

Grievances and Whistleblowing Policy

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1 Principles

Valcambi is committed to conducting business in accordance with the law and the highest ethical standards. In line with our [Values and Code of Conduct](#), the implementation of this policy further supports the following principles:

- We ensure that grievances and complaints will be addressed in a timely, transparent, accessible and equitable manner.
- We ensure fair and objective investigation of founded grievances and complaints, based on facts or reliable evidence.
- The grievances and whistleblowing policy is rights-compatible¹ and forms part of engagement and ongoing dialogue with our internal and external stakeholders in the spirit of continuous improvement.
- We will make every effort to ensure that the whistleblower and all interested parties will be protected against any reprisal, discrimination or other adverse employment consequences - excluding compliance to law and disciplinary rules.
- All interested parties are encouraged to voice concerns to Valcambi regarding misconduct, wrongdoing or any identified risk within the gold supply chain at the earliest opportunity with a view to them being fully investigated by the appropriate authority.

2 Objective

The purpose of this Policy is to provide a transparent framework for the process of receiving, investigating and responding to grievances in order to promote mutual confidence and trust with all interested parties (affected persons or whistle-blowers).

3 Normative References

The following documents are incorporated by reference into and form part of the grievances and whistleblowing policy:

- Valcambi Code of Conduct
- Valcambi Precious Metal Supply Chain Policy.

4 Definitions

Interested parties: affected persons and/or whistle-blowers.

Affected person: An affected person consists of any individual, group of individuals or community.

Complaints: relatively minor concerns, negative comments or expressions of discontent raised with regard to the company or the activities and impacts of its contractors.

Grievances: formal and serious concerns and allegations brought forward by any interested party, who alleges damage, impact or dissatisfaction as a result of the company's activities and impacts. The grievance entails the expectation of a response or a corrective action.

Grievances and whistleblowing mechanisms: the interrelated processes that support implementation of this policy, such as receiving, investigating and responding to a grievance or complaint.

Whistle-blower: any collaborator, contractor, customer, and/or third-party that raises complaints and/or grievances related to the company or its contractor's activities and impacts²

¹ The principles for a rights-compatible grievance mechanism are: Legitimate and trusted, Publicised and accessible, Transparent, Based on engagement and dialogue, Predictable in terms of process, Fair and empowering and A source of continuous learning. For guidance on each of the principles, please see ["Right-Compatible Grievance Mechanisms. A guidance tool for companies and their stakeholders"](#) (p7)

² The definition follows the *OECD Due Diligence Guidance – Supplement on Gold*. Whistle-blowers refers to individuals, interested parties that are not necessarily affected persons. In Whistleblowing Procedures the definition usually refers only to internal stakeholders. In Whistleblowing and Grievances Policy, the definition includes third parties.

5 Scope

5.1 This Policy applies to collective and individual complaints and grievances. Any complaint or grievance raised by any interested party can be considered, including both external and internal allegations.

5.2 This Policy encourages reporting of abuses, risks and behaviours that do not comply with any law or Company Regulations³ including, but not limited to, the following types of complaints:

- Corruption, fraud, bribery
- Damage to property, theft
- Employee misconduct and labour practices
- Health and safety; working conditions
- Environmental risks and impacts
- Security of people, precious metals, property
- Compliance and legal affairs
- Human rights violations

5.3 The following concerns are not covered under this Policy: unevicenced complaints; business and financial decisions that do not involve wrongdoing or illegality; any matter already addressed pursuant to disciplinary or other Valcambi procedures; career-related or other personal grievances; or solicitation of sensitive information for ulterior purposes.

5.4 Frivolous grievances will not be investigated. Only evidenced grievances and complaints will be investigated. Evidence and detailed information must be provided, including at least: name of impacted person and/or organisation, description of facts, witnesses, date, time, location of relevant events. Messages without these details will not be considered. The name of the reporting person need not be reported if they feel anonymity is necessary for privacy or protection.

6 Accountability and responsibility

6.1 Valcambi encourages achieving solutions through appropriate normative methods (as described in Chapter 6.2 below) prior to the use of formal grievance and whistleblowing processes in order to achieve a mutually acceptable resolution.

6.2 Internal grievances and complaints shall be reported first to the manager following the hierarchal report. Should the individual or group not find it possible or appropriate to contact his/her managers, complaints can be registered via e-mail (compliance@valcambi.com) or paper mail, writing to Valcambi's Human Resources Department c/o the Human Resources Development Manager. Any communication will be handled in confidence by a trained and dedicated HR individual.

6.3 The whistleblower may make the disclosure in writing, verbally, or via electronic means of communication. The dedicated mailbox compliance@valcambi.com is available to any of the interested parties (affected persons and whistle-blowers) to register grievances and complaints. Telephone calls should be made to the Valcambi Human Resources Development Manager phone line: +41 (0)91 695 5337. Paper disclosures may be posted to Valcambi sa ATTN: Human Resources Manager. Via Passeggiata, 3. CH-6828, Balerna, Switzerland.

³ Including Valcambi's Whistleblowing Programme, Code of Conduct, Valcambi Policies, and other relevant procedures.

6.4 A Human Resources manager is responsible for monitoring and assessing all incoming communications and of keeping Senior Management informed about every relevant newly identified risk and concern.

