

Italrecycling & Investment S.R.L. joined the RJC in 2022 within the precious metals trader, refiner and/or hedger forum. This is their first certification, based on an audit conducted on 13<sup>th</sup> February 2023. The below summary of audit findings complements the Member’s current RJC certificate **No 0000 4715**.

### Audit objective, activities, and methodology

The objective of the audit was to review the member’s systems and processes to establish whether they conform to the RJC Code of Practices (COP) 2019. The audit activities included planning, conducting the audit and reporting on conformance, including corrective actions approval, as per the RJC Assessment Manual. The audit consisted of collecting / sampling and reviewing objective evidence including documentation, management and employee interviews, facility walk-through, and other observations, in relation to at least the previous 12 months.

The auditors confirm that:

- The information provided by the member is true and accurate to the best knowledge of the auditor(s) preparing the report.
- The findings are based on verified objective evidence relevant to the time period for the audit, traceable and unambiguous.
- The audit scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the member’s defined certification scope.
- The auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

### Description of Member Company

Italrecycling & Investment S.R.L was established in 2019. Its primary activity is the production and processing of precious metals, namely gold, silver, platinum, palladium and rhodium. Precious metal recovery and refining activities are carried out from waste and ingots, especially from gold and plating companies. The member also carries out precious metal trader activities for professional gold operators, goldsmith and silverware production companies.

<b>No of sites visited:</b> 2	<b>Country/Countries:</b> Italy
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### Noteworthy achievements

- The member is certified to ISO 14001:2015 (Environmental Management System).
- The member is certified to RJC Chain of Custody (CoC).

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
GENERAL REQUIREMENTS		
1.1 Legal Compliance	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - Member is aware of applicable supra-national, national, state and local laws in place of business operation and those related to implementation of all applicable COP provisions. Efforts/Practice – Member has an efficient management process to maintain awareness and ensure compliance with applicable laws, including laws for the implementation of COP provisions.

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REGISTERED IN ENGLAND AND WALES WITH COMPANY NUMBER 05449042.

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		Results/Outcomes - Member is up to date with applicable laws.
2.1 Policy and Implementation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are relevant and comprehensive written policies addressing responsible business practices. There are overarching policies (e.g. Corporate Social Responsibility) and/or specific policies (e.g. Health and Safety or Modern Slavery) in place. Efforts/Practice - The policies on responsible business practices are endorsed by senior management, regularly reviewed and communicated both internally and externally. Results/Outcomes - There is an efficient process in place.
2.2 Policy and Implementation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are relevant and comprehensive written policies addressing responsible business practices. There are overarching policies (e.g. Corporate Social Sustainability) and/or specific policies (e.g. Health and Safety, Modern Slavery) in place. Efforts/Practice - The policies on responsible business practices are endorsed by senior management, regularly reviewed and communicated both internally and externally. Results/Outcomes - There is an efficient process in place.
3.1 Reporting	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There is a practice of issuing reports for wider public and for stakeholders on material and/or significant or relevant issues for business and it is done annually or more often (as per business needs). Efforts/Practice - The reporting is well-thought, organised, transparent and accessible to all. Results/Outcomes - There is an efficient process in place.
3.2 Reporting	N/A	Not applicable to the Member's activity.
4.1 Financial Accounts	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There is a practice of preparing financial statements of all business transactions in accordance with applicable national or international standards. Efforts/Practice - There is a process of maintaining financial statements of business transactions in accordance with applicable national or international standards. Member can demonstrate with credentials that an independent and qualified accountant audits or reviews the financial accounts on a regular basis (at least annually). Results/Outcomes - There is an efficient process in place for the preparation and maintenance of the financial statements.
4.2 Financial Accounts	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There is a practice of preparing financial statements of all business transactions in

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## Summary of Findings

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		<p>accordance with applicable national or international standards.</p> <p>Efforts/Practice - There is a process of maintaining financial statements of business transactions in accordance with applicable national or international standards. Member can demonstrate with credentials that an independent and qualified accountant audits or reviews the financial accounts on a regular basis (at least annually).</p> <p>Results/Outcomes - There is an efficient process in place for the preparation and maintenance of the financial statements.</p>
<b>RESPONSIBLE SUPPLY CHAINS, HUMAN RIGHTS AND DUE DILIGENCE</b>		
5.1 Business Partners	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a procedure in place (identifying, assessing and engaging) with significant business partners to influence and/or promote responsible business practices, if and when required.</p> <p>Efforts/Practice - There is an awareness and understanding of expectations of responsible business practices throughout member's business relationships and all 3-steps (identification, assessment and engagement) are efficiently utilised.</p> <p>Results/Outcomes - There is an efficient process in place to promote responsible business practices amongst significant business partners.</p>
5.2 Business Partners	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a management system in place to identify, monitor, communicate, verify, and address non-conformances associated with the activities of contractors, indirectly employed workers, and other categories of business partners e.g. visitors.</p> <p>Efforts/Practice - The management system to verify compliance with policies and procedures on relevant COP provisions is efficient and built on existing systems of monitoring, reporting and tracking of business partners, where appropriate.</p> <p>Results/Outcomes - There is an efficient process in place of the management system.</p>
6.1 Human Rights	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a relevant policy endorsed at the highest level of management and it is reflected in the operational practices (human rights due diligence: identification, prevention, mitigation, remediation and communication). The policy and due diligence are aligned and integrated with OECD Guidance (COP Provision 7).</p> <p>Efforts/Practice - The policy is publicly available and/or shared with relevant stakeholders, as applicable. It includes what and how the business practices human rights due diligence is conducted across all 4-steps: assessment of actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating the impacts.</p>

