

## INTRODUCTION

The PX Group (hereinafter referred to as "PX Group" or "PX" or "Group"), founded in 1976 in La Chaux-de-Fonds, Switzerland, is composed of complementary companies specialising in the treatment and transformation of precious and non-precious metals, offering and developing customised solutions, in particular for the watchmaking, jewellery, medical, dental, aerospace, and investment industries.

For several years, responsible sourcing and, more recently, sustainable development have been at the very centre of PX Group's business values.

When conducting its business activities, PX Group is committed to complying with all applicable national and international laws, regulations, and conventions, as well as following best practices, particularly in the fields of labour standards and social responsibility, environmental protection, and business ethics and integrity. We strive to fulfil this responsibility as best we can in all fields and at all levels of the Group's companies.

PX Group expects its suppliers (of goods and services) and their subcontractors (hereinafter collectively referred to as the "Suppliers") to comply with the same laws, regulations, conventions, and ethical business principles in force when managing their own organisations.

This Supplier Code of Conduct is based primarily on the principles recognised by the international community, such as the United Nations Universal Declaration of Human Rights, the International Labour Standards of the International Labour Organisation (ILO), the ILO Code of Practice on Health and Safety, and the OECD Guidelines for Organising Economic Cooperation and Development of Multinational Enterprises, including the OECD Guidance on Due Diligence for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas (hereinafter referred to as the "OECD Guidelines").

Our approach is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs). In accordance with the UNGP framework, we adhere to the highest standards in cases where national law and international human rights standards differ. The same applies where national law and PX Group's strict environmental, health, and safety standards differ. Should there be a conflict between national law and the high standards of PX Group, we will comply with national law while striving to respect the more demanding standard.

Any reference to PX Group in this Code also applies to its individual companies and operating entities.

Any reference to persons in this Code should be understood to be a generic term that refers to both the feminine and masculine genders.

PX Group reinforces these commitments through the five sections of its Supplier Code of Conduct (the "Code"). These sections address labour practices and human rights, environmental protection, responsible supply chains, business ethics and integrity, and the detection of non-compliance.

PX Group companies will evaluate how Suppliers comply with the Code and any breach of said Code may compromise the business relationship between Suppliers and PX Group companies, potentially leading to the termination of the contract.

## TABLE OF CONTENTS

|          |  |          |
|----------|--|----------|
| <b>1</b> | <b>LABOUR AND HUMAN RIGHTS .....</b>   | <b>3</b> |
| 1.1      | Legal compliance.....  | 3        |
| 1.2      | Combating child labour.....  | 3        |
| 1.3      | Combating forced labour and human trafficking.....                                       | 3        |
| 1.4      | Combating illegal, clandestine and undeclared work.....                                  | 3        |
| 1.5      | Combating harassment and abuse .....   | 3        |
| 1.6      | Combating discrimination .....   | 3        |
| 1.7      | Working hours .....  | 3        |
| 1.8      | Wages and employee benefits .....  | 3        |
| 1.9      | Health and safety .....  | 4        |
| 1.10     | Freedom of assembly and association .....  | 4        |
| 1.11     | Complaint management.....  | 4        |
| 1.12     | Security .....   | 4        |
| 1.13     | Local communities .....  | 4        |
| <b>2</b> | <b>ENVIRONMENTAL PROTECTION.....</b>   | <b>5</b> |
| 2.1      | Environmental management and conformity .....  | 5        |
| 2.2      | Management of air emissions .....  | 5        |
| 2.3      | Management of greenhouse gases .....   | 5        |
| 2.4      | Management of hazardous and non-hazardous waste.....                                     | 5        |
| 2.5      | Management of wastewater .....   | 5        |
| 2.6      | Management of ambient noise .....  | 5        |
| 2.7      | Management of resource consumption .....   | 5        |
| 2.8      | Biodiversity .....   | 5        |
| <b>3</b> | <b>RESPONSIBLE SOURCING .....</b>  | <b>6</b> |
| 3.1      | Metals and regulatory compliance .....   | 6        |
| 3.2      | Traceability and transparency of non-precious metals.....                                | 6        |
| 3.3      | Traceability and due diligence for the sourcing of precious metals and traceability..... | 6        |
| 3.4      | Environmental management system .....  | 6        |
| 3.5      | Quality management system .....  | 7        |
| 3.6      | Identification and evaluation of risks .....   | 7        |
| 3.7      | Sustainable materials .....  | 7        |
| 3.8      | Evaluation of a product's life cycle .....   | 7        |
| 3.9      | Community development.....   | 7        |
| <b>4</b> | <b>BUSINESS ETHICS AND INTEGRITY .....</b>   | <b>7</b> |
| 4.1      | Responsible business practices.....  | 7        |
| 4.2      | Management system and responsibilities .....   | 7        |
| 4.3      | Combating corruption .....   | 7        |
| 4.4      | Transparency .....   | 8        |
| 4.5      | Money laundering .....   | 8        |
| 4.6      | Competition and antitrust .....  | 8        |
| 4.7      | Trade restrictions and international sanctions .....                                     | 8        |
| 4.8      | Protection of intellectual property .....  | 8        |
| 4.9      | Confidentiality .....  | 8        |
| 4.10     | Protection of personal data .....  | 8        |
| <b>5</b> | <b>IDENTIFICATION OF NON-COMPLIANCE.....</b>   | <b>8</b> |
| 5.1      | General compliance .....   | 8        |
| 5.2      | Filing of complaints and reports .....   | 9        |
| 5.3      | Evaluation .....   | 9        |
| 5.4      | Non-compliance .....   | 9        |

