

## **Code of Conduct**

GOLDINVEST Edelmetalle GmbH\*  
Seilerstätte 15  
1010 Wien

Zweigniederlassung:

GOLDINVEST Edelmetalle GmbH\*  
Fasanenstraße 77  
D-10623 Berlin

\*Hereinafter referred to as GOLDINVEST

Status: August 2024

# GOLD INVEST

## Preamble

GOLDINVEST EDELMETALLE GMBH STANDS FOR LEADING COMMODITY TRADING IN THE PRECIOUS METALS SECTOR. OUR PRODUCT AND CONSULTING EXPERTISE IS MADE POSSIBLE BY OUTSTANDING EMPLOYEES. BUT THAT ALONE IS NOT ENOUGH. IN ORDER TO ACHIEVE SUSTAINABLE GROWTH, WE ARE COMMITTED TO RESPONSIBLE CORPORATE GOVERNANCE. OUR GOAL IS NOT ONLY TO MINIMIZE RISK BY COMPLYING WITH THE RELEVANT LAWS, BUT ALSO TO PRACTICE ETHICALLY IN THE INTEREST OF THE COMPANY AND ALL OUR STAKEHOLDERS. INTEGRITY, HONESTY, RELIABILITY, AND RESPECTFUL TREATMENT OF EMPLOYEES AND BUSINESS PARTNERS FORM THE BASIS OF OUR DAY-TO-DAY BUSINESS. BOTH OUR PERFORMANCE AND OUR VALUES ARE ESSENTIAL TO THE TRUST THAT OUR CUSTOMERS, PARTNERS, INVESTORS AND THE PUBLIC PLACE IN US AND THUS HELP US TO SUCCEED.

THIS CODE OF CONDUCT IS INTENDED TO COMMUNICATE OUR VALUES AND VISIONS AS WELL AS THE RESULTING BASIC RULES - IN A LEGAL AND ETHICAL SENSE - WHICH SHOULD BE SELF-EVIDENT FOR ALL OF US. OUR GOAL IS TO ENSURE THAT THESE VALUES AND RULES ARE OBSERVED, LIVED AND APPLIED IN YOUR DAILY WORK.

WE, THE EXECUTIVE MANAGEMENT TEAM OF GOLDINVEST, FULLY SUPPORT THIS CODE OF CONDUCT AND COMMIT TO THE VALUES AND VISION CONTAINED THEREIN THROUGH OUR SIGNATURE AND ACTIONS. WE EXPECT EMPLOYEES AND MANAGERS TO FOLLOW OUR EXAMPLE. WE ALSO ASK OUR BUSINESS PARTNERS TO ADOPT THE SAME HIGH STANDARDS OF CORPORATE RESPONSIBILITY AND COMPLIANCE.

Dipl. FW. Gernot Hinteregger

## The Code of Conduct of GOLDINVEST Edelmetalle GmbH at a glance:

(all gender-specific designations used in the following are understood to be in male, female and binary form)

- We conduct business ethically, with respect, appreciation, honesty, integrity, reliability and responsibility.
- We adhere to international standards regarding human and civil rights as well as labor and social law in the countries in which we operate.
- We consider a safe and healthy working environment to be a fundamental right of our employees.
- We are actively committed to environmental protection and sustainable corporate management.
- We stand for correct and fair business and do not tolerate any corrupt practices.
- Gifts and invitations may be an expression of appreciation and respect for business partners, but we will not tolerate any misuse for undue influence.
- We assume an appropriate share of social responsibility through donations or sponsorship, in the regions in which we operate.
- We clearly separate business and private interests and avoid conflicts of interest.
- We are committed to fair competition and business integrity in compliance with antitrust and competition law.
- We support the fight against criminal and terrorist activities and comply with all trade control regulations and requirements to prevent money laundering and terrorist financing.
- We respect the right to privacy and other data protection principles and process personal data only for legitimate and limited purposes.
- We respect and protect intellectual property, trade secrets and copyrights and use them only within the permitted terms of use.
- It is our duty to protect the Company and its resources from theft and fraud and to present a true and fair view in financial and other reports.
- We identify violations of laws and internal rules, including this Code of Conduct, and stop any misconduct.

