

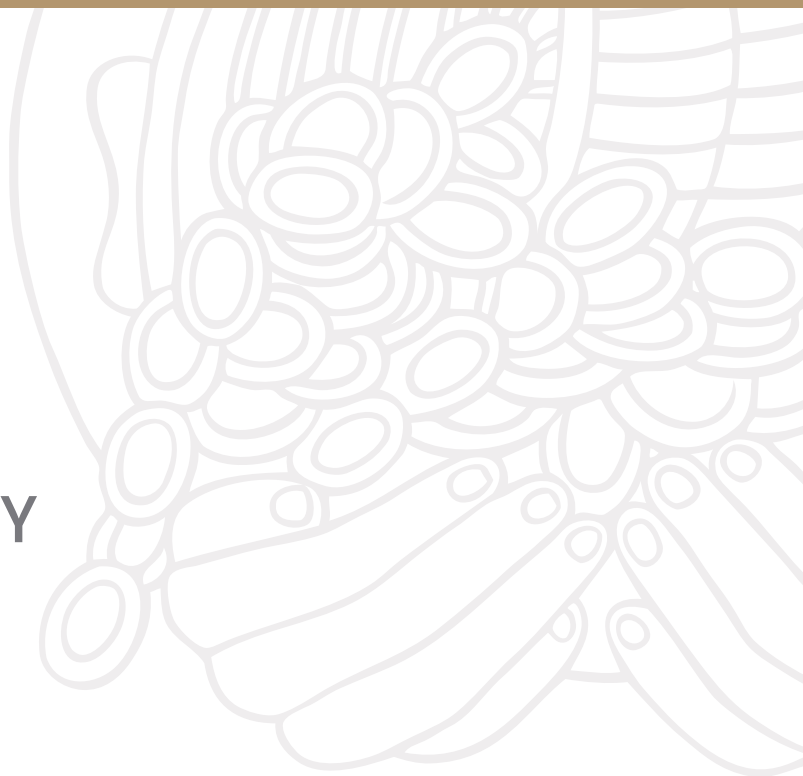


As precious as tomorrow

PAMP[®]

Produits Artistiques Metaux Precieux

SUSTAINABILITY
REPORT 2019



To our Stakeholders

At PAMP we strive to develop a truly sustainable future. For years we have worked towards this goal with great determination, driven by our belief that there is nothing more precious than tomorrow. Over time that work has been distilled into five pillars that represent our commitment: actively involving our Stakeholders; taking all possible measures to ensure our production chain is completely sustainable; maintaining a positive impact on the people and communities around us; protecting the environment through constant improvements, and collaborations with leading institutions to ensure our company is financially stable. To uphold those obligations, we will continue to ceaselessly prioritize proactive and effective corporate and socially responsible efforts throughout our company at all levels.

A practical illustration of that all-encompassing commitment, based on a 360° view of the environment around us and the Stakeholders within it, is the evolution of the data and dynamics underlying this Sustainability Report. Our efforts are inspired by the Global Reporting Initiative (GRI) guidelines, just as the latest guidelines and principles on sustainability reporting have supported our goal of creating a document that is a complete and transparent instrument for debate and discussion.

Over the course of 2018-2019, many indicators were significantly influenced by the major and essential need to rebuild our gold refinery. The following pages provide a detailed description of that important investment, which bears witness to the faith that we and MSK PAMP GROUP place in the region and in the current company structure. It constitutes an additional element of our corporate and social responsibility and our obligation to an increasingly sustainable future.

Nadia Haroun, CEO

A handwritten signature in black ink, appearing to be 'Nadia Haroun', with a long horizontal stroke extending to the right.

Our Company, p. 4

- Core values
- Activities
- Governance
- Company policy
- The Group - locations

“As precious as tomorrow”, p. 12-13

Pillar 1: Stakeholder involvement, p. 14-15

- Involvement activity
- Important topics for Stakeholders
- Materiality matrix
- Focus

Pillar 2: Supervision of the production and supply chain, p. 22-23

- Production and supply chain
- Internal procedures
- Accreditations and collaborations
- Suppliers
- Focus

Pillar 3: Social responsibility, p. 30-31

- Personnel
- Occupational health and safety
- Training
- Local community
- Focus

