

Refiner's Annual RJC Report

Table 1: Refiner's details	
Refiner's name	Wieland Edelmetalle GmbH
Location	Schwenninger Str. 13, 75179 Pforzheim, Germany
Reporting year	01.01.2020 – 31.12.2020
Senior management responsible for this report	Stefan Helmling, Managing Director

Table 2: Summary of activities undertaken to demonstrate compliance with RJC CHAIN-OF-CUSTODY-GUIDANCE		
Step 1:	Establish strong company management systems.	WIELAND has strong company management systems in place and has fully complied with step 1
Supply chain policy	WIELAND has adopted a supply chain policy.	During the reporting year, we established an appropriate supply chain policy for Gold, Silver, Platinum, Palladium and Rhodium, which is consistent with the model set out in the Annex II of the OECD Due Diligence Guidance. This established our responsibility for conducting risk-based due diligence, screening and monitoring of transactions and governance structures on site.
Management structure and responsibilities for due diligence program	WIELAND has set up an internal management structure to support supply chain due diligence.	An internal management has been set up to define the governance, roles and responsibilities, internal audit, communications and senior management review as per the adopted policy. The Compliance officer has been assigned for SAXONIA Group to manage the process, and has a direct line of reporting to the managing partner.
Internal control systems and processes for information collection	WIELAND has established a strong internal system of due diligence, controls and information collection over Precious Metal supply chain.	WIELAND has robust internal control systems. Documentation accompanying shipments must be checked. Each lot received is accurately registered in our transactional system. Specific controls regarding the received material are carried out before processing the material.
Record-keeping system and processes for identifying material origin.	WIELAND has established checks and controls for incoming materials and will keep appropriate records.	WIELAND has robust processes to identify material origin. Documentation accompanying shipments must be checked. Each lot received is accurately registered in our transactional system. Specific controls regarding the received material are carried out before processing the material.

Step 2:	Identify and assess risks in the supply chain	
System for identifying red flag locations	Wieland has a process to identify red flag locations in the supply chain.	We identify and assess risks in the supply chain. For every supplier, we have established a client database and allocate a risk profile according to our risk profile criteria. The process is a formal requirement before entering any business relationship with a supplying counterparty. Our due diligence process is carried out on a risk oriented approach.
Description of red flags in supply chain.	We have implemented a process to identify "red flags" in the supply chain, based on "red flags" in the area of our business partners and in the quality of delivered material.	During the counterparty adoption process, we perform various checks to identify red flags on the customer's side. On a daily basis, we check the material arriving at our plant in terms of material composition and country of origin, as well as countries in transit.
Steps taken to map red flag supply chain	Red flags in the supply chain are checked during counterparty inspection and during material checks when the material arrives at our plant.	Through our KYC process, we check and monitor red flags. These checks are accompanied by regular reviews and event-driven reviews. In addition, each material delivery is checked against defined parameters.
Methods, practices and information yielded by on-the-ground assessment teams	Significant business partners will be visited on a regular base. These visits will also be used for information gathering.	Staff visiting partners have received training to verify RJC-related standards. Each visit is documented by a special report that is used to verify conditions on site. The report includes information about the site, supply chain and due diligence. In the reporting year, site visits to partners were limited due to the Corona pandemic.
Actual and potential risks identified (not for potential suppliers)	WIELAND has set up risk assessment and management for the complete supply chain.	The check for actual and potential risks is implemented in the KYC and due diligence processes. In addition, each material delivery is checked against internal standards with regard to origin, supplier and plausibility.

Step 3:	Design and implement a strategy to respond to identified risks (if applicable).	We have fully complied with Step 3: Design and implement a strategy to respond to identified risks (if applicable).
How internal control systems have been strengthened to collect reliable information from red flag supply chains.	In order to harmonise internal control systems with the RJC requirements, WIELAND has strengthened information collection in the supply chain.	Controls and intelligence gathering were strengthened and deepened throughout the supply chain through revised KYC and due diligence processes.
Steps taken to manage risks, including involvement of affected stakeholders. Efforts made to monitor and track performance for risk mitigation.	WIELAND has established risk management and appointed designated managers to track performance.	The established risk management systems are designed to be reviewed annually by the appointed manager, i.e. compliance. Reporting will be reviewed for improvements to the process. An annual report will also monitor the involvement of affected stakeholders.
Number of instances where member has decided to disengage from suppliers.	We have a process in place to report the number of instances where we have decided to part ways with suppliers.	We conduct this process as a group-wide process that includes reporting to senior management and the Executive Committee of the group.
All instances of risk mitigation and results of follow-up after six months.	WIELAND has established the required tools to perform risk mitigation.	An appropriate procedure is in place and will be applied accordingly as needed.
Step 4:	Carry out independent third-party audit of refiner's due diligence practices.	WIELAND is regularly audited by the independent auditing company KPMG in accordance with the regulations of the Responsible Jewellery Council COP and COC Standards.

Pforzheim, 21.01.2021

Stefan Helmling
Managing Director