

1. Cookson-CLAL is company a for collection of scraps, treatment, refining, control, melting, storage, purchase and sales of precious metals and provider of services to the jewellery, dental and industrial markets. This policy confirms **Cookson-CLAL's commitment** to respect human rights, not to contribute to the financing of conflicts and to respect all applicable UN sanctions, resolutions and laws. It also affirms its commitment to **ethical, social and environmental responsibility**.

2. Cookson-CLAL is a **certified member of the Responsible Jewellery Council**. As such, we undertake to demonstrate, through independent third party verification, that we:

a. Respect **human rights** in accordance with the Guiding Principles of the United Nations and the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, including applicable legislation on disciplinary proceedings. In particular, we strongly reject and condemn child labour, forced labour, covert and clandestine labour, human trafficking, and all forms of discrimination. We will cease any relationship with the relevant stakeholder in the event of a breach of these provisions.

b. Do not participate in or tolerate **any form of money laundering or terrorist financing**.

c. Support **transparency of payments** from rights-compliant governments and security forces in the extractive industries.

d. We prioritize the **security of people** over that of property.

e. Strongly reject and condemn any form or attempt of **corruption and facilitation payment** in any form they present ourselves we commit to support employees who might be faced with any attempt of corruption.

f. Allow **stakeholders** to **express** anonymously and without fear of reprisals their concerns regarding possible ill-treatment at work, violations of **human rights**, as well as corruption, or related to the jewelry supply chain. To this end, we have put in place and are making available to the parties concerned a **complaints mechanism**, which can be obtained upon request from the following address: rh@cookson-clal.com.

g. Put in place the **OECD's** five-step framework for the exercise of a risk-based **due diligence** on the supply chain for minerals from conflict or high-risk areas:

We also undertake to use our influence to avoid possible abuse by other parties.

h. We undertake to respect and promote compliance with the **KIMBERLEY PROCESS** procedure concerning the purchase and sale of diamonds.

i. Adopt an environmentally responsible attitude and practices to control our **impact on the environment**.

3. Concerning serious damage to the extraction, transport or trade of minerals, we will not tolerate, assist or facilitate in any way the commission of the following acts, nor will we profit from or contribute to them:

- **torture** or cruel, inhuman and degrading treatment:

- **forced** or compulsory **labour**;

- the worst forms of **child labour**;

- violations and violations of **human rights**;

- **war crimes**, or other gross violations of international humanitarian law, crimes against humanity or genocide.

We will immediately **stop engaging with** upstream suppliers if we find a reasonable risk that they are committing abuses described above or are sourcing from, or linked to, any party committing these abuses.

4. Regarding direct or indirect support to non-State armed groups, we will **not tolerate** any direct or indirect support to non-State armed groups or their affiliates — including through the supply of gold, diamonds or precious stones, the payment of money or the provision of logistical, material or other assistance — unlawfully engaged in the following activities:

a. Unlawful control of mining sites or transport routes, points of trade in minerals and upstream actors in the supply chain,

b. Illegal taxation or extortion of gold silver of diamonds or precious stones on mining sites, transport routes or trading points of gold, silver and precious metals of the Platinum mine, diamonds or precious stones, or against intermediaries, exporting companies or international traders,

5. We will **immediately stop engaging with** upstream suppliers if we find a **reasonable risk** that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described above.

6. Regarding **public or private security forces**, 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 or that act illegally as described in the above paragraphs.

7. Regarding **bribery** and **fraudulent misrepresentation** of the origin of gold, silver, precious metals of the Platinum mine, diamonds and precious stones, we will **not offer, promise, give or demand bribes**, and will **resist the solicitation** of bribes, to conceal or disguise the origin of gold, silver, precious metals of the Platinum mine, diamonds and precious stones, or to **misrepresent taxes**, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold, silver, precious metals of the Platinum mine, diamonds and precious stones.

8. Regarding **money laundering**, we will support and contribute to **efforts to eliminate money laundering** where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of gold, silver, precious metals of the Platinum mine, diamonds and precious stones.

Philippe Souquet
Managing Director - Cookson-CLAL