Pillar 4: Environmental responsibility, p. 38-39

- Materials
- Energy
- Water
- Waste
- Atmospheric emissions
- Focus

Pillar 5: Economic responsibility, p. 46-47

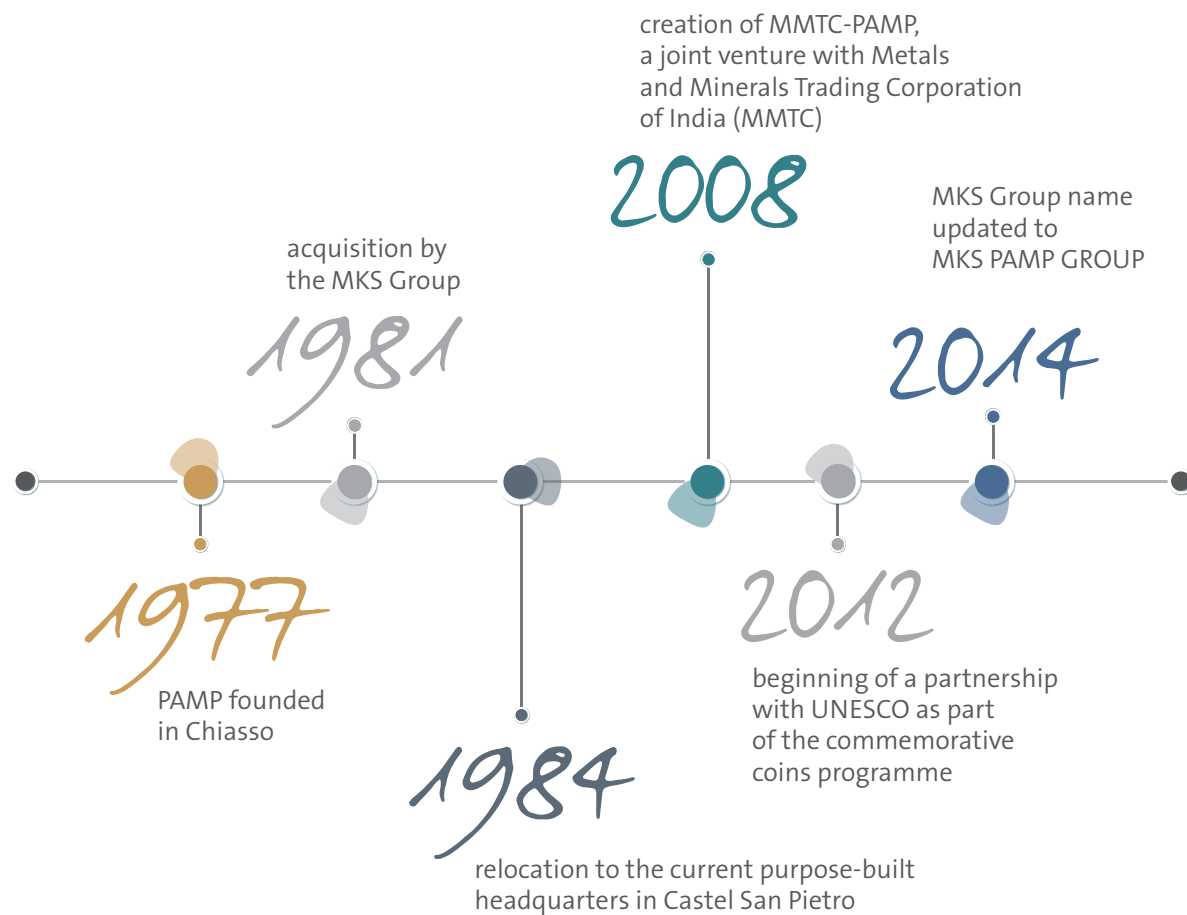
- Operating results
- Taxes, investments and sponsorships
- Provenance of suppliers
- Focus

Sustainability report, p. 53

GRI Index, p. 55-58


Our Company


PAMP stands for 'Produits Artistiques Métaux Précieux', but that's not all. Our brand name represents leadership in the sector and high quality processing of precious metals, ingots, coins and medals, and semi-finished goods. PAMP SA, based in Castel San Pietro, Switzerland, is part of MKS PAMP GROUP. The Group, based in Geneva, has **four brands with 14-offices throughout 12-countries**. In addition to PAMP and MMTC-PAMP, India, which handle the refining and processing of precious metals, the portfolio includes MKS, which provides financial, physical and commercial services to a global customer base, as well as coin and ingot distributor MTB Metals (Manfra, Tordella & Brookes), which operates in the United States.





