

# Modern Slavery Statement

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# Modern Slavery Statement

Modern slavery is a very real risk globally, including in developed markets. The International Labour Organisation (ILO) estimates that approximately 40 million people are in modern slavery a year.

Valcambi supports the elimination of all forms of modern slavery and human trafficking/smuggling.

Freedom from slavery is a human right, and we incorporate our work on preventing and addressing any involvement in modern slavery and human trafficking/smuggling into the way we conduct our activities in accordance with our values of Conformity, Integrity, Responsibility, Confidentiality & Respect.

Our statement on Modern Slavery is voluntary and outlines the policies, standards, procedures and processes we have developed and comply with in order to respect human rights and help prevent the occurrence of, and protect against, our inadvertent involvement in modern slavery and human trafficking/smuggling. This statement also sets out our expectations from our business partners, including clients and goods and services suppliers within and outside the precious minerals supply chain, in relation to the elimination of modern slavery. In addition, our contracting processes include specific requirements to prevent the abuse of human rights. We are committed to ensure that our business partners will hold their own suppliers to the same high standards. This statement also explains how we assess and mitigate our risks, how we collaborate with stakeholders and how we train our people on these issues.

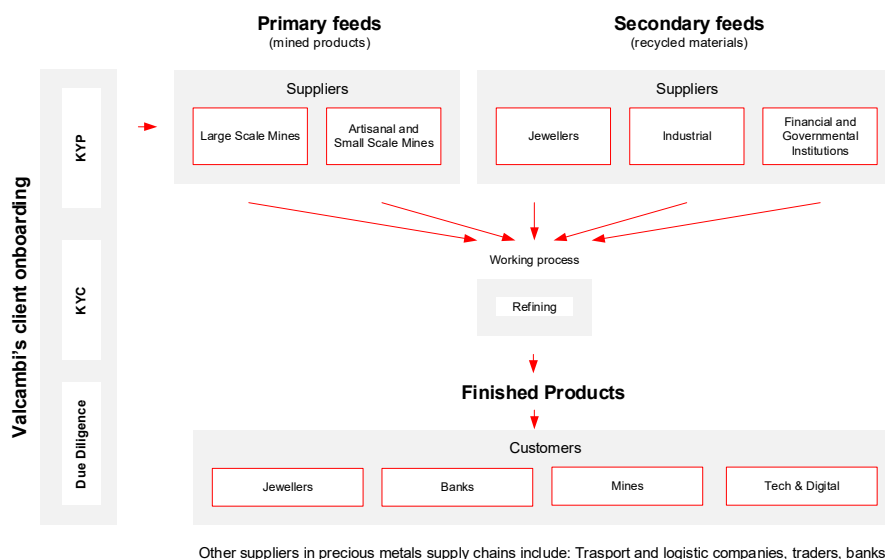
This statement will be updated whenever changes occur.

## 1 Structure, business and supply chain

Valcambi is fully owned by Global Gold Refineries Ltd (GGR) incorporated in Switzerland and owned by Rajesh Export Limited India. Valcambi is a world leader in the refining of precious metals, with more than 60 years' experience. Based in Switzerland, we operate one of the world's largest metals plants, with an annual refining capacity of up to 2,000 metric tonnes. In the last year, Valcambi had a workforce of around 180 permanent and temporary employees. We are committed to conducting our activities in a responsible way, to drive industry best practices and to unlock development and growth opportunities.

Valcambi produces high-purity precious metals from a wide range of feed materials. These can be primary 'doré' (gold mines process ore to produce an alloy called doré composed primarily of gold and silver), supplied by mining companies, industrial scraps and recycled jewellery, or bars invested and owned by financial and governmental institutions. These feed materials originate from many parts of the world including regions and countries considered as high-risk associated to human rights abuses such as modern slavery and human trafficking/smuggling. While some regions present more risks than others, we also recognize that modern slavery may exist in any jurisdiction.

In addition to our precious materials suppliers, we procure goods and services from a lot of suppliers including transport and logistics companies, providers of equipment and bulk commodities, many of whom also have further suppliers.



In managing the risks within Valcambi and our supply chain, we focus on many aspects, in particular the respect of human rights, the fight against corruption, money laundering and terrorist financing.

## 2 Policies and governance

Valcambi frames its commitment to human rights in line with the UN Guiding Principles on Business (ILO) and Human Rights, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-Risk Areas, and the Swiss Ordinance on Due Diligence and Transparency Obligations in Relation to Minerals and Metals Originating in Conflict Zones and Child Labour (ODA) (as of 3 December 2021). We comply with the GRI Standards, and uphold the framework set by the 2030 Agenda for UN Sustainable Development Goals (SDG), and with relevant sector standards such as the LBMA Responsible Gold Guidance and the Responsible Jewellery Council Code of Practice and Chain of Custody Standard.

