

## GRIEVANCE AND WHISTLEBLOWING POLICY



## Summary

1.	Guiding Principles .....	3
2.	Purpose .....	3
3.	Scope .....	4
4.	Definitions.....	4
5.	Regulatory Framework .....	4
6.	Grievance Procedure .....	4
6.1	Submission of Grievances.....	5
6.2	Anonymous Reporting and Whistleblower Protections.....	5
6.3	Information to be provided.....	5
6.4	Processing of Grievances .....	5

## 1. Guiding Principles

ARGOR-HERAEUS SA („**AHSA**“) is a highly respected international company with an excellent reputation throughout the world and committed to conducting its business in a responsible manner at all levels of the precious metals supply chain and in accordance with applicable laws and regulations. AHSA recognizes that sustainable development is integral to the long-term viability and success of its business. In line with its Code of Conduct and its Policies on Human Rights, Compliance and Ethics and Supply Chain Due Diligence the implementation of this Grievance and Whistleblowing Policy (“**Policy**“) shall further strengthen the commitment and responsibility of AHSA and meet rising market demand for traceable, responsibly produced precious metals products.

AHSA believes that internal and external stakeholders play an important and constructive role within the establishment of the Grievance Procedure. This Policy enables any stakeholder to raise a Grievance against any party. All Grievances logged under the Grievance Procedure will be dealt with in a timely manner, and all investigations and findings will be reported transparently with full public disclosure.

As the respect for human rights is a key component of AHSA’s corporate responsibility, AHSA will adhere to the principles set out by the United Nations Guiding Principles on Business and Human Rights, such as legitimacy, accessibility, predictability, equitability, rights-compatibility, and transparency, to underpin a non-judicial Grievance mechanism when addressing Grievances relating to the violation of human rights.

## 2. Purpose

The purpose of this Policy is to provide a transparent and consistent process for resolving Grievances and to develop a mechanism allowing any internal or external stakeholder to anonymously voice concerns over the precious metals supply chain or any newly identified risk.

## 3. Scope

This Policy applies to individual and collective Grievances that arise in connection or as a consequence of any activity of AHSA related to the precious metals supply chain.

Grievances within the scope of this document include, but are not limited to:

- Human rights violations;
- Health and safety, working conditions;
- Extraction, trade, handling and export of precious metals;
- Environmental risks;
- Corruption and bribery;
- Money laundering and terrorism financing;
- Compliance and legal affairs.

AHSA reserves the right not to investigate or to suspend an investigation on a Grievance if the Grievance should not be evidenced or not within the scope of this Policy or made with a malicious intent.

## 4. Definitions

**Grievance** – General expression of dissatisfaction with a situation, activity, behavior, or a more specific and serious feeling of wrongdoing that relates to harassment, discrimination or another abuse (i.e., conflict, corruption, human rights violation, etc.)<sup>1</sup>

**Grievance Procedure** – For the purpose of this Policy, the Grievance Procedure is a formal, non-judicial complaint procedure intended as an early warning risk awareness mechanism allowing any interested party (affected persons or whistle-blowers) to voice concerns regarding the company's corporate responsibility, the circumstances of precious metals extraction, trade, handling and export in a conflict-affected or high-risk area.<sup>2</sup>

## 5. Regulatory framework

This Policy is based on existing international legal and compliance standards, such as

- UN Guiding Principles on Business and Human Rights;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and -Risk Areas, Supplement on Gold;
- Responsible Jewellery Council Chain-of-Custody (CoC) Standard;
- London Bullion Market Association Guidances.

and the company's policies and procedures, particularly the

- Code of Conduct;
- Policy of Compliance and Ethics
- Human Rights Policy;
- Supply Chain Due Diligence Policy

available at [www.argor.com](http://www.argor.com).