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		<p>Results/Outcomes - There are systems in place to identify, track, collect, communicate the findings and seek and receive feedback from internal and external sources regularly. Member takes action if found to cause, contribute or link to any human rights impacts. The response to affected stakeholders is efficient, accessible and integrated (e.g. performance contracts, surveys, audits, gender-segregated data, grievance mechanisms).</p>
<p>7.1 Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas</p>	<p>Conformance</p>	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a management system process in place which is aligned with the 5 steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs), and/or other RJC recognised frameworks as relevant to business size, complexity and materials in scope. The policy and due diligence are also aligned with COP Provisions 6, 8, 12 and 29.</p> <p>Efforts/Practice – The <a href="#">policy</a> is widely communicated. There is an efficient management system in place with procedures for collecting information from suppliers and sharing it with buyers. Member defines CAHRAs and has an established process to identify risks. This process includes the establishment of verified management systems, training of employees on the topic of COP 7 and the appointment of a senior manager responsible for the member's adherence to the requirements of COP 7. The member carries out due diligence on potential business partners, which includes completion and review of Know Your Counterparty (KYC), Anti-Money-Laundering and Anti-Bribery questionnaires, as well as the review of financial statements. Should the counterparty not provide the requested documents / information, or not commit to the member's procurement policy, the commercial relationship does not proceed. For each source, the member conducts a risk analysis using international commercial information agencies (CHEOPE SRL and LEXGOLD). The member monitors and updates their list of suppliers periodically. There is a <a href="#">grievance mechanism</a>, identification and assessment of risks, management of risks (if applicable), verification and annual reporting, with required elements publicly shared (see <a href="#">Annual Report of RJC Management Systems</a>).</p> <p>Results/Outcomes - There are efficient and accessible systems in place to identify, assess, manage risks (if red flags are identified), verify, monitor and evaluate improvements and report publicly on an annual basis (see <a href="#">Annual Report of RJC Management Systems</a>). Through the member's due diligence, no high-risk transactions or red flags were identified. Member does not import material from outside Europe.</p>
<p>7.1a Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas</p>	<p>Conformance</p>	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a transparent and efficient procedure to assess all internal inventory and transaction processes to identify material inputs, product classification, type and weight of material inputs and</p>

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		<p>outputs, supplier details, including KYC. There are policy and management system processes that have been implemented. All processes and policies are aligned with the OECD Guidance and relevant RJC COP Provisions 6, 8 and 12.</p> <p>Efforts/Practice - There is understanding and engagement with downstream companies. There is clear identification of issues in member supply chain and there is adequate record-keeping and collection of information from internal system and immediate suppliers about upstream refiners. There is adequate identification and share of information, actions taken as per risks/red flags, source of different types of metals in scope, effective grievance mechanisms for supply chains and reporting.</p> <p>Results/Outcomes - There are systems in place for transparency, record-keeping, controls, understanding and identification of downstream companies, of actual and potential risks (red flags) and different types of materials (e.g. mined, recycled, grandfathered). Systems are implemented and operational.</p>
7.1b Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas	N/A	Not applicable to the Member's activity.
7.2 Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There is a strong management system process in place which is aligned with OECD Guidance's 5-steps, and/or other RJC recognised frameworks as relevant to business size, complexity and materials in scope. The policy and due diligence are also aligned with COP Provisions 6, 8, 12 and 29.</p> <p>Efforts/Practice - The policy is widely communicated. The relevant <a href="#">RJC Policy</a> is published and aligned with Annex II of the OECD Guidance. There is additional public documentation highlighting member's commitment to precious metal responsible sourcing (see <a href="#">Certifications</a>).</p> <p>Results/Outcomes - There are accessible systems in place to identify, assess, manage risks (if red flags are identified), verify, monitor and evaluate improvements and report publicly on an annual basis.</p>
7.3a Due diligence for responsible sourcing from Conflict-Affected and High-Risk Areas	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate internal and external material control systems in place that can reconcile movement of inventory in and out over a given time, for all material inputs and outputs.</p> <p>Efforts/Practice - There is a functional system in place of internal and external material control and reconciliation.</p> <p>Results/Outcomes - The system for internal and external material controls is in place and it is actively implemented.</p>
7.3b Due diligence for responsible sourcing	Conformance	<p>Commitments/Policies - There is a process in place for collecting information on the types of gold sourced, mine</p>

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## Summary of Findings

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
from Conflict-Affected and High-Risk Areas		<p>of origin of mined gold received, the identity of any mines of origin in CAHRAs and a summary of the criteria used to determine CAHRAs, as applicable.</p> <p>Efforts/Practice - The process of collecting information on the types of gold sourced and, if applicable, mine of origin of mined gold received is functional and efficient. Since this was their first certification audit, the Member had not yet shared this information with the RJC at the time of their audit, as not yet certified. The Member will share such information going forward at the next submission cycle.</p> <p>Results/Outcomes - The process of collecting information on the types of gold sourced and, if applicable, mine of origin of mined gold received is in place. During the audit period, the Member did not source mined gold.</p>
8.1 Sourcing directly from Artisanal and Small-Scale Mining	N/A	Not applicable to the Member's activity.
9.1 Sourcing post-consumer industrial precious metals directly from informal recyclers	N/A	Not applicable to the Member's activity.
10.1 Community Development	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate frameworks and approaches in place for regular discussion, consultation, and interaction with stakeholders and communities. The member is aware of the requirements under national laws.</p> <p>Efforts/Practice - The system is functional and there are adequate stakeholder and community engagement, stakeholder mapping and practical initiatives related to core business in place (e.g. trainings, employment and staff retention opportunities, investing in local financial institutions to support local procurement, educational programmes on natural resource management and monitoring, etc.).</p> <p>Results/Outcomes - There are frameworks and systems in place used for community development.</p>
11.1 Bribery and Facilitation Payments	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are written formal policies and procedures in place that prohibit bribery and corruption in the member's business practices and across the member's value chain. They protect employees from any penalty for disclosing such practices and have harsh penalties for violations. There is also a policy setting criterion for following procedures for accepting gifts from third parties. The business is very proactive in development of policies and programmes to address corruption within their operations and supply chains.</p> <p>Efforts/Practice - The system in place is functional. The policies are endorsed at the highest level and there is a senior manager in charge of anti-corruption programme. There are awareness raising programmes for all in business operation, as well as dealing with complaints.</p>

