

ARGOR-HERAEUS

The golden link

HUMAN RIGHTS POLICY



1. Introduction

Respect for human rights is one of the fundamental values of the corporate strategy of the ARGOR-HERAEUS Group, which dedicates particular attention to compliance with and implementation of the principles and obligations enshrined in binding and voluntary national and international laws governing this subject matter.

ARGOR-HERAEUS SA guarantees respect for universally recognized human rights at all the companies of the Group and commits that all of its commercial partners comply with, observe and adopt the values shared by ARGOR-HERAEUS SA.

2. Reference regulations

- Universal declaration of human rights;
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the main corresponding Conventions;
- UN guidelines for business and human rights;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3. Human rights

Human Rights are rights universally recognized to which all human beings are entitled, irrespective of their nationality, place of residence, ethnic or national origins, gender, colour, religion, language or any other status.

All human rights are universal, inalienable, indivisible and interdependent.

4. Principles at ARGOR-HERAEUS

By this Policy, confirming its own commitment to the promotion and protection of Human Rights, ARGOR-HERAEUS SA declares, in particular, as follows:

a. Prohibition of child labour

Nobody may be hired if they are below before the minimum age permitted by law.

The minimum age of completion is deemed to be the age of compulsory schooling, which is 15, as set out in ILO Convention No. 138 or not less than 14 in those countries in which this is permitted under local law.

aa. Hazardous work

ARGOR-HERAEUS does not tolerate the employment of minors for hazardous work which, due to its nature or circumstances, could endanger the health or safety or the customs or lifestyle of minors below the age of 18.

In those cases contemplated under local laws, where a minimum age of 16 is permitted, ARGOR-HERAEUS SA will tolerate the employment of minors only if the health and safety and the customs and lifestyles of the minors involved are protected in every respect and the

minors have received appropriate specific instructions or professional training in the corresponding field of activity.

bb. Worst forms of child labour

ARGOR-HERAEUS does not tolerate the worst forms of child labour¹

b. Prohibition of forced labour

ARGOR-HERAEUS does not tolerate and condemns any form of Forced Labour as defined in ILO Convention No. 29, including slave labour, labour exacted under threat of penalty or involuntary labour.

c. Non-discrimination.

Every individual must be treated with respect and dignity.

ARGOR-HERAEUS SA does not tolerate and condemns any form of discrimination and any form of harassment or prejudice (disadvantage) on grounds of race, ethnic origin, gender, religion or philosophic belief, handicap, age or sexual identity and any illegal form of threat or intimidation.

ARGOR-HERAEUS SA does not tolerate any form of discrimination in the workplace in relation to hiring, remuneration, overtime, access to training, promotion, the end of the employment relationship or retirement. Similarly, political or religious activities in the workplace are not tolerated, neither by employees of ARGOR-HERAEUS SA nor by third parties.

All employees shall enjoy equal opportunities without any discrimination based on factors unrelated to their capacity to carry out their work.

d. Freedom of association and collective bargaining

Within the limits permitted under any mandatory legislation, all employees shall be free to decide on whether to set up or join trade unions or equivalent representative organisations and to exercise their right to collective bargaining.

e. Workplace safety

For ARGOR-HERAEUS SA workplace safety is of fundamental importance.

All collaborators, in particular managers, must comply with the mandatory rules and regulations on safety in the workplace and in employment so as to ensure overall safety in the workplace.

f. Human rights in the supply chain (upstream and downstream)

ARGOR-HERAEUS SA undertakes to ensure that the precious metals in the supply chain originate from legal and ethical sources, not associated with crimes, armed conflicts or human rights abuses and that the precious metals will not be exploited for money laundering, financing terrorism and/or tax evasion or fraud and/or any other crime.

¹ see ILO Convention No. 182 on the Worst Forms of Child Labour.

The principles of ARGOR-HERAEUS SA on human rights in the supply chain are described in the Supply Chain Due Diligence Policy.

5. Human rights Due Diligence

a. Objectives of human rights Due Diligence

Human rights Due Diligence at ARGOR-HERAEUS SA is an integral part of the general Due Diligence process and its objective is:

- to identify and assess the risk of the violation of human rights;
- to prevent and mitigate the negative impact of the risks detected, if they are linked to the activities of ARGOR-HERAEUS SA either directly or indirectly;
- to manage the negative impact if this impact derives from the direct or indirect activities of ARGOR-HERAEUS SA.

b. Monitoring the observance of human rights

In order to check whether human rights are being respected by its contractual partners, the relevant Due Diligence process at ARGOR-HERAEUS SA contemplates a series of measures which include the following:

- a. Information and sharing of its policies in relation to human rights;
- b. Document analysis in order to check and confirm whether the counterparty is complying with the local laws governing this subject matter;
- c. Site visits, including, if possible, the opportunity of guided interviews with workers to assess the situation and the workplace conditions;
- d. Special clarifications in case of doubts and/or suspicions regarding the violation of human rights;
- e. Refusal to initiate or termination of the business relationship in the event that unacceptable violations are detected which are impossible to manage and which run contrary to the principles shared by the ARGOR-HERAEUS Group.

c. Moment when human rights Due Diligence is performed

Human rights Due Diligence must take place before initiating the business relationship. The corresponding checks must be repeated during the business relationship whenever this is deemed necessary or if changes regarding the risk of the violation of human rights become known.

6. Approval and entry into force

This Policy will come into force on the day of its approval by the Management of ARGOR-HERAEUS SA.

January, 2017