

Code of Conduct

version 5.2 dated May 2017



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Introduction

Edelmetaal Waarborg Nederland b.v. (Assay Office EWN, hereinafter: EWN) was designated by the Minister of Economic Affairs and Climate Policy on 11 March 2002 as a legal entity within the meaning of the Dutch Assay Act (Waarborgwet). The purpose of this law is to protect entrepreneurs against unfair competition and at the same time protect the consumer against fraud with respect to the content of precious metal in ornamental and utility articles.

The law stipulates that all ornamental and utility articles fabricated in, or imported into the Netherlands, and destined for the Dutch market for sale as platinum, gold and silver, must be submitted for testing and stamping at one of the designated assay offices charged with this task. When the submitted products contain levels of precious metal that comply with the legal requirements, then the assay office will stamp these products with the corresponding hallmarks.

EWN aims to distinguish itself and act as an independent expert assay office that is capable of serving its customers quickly and competently.

In order to assure the legislator and clientele that EWN is able to meet the highest quality requirements, EWN has a quality management system that adheres to the NEN-EN-ISO/IEC 17025 (registration number RvA scope L395) and NEN-EN-ISO/IEC 17020 (registration number RvA scope I310) standards. The procedures that are safeguarded by means of the quality management system are assessed annually by the Dutch Accreditation Council.

EWN considers it of the utmost importance that the integrity of the organisation and its employees are not called into question under any circumstances. Furthermore, EWN has an additional responsibility now that it is partly charged with implementing the Dutch Assay Act on behalf of the Minister of Economic Affairs and Climate Policy. The latter may not be brought into disrepute through the actions of EWN or its employees.

For EWN, drawing up and upholding a code of conduct is inextricably linked to the quality management system.

Codes of conduct are living documents nowadays given that the world around us is constantly in motion.

This is why EWN works continuously on adapting the quality system (and the code of conduct that forms part of it) to actual practice.

1 Guide for working professionally

EWN finds it extremely important that the integrity of the organisation and its employees are never called into question. Furthermore, EWN has an additional responsibility where honourable behaviour and integrity is concerned, now that the company has been entrusted by the Minister of Economic Affairs and Climate Policy with the testing and stamping of platinum, gold and silverware submitted to EWN under the terms of the Dutch Assay Act.

EWN and its employees are obligated to comply with the requirements and guidelines set by the legislator. In the quality management system adhered to by EWN, the formal requirements and guidelines are outlined which the legislator, the client as well as the company's own management impose across the entire business operations. Procedures and authorisations are laid down in the quality management handbook.

In addition to working according to the laws and regulations and the requirements set by management, the in-house code of conduct is an important contribution to raising the profile of EWN as a trustworthy hallmarking partner.

By establishing a clear code of conduct, EWN aims to provide both its employees and external parties with insight into the way in which the integrity of EWN is safeguarded.

The code of conduct should be known to every employee and is the guiding principle for working professionally. Every employee bears their own responsibility in this respect.

Laws and regulations, and business operations can be found in the quality management system. Standards and values as well as integrity are mentioned in the code of conduct.

2 The core values of EWN

2.1 Independence

Independence: judgements are reached in a reproducible, objective way without being prone to influence, irrespective of the subject of the judgement. Moreover, when reaching a judgement, there is no question of any relationship(s) and/or balance of power concerning other individuals and/or organisations that could influence how the judgement is reached.

The employees of EWN are objective with regard to their work and activities and carry these out in all openness and honesty. They are not hampered by commercial or personal interests and act objectively and impartially. They will perform their tasks and work activities in such a way that when taking a decision, this is primarily focused on the facts and they will not be influenced by their own feelings or preconceptions.

In order to retain its independent nature, EWN has laid down in its statutes that stakeholders in the activities carried out by EWN are excluded from acquiring shares. A register of shareholders is kept.

