

CODE OF CONDUCT

PREAMBLE

We as ADMEDES GmbH acknowledge our social, environmental and economical responsibility. This Code of Conduct does justice to the outstanding role and to the special responsibility we have as a German producer and manufacturer of valuable key elements in a globalized world.

AREA OF APPLICATION

This Code of Conduct applies to all subsidiaries worldwide. As a company group we commit ourselves to promote this Code of Conduct among our suppliers as well as our customers – if possible.

A. BASIC PRINCIPLES OF BUSINESS ETHICS

ADMEDES GmbH economical and social activities are therefore conducted in accordance with generally recognized ethical and humanitarian principles.,

Our activities and our products contribute to prosperity, while at the same time adverse impacts on future generations have to be avoided or at least to be kept to an absolute minimum. Fundamental human rights, cultures and customs must be respected and strictly observed – regarding the employees and those who are affected by the activities of the ADMEDES GmbH.

1. HARD LABOR, CHILD LABOR AND EXPLOITATION

We as ADMEDES GmbH support the protection and preservation of human rights. The use of forced labor, child labor and all forms of exploitation and inhumanity will be outlawed.

2. DISCRIMINATION

The ADMEDES GmbH does not tolerate discrimination based on race, gender, ethnic or social origins, religion, age, disabilities or sexual orientation. We commit to protect our employees from physical, psychological, sexual or verbal harassment and to punish such occurrences.

3. FREEDOM OF SPEECH

The right to freedom of opinion and expression is granted and protected.

B. COMPLIANCE WITH EXISTING LEGISLATION

The ADMEDES GmbH commits to obey general laws and regulations as well as specific laws that protect fair competition and to support their further development.

1. VAT FRAUD

Due to their high value precious metals the G.RAU Company Group presents a constant target to VAT fraud by delivering secondary raw material to the refineries.

The ADMEDES GmbH feels particularly committed to obey the current VAT laws and to support the authorities in their fight against VAT fraud.

2. PREVENTION AGAINST MONEY LAUNDERING

The ADMEDES GmbH takes appropriate measures to prevent money laundering activities in connection with the precious metals business in advance. The authorities will be supported in their fight against money laundering.

3. CORRUPTION

The ADMEDES GmbH takes appropriate measures to stop corruption.

4. CONFLICT MINERALS

On the part of ADMEDES GmbH appropriate measures are taken to prevent financing of terrorist activities in connection with the precious metals business. These measures include the support of international activities to find out the facts about the origin of minerals from the Democratic Republic of Congo (DRC) and adjoining countries. The goal is to prevent that minerals from DRC and adjoining countries and their export may contribute to financing terrorism and armed conflicts.

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C. SUSTAINABILITY

The ADMEDES GmbH produces unique high-valued products which are of vital importance for modern life. These products are key-elements for innovation and technical progress, for environmental protection and for energy-saving. The ADMEDES GmbH bases all its entrepreneurial actions on the principles of sustainability.

1. RESOURCES

The ADMEDES GmbH ensures through continuous innovation, that the production processes always correspond to the current technical standards and therefore environmental impact is kept as low as possible.

At the same time we look for continuous improvements which make it possible to keep the specific amount of resources in products as low as possible while maintaining the performance.

2. Environmental protection and health care

The ADMEDES GmbH obeys the rules in the environmental and health care sector. We pay special attention to the environment and health care of our employees.

3. Energy Saving

The ADMEDES GmbH is in compliance with all the energy policy regulations

Energy consumption as well as energy efficiency constitute considerable criteria in the procurement of energy services, products, facilities and energy.

4. Social Responsibility

The ADMEDES GmbH contributes to economic growth and prosperity. We provide employment in the supply industry. In some regions the precious metals industry is the main source of income. We are fully aware of our responsibility and we particularly declare our support to secure these jobs. The ADMEDES GmbH also contributes to social progress, for example by supporting non-profit projects.

D. Implementation and enforcement

The ADMEDES GmbH shall take appropriate and proportionate efforts to continually implement and apply the principles and values set out in this CoC.



Dr. Axel Pfrommer
CEO & President



Dipl.-Kfm. Frank Nauheimer
CFO



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