## 1 LABOUR AND HUMAN RIGHTS

### 1.1 Legal compliance

PX Group has implemented framework principles that aim to protect and value its employees, act with integrity, and maintain the trust of its customers and all stakeholders.

Suppliers are expected to comply with legal and regulatory requirements relating to their business activities and the countries in which they operate. Suppliers are required to ensure that any production, delivery, or other action subject to specific governmental, legal, or regulatory authorisation is only conducted when such authorisation has been granted.

### 1.2 Combating child labour

It is forbidden to employ children or minors under the age of 15 or who have not yet reached the minimum legal working age (whichever is higher). Suppliers must comply with the International Labour Organisation (ILO) standards as well as any applicable legal requirements.

Suppliers may employ workers who are under the age of 18, provided they have reached the legal minimum age. They must ensure that minors do not carry out any work that is likely to be harmful to their health, safety, or moral integrity. It is forbidden for Suppliers to ask minors to work additional hours or a night shift.

### 1.3 Combating forced labour and human trafficking

PX Group does not tolerate any form of abusive or illegal labour in its supply chains, such as forced labour or human trafficking. Any form of forced labour, slavery, servitude, or human trafficking by Suppliers, as well as the withholding of identity papers or work permits, the requirement for workers to post a bond, or the use of any other form of coercion, is strictly prohibited. All employees have free will to accept or leave their job. Suppliers must respect the workers' freedom of movement. Suppliers cannot force workers to work in order to repay a debt owed to them or a third party.

Suppliers must ensure that any third-party employment agencies they use comply with the terms of this Code and the law.

### 1.4 Combating illegal, clandestine and undeclared work

Suppliers must comply with all relevant rules to prevent illegal, clandestine, and non-declared work.

### 1.5 Combating harassment and abuse

Suppliers are responsible for treating workers with respect and dignity. Suppliers must prohibit any behaviour or activity involving any form of corporal punishment, physical, sexual, verbal or psychological harassment or any other form of abuse towards their employees or each other.

### 1.6 Combating discrimination

PX Group expects its Suppliers to treat all workers in an equal and fair manner. Suppliers must employ legally qualified workers based on their skills and not relating to their age, race, skin colour, religion, disability, marital status, whether they are pregnant or not, gender, political affiliation, sexual orientation, social status, nationality, or any other factor unrelated to a person's ability to perform the duties required of the job.

### 1.7 Working hours

Suppliers comply with the applicable laws and industry standards concerning working hours. The total number of hours worked a week, including overtime, cannot exceed legal limits. Workers are entitled to at least the minimum number of days off established by the relevant legislation and must have at least one day off every seven days.

### 1.8 Wages and employee benefits

Suppliers must ensure that the wages paid to their employees correspond to at least the minimum legal standards. Salaries and employee benefits are paid at intervals and in a form that fully complies with all applicable laws. Overtime shall be paid at a higher rate in accordance with legal requirements. Suppliers must communicate the payment structure and time frames to their employees. The use of temporary and outsourced labour must be within the limits set by local law.

**1.9 Health and safety**

Suppliers shall provide a safe and healthy working environment so as to prevent accidents and injuries to health arising from, in connection with, or occurring during work. Suppliers shall obtain all required health and safety authorisations, keep them up to date and comply with them. Suppliers are required to introduce procedures and training to detect, avoid, and mitigate any hazard that constitutes a risk to the health, hygiene, and safety of employees as much as possible. Health and safety instructions must be implemented and widely communicated. Employees' compliance with these instructions must be regularly assessed. Employees must be provided with the correct protective equipment for their work activities. The same principles apply to accommodation provided by Suppliers.