Core values


Our company culture is based on six-core values. Those principles define our identity, determine our strategy, and support our ideas, the way we operate and the initiatives we adopt in relation to society-at-large and to our Stakeholders. Those aspects are shared at all levels and establish our structure and policies as well as our organisational culture.


- 

EXCELLENCE
Taking great care with all phases of processing, throughout all activities and with individual products and services in order to achieve the highest levels of quality excellence
- 

TRUST AND RELIABILITY
Continuous commitment to a sustainable and transparent production chain, application of and compliance to industry regulations and principles
- 

RESPECT
Control our environmental impact via collaborations with leading regulatory institutions, and maintaining an open and respectful relationship with the community
- 

RESEARCH AND INNOVATION
Ongoing investment in research and development, adopting cutting-edge techniques and processes
- 

PROTECTION AND DEVELOPMENT
Safeguarding health and safety at work and a commitment to a peaceful working environment
- 

RESPONSIBLE SOURCING
Without exception, selecting and monitoring supply chains that meet stringent internal and industry-mandated due diligence requirements

Activities

PAMP serves its customers with the highest quality excellence standards by offering a complete range of products and services.

Products

- **Cast bars and ingots:** produced in gold, silver, platinum and palladium;
- **Minted ingots:** produced in gold, silver, platinum, palladium and rhodium in weights ranging from 0.3 g to 1 kg;
- **Finished and semi-finished products of traceable origin:** production batches fabricated via segregated processing and equipment, guaranteeing full traceability of the precious metal throughout the chain;
- **Gifts and collectors' items:** pendants, nameplates and other items in gold, silver, platinum and palladium; coins and medals for which we oversee design, packaging, marketing and distribution
- **Semi-finished goods for industrial clients:** pure precious metals, gold alloys, components, silver derivatives, and salts and solutions of platinum group metals for jewellery and other industrial sectors.

PROVENANCE: Responsible Sourcing. Transparency is Trust

The trust our customers place in PAMP remains our greatest asset. Indeed, we are committed to delivering a transparent supply chain and production management service. In that way, PAMP guarantees the origin of all precious metals utilized throughout our production processes.

Integrated with advanced Blockchain technology, PROVENANCE provides our clientele with a traceable record of every stage throughout the supply chain, applicable to all products, including bars, coins, semi-finished products, strips and grains.

The impact of PROVENANCE also extends to other fields. Ethical sourcing and supply chain management has a positive effect on human rights and labor practices, as well as environmental protections and regulatory compliance.

Altogether, PROVENANCE upholds many fundamental values:

- **Scrupulous Sourcing:** Assists customers in the selection of mines or other standard metal sources such as recycled materials or bullion bars while taking into account every compliance variable
- **Supply Chain Integrity:** For transparent traceability, Blockchain technology confirms an immutable record of each stage of the sourcing and production processes
- **Certificates of Origin:** Provides customers with a detailed guarantee that verifies each product type as conforming to the industry's highest ethical standards. For applicable products, the PROVENANCE Registered Mark can also be adopted as proof of ethical, best-practices throughout the supply chain.

Services:

- **Refining** of gold, silver and platinum group metals (annual capacity: 450 tonnes of gold, 600 tonnes of silver and 30 tonnes of platinum group metals);
- **Analysis and sampling:** control of precious metals by our assay and analysis laboratory, which operates as an independent entity under remit of the Swiss Central Office for the Control of Precious Metals and which holds ISO/IEC 17025 accreditation, in recognition of meeting the standards required for carrying out analyses using accredited methods, and can therefore issue various types of certificates;
- **Storage and vaulting services:** in Switzerland, the United States and India;
- **Wholesale –retail solutions for authorized partners:** an innovative digital platform that supports wholesale and/or retail sales of a wide range of products;
- **Financial services** (as we belong to MKS PAMP GROUP): physical trading of precious metals, unallocated trading, location and purity swaps, Web-based trading application (WTA), Web-based reporting and daily market reports;
- **Added-value solutions – proprietary VERISCAN technology:** unambiguous identification of all products from PAMP or its brand partners through instant scanning of the surface of ingots and coins. Using the VERISCAN™ – Bullion Security iPhone app, customers can securely obtain details of both the authenticity and provenance of finished or semi-finished products with unprecedented efficiency. The breakthrough system helps to greatly reduce the risk of counterfeiting and makes it possible to reduce reacquisition costs for distributors and investors.