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		The policies and approaches are reviewed at least annually, and risk management is adequate. Results/Outcomes - Systems are in place to identify, train, record, raise concerns, investigate, and penalise for violation of anti-corruption policies. There are procedures in place that are used in the business operation, and across supply chains.
11.2 Bribery and Facilitation Payments	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are written formal policies and procedures in place that prohibit bribery and corruption in the member's business practices, and across the member's value chain. They protect employees from any penalty for disclosing such practices and have harsh penalties for violations. There is also a policy setting criterion for following procedures for accepting gifts from third parties. The business is very proactive in development of policies and programmes to address corruption within their operations and supply chains. Efforts/Practice - The system in place is functional. The policies are endorsed at the highest level and there is a senior manager in charge of anti-corruption programme. There are awareness raising programmes for all in business operation, as well as dealing with complaints. The policies and approaches are reviewed at least annually, and risk management is adequate. Results/Outcomes - Systems are in place to identify, train, record, raise concerns, investigate, and penalise for violation of anti-corruption policies. There are procedures in place that are used in the business operation, and across supply chains.
11.3 Bribery and Facilitation Payments	N/A	There is no applicable law on facilitation payments in the jurisdictions where the Member operates.
12.1 Know Your Counterparty: Money laundering and finance of terrorism	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are KYC policies and procedures in place for business partners, and they are adequate and documented, with clear responsibilities, regular reviews, and proper records. They are also aligned with applicable national and international laws in the area (e.g., AML, FATF). Efforts/Practice - The procedures are documented and there are activities to support them in 4 areas (verification, identification, checks and monitoring). There is a reporting system of suspicious activity to the proper authorities for cash records. Results/Outcomes - The 4-step system is in place, and it is used to verify identities of business partners, identify high-risk counterparts, check records and monitor and report on suspicious transactions.
12.2 Know Your Counterparty: Money laundering and finance of terrorism	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are KYC policies and procedures in place for business partners, and they are adequate and documented, with clear responsibilities, regular reviews, and proper records. They are also aligned with applicable national and international laws in the area (e.g., AML, FATF).

CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		Efforts/Practice - There is a responsible person for implementation of KYC policy and procedures. Results/Outcomes - The 4-step system is in place, and it is used to verify identities of business partners, identify high-risk counterparts, check records and monitor and report on suspicious transactions.
12.3 Know Your Counterparty: Money laundering and finance of terrorism	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are KYC policies and procedures in place for business partners, and they are adequate and documented, with clear responsibilities, regular reviews, and proper records. They are also aligned with applicable national and international laws in the area (e.g., AML, FATF). Efforts/Practice - The procedures are documented and there are activities to support them in 4 areas (verification, identification, checks and monitoring). There are trainings and regular reviews (at least annually) of KYC policy and procedures. Results/Outcomes - The 4-step system is in place, and it is used to verify identities of business partners, identify high-risk counterparts, check records and monitor and report on suspicious transactions.
12.4 Know Your Counterparty: Money laundering and finance of terrorism	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are KYC policies and procedures in place for business partners, and they are adequate and documented, with clear responsibilities, regular reviews, and proper records. They are also aligned with applicable national and international laws in the area (e.g., AML, FATF). Efforts/Practice - The procedures are documented and there are activities to support them in 4 areas (verification, identification, checks and monitoring). There is a well-established reporting system of suspicious activity to the proper authorities for cash records. Results/Outcomes - The 4-step system is in place, and it is used to verify identities of business partners, identify high-risk counterparts, check records and monitor and report on suspicious transactions.
13.1 Security	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are adequate security policies and procedures in place that establish processes to identify structural and emerging security threats at various levels, and/or there is a written policy or agreement on the conduct of security personnel. They are aligned with national and international laws, as applicable. Efforts/Practice - There is a senior management function for managing security risks for all employees and other personnel, training, internal controls, regular consultations with stakeholders (government local enforcement, local communities) and monitoring the performance against the policies and procedures. Results/Outcomes - There is a policy in place for security risk assessments.
13.2 Security	N/A	Not applicable to the Member's activity.
13.3 Security	N/A	Not applicable to the Member's activity.



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13.4 Security	N/A	Not applicable to the Member's activity.
14.1 Provenance Claims	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate policies and procedures in place related to making and management of claims, aligned with relevant international and national standards.</p> <p>Efforts/Practice - Employees, suppliers and other business partners are trained and/or updated regularly, in particular employees who deal with advertising, marketing and other sales-related and relevant communication jobs. Control, reporting, and grievance mechanisms are adequate.</p> <p>Results/Outcomes - The system in place is used to identify, document, control, train, report, and address complaints.</p>
14.2 Provenance Claims	N/A	Not applicable to the Member's activity.
14.3 Provenance Claims	N/A	Not applicable to the Member's activity.
LABOUR RIGHTS AND WORKING CONDITIONS		
15.1 General Employment Terms	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate policies and procedures in place related to employment relationship, as well as associated labour and social security ones. They are aligned to relevant national and international standards and/or collective bargaining agreements and/or a policy on gender wage gap, as applicable.</p> <p>Efforts/Practice - All categories of employees have their employment terms (wages, working hours, other labour, and social security) and conditions in written and in the language(s) and forms easily understandable to them. There is also a record keeping system in place, regularly updated and a system of checks and controls of employees of business partners (e.g. contractors, subcontractors, labour agencies).</p> <p>Results/Outcomes - A system is in place to issue, verify, check, and control the situation with general employment terms and conditions for all categories of workers, and all steps are operational.</p>
15.2 General Employment Terms	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate policies and procedures in place related to employment relationship, as well as associated labour and social security ones. They are aligned to relevant national and international standards and/or collective bargaining agreements and/or a policy on gender wage gap, as applicable.</p> <p>Efforts/Practice - All categories of employees have their employment terms (wages, working hours, other labour, and social security) and conditions in written and in the language(s) and forms easily understandable to them. There is also a record keeping system in place, regularly updated and a system of checks and controls of employees of business partners (e.g. contractors, subcontractors, labour agencies).</p> <p>Results/Outcomes - A system is in place to issue, verify, check, and control the situation with general employment terms and conditions for all categories of workers, and all steps are operational.</p>