# GOLD INVEST

## **1. The basic rules of ethical conduct**

Entrepreneurial activity affects the entire environment and therefore requires constant reflection on the ethically relevant fundamentals, which should go beyond compliance with legal requirements. We require our managers, employees as well as contractual partners to conduct our business with respect and appreciation, honesty, and integrity as well as reliability and responsibility.

Compliance with applicable laws in the countries in which we operate is not only a duty, but a matter of course. Goldinvest GmbH is committed to upholding international standards such as the principles of the UN Global Compact and the documents based on it, such as the ILO Declaration on Fundamental Rights at Work, the Rio Declaration on Environment and Development, the Convention against Corruption, or the United Nations Universal Declaration of Human Rights.

We expect the same from our business partners along the supply chain.

## **2. Human and labor rights**

At Goldinvest, we believe that full respect for human and civil rights must be the highest foundation of a society, but also in the corporate world. We strictly reject any form of human trafficking, forced or child labor, discrimination based on race, color, religion, gender, age, origin, nationality, disability, sexual orientation, or any other grounds, as well as any form of (sexual) harassment, insults, aggression, hurtful or improper behavior and do not tolerate such behavior under any circumstances.

We are committed to providing equal opportunity and fair treatment for all employees in all employment-related decisions such as hiring, promotion, training and development, compensation, and termination of employment. We comply with applicable labor and social laws, including recognition of the right to collective bargaining and freedom of association in accordance with local laws.

## **3. Safety in the workplace**

At Goldinvest, we view health and safety not only as a legal obligation, but also as an integral part of our corporate culture. Healthy, satisfied, motivated and committed employees are the most important resource for the long-term success of our company.

We have implemented comprehensive Health & Safety policies and procedures at the site, as well as regular checks and training. Compliance with these requirements is in the interests of our employees and is a matter of course for the company.

# GOLD INVEST

Our managers assume a special responsibility. However, please note: Each individual employee must bear his or her share of responsibility for implementing health and safety in the workplace.

Any accident or emergency at a site carries the risk of personal injury, environmental damage, or damage to private property, and can also affect the company's reputation, especially if not responded to appropriately.

Our management is responsible for responding appropriately and promptly to incidents in accordance with our global and local crisis and emergency procedures. They also ensure that all relevant persons are aware of these procedures and receive regular training.

## **4. Environmental protection**

Compliance with legal and other regulations and requirements for the protection of the environment is a matter of course for Goldinvest. We make great efforts to use energy and natural resources sparingly and pay special attention to the recycling of residual materials in the development of new - and the improvement of existing - products. We work exclusively with certified service providers and suppliers.

## **5. Bribery and corruption**

Goldinvest stands for correct and fair business practices and is successful solely due to the expertise of its employees and the quality of its products and services. It is therefore understood that we do not tolerate any form of bribery or corruption and comply with all applicable laws and regulations, including but not limited to the UK Bribery Act and the US Foreign Corrupt Practices Act.

Bribery is not limited to cash payments, but can take a variety of forms, such as transfers to dummy accounts or shell companies, payments of fictitious or inflated invoices, the granting of excessive discounts or commissions, valuable gifts and generous hospitality, free services or referrals for job offers.

All employees, agents, contractors, and other personnel working on behalf of Goldinvest are strictly prohibited from offering, promising or granting, directly or indirectly, any benefit for the purpose of obtaining any improper consideration. Similarly, it is prohibited to solicit or accept any benefit for oneself or for any third party for any improper consideration. Even the appearance of improper influence must be avoided.

The offense of bribery is not limited to politicians and government officials or certain countries, but also applies to business partners in the private sector and all countries worldwide, even if the bribe is not paid directly but through the intermediation of third parties.

# GOLD INVEST

This prohibition also includes so-called facilitation payments, even if these may be permissible in some jurisdictions. These are usually small amounts of money to expedite or ensure the performance of routine government work, such as the issuance of permits or authorizations, the processing of government documents such as visas or work permits, the provision of telephone services, electricity and water supply, police protection or similar acts.

