

Supply Chain Policy for a Responsible Global Supply Chain of Minerals

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

C. HAFNER respects entirely OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Due to the recycling technology of C.HAFNER we can exclude the refining of ores or other ingots containing suspect elements referring to mined gold, platinum or palladium. We therefore rule out any sourcing from conflict-affected and high-risk areas.

Serious abuses associated with the extraction, transport or trade of minerals

C.HAFNER does not source from conflict-affected and high-risk areas and does not tolerate any forms of torture, cruel, inhuman and degrading treatment and any forms of forced or compulsory labour, the worst forms of child labour, other gross human rights violations and abuses such as widespread sexual violence, war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Risk management of serious abuses

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

Direct or indirect support to illegitimate non-state armed groups

We will not tolerate any direct or indirect support to illegitimate non-state armed groups through the extraction, transport, trade, handling or export of minerals. That means no illegally control mine sites or otherwise control transportation routes, illegally tax or extort money or illegally tax or extort intermediaries.

Risk management of direct or indirect support to illegitimate non-state armed groups

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to illegitimate non-state armed groups.

Public or private security forces

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. We will support efforts, to engage with central or local authorities, internati-

onal organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

Risk management of public or private security forces

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces. If this will fail we will suspend or discontinue engagement with upstream suppliers within six months from the adoption of the risk management plan.

Bribery and fraudulent misrepresentation of the origin of minerals

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral trade, handling, transport and export.

Money laundering, terrorism financing and contribution to conflict

We will support efforts, to contribute to the effective elimination of money laundering, and/or terrorism financing and/or contribution to conflict where we identify a reasonable risk of money-laundering and/or terrorism financing and/or contribution to conflict resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments


In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Risk management of Non-compliance with Environment and Sustainability legal requirements

In accordance with the specific position of the company in the supply chain, we require from our suppliers to respect and observe national laws, international regulations and recommendations from non-governmental organisations in environmental protection and sustainable use of natural resources. We require our suppliers to adhere to environmental, health, safety and labour regulation in country of operation and to hold all necessary environmental permits and registrations, as a minimum standard. Furthermore, we expect our suppliers to deploy air, water and land pollution and incident management plans, to follow water stewardship and to respect World Heritage Sites and Protected Areas. Finding any non-compliance in these items, we will suspend or discontinue engagement with those suppliers.

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