

## **Agosi AG: Supply Chain Due Diligence Policy on Precious Metals**

as per Oct. 16, 2024

Agosi AG (Agosi), originally founded in 1891 as Allgemeine Gold- und Silberscheideanstalt AG in Pforzheim/Germany, is a recycler of precious metals contained in precious metals bearing materials.

Agosi is committed to conducting its business, through its employees, directors, officers and agents, in compliance with applicable laws and overall in an honest and ethical manner. Agosi believes that a commitment to honesty, ethics and integrity is an essential foundation that builds trust with clients, business partners, shareholders and the community at large in which it operates. Consequently, Agosi diligently monitors initial steps as well as existing relationships and business activities with its customers (KYC), and closely follows the principles of major international guidelines, including (**latest versions, respectively**):

- **U.S. Dodd Frank Act**, Section 1502, Conflict Minerals Provision
- **Organization for Economic Cooperation and Development (OECD):** Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Gold Supplement
- **EU-regulation 2017/821 on Conflict Minerals**
- **Responsible Business Alliance (RBA, former EICC) – Responsible Minerals Initiative (RMI):** Conflict-Free Smelter Program, Gold Supply Chain Transparency

**Agosi 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, respectively).** 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.

**As an accredited refiner and producer of Good Delivery Bars registered at the London Bullion Market Association (LBMA), Agosi acts according to the LBMA Responsible Gold Guidance plus the LBMA Responsible Silver Guidance (latest versions, respectively),** and dissociates itself from the usage of conflict materials originating from conflict-affected regions. 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, Agosi adopts this specific policy:

**Regarding serious abuses associated with the extraction, transport or trade of gold<sup>1)</sup>:**

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.
  
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<sup>1)</sup> 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<sup>1)</sup> is traded and upstream actors in the supply chain; and/or
  - tax or extort money or gold<sup>1)</sup> at mine sites, along transportation routes or at points where gold<sup>1)</sup> 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<sup>1)</sup>:**

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<sup>1)</sup>, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold<sup>1)</sup>.

**Regarding money laundering:**

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold<sup>1)</sup>.

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

8. Agosi is certified according to both standards ISO 14001 (environmental management) and 50001 (energy 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 Agosi's operations and closely monitor energy consumption towards a responsible and an environmentally compatible energy management.

**Regarding ESG principles (Environmental Social Governance):**

9. With Agosi being part of Umicore the internationally recognized principles regarding the environment, social aspects and governance are adhered to, as formulated by frameworks like the UN Sustainable Development Goals (SDGs), UN Global Compact, UN Universal Declaration of Human Rights or the standards of the International Labour Organisation (ILO). They are summarized here: [Sustainable Development Goals | Umicore](#)

This Policy is also founded upon the [Code of Conduct](#) of our major shareholder, Umicore, and is implemented through a comprehensive management system within Agosi. Regular trainings for Agosi's staff maintain profound understanding of its importance, and strong commitment and adherence to this Policy.

By making our policy publicly available on our website <https://www.agosi.de/responsibility> Agosi 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.

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 Agosi's CoC/LBMA Compliance Manager by either sending an email to: [karl-heinz.flach@agosi.de](mailto:karl-heinz.flach@agosi.de) or calling: +49 7231 960 294.

On our website [www.agosi.de](http://www.agosi.de) a [whistleblower-form](#) is available that you can use anytime both personally or anonymously.

- 1) The mentioning of "gold" in this document is to be understood as equally representing silver, platinum, palladium and/or rhodium.