## **6. Gifts and invitations**

As an expression of appreciation and respect for business partners, giving or accepting a gift of symbolic value or an invitation in a reasonable context of customary business hospitality may be perfectly acceptable and consistent with our corporate values.

Invitations and gifts of more than token value require approval in advance by the Compliance Office, regardless of whether they are given or accepted.

In many jurisdictions, strict rules apply to federal, regional, or local government officials or employees of public companies. In such cases, we ensure correct conduct in advance and refrain from granting any benefits in case of doubt.

In any case, invitations or gifts that could influence business decisions or official actions, for example the awarding of a contract or a government grant, that could be considered discriminatory or frivolous, or that otherwise leave the impression of dishonesty or dishonesty, are prohibited, regardless of whether they are actively granted or passively accepted

## **7. Donations and sponsoring**

Goldinvest is a family-run company with a tradition of well over 10 years. Goldinvest therefore considers it an obligation to assume its fair share of social responsibility within the regional communities in which we operate, through the voluntary support of humanitarian, cultural, sporting, and scientific institutions. Goldinvest is committed to this social engagement, which we consider part of our corporate culture.

Donations and sponsorships, as well as other voluntary contributions, must be made independently of our business activities without any connection between a business transaction and the beneficiary of donations or sponsorships.

Donations must be given voluntarily, altruistically and without any consideration. In contrast, sponsorship is given in return for the right to use the person or organization receiving sponsorship for marketing and public relations purposes. In both cases, the allocation of funds must be approved in advance and transparently documented in accordance with our internal regulations.

# GOLD INVEST

Grants to political organizations or individuals, government agencies and officials, or organizations that are inconsistent with Goldinvest's values are not permitted. Contributions that could be used to influence business or government decisions or otherwise violate applicable law are strictly prohibited.

## **8. Conflicts of Interest**

Every business decision we make, and the resulting actions must be in the best interest of the company and not influenced by our personal interests or relationships. Therefore, we avoid embarrassing situations from the outset.

Secondary employment is not permitted if it could create a conflict of interest or competitive situation with Goldinvest or could interfere with work performance at Goldinvest. This includes employment with another employer, self-employment, as well as voluntary and other unpaid activities.

Goldinvest employees are prohibited from operating their own business, directly or indirectly holding an interest, directorship, or management position in another company if that company has a business or competitive relationship with Goldinvest.

Relatives of members of Goldinvest's Advisory Board Management Teams may not be employed by Goldinvest. Relatives of employees may not be employed in an organizational framework in which a hierarchical or de facto dependency or subordination arises between the persons involved.

Exceptions to the above provisions may only be granted in exceptional situations and must be approved in advance by the external Compliance Office.

## **9. Antitrust and competition law**

National and international laws ensure that markets are subject to fair competition and that no market participant gains an unlawful advantage over competitors through agreements or understandings.

Goldinvest is committed to fair competition and conducting business with integrity. We comply with applicable antitrust and competition laws in all relevant areas such as sales and marketing, purchasing, production or research and development.

Any activities that are likely to reduce or eliminate competition are therefore strictly prohibited. This includes, but is not limited to:

# GOLD INVEST

Agreeing, colluding or exchanging information with competitors on prices, terms and conditions, production or distribution costs and quantities, sales strategies, sharing customers or markets, failing to offer products and services; making bogus offers; discriminating against customers or suppliers; obtaining knowledge through industrial espionage, theft, wiretapping or other unlawful activities; deliberately disseminating false information about competitors; fixing resale prices; and certain forms of exclusive arrangements with resellers.

## **10. Trade control regulations, prevention of money laundering and terrorist financing**

Many countries, as well as supranational institutions such as the United Nations and the European Union, have adopted laws and regulations to combat terrorism, human rights abuses, human and drug trafficking, organized crime, and money laundering. They impose numerous sanctions and embargoes on countries, organizations, companies and individuals, import and export restrictions on certain goods and technologies, and bans on certain services and financial transactions.

