Conduct and Supply Chain Standards. A guideline sets out how complaints will be handled and how grievances will be remedied.