Preventive and remedial measures have been taken to avoid any external and/or internal pressure on employees. For example, the remuneration of employees is based on an objective assessment and evaluation of their position; this is independent of the number of audits carried out, or the outcome

of these. This is to prevent any external influence by, for example, a client who wants to exert influence on the quality and independence of the work activities. Furthermore, employees have the opportunity to lodge an objection to their manager concerning the handling of an assignment on account of the estimated risks.

Employees are aware of these measures and should at all times take the independent character of EWN, and their own role therein, into account when carrying out their duties. Moreover, employees are also expected to decline any activities that are not in line with the independent character of EWN.

2.2 Impartiality

Impartiality: there is no mixing of improper interests, personal interests, preferences, affinities and/or prejudices when reaching a judgement, also every appearance of any such mixing is avoided.

EWN employees are fully aware of their own responsibility with regard to the impartiality of EWN and take the utmost care to uphold this impartiality. While carrying out their duties, they shall not be impeded by interests that are incompatible with the integrity and objectivity that is required.

Employees shall not accept gifts or services that influence the impartiality or that are out of proportion to regular social etiquette. Nor shall they offer concerned parties any gifts or services that may affect the relationship with that party.

2.3 Confidentiality

Confidentiality: information, which is not publicly known or only to a limited extent, shall not be disclosed - in any way whatsoever - other than to the authorised persons and organisations within these constraints. Knowledge and information, which is available by virtue of the position and/or performance of the position, will only be used for the purposes for which they are provided.

The nature of EWN's activities is such that employees (may) regularly have access to confidential information. Parties concerned can be assured that this information will not be used other than for directly carrying out their tasks and activities and that this information will not be disclosed or forwarded to third parties. This concerns all information that employees collect or obtain over the course of their duties and will remain in force even after completion of the work activities or the termination of the relationship with the party concerned.

Everyone who works at EWN is obligated to maintain confidentiality of what they learn in their position and of which they can surmise that confidentiality is essential in accordance with the regulation on employment conditions. In addition to this, a confidentiality declaration forms part of the signed employment agreement.

2.4 Conflicts of Interest

Conflict of interest: allowing other interests - of whatever nature and capacity - to prevail over the interests of EWN.

Conflicts of interest usually affect the ability of an employee to arrive at an objective judgement. EWN is constantly checking whether there is a potential conflict of interest and if this might

jeopardise the objectivity. EWN will do everything in its power to prevent a conflict of interest relating to any concerned parties or relating to our activities. EWN employees who have a relationship with existing and/or new customers are under obligation to report this to the management of EWN.

Employees of EWN are allowed to take on an ancillary position only if it does not conflict with their professional obligations at EWN. Prior approval by the management is required before accepting a paid or unpaid ancillary position.

2.5 Trustworthiness

Trustworthiness: expectations and requirements concerning the performance of tasks and duties should not be compromised. This relates to behaviour as well as to the results of work carried out.

People must be able to count on an EWN employee. When carrying out their work activities, employees shall abide by agreements with external parties as well as those within EWN. Knowledge and information that employees have at their disposal on account of their position shall be used only for the purposes for which they were provided. The confidential handling of sensitive information safeguards the trustworthiness and credibility of EWN.

Parties can rest assured that EWN takes complaints seriously. This concerns both complaints relating to matters which have been submitted to our oversight and complaints arising from our own actions.

2.6 Irreproachable conduct

Irreproachable conduct: behaving in a proper way, meaning that an individual is not culpable – and has never been culpable – of conduct in violation of societal standards and values and of conduct not in keeping with the prevailing codes of conduct.

Employees of EWN are well aware that their behaviour, also outside of working hours and in private situations, can have a direct influence on their objectivity and professionalism and consequently on the integrity of EWN. Inappropriate and offensive behaviour can lead to disciplinary measures with ultimately dismissal as the gravest measure.

2.7 Due diligence

Due diligence: acting with the commitment and accuracy required for the proper performance of the assigned task and carrying out of their duties.

The actions of an employee are such that the views and interests of all parties concerned are treated in an equal and respectful manner, and that the interests of parties are weighed up in an appropriate manner.