6.5 According to the nature of the complaint, a department/responsible member of Senior Management will be assigned to determine an appropriate action plan for its resolution and for the engagement process with the interested parties. Assignments will be made according to the type of complaint as follows:

- Customers (referred to commercial issues): Sales Officer and/or Communication Officer
- Customers (referred to sourcing issues): Sales Officer and Compliance Officer and/or Communication Officer
- Civil society and NGOs: Communication Officer and Compliance Officer and CEO
- Certification bodies: AMS Manager
- Authorities/Associations: CEO (or CFO/COO on his behalf)
- Internal stakeholders: HR/AMS/CEO/Heads of Departments.

6.6 Milestones in the complaint/grievance process will be communicated to the individual or group as follows:

6.6.1 Receipt of complaint/grievance: within two weeks of registration of a complaint or grievance, an initial response will acknowledge the receipt and explain the process to be followed, indicating a timeframe within which the interested parties can expect the complaint/grievance to be analysed.

6.6.2 Analysis of complaint/grievance: within the same timeframe the complaint or grievance will be assessed for being within the scope of this Policy, considering the type of complaint/grievance, and for whether it is founded/not founded on evidence. Valcambi will use best endeavours to inform individual or group of the expected timeframe for considering the complaint/grievance and where possible, its resolution.

6.6.3 Closure or resolution of complaint/grievance: feedback on the outcome and any updates on the timeframe for resolution of the complaint/grievance will be provided to all interested parties.

6.7 Valcambi will ensure that all communications and acceptance or non-acceptance of responses are recorded in a unique case folder and tracked through its resolution. Information to be recorded to include: number, assigned officer, registration date, status: under investigation, open (founded), rejected (unfounded), closed (founded).

7 External References

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and the Supplement on Gold, 2013.
- LBMA Responsible Gold Guidance, 2015.
- The World Gold Council Conflict Free Gold Standard, 2012
- UN Guiding Principles on Business and Human Rights, 2011
- The Conflict-Free Sourcing Initiative: Five Practical Steps to Support SEC Conflict Minerals Disclosure, 2015.
- Responsible Jewellery Council – Standards Guidance, 2013.

8 Incident report guidance

Any collaborator, contractor, customer, and/or third-party wishing to raise any complaint and/or grievances related to the activities or impacts of the company or its contractors shall conform to this reporting guidance.

This guidance provides additional information on how to report the incident to facilitate its resolution. Complaints or grievances without this information are difficult to process which may result in the complaint/grievance not being resolved or remediated. It is therefore incumbent upon whistle-blowers and other complainants to provide as much information as possible.

8.1 Types of risks that can be reported

This guidance is particularly useful for stakeholders on the ground who want to inform Valcambi of risks and behaviours that do not comply with the law or Company Regulations⁴ including, but not limited to, the type of complaints listed in 5.2.

8.2 Anonymity

The name of the reporting person does not need to be reported if it is felt that anonymity is necessary for privacy or protection. However, a minimum level of information and evidence would be required to substantiate the claim.

8.3 Evidence

Evidence and detailed information must be provided whenever possible, including at least:

- name of affected person, community and/or organisation
- description of facts,
- witnesses,
- date,
- time,
- location of relevant events
- identity of buyers of minerals from the stated location (if known)

Without the above information, it may be difficult to establish any link between Valcambi and the incident. We encourage any stakeholder to provide as much information as possible.

⁴ Including Valcambi's Grievance and Whistleblowing Policy, the Supply Chain Policy for Responsible Global Supply Chain of Precious Minerals and any relevant Valcambi procedures.

8.4 Stakeholders informed

Information should be provided in relation to which actors, beyond Valcambi, have been informed about the incident.

Select relevant actor/s	Provide email address, phone number and physical address or any of these	Provide information on what response you received from the actor
<input type="checkbox"/> Local authority		
<input type="checkbox"/> Provincial authority		
<input type="checkbox"/> National authority		
<input type="checkbox"/> Ministry / Department		
<input type="checkbox"/> Local civil society organisation/NGO		
<input type="checkbox"/> International civil society organisation/NGO		
<input type="checkbox"/> International Organisation		
<input type="checkbox"/> Police or antifraud brigades		
<input type="checkbox"/> Prosecutors		
<input type="checkbox"/> Lawyers		
<input type="checkbox"/> Member of parliament		
<input type="checkbox"/> Media		
<input type="checkbox"/> Other (please specify)		

This information can help Valcambi use its influence to ensure that remediation takes place and that victims are protected and compensated.

8.5 NGO reports

If you represent civil society and you have produced a report that could inform us of incidents occurring in our supply chain, please make sure you:

- **Provide a clear research methodology** indicating: where you carried out the research (precise location), people interviewed (anonymous or otherwise), the researcher's educational background and professional experience.
- **Use clear and accurate referencing:** cite all sources (individual, radio, reports, media, documents, other) with precise dates (and times where appropriate)
- **Ensure diversity of your sources to back up your allegations** - even if you decide to protect your sources, use a coding system to refer to them (this will help demonstrate the diversity of stakeholders interviewed and that you are not relying on just a few sources)
- **Include victim perspectives where possible and protect vulnerable interviewees**
- **Provide information that can help us establish a link with the actors in the supply chain:** for example, if the incident took place on a mine site, who were the trader and exporters buying from the miners? Are they members of a cooperative? If yes, which one?