

## POLICY OF COMPLIANCE AND RESPONSIBLE BUSINESS PRACTICES HERAEUS LIMITED AND HERAEUS METALS HONG KONG LIMITED

Heraeus has policies, guidelines and procedures in place to ensure compliance with responsible business practices in particular for sourcing of precious metals, to meet our high standards of human rights, labour rights and environmental and ethical practices, to comply with all applicable laws, to exercise full transparency of our transactions and engage only with persons and/or companies who themselves abide by laws and ethical principles. These policies, guidelines and procedures apply to all employees, officers, directors and organizations within Heraeus world-wide.

The Heraeus **Code of Conduct** is an integral part of our responsible-conscious management structure and Heraeus' operations are governed by this code. Failure to comply with our Code will not be tolerated. Please see link to Heraeus Code of Conduct: [https://www.heraeus.com/media/media/group/doc\\_group/corporate\\_responsibility\\_1/Code\\_of\\_Conduct.pdf](https://www.heraeus.com/media/media/group/doc_group/corporate_responsibility_1/Code_of_Conduct.pdf)

Although Heraeus Limited as a Hong Kong entity does not fall under the regulation, we are in compliance with every aspect of the Dodd Frank Act Section 1502. Since 2010, we established an appropriate **Supply Chain Policy** which is corresponding to the model set out in the **Annex II of OECD's Due Diligence Guidance on Conflict Minerals**. In our supply chain policy, the principles for responsible sourcing are set out to ensure that precious metals are from legitimate and responsible sources, produced in accordance with internationally accepted environmental standards and have not been associated with crime, armed conflict or human rights abuse. We will not, under any circumstances, engage in business that arises from criminal or illegal activities, or from criminals or terrorist groups, or that is used to finance criminal or terrorist activities. Our due diligence processes are regularly updated, and we are required to obtain, verify and record ownership and specific business information about our business partners before starting a business relationship and setting up an account.

Establishing business relationships with suppliers which act against those principles is not tolerated throughout our organization. This sets our responsibility for conducting risk based due diligence, screening and monitoring of transactions and governance structures in place for all Heraeus entities involved in purchasing, refining or other transactions with conflict minerals (including but not limited to Gold, Tin, Tungsten and Tantalum).

Please see link to our supply chain policy: <http://www.herae.us/conflictminerals>

Heraeus is committed to Environmental, Health and Safety to ensure a sustainable environment and healthy and safe workplace for all persons working for and on behalf of Heraeus, as well as our neighbors and the general public. Please see link to **Heraeus Environmental, Health and Safety (EHS) Policy**:

[https://www.heraeus.com/media/media/group/doc\\_group/corporate\\_responsibility\\_1/EHS\\_Policy\\_EN.pdf](https://www.heraeus.com/media/media/group/doc_group/corporate_responsibility_1/EHS_Policy_EN.pdf)

Throughout our organization, we apply the principles of Anti-Money laundering and combating terrorist financing, as laid out in our home country, Hong Kong, according the Drug Trafficking (Recovery of Proceeds) Ordinance (Cap.405), the Organized and Serious Crimes Ordinance (Cap.455), as well as the United Nations (Anti-Terrorism Measure) Ordinance (Cap.575).

Heraeus Limited is a **London Bullion Market Association (LBMA)** accredited Good Delivery Refiner for Gold (since 01/2006) and Silver (since 09/2010) and a **London Platinum & Palladium Market (LPPM)** accredited Good Delivery Refiner for Platinum (since 07/2008) and Palladium (since 10/2011). In 2012 Heraeus Limited made the commitment to abide to the **LBMA's Responsible Gold Guidance** and is annually audited by a third party. Please see link to Heraeus Compliance Reports and Independent Assurance Reports: <http://www.herae.us/conflictminerals>

Heraeus Limited became a Responsible Jewellery Council (RJC) Member in June 2015 and is committed to responsible business practices. Since November 23, 2015, we are a CoP (Code of Practices) and CoC (Chain-of-Custody) certified entity.

We expect from our employees, officers and directors to comply with our policies. We provide regular trainings and do our best to ensure that all employees comply with the company standards and laws applicable to their job responsibilities and adhere to the guiding principles of this policy. We inform our employees that it is everybody's duty to raise any suspicious relations and/or suspicious and unusual transactions to management and/or compliance officer or our external ombudsman immediately. To guarantee that our policy is up to date, we conduct regular reviews and ensure the implementation by elaborating specific codes and procedures, effective communication, training and continuous monitoring.

For further information please do not hesitate to contact us.

Heraeus Metals Hong Kong Limited



General Manager: Mr. Dick Poon  
Date: January 4<sup>th</sup>, 2021

Heraeus Limited, Hong Kong



General Manager: Mr. Tim Hannoschoeck  
Date: January 4<sup>th</sup>, 2021