Customers and markets

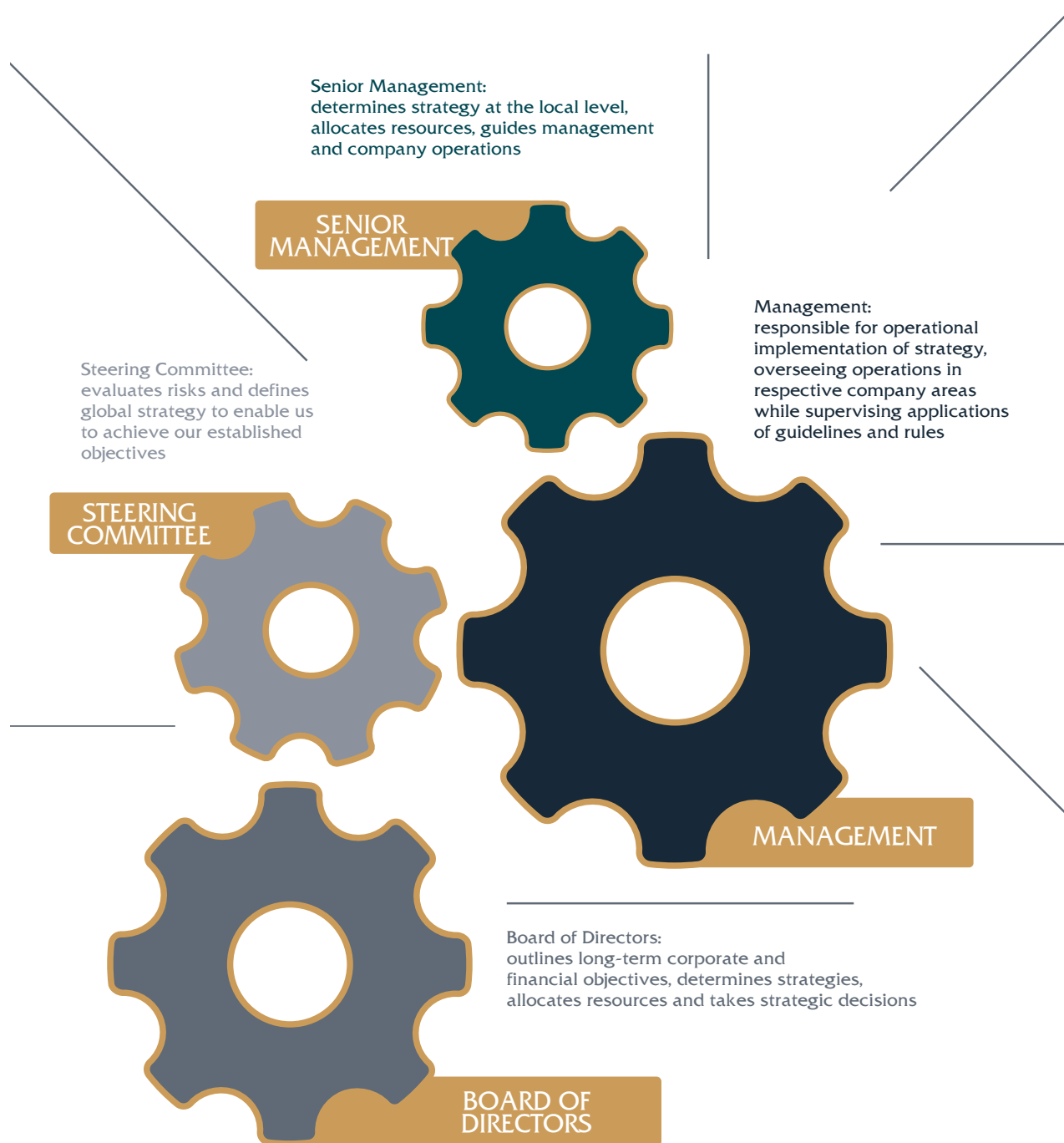
PAMP has a varied global customer base operating in a range of sectors:

- Central and commercial banks;
- National mints;
- Mining companies;
- Manufacturers of and dealers in jewellery and watches;
- Asset management and trading companies;
- Commodity trading advisors (CTA);
- Major private investors;
- Ingot traders;
- National postal regulatory authorities.

For minted products, our main markets of operation are those where the Group's companies are located, namely North America, Europe and Asia. Our principal customer base in the ingot market remains the banking sector, especially in Europe and North America.