At all times, EWN aspires to the highest attainable level of quality in its work activities, with an eye for objectivity and integrity. EWN is meticulous in its handling of technical and administrative processes, both towards the outside world and within the organisation.

The work instructions and procedures drawn up by EWN serve as a guideline in this respect. Situations that are not adequately covered by the work instructions or procedures are brought to the attention of the line manager.

2.8 Use of resources

Use of resources: resources that have been made available by EWN will be used in such a way that these resources can be used at all times for carrying out the task.

Employees can make use of resources provided by EWN (such as vehicles, telephone, computer, etc.). These resources have been made available by EWN in order to enable or simplify the assigned work activities and should primarily be used for these purposes.

It is permitted to make limited use of these resources for private purposes, within reason and in accordance with the rules of the code of conduct. In doing so, employees are required to comply with the rules governing the private use of these resources.

2.9 Responsibility

Responsibility: the obligation to ensure that the tasks and obligations that directly or indirectly form part of the job are carried out and completed properly and to account for this. This also means 'willingness to be held accountable'.

The conduct of EWN's employees is transparent, so that optimal accountability is assured and supervisory bodies have full insight into the conduct of EWN and the reasoning behind its actions.

Within EWN, everyone is aware of their responsibility within the scope of their own position. The employee supports the responsibilities that the manager has by informing him/her where necessary.

Employees are well aware of their own behaviour and take the utmost care that their behaviour will not in any way harm the reputation of EWN. They shall refrain from behaviour that could bring EWN into disrepute.

2.10 Being of service

Being of service: conduct is always and wholly centred on the interests of all concerned authorities, organisations, persons and EWN, as much as this is possible within reason and that can and may be expected from the employee.

EWN strives for the highest attainable level of quality when carrying out its work activities. This also applies to dealings and communications with external parties.

Employees of EWN demonstrate their awareness of the views and traits of others and respect these as much as possible. They treat others with the respect that they themselves would like to be treated with. They take complaints seriously and work in a service-oriented manner.

Employees should deal and communicate with external parties in a professional manner. The guiding principle in this are the legislation and regulations that govern the activities of EWN.

2.11 Professionalism

Professionalism: the (continued) compliance with the requirements and justified expectations that are set for the method of professional practice, notably concerning the continued development of knowledge and skills.

Employees of EWN possess the right level of expertise needed for the performance of their duties. At the same time, they keep their professional knowledge, competences and skills up to date. This way, concerned parties can count on a professional provision of services based on the latest developments in areas of the law and regulations as well as technology. EWN also supports its employees in keeping their knowledge up to date so that they are able to continue to develop themselves as professionals.

2.12 Collegiality

Collegiality: working together to create a positive and conducive atmosphere, where colleagues are treated in a positive and correct manner.

Within the organisation, EWN promotes a positive work climate where everyone is able to feel safe. This means, for example, that EWN does not offer room for discrimination in any form whatsoever or for other forms of undesirable behaviour such as bullying, intimidation or ignoring others.

EWN employees are open to the views and assessments of their colleagues and treat each other with respect. They can be spoken to about their behaviour and endeavour to address issues from a positive angle.

The management in particular fulfils an exemplary role within the organisation. The management encourages the professional development of the other employees and deals with differences of opinion in a professional manner.

2.13 Quality

Quality: fulfilling the explicit and implicit predefined requirements for services, products and assignment results.

EWN strives for the highest attainable level of quality in its work activities. The quality requirements are stipulated in the quality handbook and in the respective laws and regulations. EWN strives at all times to achieve a high level of quality for both the entire organisation and in all its services to external parties.

The EWN quality management handbook is available for consultation at the office of the quality officer. Employees are expected to be at least familiar with the aspects that are important for carrying out their duties. The requirements of the NEN-EN-ISO/IEC 17025 and NEN-EN-ISO/IEC 17020 standards form the foundation for the quality management system and its description. The quality of the work activities and business operations are assessed annually by the Dutch Accreditation Council.

Date

Name

Signature