

Policy relating to the supply chain for minerals and metals potentially coming from conflict-affected or high-risk areas (outside the European Union)

| | |
|------------------|--|
| VERSION | 1.0 |
| I. Objectives | <p>Considering that there may be serious risks associated with the extraction, trade, processing and export of minerals and precious metals coming from conflict-affected or high-risk areas, Spuerkeess (hereinafter the «Bank») has committed to the responsible sourcing of minerals and precious metals (i.e. that is conducted in an ethical and sustainable manner and that protects human rights).</p> <p>This supply chain policy (hereinafter the «Policy») defines the Bank's commitments with regard to ensuring the responsible sourcing of minerals and precious metals.</p> <p>This Policy is part of the Bank's contribution to the United Nations Agenda 2030, and more specifically to Sustainable Development Goal 12: «Ensure sustainable consumption and production patterns».</p> |
| II. Scope | <p>This Policy applies to the Bank and its suppliers of minerals and precious metals, and more specifically to the Bank's gold suppliers outside the European Union, regardless of their size.</p> |
| III. Commitments | <p>The Bank is committed to selecting smelters that produce gold ingots that meet the following requirements:</p> <ul style="list-style-type: none"> ■ Demonstrate a clear commitment to responsible gold production; ■ Provide full and transparent information relating to sustainability (environment, social and governance, including human rights); ■ Commit to meeting relevant ESG standards, in particular: <ul style="list-style-type: none"> ■ Certification under the Responsible Gold Guidance (RGG) of the London Bullion Market Association (LBMA); ■ Have in place effective management systems, procedures, processes and practices to manage supply chain risks in terms of: <ul style="list-style-type: none"> - economic crime (particularly money laundering, terrorist financing and tax evasion); - social standards (particularly human rights (as defined in the Universal Declaration of Human Rights), international agreements relating to civil and political rights and economic, social and cultural rights, and the labour standards of the International Labour Organisation (ILO), such as the prohibition of child labour or forced labour, health and safety)); - environmental standards. |

| | |
|------------------------------|---|
| III. Commitments | <p>Via its responsible sourcing practices, the Bank undertakes to:</p> <p>a. Exclusion refrain from any action that is likely to contribute to the financing of a conflict and to comply with the applicable United Nations resolutions and, if applicable, the national laws implementing these resolutions.</p> <p>b. Responsible Procurement & Audit only source precious metals from smelters that comply with this Policy and that are certified compliant by an approved external auditor.</p> |
| IV. Compliance | <p>The Bank is committed to promoting compliance with the following regulations and standards:</p> <ul style="list-style-type: none"> ■ EU Regulation 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores and gold originating from conflict-affected and high-risk areas; ■ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; ■ Corporate Sustainability Reporting Directive (CSRD); ■ Corporate Sustainability Due Diligence (CSDD); ■ World Gold Council's Conflict-Free Gold Standard. |
| V. Implementation | <p>The Bank undertakes to distribute this Policy to suppliers and/or incorporate it in contracts and/or agreements entered into with the suppliers in question. The Bank will immediately suspend or terminate any relationship with upstream suppliers if it identifies any reasonable risk that they are not complying with this Policy.</p> |
| VI. Reporting & transparency | <p>The Bank will publish an annual report on its policies and practices relating to the supply chain, in accordance with Article 7, Paragraph 3 of EU Regulation 2017/821. This report will be published on the Bank's website.</p> <p>The Bank will submit the aforementioned report to the regulatory authorities, particularly the Ministry of Foreign and European Affairs of the Grand Duchy of Luxembourg.</p> <p>Any complaints may be sent to the Bank's Compliance Department at the following e-mail address: reclamations@spuerkeess.lu</p> |
| VII. Amendments | <p>The Bank reserves the right to amend this Policy if required, particularly as a result of regulatory monitoring carried out by the Bank.</p> |