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
15.3 General Employment Terms	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are adequate policies and procedures in place related to employment relationship, as well as associated labour and social security ones. They are aligned to relevant national and international standards and/or collective bargaining agreements and/or a policy on gender wage gap, as applicable.</p> <p>Efforts/Practice - All categories of employees have their employment terms (wages, working hours, other labour, and social security) and conditions in written and in the language(s) and forms easily understandable to them. There is also a record keeping system in place, regularly updated and a system of checks and controls of employees of business partners (e.g. contractors, subcontractors, labour agencies).</p> <p>Results/Outcomes - A system is in place to issue, verify, check, and control the situation with general employment terms and conditions for all categories of workers, and all steps are operational.</p>
16.1 Working Hours	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place related to working hours and overtime. There is a policy to report on non-compliances/grievance policy for violations of working time and involuntary overtime. They are aligned with relevant national and international standards and/or collective bargaining agreements, workers representation at work and COP Provisions 16 (48 hours working week, 60 hours in total working week with overtime), 18.4, 19, and 21 or the provision which provides better protection.</p> <p>Efforts/Practice - There is senior management for human resources to set and oversee working hours and overtime. The procedures are documented, and worker timekeeping is in place. Grievance procedures for non-compliances are regularly communicated to employees and are enforced.</p> <p>Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee working hours and overtime, and they are operational.</p>
16.2 Working Hours	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place related to working hours and overtime. There is a policy to report on non-compliances/grievance policy for violations of working time and involuntary overtime. They are aligned with relevant national and international standards and/or collective bargaining agreements, workers representation at work and COP Provisions 16 (48 hours working week, 60 hours in total working week with overtime), 18.4, 19, and 21 or the provision which provides better protection.</p> <p>Efforts/Practice - There is senior management for human resources to set and oversee working hours and overtime. They procedures are documented, and worker timekeeping is in place. Grievance procedures for non-compliances are regularly communicated to employees and are enforced.</p>

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee working hours and overtime, and they are operational.
16.3 Working Hours	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to rest days. There is a policy to report on non-compliances/grievance policy for violations of these provisions. They are aligned with relevant national and international standards and/or collective bargaining agreements, workers representation at work and COP Provision 16, or the provision which provides better protection. Efforts/Practice - There is senior management for human resources to set and oversee rest days. The procedures are documented, and worker timekeeping is in place. Grievance procedures for non-compliances are regularly communicated to employees and are enforced. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee rest days, and they are operational.
16.4 Working Hours	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to holidays and leave. There is a policy to report on non-compliances/grievance policy for violations of these provisions. They are aligned with relevant national and international standards and/or collective bargaining agreements, workers representation at work and COP Provision 16, or the provision which provides better protection. Efforts/Practice - There is senior management for human resources to set and oversee holidays and leave entitlements. The procedures are documented, and worker timekeeping is in place. Grievance procedures for non-compliances are regularly communicated to employees and are enforced. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee holidays and leave entitlements, and they are operational.
16.5 Working Hours	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to workday breaks. There is a policy to report on non-compliances/grievance policy for violations of these provisions. They are aligned with relevant national and international standards and/or collective bargaining agreements, workers representation at work and COP Provision 16, or the provision which provides better protection. Efforts/Practice - There is senior management for human resources to set and oversee workday breaks. The procedures are documented, and worker timekeeping is in place. Grievance procedures for non-compliances are regularly communicated to employees and are enforced. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee workday breaks, and they are operational.
17.1 Remuneration	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and

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		<p>procedures in place related to payment of legal minimum wage (not including overtime) or higher, as per prevailing industry standards and they prohibit illegal deductions. They are aligned with applicable national or international laws, COP Provisions 16 and 22.1 and non-discriminatory (equal pay for equal work). There is also a provision on addressing living wage.</p> <p>Efforts/Practice - There is human resources management to set and oversee wages and deductions. Procedures and records are kept for workers, and communicated to workers, in a timely and easy way.</p> <p>Results/Outcomes – Relevant policies, procedures and system are in place to set and oversee minimum wages payments and legal deductions and are operational.</p>
17.2 Remuneration	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place related to overtime, method of wage payments, prohibited deductions from wages, benefits, provisions, services and loans to workers and they are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6.</p> <p>Efforts/Practice - There is human resources management to set and oversee overtimes, methods of wage payments, prohibition of illegal deductions from wages, benefits, provisions, services and loans to workers. Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner.</p> <p>Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee overtime, methods of wage payments, prohibitive deductions, benefits, provisions, services and loans, and are operational.</p>
17.3 Remuneration	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place related to overtime, method of wage payments, prohibited deductions from wages, benefits, provisions, services and loans to workers and they are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6.</p> <p>Efforts/Practice - There is human resources management to set and oversee overtimes, methods of wage payments, prohibition of illegal deductions from wages, benefits, provisions, services and loans to workers. Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner.</p> <p>Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee overtime, methods of wage payments, prohibitive deductions, benefits, provisions, services and loans, and are operational.</p>
17.4 Remuneration	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place related to payment of legal minimum wage (not including overtime) or higher, as per prevailing industry standards and they prohibit illegal deductions. They are aligned with applicable national or</p>

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		international laws, COP Provisions 16 and 22.1 and non-discriminatory (equal pay for equal work). There is also a provision on addressing living wage. Efforts/Practice - There is human resources management to set and oversee wages and deductions. Procedures and records are kept for workers, and communicated to workers, in a timely and easy way. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee minimum wages payments and legal deductions and are operational.
17.5 Remuneration	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to prohibited deductions from wages and they are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6. Efforts/Practice - There is human resources management to set and oversee prohibition of illegal deductions from wages. Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee prohibition of illegal deductions from wages and are operational.
17.6 Remuneration	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to provisions and services to workers. They are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6. Efforts/Practice - There is human resources management to set and oversee provisions and services to workers. Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee provisions and services and are operational.
17.7 Remuneration	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to methods of wage payments and loans to workers and they are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6. Efforts/Practice - There is human resources management to set and oversee methods of wage payments and loans to workers. Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee methods of wage payments and loans and are operational.
17.8 Remuneration	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to worker benefits and they are aligned with applicable national and international laws, COP Provisions 1, 16, 20 and 23.6. Efforts/Practice - There is human resources management to set and oversee worker benefits.