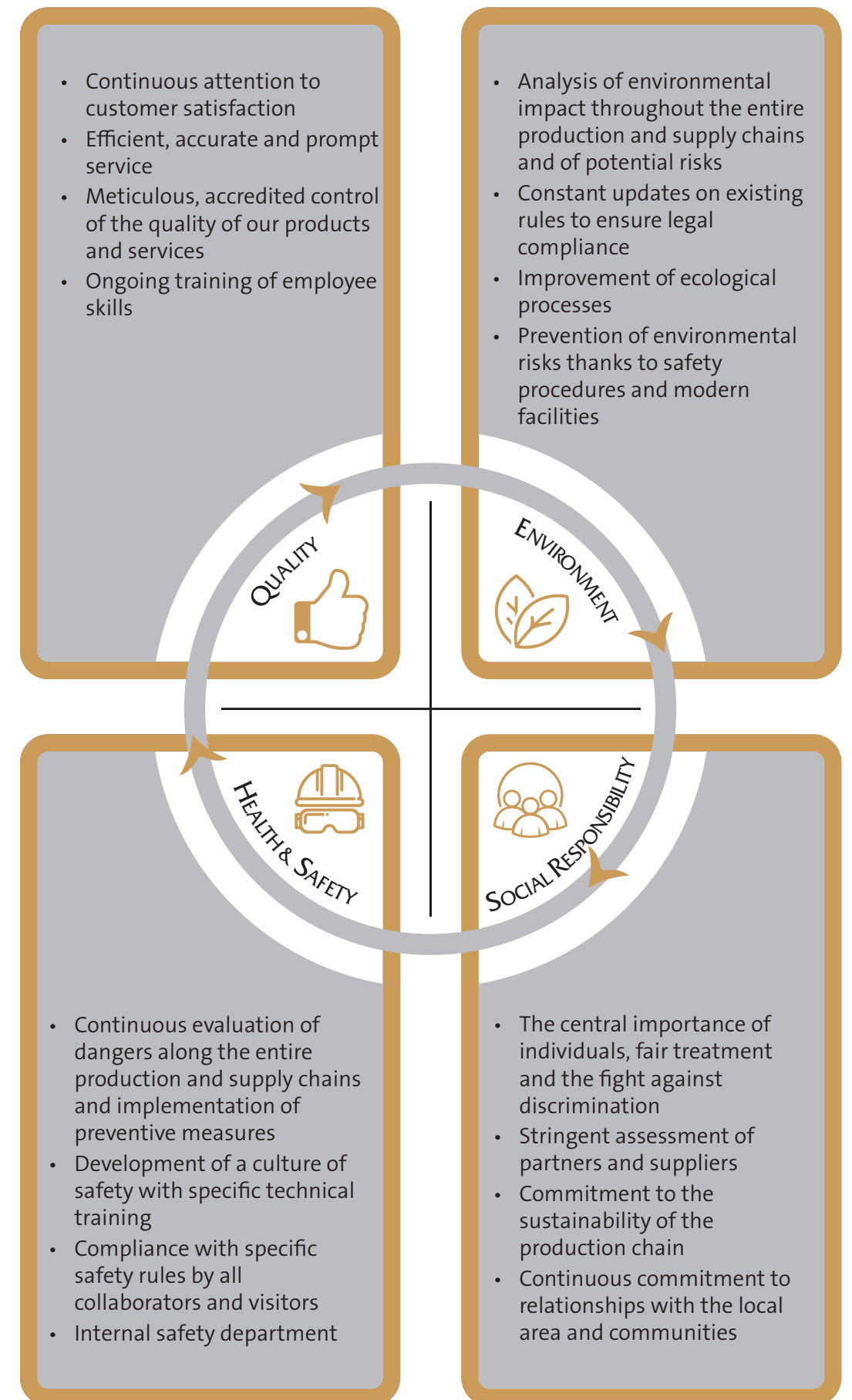
Governance

We maintain a flexible and efficient governance structure within MKS PAMP GROUP that allows us to take decisions quickly and efficiently. Our management bodies and main tasks are described below:



We are also subject to checks, audits and verifications by third parties such as private bodies and regulatory institutions. The values of corporate social responsibility are shared internally within our company management, various internal committees, and external collaborations that actively supervise the best possible implementation of those values.

