

# Supply Chain Due Diligence Policy

The SAXONIA Group is a European precious metal refining and production company.

Our fully-owned subsidiary SAXONIA Edelmetalle GmbH is an LBMA-accredited silver producer and an LPPM-certified producer of platinum and palladium. We are fully committed to observing the LBMA's Responsible Silver Guidance and the LPPM's Responsible Platinum/Palladium Guidance.

Our fully-owned subsidiary Doduco Contacts and Refining GmbH is an LBMA-accredited silver producer. We are fully committed to observing the LBMA's Responsible Silver Guidance.

As a manufacturer of gold, silver, platinum, palladium and rhodium products, our fully-owned subsidiary Wieland Edelmetalle GmbH is a certified member of the RJC. The RJC has developed a benchmark standard for responsible, ethical, social and environmental action in the jewellery supply chain and credible verification mechanisms to ensure the respect for human rights. Wieland also participates in the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP), which provides an independent third-party audit to demonstrate the responsible sourcing of precious metals in accordance with current global standards.

SAXONIA has adopted a guideline which is consistent with the OECD Due Diligence Guidance as well as with the Supplement on Gold of the OECD Due Diligence Guidance.

Our objective is to ensure that all the precious metals we process come from legal and ethical sources and are not associated with crime, armed conflict or human rights abuses. With our Code of Conduct for Business partners we have addressed all relevant environmental, social and governance related requirements that our suppliers need to comply with.

We consider precious metals to be gold, silver, platinum, palladium and rhodium. We implement our Supply Chain Due Diligence Policy for the responsible sourcing of precious metals to demonstrate that appropriate and ongoing due diligence has been followed.

**We do not source our materials from conflict-affected or high-risk areas.** We define "conflict-affected" and "high-risk" areas according to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas as well as according to EU CAHRA list under Regulation (EU) 2017/821.

We are aware that the control and monitoring of suppliers is a key activity to ensure sustainability, especially in the refining and trading business.

We undertake to conduct business in an honest manner to maintain high moral, ethical and social standards.

**We will never tolerate or assist in:**

- torture or cruel, inhuman and degrading treatment
- corruption or any other illegal activities
- human rights violations and abuses
- war crimes or the violation of international humanitarian law
- child labour or any other form of forced labour

We will not engage with – and will immediately stop any potential or upcoming engagement with – customers, suppliers or public or private security forces whenever we identify a link to or participation in any of the forms of abuse defined above.

**We will not tolerate any direct or indirect support to non-state armed groups, public or private security forces** or their affiliates by producing, processing, handling, transporting, trading or otherwise providing assistance, who illegally:

- control mining sites, transportation routes, points where precious metals are traded and upstream actors in the supply chain; and/or
- tax or extort money or precious metals at mining sites, along transportation routes or at points where they are traded or from intermediaries, export companies or international traders

We will not engage with – and will immediately stop any potential or upcoming engagement with – customers and suppliers whenever we identify a link to or participation in any of the actions described above.

We will not engage with – and will immediately stop any potential or upcoming engagement with – upstream customers and suppliers whenever we identify that they are sourcing materials from – or are linked to – any party providing direct or indirect support to non-state armed groups.

**We will not conceal or disguise the origin of our precious metals**, or misrepresent taxes, fees and royalties paid to the government for the purpose of the mining, trade, handling, transport and export of precious metals.

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, aimed to conceal, to disguise or to misrepresenting the origin of precious metals.

We will support efforts for – and contribute to – the **prevention of money laundering and the financing of terrorism** whenever we identify a reasonable risk of money laundering and the financing of terrorism resulting from or connected to the extraction, trade, handling, transport and export of precious metals.

The compliance process is integrated in the management systems and thus serve to reduce the entrepreneurial risk. The management systems ensure that processes are documented and regularly trained and evaluated in internal and external audits. Derived measures result in a continuous improvement of the processes.

If you have any questions or concerns regarding this policy or its implementation, please contact our Group Compliance Officer on the phone: 0049 351 484585 190 or via email: [compliance@saxonia.de](mailto:compliance@saxonia.de)

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Managing Director  
SAXONIA Holding GmbH