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		Procedures, trainings, records are kept for workers, and implemented in a timely and regular manner. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee worker benefits and are operational.
18.1 Harassment, discipline, grievance procedures and non-retaliation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place related to zero tolerance of all forms of violence and harassment in the workplace, no matter of its severity and covering all types of workers. They aligned with applicable national and international laws. Efforts/Practice - There is either a dedicated person and/or human resources management setting and overseeing the implementation of policies and procedures prohibiting all forms of violence and harassment. The policies and procedures specifically focus on gender-based violence, prevention and creation of positive environment via regular trainings and communication of information to supervisors and workers of all categories. Results/Outcomes - Relevant policies, procedures and system are in place to set and oversee positive work environment without violence and harassment and are operational.
18.2 Harassment, discipline, grievance procedures and non-retaliation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (integrated or stand-alone) policies and procedures in place to prevent and address gender-based violence covering all workers. They are aligned with applicable national and international laws in the area as well as relevant COP Provisions 2, 6, 7, 17. Efforts/Practice - Key staff have regular training (e.g., doctors, nurses, key personnel among security staff, etc.) for aspects of gender-based violence. Results/Outcomes - Relevant policies, procedures, system and mechanisms are in place to set and oversee trainings to key personnel on gender-based violence issues and are operational.
18.3 Harassment, discipline, grievance procedures and non-retaliation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (integrated or stand-alone) policies and procedures in place to establish disciplinary process and grievance procedures covering all workers. They are aligned with applicable national and international laws in the area as well as relevant COP Provisions 2, 6, 7, 17. Efforts/Practice - There is a dedicated human resources person / department and key staff have regular training. There is efficient communication to all workers and supervisors on disciplinary process. Results/Outcomes - Relevant policies, procedures, system and mechanisms are in place to set and oversee disciplinary issues and are operational.
18.4 Harassment, discipline, grievance procedures and non-retaliation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (integrated or stand-alone) policies and procedures in place to prevent retaliation for raising concerns at work, to receive and address grievances, conduct investigation processes and ensure appropriate record-keeping. They are

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		aligned with applicable national and international laws in the area as well as relevant COP Provisions 2, 6, 7, 17. Efforts/Practice - There is a dedicated human resources person / department (separate from those dealing with external grievances and complaints) and key staff have regular training. There are proper and up-to-date record keeping of procedures and investigations, and efficient communication to all workers and supervisors. Results/Outcomes - Relevant policies, procedures, system and mechanisms are in place to set and oversee non-retaliation, trainings to key personnel, grievance and investigation processes, and are operational.
18.5 Harassment, discipline, grievance procedures and non-retaliation	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (integrated or stand-alone) policies and procedures in place to prevent retaliation for raising concerns at work. They are aligned with applicable national and international laws in the area as well as relevant COP Provisions 2, 6, 7, 17. Efforts/Practice - There is a dedicated human resources person / department (separate from those dealing with external grievances and complaints) and key staff have regular training on preventing retaliation for raising concerns at work. There are proper and up-to-date record keeping of procedures and investigations, and efficient communication to all workers and supervisors. Results/Outcomes - Relevant policies, procedures, system and mechanisms are in place to set and oversee non-retaliation, trainings to key personnel, grievance and investigation processes, and are operational.
19.1 Child Labour	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (stand-alone or integrated) policies and procedures prohibiting the use of child labour, including worst forms, and preventing young workers from doing hazardous work, with provisions covering remediation, hiring processes and/or keeping up-to-date employment records. They are aligned with the ILO Conventions 138 and 182 and Recommendations 146 and 190 on minimum age for work and worst forms of child labour and requirements of the COP Provisions 6, 7, 8 and national laws. Efforts/Practice - There is a senior management function (human resources), proper and regular communication of labour policy to all direct and indirect workers and business partners, and risk assessment and remediation process. There is a heightened risk approach applied when working with labour or recruitment agencies and hiring personnel is properly and regularly trained on this aspect. The issue of minimum age and child labour are also part of enforcement of COP Provisions 6, 7, 8 requirements as relevant. Results/Outcomes - Relevant policies, procedures, system and remediation process are in place to set, oversee and monitor compliance with prohibition of child labour and respect of minimum age for employment, and are operational.
19.2 Child Labour	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (stand-alone or integrated) policies and procedures prohibiting the use of

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		<p>child labour, including worst forms, and preventing young workers from doing hazardous work, with provisions covering remediation, hiring processes and/or keeping up-to-date employment records. They are aligned with the ILO Conventions 138 and 182 and Recommendations 146 and 190 on minimum age for work and worst forms of child labour and requirements of the COP Provisions 6, 7, 8 and national laws.</p> <p>Efforts/Practice - There is a senior management function (human resources), proper and regular communication of labour policy to all direct and indirect workers and business partners, and risk assessment and remediation process. There is a heightened risk approach applied when working with labour or recruitment agencies and hiring personnel is properly and regularly trained on this aspect. The issue of minimum age and child labour are also part of enforcement of COP Provisions 6, 7, 8 requirements as relevant.</p> <p>Results/Outcomes - Relevant policies, procedures, system and remediation process are in place to set, oversee and monitor compliance with prohibition of child labour and respect of minimum age for employment, and are operational.</p>
19.3 Child Labour	N/A	Not applicable to the Member's activity.
20.1 Forced Labour	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are (stand alone or integrated) policies and procedures prohibiting forced labour, including all its forms. They are aligned with the relevant international and national laws, regulations and standards and requirements of the COP Provisions 6, 7, 13, 15, 17 and 18, as relevant.</p> <p>Efforts/Practice - There is a senior management function (human resources) and proper communication of expectations to all business partners in the supply chain. There are clear standard employment contracts and grievance procedures communicated in writing and via trainings/sessions, regular risk assessment of contractors, suppliers and/or labour providers, formal audits and desktop reviews of policies and procedures.</p> <p>Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with prohibition of forced labour in all forms, and are operational.</p>
20.2 Forced Labour	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are (stand alone or integrated) policies and procedures prohibiting forced labour, including all its forms. They are aligned with the relevant international and national laws, regulations and standards and requirements of the COP Provisions 6, 7, 13, 15, 17 and 18, as relevant.</p> <p>Efforts/Practice - There is a senior management function (human resources) and proper communication of expectations to all business partners in the supply chain. There are clear standard employment contracts and grievance procedures communicated in writing and via trainings/sessions, regular risk assessment of</p>



CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		contractors, suppliers and/or labour providers, formal audits and desktop reviews of policies and procedures. Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with prohibition of forced labour in all forms, and are operational.
20.3 Forced Labour	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (stand alone or integrated) policies and procedures prohibiting forced labour, including all its forms. They are aligned with the relevant international and national laws, regulations and standards and requirements of the COP Provisions 6, 7, 13, 15, 17 and 18, as relevant. Efforts/Practice - There is a senior management function (human resources) and proper communication of expectations to all business partners in the supply chain. There are clear standard employment contracts and grievance procedures communicated in writing and via trainings/sessions, regular risk assessment of contractors, suppliers and/or labour providers, formal audits and desktop reviews of policies and procedures. Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with prohibition of forced labour in all forms, and are operational.
21.1 Freedom of association and collective bargaining	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (stand-alone or integrated) policies and procedures in place respecting freedom of association and collective bargaining process/agreement, and prohibiting discrimination against members of unions or alternative organisations allowed under applicable law. They are aligned with national and international laws and standards and requirements of the CoP Provisions 16, 17, 18 and 22, where relevant and allowed under applicable law. Efforts/Practice - There is a senior management function (human resources) overseeing this area and adequate review of non-discrimination aspects in hiring, terminating and performance review process. There are properly functioning grievance processes to address any workers concerns, including discrimination against any union/alternative organisations members. There is proper communication of the rights of workers to form and/join trade unions or alternative organisations of their choice and collective bargaining process/agreement, as allowed under applicable law. Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with workers' rights to associate freely, to access grievance mechanisms and engage in collective bargaining process/agreement as allowed under applicable law, and are operational.
21.2 Freedom of association and collective bargaining	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are (stand-alone or integrated) policies and procedures in place respecting freedom of association and collective bargaining process/agreement, and prohibiting discrimination against members of unions or alternative organisations

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		<p>allowed under applicable law. They are aligned with national and international laws and standards and requirements of the CoP Provisions 16, 17, 18 and 22, where relevant and allowed under applicable law.</p> <p>Efforts/Practice - There is a senior management function (human resources) overseeing this area and adequate review of non-discrimination aspects in hiring, terminating and performance review process. There are properly functioning grievance processes to address any workers concerns, including discrimination against any union/alternative organisations members. There is proper communication of the rights of workers to form and/join trade unions or alternative organisations of their choice and collective bargaining process/agreement, as allowed under applicable law.</p> <p>Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with workers' rights to associate freely, to access grievance mechanisms and engage in collective bargaining process/agreement as allowed under applicable law, and are operational.</p>
21.3 Freedom of association and collective bargaining	N/A	Not applicable to the Member's activity.
22.1 Non-discrimination	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are (stand-alone or integrated) policies and procedures in place prohibiting discrimination in the workplace and they are aligned with national and international laws and standards and requirements of COP Provision 18, where relevant.</p> <p>Efforts/Practice - There is a senior management function (human resources) overseeing non-discrimination. There are regular risk assessments of operations, particular occupations, categories of workers, review of hiring, termination, promotion and performance appraisals for this aspect, regular trainings and awareness raising among workers, business partners, suppliers.</p> <p>Results/Outcomes - Relevant policies, procedures, systems are in place to set, oversee and monitor compliance with non-discrimination in the workplace, and are operational.</p>
HEALTH, SAFETY AND ENVIRONMENT		
23.1 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces and they are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace, record-keeping of compliance with regulations, permits, codes and licences.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the</p>

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		compliance with safe and healthy working conditions and workplaces.
23.2 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including safe, decent and non-discriminatory facilities at work and on-site housing, where relevant (e.g. food, water, sanitation, fire equipment, emergency exits and lighting etc.). They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace. This includes access to safe, decent and non-discriminatory facilities at work and on-site housing, where relevant (e.g. food, water, sanitation, fire equipment, emergency exits and lighting etc.).</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including access to safe, decent and non-discriminatory facilities at work.</p>
23.3 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces and specify risk assessments of occupational hazards. They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace. This includes risk assessments of workplace hazards associated with the member's activities and products and controls to minimise the risks of accidents and injury to employees.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including the risk assessments and controls of occupational hazards.</p>
23.4 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including established mechanisms for health and safety committees, by which employees can raise and discuss health and safety issues with management. They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that</p>

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		<p>oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace, including functioning health and safety committee.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including health and safety committee.</p>
23.5 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including providing training and information about health and safety to employees in a form and language they can understand. They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace. This includes trainings to employees in a form and language they understand (and record-keeping) on specific role-related health and safety hazards and controls, appropriate action in the event of an accident or emergency, fire safety and emergency procedures, first-aid training for designated employee representatives.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including employees training and record-keeping.</p>
23.6 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including requirements for personal protective equipment and they are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace, including providing and correctly using personal protective equipment, as applicable.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including requirements for personal protective equipment.</p>
23.7 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working</p>

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		<p>conditions and workplaces, including access to adequate first aid / medical facilities and trained personnel. They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace, including access to adequate first aid / medical facilities and trained personnel.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including access to adequate first aid / medical facilities and trained personnel.</p>
23.8 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including accessible emergency procedures and evacuation plans. They are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace. This includes emergency procedures and evacuation plans that are accessible, regularly tested and periodically updated.</p> <p>Results/Outcomes - Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including accessible, updated and tested emergency procedures and evacuation plans.</p>
23.9 Health and Safety	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place to regulate safe and healthy working conditions and workplaces, including incident investigations, and they are aligned with national and international laws and standards and requirements of COP Provisions 6, 22, 24, 28 and 40, where relevant.</p> <p>Efforts/Practice - There is a health and safety person and/or appropriate people in member's business that oversee all aspects of occupational health and safety and/or adequate arrangements for safe and healthy workplace. This includes incident investigations and reviews of relevant hazard controls based on investigation results, to identify opportunities for improvement.</p> <p>Results/Outcomes – Relevant policies, procedures, protocols, system, and mechanisms are in place and operational to set, oversee, monitor, and control the compliance with safe and healthy working conditions and workplaces, including incident investigations.</p>