Company policy



The Group – locations



- **MKS SA**
Geneva, Switzerland
 - Founded in 1979
 - The largest and principle trading company of the MKS PAMP GROUP
 - Provides financial and physical services and trading to a global clientele

- **PAMP SA**
Castel San Pietro, Switzerland
 - Founded in 1977
 - The leading global brand in the production of ingots, in particular bullion commonly known as ‘small bars’
 - Processes precious metals at a facility with cutting-edge equipment

- **GOLDAVENUE SA**
Geneva, Switzerland
 - Founded in 2018
 - The official online, retail distributor of the MKS PAMP GROUP
 - Makes it easy for customers to buy, sell and deposit products of gold and other precious metals

- **MTB - Manfra, Tordella & Brookes, Inc**
New York, United States
 - Founded in 1957
 - Part of the MKS PAMP GROUP since 2002
 - Offers individuals and institutions a wide range of coins, ingots and investment bars

- **MKS PAMP GROUP B.V.**
Amsterdam, The Netherlands
 - Founded in 2008
 - Guarantees financial strength and structure to the entire group

- **MMTC-PAMP India Private Ltd.**
New Dehli, India
 - Founded in 2008
 - Manages the most modern precious metals refinery in the world and is the first and only LBMA Good Delivery refinery for gold and silver in India
 - The company is a joint venture with MMTC, the largest trading and precious metals importing company in India

- **OTHER LOCATIONS**
 - Sydney
 - Dubai
 - Hong Kong
 - Kuala Lumpur
 - Istanbul
 - Shanghai
 - Singapore
 - Bangkok

At PAMP, all of our thoughts and actions are influenced by the desire to help create a better tomorrow, since we know that our present activities influence what we leave to future generations. Given the great responsibility of our actions, we believe they are as 'precious' as the metals that we process and the products we produce. As part of our five pillars of commitments, we have defined stringent guidelines to follow when implementing conscious and practical corporate social responsibility. PAMP also recognizes the many precious contributions of our Stakeholders, whose involvement is extremely important to create shared values. How precious it is to maintain a production and supply chain based on transparent and sustainable management of raw materials that also ensures respect for human rights? How precious it is to acknowledge people, whether collaborators or members of the institutions and the communities that interact with our company? How precious it is to spare no efforts in protecting the environment and the company's long term stability? Our five foundational pillars are composed of a series of small gestures, like gold nuggets, symbolizing the precious nature and care they require to shine to their best advantage. It takes mindfulness and dedication for something precious to truly attain value. Our motto 'as precious as tomorrow' represents an unwavering commitment to ensure we all may enjoy a sparkling future.

Our 5 pillars

as Precious as tomorrow

1.
**Stakeholder
involvement**

p.14-15

2.
**Supervision of
the production
and supply
chain**

p.22-23

3.
**Social
responsibility**

p.30-31

4.
**Environmental
responsibility**

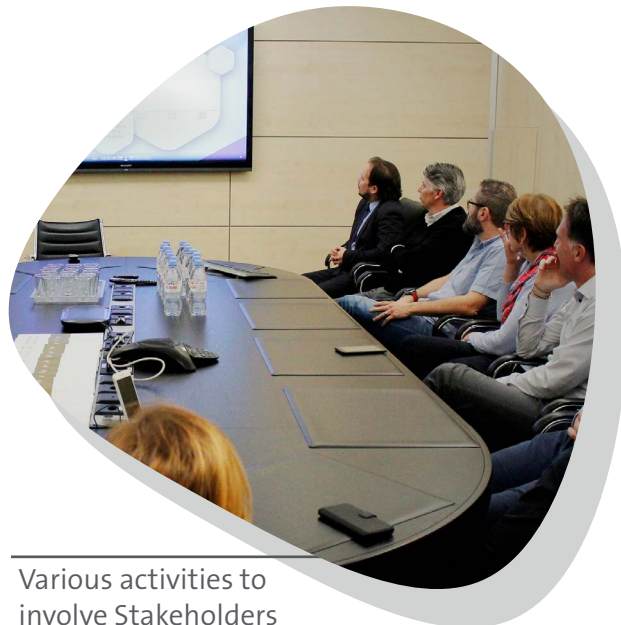
p.38-39

5.
**Economic
responsibility**

p.46-47

Stakeholder involvement

Our relationships with our Stakeholders are not limited to collaborations in a narrow sense. We take steps every day to ground those relationships in open dialogue and sharing. That is the only way to ensure we can generate value and implement the best possible corporate and social responsibility initiatives. PAMP regularly meets with Stakeholders to strategize and organise activities and events in which both PAMP and community leaders and organisations take part. Each Stakeholder feels strongly about different topics, and so in managing our operations we identify the most efficient ways to integrate and satisfy those unique needs. We analyze topics collectively, in order to identify points in common, and to make improvements wherever possible.