## 6. Grievance Procedure

### 6.1 Submission of Grievances

An integral part of a good compliance culture is the ability to report violations and unethical behavior, which are the subject of the applicability of this Policy, confidentially and without fear of retaliation. To this end, the following channels of communication are offered:

- Heraeus Group:
  - Online: "Heraeus SpeakUp", available globally:  
<https://heraeus.speakup.report/it/compliance/home>
  - Telephone: Country-specific telephone number for filing a report (Annex 1): [https://cdn-de1.staffbase.com/eyo-live-de/raw/upload/v1695314547/iFB14Uvxt75gKMjO1kn6sCSRp2GNdsFhj0dA2qSXVL4zMGbHnDKFRmtPdHxA9N7XYEiWIZEr91zJvn2rjCnmwOs37oADGNXN9ZzJGcuju9BAEpGdt33hs1qvWE0pW5yu9RTEWhAc1WwjL70cflTml5q0QAmZV0vBpg0fPTJbIFcYQW6TOKT9ygFGS9S1hfl/Heraeus\\_SpeakUp\\_Phone\\_list\\_230419.pdf](https://cdn-de1.staffbase.com/eyo-live-de/raw/upload/v1695314547/iFB14Uvxt75gKMjO1kn6sCSRp2GNdsFhj0dA2qSXVL4zMGbHnDKFRmtPdHxA9N7XYEiWIZEr91zJvn2rjCnmwOs37oADGNXN9ZzJGcuju9BAEpGdt33hs1qvWE0pW5yu9RTEWhAc1WwjL70cflTml5q0QAmZV0vBpg0fPTJbIFcYQW6TOKT9ygFGS9S1hfl/Heraeus_SpeakUp_Phone_list_230419.pdf)

<sup>1</sup> Based on the definition provided by the Responsible Minerals Initiative available at [www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org).

<sup>2</sup> Based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Supplement on Gold and Human Rights and Grievance Mechanisms provided by The Centre for Research on Multinational Corporations (SOMO).

- ARGOR\_HERAEUS SA:  
Compliance Officer of AHSA:
  - Address: ARGOR-HERAEUS SA  
Compliance Officer  
Via Moree, 14  
CH-6850-Mendrisio
  - Telephone: +41 91 640 57 17E-mail: [compliance.argor@heraeus.com](mailto:compliance.argor@heraeus.com)
  - In person: Compliance Officer of ARGOR-HERAEUS SA

## 6.2 Anonymous Reporting and Whistleblower Protections

The predefined e-mail box [compliance.argor@heraeus.com](mailto:compliance.argor@heraeus.com) and "Heraeus SpeakUp" <https://heraeus.speakup.report/it/compliance/home> have been specifically designated to enable anonymous submissions and reporting. For anonymous submissions, contact information is not required, just a description and evidence of the incident is needed, as detailed as possible.

While providing contact information is basically encouraged, as it allows for further follow up during the investigation of the submitted incident and the subsequent resolution process, anonymous submissions will be investigated and treated in the same way as all other submissions.

Whistleblowers who disclose information in good faith will be protected irrespective of the quality of the evidence provided or the outcome of the investigation undertaken by AHSA. The identity of the whistleblower if shown on any submitted documents will be removed by AHSA. An exception on the above will only be necessary if the source is required to be disclosed as part of a legal procedure under the applicable legislation.

## 6.3 Information to be provided

Any submission shall include the following information:

- Full name of the Grievant, not applicable to whistleblowers;
- Full contact details of the Grievant, not applicable to whistleblowers;
- Detailed description of the submitted incident supported by objective evidence.

## 6.4 Processing of Grievances

Every Grievant will receive for its submission a written confirmation of receipt. Subsequently AHSA will assess, whether the submitted Grievance is sufficiently evidenced in order to launch an investigation. Any investigation will be carried out involving all responsible functions in AHSA. Non-anonymous Grievant will be informed about the result of the investigation. Grievances including its investigation will be treated strictly confidential and filed in accordance with applicable privacy regulations.