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23.10 Health and Safety	N/A	Not applicable to the Member's activity.
24.1 Environmental Management	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place (stand-alone or integrated) that clearly state commitment to environmental management, specify responsibilities and control measures, life cycle thinking to continuous improvement. They are aligned with applicable national and international standards and laws and COP Provisions 2, 23.3, 24.2, 25, 26, 27, 34 and 38, as appropriate.</p> <p>Efforts/Practice - The implementation of the environmental management system is adequate, with senior management oversight. The system follows the approach of Plan-Do, Check-Act cycle (assesses risks and impacts, checks legal compliance, sets targets, identifies options, monitors, measures, and reports on processes).</p> <p>Results/Outcomes - Relevant policies, procedures and systems for environmental management are in place, comprehensive, and operational.</p>
24.2 Environmental Management	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place (stand-alone or integrated) that clearly state commitment to environmental management, specify responsibilities and control measures, establish training format and/or frequency and how information is communicated to relevant employees about environmental risks and controls.</p> <p>Efforts/Practice - There are regular and assessable trainings and communication to all relevant employees (direct and indirect) about environmental risks and controls, in a format and language that workers can easily understand.</p> <p>Results/Outcomes - Relevant policies, procedures and systems for environmental management are in place, comprehensive, and operational.</p>
25.1 Hazardous Substances	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place on handling, use, storage, and disposal of hazardous substances and for maintaining inventory records and up-to-date accessible safety data sheets (or equivalent). They are aligned with applicable national and international laws and standards and COP Provisions 23 and 24 as appropriate.</p> <p>Efforts/Practice - There is an adequate system to enforce policies and procedures and maintain inventory system. There is a manager responsible for keeping inventory and up-to-date accessible safety data sheets (or equivalent). There is coordination with other relevant environmental and health and safety parts of business, as well as trainings for all relevant workers and proper and regular communication of policies, procedures, risks and operations.</p> <p>Results/Outcomes - Relevant policies, procedures and systems to handle, use, store, dispose, keep records and communicate risks of hazardous substances are in place, and operational.</p>

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25.2 Hazardous Substances	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are existing policies and procedures in place that clearly ban manufacture, trade or use or specify a phased-out approach in use of chemicals and hazardous substances subject to international bans.</p> <p>Efforts/Practice - There is an adequate system of controls, and it covers areas of international ban of chemicals and hazardous substances. Review of international agreements is regular as well as phased-out approaches. Procurement of hazardous substances is from legitimate commercial suppliers.</p> <p>Results/Outcomes - Relevant policies, procedures, and systems for controls of chemicals and hazardous substances subject to international bans are in place, comprehensive, and operational.</p>
25.3 Hazardous Substances	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place on handling, use, storage, and disposal of, as well as use of alternatives to hazardous substances in their business processes.</p> <p>Efforts/Practice - The use of alternatives to hazardous substances, wherever technically feasible and economically viable, is also considered as part of an adequate system of implemented policies and procedures.</p> <p>Results/Outcomes - Relevant policies, procedures and systems to handle, use, store, dispose, keep records of, and use alternatives to hazardous substances are in place, and operational.</p>
26.1 Wastes and Emissions	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place for identifying significant wastes and emissions to air, water and land generated in their business processes, with clearly defined roles and responsibilities. They are aligned with applicable regulatory limits, national and international standards and laws and COP Provisions 24 and 27.</p> <p>Efforts/Practice - There is an adequate environmental management system in place to identify significant wastes and emissions to air, water and land, aligned with COP Provision 24.</p> <p>Results/Outcomes - Relevant policies, procedures and systems for identification of significant wastes and emissions to air, water and land are in place, comprehensive, and operational.</p>
26.2 Wastes and Emissions	Conformance	<p>Member is fully compliant with this COP provision.</p> <p>Commitments/Policies - There are policies and procedures in place for monitoring and controlling all identified significant wastes and emissions to air, water and land generated in their business processes, with clearly defined roles and responsibilities. They are aligned with applicable regulatory limits, national and international standards and laws and COP Provisions 24 and 27.</p> <p>Efforts/Practice - There is an adequate environmental management system in place to manage and quantify significant wastes and emissions, including monitoring</p>

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		trends over time and driving continuous improvement in environmental performance. The system follows the 4R of waste management (reduce, reuse, recycle and recover, followed by disposal of any residual waste safely) and the mitigation hierarchy, as described under COP 24 (avoid or anticipate, minimise, restore and offset). Results/Outcomes - Relevant policies, procedures and systems for management of significant wastes and emissions are in place, comprehensive, and operational.
27.1 Use of Natural Resources	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are monitoring and efficiency initiative(s) in place for energy and water use, and they are aligned with national frameworks, targets, and/or legislation (e.g. EU Directive 2014/95/EU to include non-financial statements in annual reports, as applicable) and COP Provisions 3, 24.1 and 26. Efforts/Practice - There is an adequate system in place to monitor energy and water use and enforce efficiency initiatives. The system follows 4 steps to calculate and improve energy and water use in business operations (i.e. identification, prioritisation, implementation and review steps). There is a responsible manager to implement initiatives. Results/Outcomes - The initiatives and the system to calculate and improve energy and water use are in place, comprehensive, and operational.
27.2 Use of Natural Resources	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are identification, monitoring and efficiency initiatives in place for other significant natural resources used (e.g. forest products and plastics), and they are aligned with national frameworks, targets, and/or legislation (e.g. EU Directive 2014/95/EU to include non-financial statements in annual reports, as applicable) and COP Provisions 3, 24.1 and 26. Efforts/Practice - There is an adequate system in place to identify other significant natural resources used (e.g. forest products and plastics) and enforce efficiency initiatives. The system follows 4 steps to calculate and improve use in business operations (i.e. identification, prioritisation, implementation, and review steps). There is a responsible manager to implement initiatives. Results/Outcomes - The initiatives and the system to calculate and improve the use of other significant natural resources (e.g. forest products and plastics) are in place, comprehensive, and operational.
27.3 Use of Natural Resources	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are energy (including renewable) use and efficiency initiative(s) in place, and they are aligned with national frameworks, targets, and/or legislation (e.g. EU Directive 2014/95/EU to include non-financial statements in annual reports, as applicable) and COP Provisions 3, 24.1 and 26. Efforts/Practice - There is an adequate system in place to enforce energy (including renewable) use and efficiency initiatives. The system follows 4 steps to calculate and improve energy (including renewable) use

