

OUR CODE OF CONDUCT

Introduction

The economic environment in recent years has been above all characterised by much uncertainty. The financial and sovereign debt crisis has made it clear that traditional assets such as precious metals - especially physical gold and silver - are more than ever essential elements of personal protection. To protect your assets with precious metals, you need a reliable and competent partner. philoro EDELMETALLE offers not only high-quality products, it also has a corporate culture characterised by sustainable values and an ownership structure with a long-term focus.

As one of the leading international providers of investments in precious metals, we hold high ethical values and adhere to professional standards, something we also expect from our members, shareholders, co-owners, managers and employees.

Our reputation and our future success are based on personal responsibility and compliance with our code of conduct. We must observe these rules of conduct in order to be able to maintain our reputation for integrity and fairness, and reliability and transparency when it comes to sustainability.

The interests of philoro EDELMETALLE, its shareholders and clients must always take priority over the personal interests of its employees, regardless of their position. We strive to not just act within the law, but also in keeping with what we consider to be righteous. Our employees and management team have no objections to these rules of conduct, rather, they are proud to represent these values.

A handwritten signature in blue ink, appearing to read "René Brückler".

René Brückler MA
Gründer und Eigentümer von philoro

A handwritten signature in blue ink, appearing to read "Mag. Rudolf Brenner".

Mag. Rudolf Brenner
Gründer und Eigentümer von philoro

Our clients are our focus

We have earned the trust of our clients over the years by placing them at the centre of our activities. We effectively identify the needs of our clients, protect their personal interests and handle their personal data with care. Our goal is to understand our clients as much as possible and to meet their needs through our experience and with passion.

Responsibility for our actions

We take responsibility for our actions and meet our obligations to our employees and co-owners, and we strive to generate sustainable profits. We act and make decisions based on high ethical standards, and we offer our employees an interesting and challenging position in an environment of mutual respect.

Discretion in dealing with information

We guarantee confidentiality and discretion with regard to information entrusted to us by our clients, unless their disclosure is required by law.

The employees of philoro EDELMETALLE respect the privacy of people and their personal data. We collect and process personal data as required by law. We respect the privacy of each individual and have no interest in what anyone does outside work unless it impacts their work or puts the reputation of philoro EDELMETALLE and our business interests at risk.



Integrity and trust

Together we show that philoro EDELMETALLE places great value on strong, sustainable values. Integrity is important for our long-term success. We respect the interests of our shareholders, employees and society as a whole. We act decisively and our guidelines set standards that avoid potential conflicts of interest and risks to our reputation. Our employees must not be in personal competition with philoro. We want to build trust and show that we always act in accordance with the ethical values and professional standards set out in this code of conduct.

Compliance - avoiding legal risks

We strive to set an example in the way we handle and monitor compliance with these guidelines. In accordance with the guidelines, manuals, laws and corporate policy, we conduct ourselves in such a way that, with regard to the respective area of responsibility, the implementation of the measures and approaches can be ensured. We continually question new and proven practices and, if a standard rule cannot be complied with, we lodge a complaint with the relevant supervisory authorities.

Mutual respect

We create a working environment characterised by respect and the safeguarding of human rights, and we are committed to mutual responsibility and trust. We achieve more as a team, regardless of people's individual strengths. Together as a team and regardless of the strength of the individual, we achieve more overall. The team, which gives everyone the same opportunities, takes priority over personal success. We recruit and select our employees based on merit, regardless of race, ethnicity, gender, national origin, age, disability, sexual orientation, religion, marital or family status, pregnancy, or other characteristics protected by law. Our employees are one of our greatest strengths. We value the diversity of people, opinions, views and expertise, which is why we work with colleagues inside and outside our divisions to achieve our goals together.

We stand for maintaining job safety, and we comply with the applicable occupational health and safety regulations.

Service and quality

Treating our clients fairly and with integrity is very important to us. Everyone benefits from a business relationship based on trust and honesty. To remain competitive, everything we do must be legally correct and fair. We only make promises we can keep. We deal with client complaints immediately to ensure that we meet our high standards of quality.

Sustainability and responsibility

philororo EDELMETALLE respects human rights and is committed to social and environmental sustainability in all its business divisions. We work hard on making sure that our impact on the environment and on people's health is as low as possible. We achieve this by reducing waste and emissions, using energy efficiently, reducing health risks at the workplace and producing safe products. There is nothing so important that we do not take the time to make it safe. It is important for us to not only to look at the environmental risks and social impact of our business activities, but also the impact of the business practices of our suppliers and products.

Social responsibility for the environment and society – this represents both a major challenge and an opportunity for companies. philoro stands for "Sustainable Gold". This means that the mining of precious metals is monitored and documented with ethically sound conditions in mind.



Compliance with laws and regulations

All members of management and all employees are obliged to comply with these standards and to observe restrictions imposed by laws, rules and regulations. We are committed to the prevention of money laundering and corruption, we comply with antitrust and competition laws, and we do not practice unethical or unfair competition. We comply with and follow all relevant tax laws and strictly adhere to KYC rules; we make accurate records of all our business activities, which we also keep up to date.

Risk culture

It is an essential part of our corporate culture in our business divisions to carefully examine and identify risks. We have defined the following as risk areas: Production, Environment, commercial department and our associated reputation. We minimise risks, we act to ensure this, and we rely on independent compliance and auditing procedures.

Transparency and cooperation

We are committed to presenting our communications and business relationships in a constructive, transparent and cooperative manner. Our relationships with the supervisory authorities are transparent and cooperative, and financial reporting is prepared in accordance with applicable and regulatory requirements. This creates transparency about existing and possible future risks, possible existing risks, or risks that could occur in the future.

We are proud to represent these values

The code of conduct sets out the nature of philoro EDELMETALLE's business activities, and violations are not tolerated. philoro EDELMETALLE requires its employees and managers to commit to the spirit and wording of this code of conduct. The guidelines were created by philoro EDELMETALLE; they are updated from time to time in order to optimise specific guidelines and procedures of a particular business segment. Violations of the standards in this code of conduct can result in disciplinary action and even dismissal. If philoro EDELMETALLE finds that the code of conduct has been violated or a crime has been committed, the competent authorities will be informed immediately. We encourage our employees to speak out internally about violations of the law, rules, regulations and this code of conduct and to report such actions directly to the relevant supervisory authorities.

philororo EDELMETALLE ensures that employees do not suffer reprisal as a result of having made such reports in good faith.

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Last updated: 20/09/2014