Valcambi's Compliance Department is responsible for overseeing and managing all aspects related to human rights. They ensure that management and employees act in compliance with applicable laws, rules and regulations and are aware of any potential risks of dealing with potential and current business partners.

We require that our people and business partners comply with our policies and standards, and request that our business partners' own policies and standards are aligned with ours. These instruments include a component that aims to respect human rights and prevent modern slavery and human trafficking/smuggling and include:

- Our Code of Conduct;
- Our Precious Metals Supply Chain Policy; and
- Grievances and Whistleblowing Policy.

Our **Code of Conduct** sets the expectations of behaviour for Valcambi's employees and business partners working with us or on our behalf. The Code of Conduct explicitly refers to the fundamental human rights of the people where we operate and those with whom we work, including specific prohibitions against the use of child, forced and compulsory labour, human trafficking/smuggling, and slavery or servitude, whether involving adults or children.

Our **Precious Metals Supply Chain Policy** applies specifically to Valcambi's clients and suppliers within the precious metals supply chains, as this is the area that presents the greatest risks. It sets out our expectations with respect to key issues such as human rights. Specifically, it requires that all work must be freely chosen and completed without the use of child, forced or compulsory labour, human trafficking/smuggling, and slavery or servitude. It makes it clear that Valcambi may decide not to work with business partners who do not meet our expectations. This means that non-compliance may allow us to terminate the relationship with a third party.

Our **Grievances and Whistleblowing Policy** is available to all of our people, business partners, other stakeholders and the public to bring allegations of issues and inappropriate behaviour to the attention of Valcambi Senior Management. Reports received through this channel can be on any topic and may relate to (but are not limited to) concerns about material violations of laws or company standards, policies or procedures including activities in violation of human rights, or bribery and corruption.

More broadly, before engaging with business partners within the precious minerals supply chains, since it is the area presenting the greatest risks, we systematically conduct a due diligence assessment, the details of which are described in the section 'Risk assessments and management' below.

## 3 Risk assessments and management

To assess and manage our risks, we undertake appropriate due diligence of our current and potential business partners within the precious metals supply chains, using a risk-based approach as set out below:

- During pre-qualification, we conduct risk assessments of our business partners.
- One of the many risk management tools we use is the country risks assessment tool, which identifies countries that are important to our business and ranks them based on their economic, political, social, environmental, infrastructure and security risks. Included in this tool are risks related to human rights. The modern slavery related human rights included in our assessments incorporate: rights around labour issues, personal integrity and security of person, freedom of expression, freedom of association and minority rights.
- Our Know Your Customer (KYC) procedure provides the overarching due diligence process for our business partners risk management approach, facilitating identification of the potential risks of engaging, renewing or extending a relationship with a third party. The procedure is designed to identify

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a variety of risks relating to responsible business conduct, including human rights, specific domestic child labor violation and worst forms of child labor and modern slavery, bribery and corruption, money laundering, terrorism financing, trade sanctions or denied party transactions.

- We conduct due diligence, and may conduct enhanced due diligence, investigating and assessing potential adverse impacts in various areas, including respect of human rights whenever required. This is the case when, but is not limited to, sourcing from Artisanal and Small-Scale Mines, where we will put a special focus on verifying that there is no child labour and/or exposure of young workers to hazardous work and forced or compulsory labour. We conduct on-site visits to ensure the respect of human rights.
- In cases where we detect non-conformities, if the circumstances allow that, we work with the business partners to determine appropriate corrective actions. In these cases, together with the affected business partners we monitor the corrective action until both parties agree the desired outcome has been achieved.
- At all times we reserve the right not to accept, to suspend, discontinue or terminate relationships with business partners when we have reason to suspect or can identify that the counterparty:
  - is in breach of the law; or
  - refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions required to operate in accordance with our Code of Conduct and Precious Metals Supply Chain Policy.

### 4 Training

All employees receive relevant communications and support to ensure they comply with the business practices and our Code of Conduct.

All eligible employees and temporary staff receive training on various latest standards including aspects of human rights we must comply with.

### 5 Initiatives and collaborations

Beyond our Policies, standards, procedures and due diligence, Valcambi is actively involved in initiatives supporting the adoption of responsible mining practices, including those related to the respect of human rights. These initiatives include projects we directly support with the aim to ultimately source from those mines once the practices they conduct meet Valcambi's standards. Respect of human rights is the first aspect we look at and, when we identify gaps, we work together with the miners to find corrective-action plans to address these in a way that is effective and achievable for them.

We also support responsible mining practices through organisations, including the Swiss Better Gold Association (SBGA) and the European Partnership for Responsible Minerals (EPRM), whose missions are to support miners to improve their practices, including in the area of human rights, so they can access global markets.

In addition, we recognise the value of collaborating with our peers to learn from others and internalize best practices. To this end, we have ongoing relations with organisations such as ILO, USAID, etc.