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CODE OF PRACTICE 2019 PROVISIONS	RATING	COMMENTS / CONCLUSIONS
		in business operations (e.g. identification, prioritisation, implementation and review steps). There is a responsible manager to implement initiatives. Results/Outcomes - The initiatives and the system to calculate and improve energy (including renewable) use are in place, comprehensive, and operational.
27.4 Use of Natural Resources	N/A	Not applicable to the Member's activity.
GOLD, SILVER, PGM, DIAMOND AND COLOURED GEMSTONE PRODUCTS		
28.1 Product Disclosure	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies and procedures in place on representation of materials and products in selling, advertising and/or marketing. They are in compliance with applicable law regarding false and misleading representations and with internationally accepted standards. Efforts/Practice - There is an adequate system in place to enforce accurate representations in the selling, advertising and/or marketing of materials and products. All employees with relevant responsibilities are trained and/or updated regularly. Results/Outcomes - Relevant policies, procedures and systems to enforce accurate representations are in place, comprehensive, and operational.
28.2a Product Disclosure	Conformance	Member is fully compliant with this COP provision. Commitments/Policies - There are policies, procedures and register on product disclosure in place, covering all materials or products in scope that explain relevant laws, regulations and industry standards, including penalties for non-conformance. They are aligned with the requirements on legal compliance under COP Provision 1. Efforts/Practice - There is an adequate system in place with accurate record-keeping of all stages, especially during processing stage. Physical characteristics of materials and products in scope are accurately accrued and disclosed, in particular the fineness or content of gold, silver and PGM, as required by law, if in scope. Any quality marks used are applied in accordance with applicable law or industry standards. There is a senior manager who regularly monitors implementation of applicable laws, internal policy, procedures, and register. Results/Outcomes - Relevant policy, procedures, registers and systems are in place, and they are comprehensive and operational.
28.2b-j Product Disclosure	N/A	Not applicable to the Member's activity.
28.3 Product Disclosure	N/A	Not applicable to the Member's activity.
29.1 Kimberly Process Certification Scheme and World Diamond Council System of Warranties	N/A	Not applicable to the Member's activity.
29.2 Kimberly Process Certification Scheme and World Diamond Council System of Warranties	N/A	Not applicable to the Member's activity.

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29.3 Kimberly Process Certification Scheme and World Diamond Council System of Warranties	N/A	Not applicable to the Member's activity.
29.4 Kimberly Process Certification Scheme and World Diamond Council System of Warranties	N/A	Not applicable to the Member's activity.
30.1 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
30.2 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
30.3 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
30.4 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
30.5 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
30.6 Grading, analysis and appraisal	N/A	Not applicable to the Member's activity.
RESPONSIBLE MINING		
31.1 Extractive Industries Transparency Initiative	N/A	Not applicable to the Member's activity.
31.2 Extractive Industries Transparency Initiative	N/A	Not applicable to the Member's activity.
32.1 Stakeholder Engagement	N/A	Not applicable to the Member's activity.
32.2 Stakeholder Engagement	N/A	Not applicable to the Member's activity.
32.3 Stakeholder Engagement	N/A	Not applicable to the Member's activity.
33.1 Indigenous Peoples and Free Prior Informed Consent	N/A	Not applicable to the Member's activity.
33.2 Indigenous Peoples and Free Prior Informed Consent	N/A	Not applicable to the Member's activity.
33.3 Indigenous Peoples and Free Prior Informed Consent	N/A	Not applicable to the Member's activity.
34.1 Impact assessment	N/A	Not applicable to the Member's activity.
34.2 Impact assessment	N/A	Not applicable to the Member's activity.
34.3 Impact assessment	N/A	Not applicable to the Member's activity.
35.1 Artisanal and Small-Scale Mining and Large-Scale Mining	N/A	Not applicable to the Member's activity.
36.1 Resettlement	N/A	Not applicable to the Member's activity.
37.1 Emergency response	N/A	Not applicable to the Member's activity.
38.1 Biodiversity	N/A	Not applicable to the Member's activity.
38.2 Biodiversity	N/A	Not applicable to the Member's activity.
38.3 Biodiversity	N/A	Not applicable to the Member's activity.
38.4 Biodiversity	N/A	Not applicable to the Member's activity.
38.5 Biodiversity	N/A	Not applicable to the Member's activity.
39.1 Tailings and waste rock	N/A	Not applicable to the Member's activity.
39.2 Tailings and waste rock	N/A	Not applicable to the Member's activity.

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39.3 Tailings and waste rock	N/A	Not applicable to the Member's activity.
39.4 Tailings and waste rock	N/A	Not applicable to the Member's activity.
40.1 Cyanide	N/A	Not applicable to the Member's activity.
41.1 Mercury	N/A	Not applicable to the Member's activity.
41.2 Mercury	N/A	Not applicable to the Member's activity.
42.1 Mine rehabilitation and closure	N/A	Not applicable to the Member's activity.
42.2 Mine rehabilitation and closure	N/A	Not applicable to the Member's activity.
42.3 Mine rehabilitation and closure	N/A	Not applicable to the Member's activity.
42.4 Mine rehabilitation and closure	N/A	Not applicable to the Member's activity.