**1.10 Freedom of assembly and association**

Suppliers recognise and respect the legal rights of employees to freely associate with, form, and join organisations or trade unions of their choice and to negotiate collectively without interference, discrimination, retaliation, or harassment.

**1.11 Complaint management**

Suppliers have an effective process for reporting complaints and facilitating open communication between management and employees.

**1.12 Security**

Suppliers shall assess the security risks and take action to protect employees, representatives, visitors, and employees of the relevant business partners against theft, damage, or replacement of products on the premises and during events, trade fairs, and the shipment of goods.

**1.13 Local communities**

PX Group strives to have a positive influence on the populations with which it interacts and the regions in which it operates to prevent any damage to local communities, and it expects its Suppliers to adhere to the same standards. When interacting with indigenous communities, as defined by applicable laws, Suppliers commit to respecting their rights as well as their social, cultural, environmental, and economic interests, including their ties to land and water.

## 2 ENVIRONMENTAL PROTECTION

### 2.1 Environmental management and conformity

Suppliers must respect all applicable environmental laws and regulations. All required permits, licences or other authorisations must be obtained, the related requirements must be met, and the related reporting formalities must be completed.

### 2.2 Management of air emissions

Suppliers identify, manage, and reduce any atmospheric emissions resulting from their activities that pose a threat to the environment. They are responsible for regularly evaluating the efficiency of their air emission monitoring systems, ensuring that they comply with legal requirements.

### 2.3 Management of greenhouse gases

Suppliers must monitor their energy consumption, implement measures to reduce their greenhouse gas (GHG) emissions, and combat climate change, especially through the use of renewable technologies.

### 2.4 Management of hazardous and non-hazardous waste

Suppliers implement a systematic approach for responsibly identifying, managing, reducing and eliminating, or recycling hazardous and non-hazardous waste.

When Suppliers deal with hazardous chemicals, they are committed to ensuring safe chemical management and compliance with applicable national and international regulations and all professional standards, including the European Union's REACH regulation. Furthermore, Suppliers must adopt new processes and best practices in order to reduce their environmental impact and any impacts on health and safety linked to the use of chemical products. Suppliers must have an inventory of the hazardous substances used in their facilities. Safety data sheets (or equivalent) must be available wherever hazardous substances are used. Chemical products must be correctly labelled and the risks they present must be clearly and actively communicated to all employees who use them.

### 2.5 Management of wastewater

Suppliers analyse, manage, and reduce wastewater resulting from their activities. They are responsible for regularly evaluating the efficiency of their wastewater purification systems in compliance with legal requirements.

Suppliers located in areas where water is scarce must implement robust water management systems and collect data (e.g., water consumption, wastewater, and recycled water) in order to reduce any adverse effects on the local community.

### 2.6 Management of ambient noise

Suppliers identify, control, monitor, and reduce noise generated by the facilities that have an impact on the noise levels in the surrounding area.

### 2.7 Management of resource consumption

We encourage Suppliers to do their best in order to constantly reduce their consumption of natural resources. We require our Suppliers to opt for the circular use of raw materials (reduce, reuse, recycle, and repurpose).

### 2.8 Biodiversity

Suppliers must avoid and reduce their impact on biodiversity. Suppliers must research biodiversity preservation opportunities linked to their activity. They must do their best to generate a positive impact on biodiversity and local populations.

### 3 RESPONSIBLE SOURCING

#### 3.1 Metals and regulatory compliance

Suppliers must ensure that materials containing tin, tantalum, tungsten or gold (3TG) are not sourced from conflict zones or regions where their extraction funds human rights abuses. They must provide verifiable documentation proving their compliance with the European Conflict Minerals Regulation (EU 2017/821) or equivalent recognised frameworks, such as the Responsible Minerals Initiative (RMI).

Suppliers undertake not to use substances prohibited under the RoHS Directive (2011/65/EU and its amendments), such as lead or mercury. They must provide declarations of compliance and, on request, analysis reports demonstrating that the materials delivered comply with the limits defined by this regulation.

#### 3.2 Traceability and transparency of non-precious metals

Suppliers must maintain full traceability for the non-precious metals used, documenting their origin, certification and processing conditions. This information must be made available in the event of an audit or specific request.

#### 3.3 Traceability and due diligence for the sourcing of precious metals and traceability

PX Group is fully committed to ensuring that all its sourcing is ethical and legitimate, does not come from conflict or high-risk zones, or countries with known limited reserves, and respects human rights. PX Group complies with the OECD Guidelines, the high standards of the London Bullion Market Association (LBMA) and the Responsible Jewellery Council (RJC), as well as the Swiss laws on anti-money laundering (AML) and the financing of terrorism, and the control of precious metals (CPM).

