

# **Corporate Social Responsibility Policy**

Cooksongold is the UK's largest manufacturer and retailer of bullion products, tools, equipment, and accessories to jewellery making industry. Cooksongold also purchases precious metal scrap for refining and has stores in Birmingham and London. This policy confirms Cooksongold's commitment to respect human rights, refrain from actions which contribute to the finance of conflict, and to comply with relevant United Nations sanctions, resolutions and laws implementing such resolutions.

Cooksongold is a Member of the Responsible Jewellery Council (RJC). The RJC is a standards-setting organisation that has been established to reinforce consumer confidence in the jewellery industry by promoting responsible ethical, human rights, social and environmental practices throughout the jewellery supply chain. The RJC and its Members are opposed to activities which directly or indirectly finance, benefit or facilitate armed conflict, extreme violence, and human rights abuses.

The RJC supports the UN Global Compact and has two standards platforms which provide the mechanism for RJC Members to support these commitments:

- <u>RJC Principles and Code of Practices</u>: RJC Certified Member conforms to the RJC Code of Practices, the RJC's standard for responsible business practices.
- <u>RJC Chain-of-Custody standard</u>: CoC Certified Entity has verified systems in place for custody and/or supply of responsibly sourced Jewellery Materials.

As an RJC Certified Member, we commit to and have independent third-party verification that we:

- Respect human rights according to the Universal Declaration of Human Rights and International Labour Organisation Fundamental Rights at Work.
- Do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism.
- Support transparency of government payments and rights-compatible security forces in the extractives industry.
- Do not provide direct or indirect support to illegal armed groups.
- Establish processes through which stakeholders can raise concerns about the jewellery supply chain.

In addition to our own commitment, we use our influence to prevent abuses being committed by others.

## Regarding serious abuses associated with the extraction, transport, or trade of gold:

- 1. We will neither tolerate nor profit from, contribute to, assist, or facilitate the commission of:
- Torture, cruel, inhuman and degrading treatment;
- Forced or compulsory labour;
- Any form of abusive child labour;
- Human rights violations and abuses;
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.
- 2. We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable risk that they are committing or are sourcing from or linked to any party committing, abuses described in paragraph 1.

Issue 3 – 07/02/2024 1/3

#### Regarding direct or indirect support to non-state armed groups:

- 3. We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring gold from, making payments to, or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally:
- control mine sites, transportation routes, points where gold is traded and upstream actors in the supply chain; and/or
- tax or extort money or gold at mine sites, along transportation routes or at points where gold is traded, or from intermediaries, export companies or international traders.
- 4. We will not deal with, and will immediately 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 non-state armed groups as described in paragraph 3.

#### Regarding public or private security forces:

5. We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment, and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 1, or that act illegally as described in paragraph 3.

## Regarding bribery and fraudulent misrepresentation of the origin of gold:

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

# Regarding money laundering:

7. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport, or export of gold.

## Compliance to existing legislation:

8. We pledge to respect the laws, regulations, common and special legislation concerning the trading and processing of precious metals applying the principles of Know Your Counterparty (KYC) in particular:

# VAT fraud

Due to their value, precious metals are often a target for VAT fraud. We are committed in a very precise and detailed manner to:

- . Obey the current VAT legislation and support authorities in the fight against VAT fraud.
- . Categorically denounce smuggling, embezzlement, fraud, and racketeering.

## Prevention against money laundering

We take appropriate measures to prevent money laundering activities associated with the sale of precious metals. We support the authorities in their fight against money laundering.

#### Corruption

We reject any attempted bribery and facilitation payments in whatever form they arise; we commit to support employees who could face any attempt of corruption.

Issue 3 – 07/02/2024 2/3

#### Minerals from conflict zones

We take appropriate measures to prevent the financing of terrorist activities related to the precious metals sector of our business.

#### Conflicts of interest

The employees, officers and directors must be loyal to the company's polices and shall not use their position to gain personal advantage or to encourage others in the detriment of the Group. Personal interests that are in conflict or appear to be in conflict with the interests of the Group or have a negative impact on the performance of individuals must be systematically avoided.

#### Our ethical business practices

Ensure compliance with the KIMBERLEY PROCESS regarding the purchase and sale of diamonds.

Never divulge or exploit confidential information about the Group or its partners.

Never solicit or accept money for personal benefit from any business partner or competitor.

Never accept from any business associate or competitor, gifts, services, or anything in kind, if it has a negative influence on the performance of the Group, or if these gifts, or other services are seen to be excessive.

# Quality, Environmental and Health & Safety:

9. Our integrated Quality, Environmental and Health & Safety Management System is UKAS certified to ISO9001, ISO14001 and ISO45001 and forms the framework for achieving continual improvement, complete customer satisfaction, protection of the environment and the health & safety of all individuals along with full realisation of all company objectives. Refer to the QuEnSH Policy.

## **Counterparty Compliance:**

10. We will not tolerate any violation in any case of the above-mentioned ethical guidelines. We will immediately suspend or discontinue engagement with any trading partner which are not compliant with this policy even in cases where we identify a yet unproven but reasonable risk that the trading partner might violate at least one of the above-mentioned clauses.

Signed:

Paul Cooper Managing Director Date: 7<sup>th</sup> February 2024

Issue 3 – 07/02/2024 3/3