



VALUE TRADING BV
Simonsstraat 48
2018 Antwerp, Belgium
T +32 (0)3 221 15 69
www.valuetrading.eu
info@valuetrading.eu

Antwerpen, 12/01/2023

ANNUAL COMPLIANCE REPORT

REFINER'S DETAILS	
Refiner's name:	VALUE TRADING BV
Registered address:	Simonsstraat 48, 2018 Antwerpen Belgium
Period covered:	01/01/2022 – 31/12/2022
Senior management responsible for the report:	Nico Van den Eynde - Compliance Officer Eric Thoelen - Director

Introduction:

This report demonstrates how VALUE TRADING BV complies with the OECD guidelines, The Responsible Jewellery Council COP and COC standards and the EU Minerals regulation.

Value Trading has undergone a significant reorganization and are no longer refining precious metals at our location in Antwerp but now outsources this activity to other companies. This enables us to concentrate on recycling and trading precious metals and to further enhance our bespoke service to the goldsmiths and jewellery trade in Belgium and the European Union.

Summary of activities undertaken to demonstrate compliance:

Step 1: Establish strong company management systems

Value Trading has established an efficient management system and adopted a strong policy regarding due diligence for our precious metals supply chain. Our supply chain policy is designed to be fully compliant with the OECD guidance and can be consulted on our website www.valuetrading.eu.

This policy embodies our commitment to implement all regulatory requirements



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Step 2: Identify and assess risks

Value Trading has systems in place to identify and assess risks in the supply chain. All customers and suppliers must pass through our stringent KYC and due diligence systems which are regularly updated. This is mandatory before any transaction can take place. Our client data base is continuously and automatically monitored.

Step 3: Design and implement a management system to respond to risks

Value Trading reasonably ensures that the precious metals contained in the products manufactured do not directly or indirectly finance or benefit armed groups, terrorist organizations or perpetrators of human right abuses and mitigate these risks by focusing our activity primarily in the European Union. We have an automated and permanent screening system of all business partners in place. If and when a risk is identified we actively engage with the customer/supplier to receive further information. Regular compliance meetings are held to evaluate any occurring case. If we cannot mitigate the risk, the decision to terminate the business relationship could occur.

Step 4: Arrange for an independent audit

Value Trading has engaged SGS (UK) Ltd to perform the mandatory audit on behalf of The Responsible Jewellery Council. A full audit on our company practices, compliance systems and supply chain has been executed resulting in a full 3-year certification for both COC as well as COC standards.

<https://www.responsiblejewellery.com/wp-content/uploads/0000-4179-RJC-Certificate-COP2019EU.pdf>

<https://www.responsiblejewellery.com/wp-content/uploads/Value-Trading-BV-RJC-Certificate-COC-2017-EU.pdf>

Step 5: Report on supply chain due diligence

All information and specifics Value Trading's systems, procedures and controls have been set out in our supply chain and due diligence policies and can be consulted on our company website

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Management conclusion

Value Trading is compliant with the OECD guidance and EU minerals Regulation as well as the chain of custody and code of practices standards of The Responsible Jewellery Council. Value Trading has implemented effective management systems and procedures conform these requirements for the reporting year ended 31 December 2022.

If users of this report wish to provide any feedback to Value Trading with respect to this report, they are welcome to contact compliance at compliance@valuetrading.eu

Antwerpen 12 January 2023

Nico van den Eynde
Compliance Officer

Eric Thoelen
Director