

January 2023

Preamble

At G.RAU GmbH & Co. KG we commit to our social, ecological and economic responsibility.

As a member of the professional association of precious metals, which represents the political concerns of the producers and processors of precious metals (cutting establishments) such as gold, silver, platinum, palladium and other platinum group metals, we refer to the contents of the Code of Conduct of the professional association of precious metals.

G.RAU GmbH & Co. KG also undertakes to sustainably follow the codified values and principles of the Code of Conduct of the professional association of precious metals.

This Code of Conduct should do justice to the prominent role and the particular responsibility that we have as a German producer and processor of precious metals as valuable key products in a global business world.

Scope of validity

This Code of Conduct is valid for all subsidiaries all over the world. We undertake as a company to promote compliance with the Code to our suppliers, and if possible, also to our customers.

A. Basic principles of business ethics

G.RAU GmbH & Co. KG orientates its business and social actions on the generally valid ethical and humanitarian principles. Our activities and products contribute to prosperity, while, at the same time, disadvantageous impacts on future generations are avoided where possible or at least restricted to an absolute minimum. This requires the unconditional compliance with fundamental human rights and the unconditional respect of cultures or habits and customs with respect to the employees but also with regard to all those who are affected by the activities of G.RAU GmbH & Co. KG.

1. Forced labour, child labour and exploitation

G.RAU GmbH & Co. KG outlaws forced labour, child labour or any other form of exploitation and contempt for mankind. We stand up for the promotion of human rights.

2. Discrimination

G.RAU GmbH & Co. KG does not tolerate discrimination under any circumstances, e.g. according to race, sex, ethnic or social origin, religion, age, disabilities or sexual orientation. We undertake to protect our employees against physical, sexual or verbal harassment and to penalise such occurrences.

3. Freedom of expression

Freedom of expression and freedom of speech are granted and protected.

B. Compliance – conformity with existing laws

G.RAU GmbH & Co. KG hereby undertakes to comply with the general laws and provisions as well as special laws to protect fair competition and to support their further development.

1. Turnover tax fraud

Precious metals constantly offer a target for turnover tax fraud when delivering recycling material to precious metal cutting establishments because of their high value. We, at G.RAU GmbH & Co. KG, undertake in particular to observe compliance with the current laws on turnover tax and to support the authorities in their fight against turnover tax fraud.

2. Prevention of money laundering

G.RAU GmbH & Co. KG takes suitable precautionary measures to prevent money laundering activities in connection with their precious metal transactions in advance. The authorities are supported in their attempts to prevent money laundering.

3. Corruption

The business relationships between G.RAU and their business partners should be characterised by fairness. We may not offer potential customers, authorities, regulatory agencies or other representatives of such facilities any rewards or advantages that are contrary to current legislation or good business practices.

Our employees may not accept any payments, gifts or other remunerations from third parties, which could lead to the objectivity of decisions being regarded as dubious.

Every employee is obliged to comply with the rules of fair competition within the scope of legal regulations. We respect the basic principles of fair competition and do not

make any anti-competitive agreements on prices, conditions, customers, markets, quantities or areas.

4. Reporting of irregularities

Every employee has the right to point out circumstances to his/her superior that are indicative of a violation of the regulations contained in this Code of Conduct. This can also be done anonymously.

5. Conflict Minerals

Suitable measures are met by G.RAU GmbH & Co. KG in order to avoid the financing of terrorist activities in connection with precious metal transactions. This includes the support of international endeavours to gain clarity on the acquisition and origin of minerals from the Democratic Republic of Congo and neighbouring states. The objective is to prevent minerals mined there and their export from being able to support terrorism and military conflicts in these countries.

6. Data Protection

G.RAU GmbH & Co. KG recognizes the general privacy rights of their employees and the employees of their business partners.

G.RAU therefore ensures that personal data is always processed and disseminated in accordance with the applicable legal regulations.

C. Sustainability

G.RAU GmbH & Co. KG manufactures products of great value and vital importance for modern life. These products stand for innovation and technical progress, for environmental protection, climate protection and energy saving. G.RAU GmbH & Co. KG orientates their entrepreneurial activities on the principles of sustainability.

1. Resources

G.RAU GmbH & Co. KG ensures, by constant innovation, that the production processes are always state-of-the-art and therefore the impact on the environment is kept as low as possible. At the same time, we are always searching for constant improvements that make it possible to keep the product-related resources used as low as possible while maintaining the efficiency at the same time.

2. Environmental and health protection

G.RAU GmbH & Co. KG complies meticulously with all environmental and health-related provisions. The protection of our employees' health has special priority.

3. Social responsibility

G.RAU GmbH & Co. KG contributes to growth and prosperity. It ensures numerous jobs also in the supply industry. This industry is the main source of income in some regions. We are conscious of this responsibility and are committed to the sustainable task of safeguarding these jobs.

In addition, G.RAU GmbH & Co. KG contributes to social development, e.g. by promoting charitable causes.

D. Implementation and enforcement

G.RAU GmbH & Co. KG takes all appropriate and proportionate efforts to continually implement and use the principles and values stipulated in this CoC.

G.RAU GmbH & Co. KG

Dr. Axel Pfrommer
President & CEO