Where appropriate, AHSA will treat as grievances, reports received outside of the procedures set forth in this Policy. In such cases, AHSA will ask the Grievant to formally submit its grievance and any supporting evidence through the contact points provided in this Policy.

## Annex 1

Heraeus SpeakUp Phone List  
Heraeus Organization Code: 103364

Country	Phone number	Phone instructions
Albania	+355 4 530 1801	Call charged at local rate
Algeria	+213 983 29 93 38	Call charged at local rate
Angola	+244 226 425 610	Call charged at local rate
Anguilla	1833 422 2005	Freephone
Antigua and Barbuda	1833 422 2006	Freephone
Argentina	+54 11 2039 7280	Call charged at local rate
Australia	+61 2 8284 6262	Call charged at local rate
Austria	0800 909 683	Freephone
Bahamas	1833 422 2007	Freephone
Bahrain	+973 1650 1936	
Bangladesh	+880 (0) 9610 998462	Freephone
Barbados	+1 (246) 623 9631	Call charged at local rate
Belgium	0800 89 326	Freephone
Belize	1800 0130 076	Freephone
Benin	+229 20 90 0380	Call charged at local rate
Bermuda	1833 422 2008	Freephone
Bhutan	+975 2 379 003	Freephone
Bolivia, Plurinational State of	800 105 122	Freephone
Bosnia and Herzegovina	+387 70 330 093	Call charged at local rate
Botswana	800 786 1103	Freephone
Brazil	+55 (11) 4700 8838	Call charged at local rate
Brunei Darussalam	801 4657	Freephone
Bulgaria	800 210 0645	Freephone
Burkina Faso	+226 25 30 09 82	Call charged at local rate
Cambodia	1800 209 867	Freephone
Cameroon	+237 6 57 10 31 12	Freephone
Canada	+1 (514) 395 0496	Call charged at local rate
Cayman Islands	+1 (345) 769 5580	Call charged at local rate
Chile	+56 22 483 5917	Call charged at local rate
China	1080 0152 3042	Freephone (via China Telecom)
China	1080 0852 2221	Freephone (via China United Network)
Colombia	+57 601 242 1247	Call charged at local rate
Costa Rica	+506 4036 0350	Call charged at local rate
Côte d'Ivoire	+225 05 66 77 0918	Freephone
Croatia	0800 7745	Freephone
Cyprus	800 91142	Freephone
Czechia	800 050 833	Freephone
Denmark	+45 43 31 09 61	Call charged at local rate
Dominica	1833 422 1998	Freephone
Dominican Republic	+1 (829) 947 1996	Call charged at local rate
Ecuador	1800 001 432	Freephone
Egypt	0800 000 0083	Freephone
El Salvador	+503 2230 4752	Call charged at local rate
Estonia	+372 609 3008	Call charged at local rate
Ethiopia	800 86 1919	Freephone
Fiji	008 002 650	Freephone
Finland	0800 392 912	Freephone
France	080 554 3753	Freephone
French Guiana	0800 99 1448	Freephone
French Polynesia	0800 91 4886	Freephone
Georgia	1800 008 013	Freephone

