



VALUE TRADING BV
Simonsstraat 48
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www.valuetrading.eu
info@valuetrading.eu

Antwerpen, 14/05/2024

ANNUAL COMPLIANCE & DUE DILIGENCE REPORT

REFINER'S DETAILS	
Refiner's name:	VALUE TRADING BV
Registered address:	Simonsstraat 48, 2018 Antwerpen Belgium
Period covered:	01/01/2023 – 31/12/2023
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 BV has obtained in April 2023 the necessary licenses, in close cooperation with the City of Antwerp, and can now process a limited quantity of precious metals.

Recent elaborate research & studies by independent organizations and local authorities concluded that Value Trading's activity poses no risk whatsoever to the local community, as confirmed by the results of quarterly emission measurements executed by an independent organization.

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 comprehensive supply chain and due diligence policies are designed to be fully compliant with the OECD guidance and can be consulted on our website www.valuetrading.eu.



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These policies embody our commitment to implement all regulatory requirements and assurance for a responsible and sustainable supply chain.

Step 2: Identify and mitigate 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.

Quarterly meetings are held by the management with staff to discuss any identified red flags or risks and / or mitigate should it be required.

No risks or red flags were identified in the reporting period.

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. Value Trading has appointed a compliance officer with the authority to suspend or terminate a transaction and/or client relationship.

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 2022 resulting in a full 3-year certification for both COC as well as COC standards.

Value Trading has successfully undergone the mid-term COP and COC audit executed by SGS (UK) Ltd on behalf of The Responsible Jewellery Council on 23/01/2024.



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<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 regarding 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 www.valuetrading.eu

Value Trading concentrates mainly on the EU market for sourcing its precious metals and no risks in the supply chain have been identified in the reporting year.

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 successfully implemented effective management systems and procedures conform these requirements for the reporting year ended 31 December 2023.

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, 14th May 2024

Nico van den Eynde

Compliance Officer

Eric Thoelen

Director