

- 1.** Cookson-CLAL is a company 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, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws.
- 2.** Cookson-CLAL is a **certified member of the Responsible Jewellery Council (RJC)**. As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism; we commit to support any employee who may be confronted with all attempts corruption.
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups;
 - e. enable stakeholders express their concerns about possible employees maltreatment, bribery, or the supply chain of the jewellery industry. To do this, we have put in place and keep at disposal of concerned parties a grievance mechanism, which can be obtained on simple request from the following address: rh@cookson-clal.com.
 - f. are implementing the OECD five-step framework as a management process (and Supplement on Gold if applicable) for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.
- 3. We also commit to using our influence to prevent abuses by others.** To do this, we have put in place instructions:
 - a. Assessment of our stakeholders (KYC);
 - b. Internal protocol for reporting acts deemed unlawful;
 - c. Formalized monitoring of the company's risks.
- 4. Regarding serious abuses associated with the extraction, transport or trade of minerals**
We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:
 - a. torture, cruel, inhuman and degrading treatment;
 - b. forced or compulsory labour;
 - c. the worst forms of child labour;
 - d. human rights violations and abuses; or
 - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
- 5. We will immediately stop engaging with upstream suppliers** if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses.
- 6. Regarding direct or indirect support to non-state armed groups**
We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold or Platinum Group Metal (PGM) from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:
 - a. control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain; or
 - b. tax or extort money, of gold or PGM at mine sites, along transportation routes or at points where gold or PGM are traded, or from intermediaries, export companies or international traders.
- 7. 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 in paragraph 6.
- 8. 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 described in paragraph 4, or that act illegally as described in paragraph 6.
- 9. Regarding bribery and fraudulent misrepresentation of the origin of gold or PGM**
We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold or PGM, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold or PGM.
- 10. 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 or PGM.

Lyon, 24th September 2019

Bruno Costet

Director General - Cookson-CLAL

