

11.106 Metalor code of conduct for business Partners dealing with Precious Metals (PM)

Introduction

Metalor affirms its Code of Conduct for Business Partner as a part of its global business activities. The Code of Conduct for Business Partner (hereinafter called "CoC") acts as a company guideline, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust. The content of this CoC is an expression of the company's collective core values.

1 UN Convention against corruption in 2003, in force since 2005

1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means the undersigned company assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. The undersigned company voluntarily contributes to the well being and long-term development of a global society at every point it can at the locations where it is in business. It is geared towards universally held ethical values and principles, especially integrity, honesty and respect of human dignity.

2. Where the CoC applies

This CoC is in effect for all of the undersigned company's branches and business units worldwide.

The undersigned company commits to promoting adherence to the content of this CoC applying it as well to its suppliers and other participants in its supply chain.

3. Core Values for Code of Conduct in Corporate Management

The undersigned company will proactively work to ensure that the values mentioned below are put into practice and adhered now and in the future.

3.1 Adherence to Laws

The undersigned company will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the undersigned company will carefully examine what good company practices from its home country should be applied to enable supportive, responsible company management.

3.2 Integrity and Organizational Governance

The undersigned company gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

The undersigned company rejects corruption and bribery as stated in the relevant UN-Convention². It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

The undersigned company pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities.

3.3 Privacy Policy

The undersigned company will abide by the laws and directives in effect to protect personal data of its employees, customers and contracting parties. When collecting, storing, processing and transferring personal data, the undersigned company will take the utmost care. Any deficiency will be immediately forwarded to the privacy officer for clarification.

3.4 Consumer Interests

To the extent consumer interests are affected, the undersigned company abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

3.5 Communication

The undersigned company will communicate in an open way and is oriented towards dialog about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every transaction will be duly documented, will not be unduly changed or destroyed and will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

3.6 Human Rights

The undersigned company is committed to promote human rights. It respects human rights stated in the Charter of the United Nations³, especially those named in the following:

3 General explanation of human rights, UN Resolution 217 A (III) from 1948

4 ILO = International Labour Organization

5 ILO-Convention No. 138 from 1973 and ILO-Convention No. 182 from 1999

6 ILO-Convention No. 29 from 1930 and ILO-Convention No. 105 from 1957

3.6.1 Privacy

Protection of privacy.

3.6.2 Health and Safety

Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

3.6.3 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.6.4 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression.

3.7 Working Conditions

The undersigned company abides by the following core work standards from ILO⁴:

3.7.1 Child Labor

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.⁵

3.7.2 Forced Labor

The prohibition of forced labor of any kind.⁶

3.7.3 Wage Compensation

Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force.⁷

7 ILO-Convention No. 100 from 1951

8 ILO-Convention No. 87 from 1948 and ILO-Convention No. 98 from 1949

9 ILO-Convention No. 111 from 1958

10The 27 principles from the "Rio Declaration on Environment and Development" from 1992 as the result from the UN Conference on Environment and Development in Rio de Janeiro.

3.7.4 Employee Rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective- bargaining, as long as this is legally permitted and possible in the respective country.⁸

3.7.5 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion.⁹

3.8 Hours of Work

The undersigned company abides by work standards concerning the longest permitted time of work.

3.9 Environmental Protection

The undersigned company fulfills the requirements and the standards for environmental protection that affect its operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio-Declaration¹⁰.

3.10 Civic Commitment

The undersigned company contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees.

4. Implementation and Application

The undersigned company will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed.

5. Special terms for business partners dealing with Precious Metals (PM)

Metalor adheres to the highest standard of ethical sourcing of precious metals materials, as set forth in our Supply Chain Due Diligence Policy (please refer to Metalor’s website : http://www.metalor.com/en/node_59/about-metalor/node_1305)

In order to achieve this, Metalor actively participates in, cooperates with, and enhances worldwide efforts to ensure that precious metals come from legal, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our policy to do business only with legitimate, ethical principles and law-abiding business partners.

Moreover, with specific regard to the supply chain due diligence for responsible mineral sourcing, Metalor, as a general principal, refuse to source any gold originated from or transported through the Democratic Republic of Congo (DRC) and Adjoining Countries (*U.S. Dodd Frank Act, Section 1502, Conflict Minerals Provision (2010)*).

Furthermore, Metalor is committed to support its business partners in being "Dodd-Frank DRC Country Conflict-Free" compliant by implementing appropriate "known origin" systems in their business. (*SEC final rules on conflict minerals 2012- Release No. 34-67716; File No. S7-40-10*).

Therefore, we require that you respect our policy and principles in your business dealings with us, and certify that you will comply with such policy and principles.

The undersigned company will accept and apply, not only in the framework of its commercial partnership with Metalor, but also in its own business within the PM industry, to above mentioned Supply Chain Due Diligence Policy.

By signing the present document, we, (Name of the company): - abide to the principles stated in Metalor’s Code of Conduct for Business partner policy

Signature of legal representative: -

Signature of legal representative: -

Name: -

Name: -

Title: -

Title: -

Place and date: -

Place and date: -