

Supply Chain Due Diligence Policy on Precious Metals

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Umicore Galvanotechnik GmbH, founded 1888 in Schwäbisch Gmünd / Germany, develops, produces and distributes precious metal electrolytes (gold, silver, platinum, rhodium, ruthenium and palladium). We are committed to conducting our business, through our employees, directors, officers and agents, in compliance with applicable laws and overall in an honest and ethical manner. We fixed our policy in **The Umicore Way** and our **Code of Conduct**.

Umicore Galvanotechnik GmbH believes that a commitment to honesty, ethics and integrity is an essential foundation that builds trust with clients, business partners, shareholders and the community in which it operates. Consequently, Umicore Galvanotechnik GmbH diligently monitors initial steps as well as existing relationships and business activities with its customers and suppliers (KYC), and closely adhere the principles of major international guidelines, including (latest versions, respectively):

- U.S. Dodd Frank Act, Section 1502, Conflict Minerals Provision (2010)
- Organization for Economic Cooperation and Development (OECD): Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2011), and its Gold Supplement (2012)
- Responsible Business Alliance (RBA, former EICC) – Responsible Minerals Initiative (RMI): Conflict-Free Smelter Program, Gold Supply Chain Transparency (2011)
- IPA (International Platinum Group Metals Association) - <https://ipa-news.com/index/sustainability/industry-principles.html>

Umicore Galvanotechnik GmbH is a certified Member of the **Responsible Jewellery Council (RJC)**, and complies to the RJC Code of Practices and Chain of Custody Standard (latest versions). The RJC is a standards setting organisation that has been established to reinforce consumer confidence in the jewellery industry by promoting responsible ethical, human rights, social and environmental practices throughout the jewellery supply chain. The RJC and its Members are opposed to activities which directly or indirectly finance, benefit or facilitate armed conflict, extreme violence and human rights abuses.

Among other guidelines, the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas / Supplement on Gold (latest versions, respectively) is binding for us.

In addition to our own commitment, we use our influence to prevent abuses being committed by others. When we identify a reasonable risk that a supplier is sourcing from, or linked to, a party committing serious abuses as set forth below, we will suspend or discontinue our relation with such supplier.

Considering money laundering and other risks that may be connected to the extraction, trading, handling and exporting of minerals from conflict-affected and high-risk areas, and our commitment to support and contribute to the respect of human rights and ethics in business, Umicore Galvanotechnik GmbH adopts this specific policy:

Regarding serious abuses associated with the extraction, transport or trade of gold and platinum group metals:

1. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - torture, cruel, inhuman and degrading treatment;
 - forced or compulsory labor;
 - child labor (as defined in Convention 182 of the International Labour Organization);
 - human rights violations and abuses;
 - war crimes, violations of international humanitarian law, crimes against humanity or genocide.



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2. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable risk that they are committing, or are sourcing from or linked to any party committing abuses described in paragraph 1.

Regarding direct or indirect support to non-state armed groups:

3. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold and platinum group metals from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally
 - control mine sites, transportation routes, points where gold and platinum group metals are traded and upstream actors in the supply chain; and/or
 - tax or extort money or gold and platinum group metals at mine sites, along transportation routes or at points where gold and platinum group metals is traded, or from intermediaries, export companies or international traders.
4. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 3.

Regarding public or private security forces:

5. We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 1, or that act illegally as described in paragraph 3.

Regarding bribery and fraudulent misrepresentation of the origin of gold and platinum group metals:

6. We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold and platinum group metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold and platinum group metals.

Regarding money laundering and financing of terrorism :

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering or financing of terrorism resulting from, or connected to, the extraction, trade, handling, transport or export of gold and platinum group metals.

Regarding the protection of the environment and the conservation of energy resources:

8. Umicore Galvanotechnik GmbH is certified according to ISO 14001 (environmental management). As a consequence, the company has implemented guidelines for the usage of natural resources and energy saving. We also focus on the environmental safety of our operations and closely monitor energy consumption towards a responsible and an environmentally compatible management.

This Policy is also founded upon the Code of Conduct of Umicore Group, and is implemented through a comprehensive management system. Regular trainings for our staff maintain profound understanding of its importance, and strong commitment and adherence to this Policy.

We would like to encourage customers and business partners as well as every interested party to align their business practices and processes according to the guidelines, values and stipulations mentioned therein.



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Furthermore, we offer all our employees and potential stakeholders the possibility to voice concerns about our supply chain or any doubts regarding traceability or identification of risks that might violate this policy. In such a case, please inform us immediately and directly contact our Compliance Officer by either sending

email to: galvano@eu.umicore.com
or calling: +49 7171 607 01

Additional documents	VA-GT-L-01	Strategieentwicklung
	AU-GT-L-01-03	Prozessorientierung - Risiken und Chancen
	GP-EHS-001	Group Safety Policy
	GP-CS-001	Corporate Security Policy
	GP-EHS-003	EHS Product Stewardship Policy
	The Umicore way	Umicore Way
	Umicore-Code of conduct	Umicore Code of Conduct
	umicore-sustainable-procurement	Umicore Sustainable Procurement Charter
	responsible supply chain policy	Umicore Responsible global supply chain of minerals from conflict-affected and high risk areas
		Umicore PGM Policy Declaration.
	Integrated Annual Report	Umicore Integrated Annual Report
	OECD-Leitfaden	OECD-Leitfaden für die Erfüllung der Sorgfaltspflicht zur Förderung verantwortungsvoller Lieferketten für Minerale aus Konflikt- und Hochrisikogebieten



 Michael Herkommer Managing Director Umicore Galvanotechnik GmbH	 Thilo Kuhn KYC Officer Umicore Galvanotechnik GmbH	 Harald Ziller RJC Compliance Officer Umicore Galvanotechnik GmbH
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