Goldinvest complies with all applicable regulations regarding trade controls and the prevention of money laundering and terrorist financing. To the best of our knowledge, we only maintain relationships with business partners whose funds come from reputable and legal sources and who do not support criminal or terrorist activities.

To fulfill our obligations, we apply defined processes to identify and assess our business partners and their legal backgrounds, and to determine whether certain transactions with them are permissible.

## **11. Data protection and privacy**

To enable our business processes and fulfill related obligations, Goldinvest must process not only business data, but also data relating to individuals, primarily our employees, but also other individuals with whom we work.

We respect the right to privacy and other data protection rights as set out in the EU General Data Protection Regulation (GDPR) and are committed to processing personal data lawfully, fairly, transparently and only for legitimate and limited purposes.

We comply with the provisions of the GDPR and all local data protection and privacy regulations. In particular, we ensure that the collection, processing and use of personal data is carried out only within the scope permitted by law and operationally necessary, and that such data is protected from unauthorized disclosure, use or modification.



# GOLD INVEST

This also requires that employees handle all information and IT systems conscientiously and carefully. Careless handling can cause considerable damage to our company, our employees or third parties.

## **12. Information security**

Information is a key success factor in day-to-day business and competition. The use of modern information systems enables efficient and professional work, but also entails risks for data security and privacy. Protecting personal and business data and ensuring the functionality and integrity of our information and communication systems are therefore top priorities.

All data and information created, stored, sent or received in connection with work for Goldinvest is the property of the Company and should not be considered private data or communications. All such data and information, both physical and electronic, must be marked and handled in accordance with our rules for the classification of information. Unless specifically designated otherwise, all information shall be considered for internal use only and shall not be disclosed to any third party. The confidentiality obligation continues to apply after termination of employment with Goldinvest.

Business partners, consultants and former employees of Goldinvest are considered external persons in this context and may not receive internal or confidential information. Should they need such information to perform their duties for Goldinvest, formal authorization and a confidentiality agreement must be obtained in accordance with our applicable policies and procedures before any information is provided to them.

## **13. Intellectual property**

Goldinvest and its employees respect and protect intellectual property and copyrights. We use these assets only within the Terms of Use and keep them confidential to ensure compliance with applicable laws and license terms. This also applies to information entrusted to Goldinvest by customers, suppliers or other business partners.

Goldinvest only permits software on its computers that has been approved by the Company and for which the Company has a proper license for commercial use. We do not condone the copying, downloading or distribution of software or other copyrighted material beyond the agreed scope. The use of so-called "freeware" or "shareware", i.e. programs and files that are available free of charge on the Internet, is generally not permitted.

Most information such as books, magazines, websites, music or video recordings etc. are generally also subject to copyright and are protected against unauthorized use. Unless express permission has been granted by the author, publisher or other legal rights holder, reproduction, distribution or electronic storage is prohibited.

## **14. Corporate resources**

All managers and employees have a duty to protect the company and its resources from internal and external threats, such as theft or fraud, and to ensure truthful representation in financial statements and other reports.

The use of company resources is intended for business tasks. Equipment, tools and other resources provided by the company are to be used prudently, carefully and cost effectively.

Goldinvest recognizes that employees may, on an exceptional basis, use equipment or communications media for personal purposes. This is generally tolerated provided that the use is limited in duration and scope, does not interfere with work performance, results in a significant burden or drain on core resources or a significant increase in costs to the company, and does not violate relevant company policies.

Goldinvest reserves the right to limit and/or monitor the use of work and communication equipment, including the use of computers, software, email, internet, instant messaging, text messaging, voice messaging, conferencing equipment, cell phones, office supplies, etc., in accordance with applicable laws and existing company agreements.

## **15. Internal and external communication**

Goldinvest requires honest and respectful behavior in all types of internal and external communications, regardless of the form or medium used. We do not tolerate offensive content, discriminatory or harassing text or images, derogatory references to age, disability, ethnic origin, marital status, nationality, color, religion, gender or sexual orientation, pornographic, criminal or terrorist content, political agitation or any other type of questionable content including chain letters, hoax emails or spam. This applies to personal interaction, all forms of written or electronic communication, as well as internet platforms and social media. Accessing websites with the above content on company-owned devices or communication lines is also not acceptable.