Various activities to involve Stakeholders



Company visits from our Partners

Every **6-weeks:** meetings with Workers' Representatives



Participation in 9 trade events and fairs

Constant contact to maintain valuable relationships

16-topics of importance to Stakeholders

INDEX

Involvement activity	p.16-17
Important topics for Stakeholders	p.18-19
Materiality matrix	p.20
Focus: An occasion to meet at a UNICEF fundraising event	p.21

Involvement activity

Initiatives for involving Stakeholders are based on transparency, continuous dialogue and personalized activities, aimed at generating added value for the parties involved. It is important to foster a cultural climate of mutual exchange so we remain abreast of the interests of our different Stakeholders and understand how their concerns may have evolved over time. That approach allows us a broader perspective of each specific interest while at the same time creating value in both the short and long term. The table summarizes the various activities PAMP has undertaken, as well as the specific interests of the different Stakeholders we interact with.

STAKEHOLDER	Involvement activities
Shareholders (company owners)	Quarterly meetings of the Board of Directors
Group Companies	Annual group strategy meeting Periodic meetings within business areas Meetings at fairs and trade events Regular contacts Company visits
Employees	Periodic meetings (every six weeks) with Workers' Representatives Notice board, suggestion box and register of ideas Social initiatives: company dinners, voluntary activities, the possibility of making individual proposals on a dedicated notice board Company training plan Annual performance reviews for workers through a system of KPIs Sustainability report
Customers and commercial partners	Company visits Interactions with the Sales & Marketing team Sector fairs Regular due diligence verifications and checks Sustainability report
Suppliers	Periodic meetings Regular due diligence verifications, checks and cataloguing External audits Use of digital platforms to structure information on sustainability Sustainability report

STAKEHOLDER	Involvement activities
Institutions	Periodic meetings Company visits Regular contact Collaboration, exchange of data and technical consultancy on environmental topics Sharing information and communication (e.g. press releases) Voluntary initiatives in collaboration with the municipality Sustainability report
Local community	Sponsorship Voluntary initiatives in collaboration with local actors Periodic meetings with the local associations (Vivigorla e Dintorni) Dedicated email address for reporting environmental problems Sustainability report
Competitors	Informal meetings for discussions and debate Sustainability report
Sector associations	Memberships of various groups and associations Participation in working groups Provision of knowledge and expertise on various topics for the development of guidelines and regulations Collaboration on courses and seminars Participation in assemblies and meetings Participation in training events Sustainability report
Labour unions	Two-way communications channel Contact on specific occasions Sustainability report
Public services	Sharing emergency plans Regular updates on internal changes and exchange of information Ongoing direct collaboration mediated by the Cantonal Office Regular drills conducted during the year Sustainability report
Media	Press releases Press conferences Collaboration with a specialised company as the point of contact for media requests Sustainability report

Important topics for Stakeholders

Developing a successful collaboration with Stakeholders requires particular sensitivity in understanding various aspects of the relationship. A favorable outcome is directly proportionate to the ability to fully comprehend and empathize with their particular characteristics and needs, and to maintain meaningful relationships over time in order to become best acquainted with their individual areas of concern. The table below lists all 'material' topics, which according to the GRI definition are:

- Areas where the company can have an impact through its own operations
- Topics that can influence the assessments and decisions of Stakeholders in relation to the company

Analyzing those topics, which are constantly monitored and updated, allows us to define guidelines for drafting and choosing the content of this sustainability report. The different topics have been allocated according to the pillar to which they refer, and have been cross-referenced with their level of importance to the various Stakeholders. The result of that process is the materiality matrix, which is shown on the following page.