Germany	0800 1818 952	Freephone
Ghana	+233 59 699 3553	Call charged at local rate
Greece	0080 0441 45924	Freephone, the number will not work when called from a mobile
Grenada	+1 (473) 230 0333	Call charged at local rate
Guam	1833 809 6777	Freephone
Guatemala	+502 2302 8459	Call charged at local rate
Hong Kong	+852 3019 4193	Call charged at local rate
Hungary	06 809 845 89	Freephone
Iceland	+354 415 0349	Call charged at local rate
India	0008 0005 03159	Freephone
Indonesia	+62 21 8063 0074	Call charged at local rate
Ireland	1800 800 636	Freephone
Israel	+972 3374 1225	Call charged at local rate
Italy	800 147 694	Freephone
Jamaica	+1 (876) 677 9125	Call charged at local rate
Japan	+81 3 6627 0734	Call charged at local rate
Jordan	0800 23801	Freephone, no mobile access
Kazakhstan	+7 (8727) 357 45 82	Call charged at local rate, no mobile access
Kenya	+254 20 765 0957	Call charged at local rate
Korea, the Republic of	+82 2 3276 1660	Call charged at local rate
Kuwait	+965 2205 5730	Freephone
Latvia	800 05929	Freephone
Lebanon	833 816 0193	Freephone
Lithuania	8800 30366	Freephone
Luxembourg	+352 342 080 8982	Call charged at local rate
Malaysia	+60 3 7724 3136	Call charged at local rate
Malta	8006 5144	Freephone
Martinique	0800 90 1651	Freephone
Mauritius	+230 5 297 0999	Call charged at local rate
Mexico	+52 55 4780 6198	Call charged at local rate
Moldova, the Republic of	080 060 016	Freephone
Morocco	+212 5 30 14 41 08	Call charged at local rate
Myanmar	0800 800 8062	Freephone
Namibia	+264 83 380 0103	Freephone
Nepal	1800 001 0186	Freephone
Netherlands	+31 10 700 75 03	Call charged at local rate
New Zealand	+64 9 913 5892	Call charged at local rate
Nicaragua	+505 7513 7610	Call charged at local rate
Nigeria	070 8060 1221	Freephone
North Macedonia	+389 2551 3216	Call charged at local rate
Norway	+47 24 14 06 01	Call charged at local rate
Oman	8007 4161	Freephone
Pakistan	0080 0900 44437	Freephone
Panama	+507 308 4480	Call charged at local rate
Papua New Guinea	0008 61322	Freephone
Paraguay	0098 0044 10266	Freephone, no mobile access
Peru	0800 74535	Freephone
Philippines	1800 8394 8474	Freephone, can only be connected by Globe Telecom device
Poland	0080 0012 953	Freephone
Portugal	800 831 302	Freephone
Puerto Rico	+1 (787) 200 7305	Call charged at local rate
Qatar	800 101 094	Freephone

Réunion	1800 916 980	Freephone
Romania	0800 400 653	Freephone
Serbia	+381 10 520 043	Call charged at local rate
Seychelles	800 131	Freephone
Singapore	+65 6403 7051	Call charged at local rate
Slovakia	0800 113 418	Freephone
Slovenia	0800 83115	Freephone
South Africa	+27 (21) 427 7937	Call charged at local rate
Spain	+34 900 031 156	Call charged at local rate
Sri Lanka	+94 (72) 091 0370	Call charged at local rate
Sudan	+249 15 655 9883	Freephone
Suriname	833 816 0919	Freephone
Sweden	020 160 4703	Freephone
Switzerland	080 000 5691	Freephone
Taiwan, Province of China	+886 2 7743 8912	Call charged at local rate
Tanzania, the United Republic of	0800 11 1020	Freephone
Thailand	+66 2 844 9693	Call charged at local rate
Trinidad and Tobago	+1 (868) 224 1869	Call charged at local rate
Tunisia	+216 31 300 338	Call charged at local rate
Turkey	0080 04488 28602	Freephone
Turks and Caicos Islands	1833 462 1355	Freephone
Uganda	+256 41 423 8162	Call charged at local rate
United Arab Emirates	800 0444 0408	Freephone
United Kingdom	080 0022 4118	Freephone
United States of America	+1 (669) 288 7154	Call charged at local rate
Uruguay	0004 1598 5762	Freephone
Venezuela, Bolivarian Republic of	+58 212 335 7722	Call charged at local rate
Viet Nam	+84 1900 3271	Call charged at local rate
Virgin Islands (British)	1833 462 1356	Freephone
Virgin Islands (U.S.)	1833 724 6398	Freephone
Zimbabwe	+263 867 742 2010	Freephone