PX Group expects its Suppliers across the gold, silver, and platinum group metals (PGMs) supply chain to be actively involved in their supply chain in order to increase transparency.

Said Suppliers must be able to demonstrate the origin of the precious metals supplied to PX Group and prove that such metals meet the following requirements:

- They conform to the OECD Guidelines
- They are free from conflict, are mined responsibly, respect human rights and labour laws, and do not cause damage to the environment, either directly or through subsequent contamination by mine tailings or waste rock.
- They comply with the applicable national laws relating to the fight against anti-money laundering and the financing of terrorism.

Traceability must be rigorous and verifiable. Suppliers must provide data and information on traceability when requested.

Furthermore, PX Group must ensure full traceability of the precious metals it provides to Suppliers during sub-contracting operations. Consequently, PX Group requires you not to mix their materials with your own or those of a third party and to return to PX Group any waste that results only from their deliveries.

#### 3.4 Environmental management system

The Suppliers of raw materials are encouraged to establish an environmental management system (e.g.: ISO 14001) in order to respect their commitment to the environment and mitigate any negative effects. Suppliers must have an environmental action plan and monitor their impacts on the environment.

### **3.5 Quality management system**

Suppliers implement and maintain effective business and quality management systems that facilitate the legal compliance of products. They identify and mitigate risks related to quality and facilitate continuous improvement. The quality management system can be based on the ISO 9001 standard or equivalent industrial standards.

### **3.6 Identification and evaluation of risks**

Suppliers implement risk identification and assessment systems to enable suspicious activities and transactions to be reported and their risks assessed. Suppliers commit to demonstrating diligence and monitoring risk management.

### **3.7 Sustainable materials**

Suppliers favour recycled and recyclable materials. If this is not possible, Suppliers are encouraged to favour bio-sourced, compostable, or biodegradable materials. At the very least, Suppliers must favour materials that can be re-used as energy sources. Suppliers provide support for environmental claims (recycled, recyclable, organic, bio-sourced, compostable, or biodegradable) by providing the relevant documentation or certification.

### **3.8 Evaluation of a product's life cycle**

Suppliers are encouraged to design products in such a way as to minimise their size and weight and to keep the content of substances that could hinder their reuse or recovery to a minimum. They are encouraged to evaluate the social and environmental impacts associated with the entire life cycle of the materials, processes, or products supplied to PX Group companies. If there is a choice between two identical materials, processes, or products, Suppliers must always opt for the one with the lower impact. The data relating to the evaluation of social and environmental impacts must be accessible when requested.

Suppliers shall implement effective systems to reduce, recycle and treat scrap metal in accordance with local and international regulations, while minimising its environmental impact.

### **3.9 Community development**

Suppliers are encouraged to assist with the social, economic, and institutional development of the communities in which they carry out their activities and support community initiatives. They ensure that an effective complaint system is in place to act as a communication channel with affected communities and other relevant stakeholders.

## **4 BUSINESS ETHICS AND INTEGRITY**

### **4.1 Responsible business practices**

Suppliers commit to behaving in an exemplary manner in terms of integrity when carrying out their activities. The Suppliers apply the most demanding ethical standards in their business practices and their interactions with companies in the PX Group and carry out all their activities in a legal way, in compliance with the company's applicable policies and rules. Suppliers work to build trust by ensuring that their work ethic contributes to credible, stable, and lasting business relationships.

### **4.2 Management system and responsibilities**

PX Group holds its Suppliers responsible for compliance with this Code of Conduct and all its standards. Suppliers must implement or maintain (where applicable) a management system that facilitates compliance with this Code and the law, identifies and mitigates related operational risks, and facilitates continuous improvement.

### **4.3 Combating corruption**

PX Group commits to fighting against corruption and implements a zero-tolerance policy with regard to corruption, both internally and externally. PX Group does not authorise any exchange of favours, money, gifts, or other monetary advantages with a manager, representative, or employee of PX Group intended to influence a commercial decision.

PX Group expects its Suppliers to take appropriate measures to prevent, detect, and punish any act directly or indirectly involving corruption or bribery within the scope of their activities. This includes the prohibition of so-called facilitation payments and any other favour granted to public officials in return for carrying out routine actions.

#### **4.4 Transparency**

Suppliers accurately record information relating to their business activities, labour, health and safety, and environmental practices and disclose such information, without falsification or misrepresentation, to all relevant parties and in accordance with the law.