Representation of the Company to the outside world is reserved for management bodies and authorized functions, the Board, the Executive Management Team, Corporate Communications and Investor Relations. Publication of professional articles and speeches are generally permitted but must be reported to Corporate Communications if they are related to employment with Goldinvest.

All private activities of our employees, including but not limited to postings on social media, must be clearly separated from corporate activities and must not damage Goldinvest's reputation.

# GOLD INVEST

## **16. Scope and Implementation**

This Code of Conduct applies to all Goldinvest employees and managers worldwide, regardless of their hierarchical position or employment relationship.

It summarizes the essential basic rules of ethical conduct. Further details and specific rules that apply to all or only certain business units or geographical regions are supplemented by separate guidelines, process descriptions or sets of rules. These documents are binding and form an integral part of this Code of Conduct.

Failure to comply with this Code of Conduct or other internal policies may result in disciplinary or even legal action. Goldinvest does not tolerate any unlawful conduct and will punish any attempted violation in accordance with applicable labor laws. In addition, Goldinvest reserves the right to seek damages.

Although every Goldinvest employee is required to comply with the provisions of this Code of Conduct, a significant portion of the responsibility for compliance falls on our management and executives at all levels. It is one of their primary duties to guide and control their employees and team members in their day-to-day activities and to set a good example as role models.

To ensure the correct and consistent application of this Code of Conduct and compliance with all applicable laws and regulations at Goldinvest, the External Compliance Office and the External Audit Department conduct periodic assessments and identify potential for improvement.

It is in Goldinvest's interest to also inform our business partners (customers, suppliers, consultants, etc.), from whom we expect similar compliance standards, about this Code of Conduct.

## **17. Questions and assistance**

Sometimes there are situations in which it is not entirely clear at first glance whether a certain behavior or action is legally and ethically correct. Sometimes it requires precise clarification of the relevant conditions and accompanying circumstances. If you have any questions about the provisions of this Code of Conduct or are not sure whether your (planned) decisions, procedures or other activities comply with the provisions of this Code of Conduct, please contact your supervisor or ask the external Compliance Office or the internal Legal Department for advice.

## 18. Reports and complaints -the Goldinvest Compliance Helpline

Unethical conduct is not a trivial offense. If you know of or suspect a serious violation of laws and regulations, this Code of Conduct or other policies, report the incident. Do not stand by and look the other way!

As a rule, questions, suggestions, problems, and complaints can and should be resolved first with your immediate supervisor. However, sometimes this may not be effective, or you may be uncomfortable addressing concerns personally. If you identify ethical misconduct, report it immediately. Goldinvest employees are required to report serious cases to the internal Compliance Office.

The Goldinvest Compliance Officer allows you to report suspected misconduct and seek advice at any time, regardless of where you are located. The Compliance Officer can be reached at [compliance@goldinvest.at](mailto:compliance@goldinvest.at) and guarantees full anonymity if you so wish.

When reporting an incident, describe the relevant facts and all relevant surrounding circumstances as clearly and precisely as possible. The more information we receive, the better and faster we can respond and help with reliable and practical advice. All information you provide will be treated confidentially and carefully evaluated. We ask for your understanding that we cannot respond to reports without sufficient information. Please also note that frivolous reports or false accusations against others are not only unethical but may also be punishable by law and cause lasting damage. Such behavior is not permissible and is a serious misuse of the Compliance Helpline.

Imprint:

Media owner and publisher: Goldinvest Edelmetalle GmbH, Seilerstätte 15, 1010 Vienna, Austria Producer: Goldinvest - 01 / 2022- 10-DE, Publication and production: Vienna, Austria.

Copyright Notice:

The text, images and graphics in this publication are protected by copyright. Unless otherwise stated, the corresponding rights of use, in particular the reproduction, distribution and editing rights, are held exclusively by Goldinvest. This publication is for personal information purposes only. Any use beyond this, in particular reproduction, editing or commercial use is subject to prior written approval by Goldinvest.