



Baird & Co. Ltd



Baird & Co.
Bullion Merchants
Est. London 1967

Supply Chain Due Diligence Statement

2023



Baird & Co. Ltd

Supply Chain Due Diligence Policy Statement

2023

Baird & Co. Ltd (Baird & Co.) is a Private Limited Company registered in England & Wales under company registration number 02269558.

Baird & Co. Ltd offers commercial services including the refining of precious metals, sales and trading of precious metals, scrap buying and the production of manufacturing materials and engineering products. The Company has an international client base and provides products globally to approved regions.

The Board of Directors, management team and all employees of Baird & Co. Ltd are committed to ensuring that all metals sourced by the Company are done so from legitimate, ethical sources, and are not compromised by any association with crime, armed conflict, human rights abuses or adverse ESG factors.

Baird & Co. have effective policies, procedures and controls in place which ensure the Company is compliant with the standards as set forth by:

- The LBMA Responsible Gold Guidance (version 9) (2021)
- The LBMA Responsible Silver Guidance (2018)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016)
- The UK Modern Slavery Act (2015)
- The UK Bribery Act (2010)
- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) (2009) (2021)
- The International Labour Organization (ILO) standards, on Child Labour; Minimum Age convention (1973), Worst Forms of Child Labour Convention (1999)
- The EITI (Extractive Industries Transparency Initiative) Principles (2003)
- The Responsible Jewellery Council Code of Practices (2019)

Baird & Co. have implemented effective management systems and controls which ensure that the Company has due diligence processes in place which:

- do not support fraud, corruption nor any other illegal activities
- maintains high moral, and ethical business standards
- cultivates proper business relationships with all customer and counterparties

Baird & Co. will suspend or discontinue engagement with any suppliers who do not also meet these standards and where attempts at risk mitigation have failed.

Baird & Co. will not tolerate nor partner with any customer or counterparty involved with:

- forced or compulsory labour
- any form torture, cruel, inhuman and degrading treatment
- human rights violations and abuses
- war crimes, violations of international humanitarian law, crimes against humanity or genocide
- the worst forms of child labour

Baird & Co. will not facilitate nor participate with indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. This includes but is not limited to procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- illegally control mine sites or otherwise control transportation routes and points where minerals are traded; and/or
- illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- illegally tax or extort intermediaries, export companies or international traders

Baird & Co. fully support the effective elimination of money laundering from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by any suppliers.

Baird & Co. do not facilitate nor participate in any attempts to offer, promise or demand bribes and will resist the solicitation of bribes which are intended to conceal or disguise the origin of any minerals, or misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling transport and export. Baird & Co. will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.

Baird & Co. will suspend or discontinue engagement with any suppliers where a reasonable risk has been identified that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

Baird & Co. recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.



Baird & Co. are committed to ensuring whenever there is occasion within the supply chain contract for public or private security forces, it will be required that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. Baird & Co. will not tolerate nor work with individuals or units of security forces that are known to have been responsible for gross human rights abuses.

Baird & Co. supports all efforts to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Baird & Co. Ltd on 30th January 2023 and it will be reviewed and updated annually.

**Lorena Baird
Director
Baird & Co. Ltd**

30th January 2023