#### **4.5 Money laundering**

PX Group implements a zero-tolerance policy with regard to money laundering and the financing of terrorism. Suppliers ensure full compliance with applicable national and/or international accounting and banking standards and processes, as well as legislation relating to money laundering, terrorist financing, fraud, and other illegal activities. Suppliers agree to commit to taking the appropriate measures, aiming to avoid their activities being used as a vehicle for money laundering.

#### **4.6 Competition and antitrust**

Suppliers must strictly adhere to the laws regarding competition (or the antitrust law), which ensure free and fair competition throughout the world. Suppliers must not engage in discussions or activities (e.g.: with professional associations or competitors) that could lead to allegations or an impression of inappropriate anti-competitive behaviour.

#### **4.7 Trade restrictions and international sanctions**

PX Group requires its Suppliers to respect all trade restrictions and international sanctions, taking into account their evolution as well as laws and regulations relating to the control of imports and exports.

#### **4.8 Protection of intellectual property**

Suppliers respect all intellectual property rights of their business partners and avoid any infringement of patents, trademarks, copyrights, trade secrets, or any other intellectual property right.

#### **4.9 Confidentiality**

PX Group requires its Suppliers to commit to taking all the necessary measures to ensure the confidentiality of professional secrets and other private information communicated as part of their business relationship with PX.

#### **4.10 Protection of personal data**

PX Group requires its Suppliers to respect the applicable laws and regulations relating to the protection of personal data.

### **5 IDENTIFICATION OF NON-COMPLIANCE**

#### **5.1 General compliance**

PX Group expects its Suppliers to communicate the clauses of this Code to their employees, subcontractors, and relevant third parties with whom they conduct business and to ensure that these clauses are incorporated into their respective operations. Suppliers proactively notify PX of any potential or proven non-compliance related to the requirements set out in this Code and their suggested corrective actions.

## **5.2 Filing of complaints and reports**

Suppliers must implement tools that allow employees or any stakeholder to raise their concerns without fear of reprisal or negative repercussions.

Suppliers who are aware of any violation of this Code or the applicable laws and regulations are encouraged to inform their contact(s) within PX companies.

Moreover, PX Group invites its Suppliers to report these violations in good faith, confidentially and securely by sending an e-mail to: [complaints@pxgroup.com](mailto:complaints@pxgroup.com).

PX Group will investigate each concern raised and, where possible, discuss the results with the Supplier in accordance with confidentiality requirements.

A report made in good faith of a potential breach of these standards by a Supplier will not affect the Supplier's relationship with the PX Group.

## **5.3 Evaluation**

Suppliers carry out regular assessments of their facilities and activities, as well as the facilities and activities of their subcontractors who supply goods or services ultimately intended for PX Group companies, to ensure compliance with this Code and the law.

Suppliers must provide all documentation or information proving full compliance with this Code when requested.

The Suppliers authorise PX Group companies, or a third party appointed by them, on request and with reasonable notice, to assess the Suppliers' facilities and operations. PX Group expects Suppliers to be able to exercise the same control over their own subcontractors and suppliers in order to assess compliance with the applicable principles and requirements under the terms of this Code, in particular in order to be able to compile a report in the event of incidents implicating them.

Suppliers commit to implementing the necessary processes in order to limit and recover non-compliance relating to this Code within a reasonable timeframe after its detection.

## **5.4 Non-compliance**

PX Group reserves the right to terminate any commercial relationship with any Supplier who violates this Code or whose Suppliers or subcontractors violate this Code. If non-compliance is identified, PX Group will first work with the Supplier to find an appropriate solution and means of improvement. If the Supplier demonstrates a structural unwillingness to cooperate and improve, consideration will be given to terminating the commercial relationship. The decision to terminate the relationship due to a breach of the Code will only be taken when mitigating measures have failed or have not been taken.

**Approval**

On behalf of the company named below, we confirm full compliance with this PX Group Supplier Code of Conduct and the clauses and principles applicable to our business sector and hereby approve it with our signature(s).

**Company details**

Company name: .....

Address: .....

**Authorised signatories**

Signature: .....

Signature: .....

Surname, name: .....

Surname, name: .....

Role: .....

Role: .....

Date: .....

Date: .....

*This Code will be regularly updated to incorporate changes in legislation, regulations, and PX Group policies.*

*If this Code is translated, the French version shall take precedence over the translated version.*

*Please contact [complaints@pxgroup.com](mailto:complaints@pxgroup.com) if you have any questions or comments about this Supplier Code of Conduct.*