Stakeholder involvement

- 1 Transparency towards stakeholder**
Shareholders, Group companies, Employees, Customers and Partners, Suppliers and Minerals supply chains, Institutions, Local community, Competitors, Sector associations, Labour unions, Public services, Media
- 2 Proactive approach to corporate social responsibility**
Shareholders, Customers and Partners, Suppliers and Minerals supply chains, Institutions, Local community, Sector associations

Supervision of production and supply chain

- 3 Ethical conduct and transparency of the production chain**
Shareholders, Group companies, Customers and Partners, Institutions, Media
- 4 Compliance with laws and regulations**
Shareholders, Group companies, Customers and Partners, Institutions, Local community, Sector associations, Labour unions, Public services, Media
- 5 Analysis of commercial partners and suppliers**
Shareholders, Group companies, Customers and partners, Suppliers and Minerals supply chain, Institutions, Local community, Sector associations, Labour unions, Media

Social responsibility

- 6 Employment conditions and work environment**
Employees, Institutions, Labour unions, Media
- 7 Occupational health and safety**
Employees, Institutions, Labour unions, Media
- 8 Teaching and training**
Employees, Sector associations, Labour unions
- 9 Partnerships with local actors and relationships with the local community**
Institutions, Local community, Sector associations, Public services, Media
- 10 Dialogue with institutions**
Institutions, Local community

Environmental responsibility

- 11 Protecting the environment**
Shareholders, Customers and Partners, Institutions, Local community, Sector associations
- 12 Careful management of resources**
Shareholders, Customers and Partners, Institutions, Local community

Economic responsibility

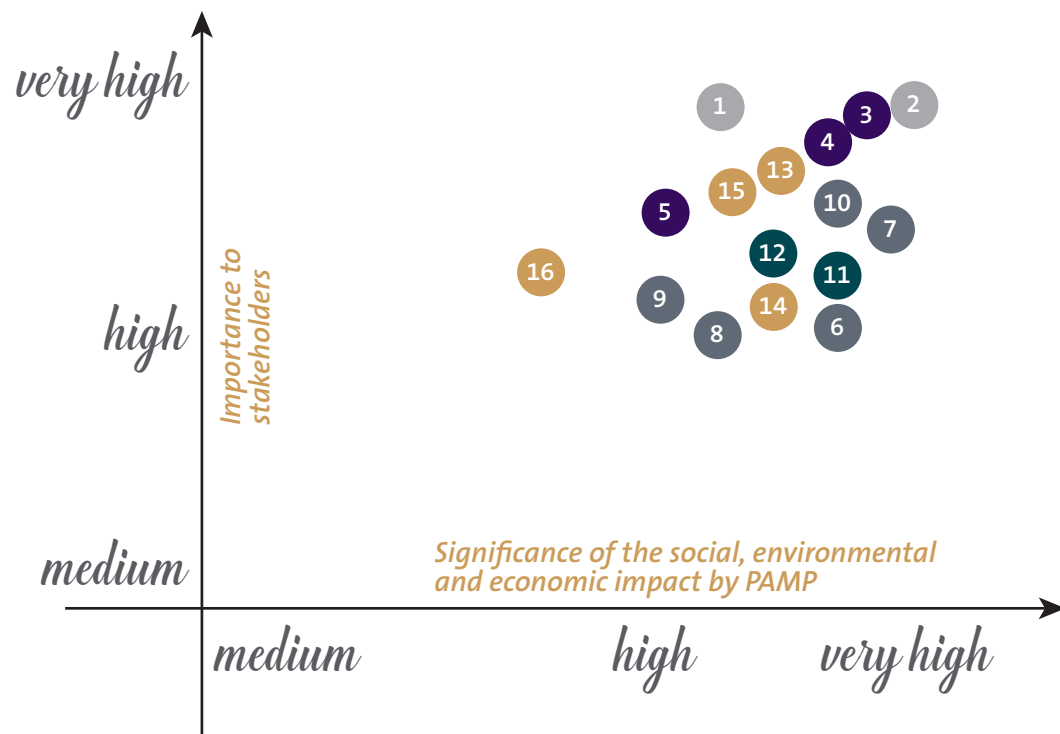
- 13 Lasting company competitiveness**
Shareholders, Group companies, Employees, Customers and Partners, Institutions, Sector associations
- 14 Creation and distribution of economic value**
Shareholders, Group companies, Customers and Partners, Suppliers and Minerals supply chains, Institutions, Sector associations, Labour unions
- 15 Creation of value through innovative, high quality products and services**
Shareholders, Group companies, Customers and Partners, Competitors, Sector associations
- 16 Purchase from local suppliers**
Suppliers and Minerals supply chains, Local community, Sector associations, Public services, Media

Materiality matrix

The materiality matrix presents important topics that have been identified and organised according to the following criterion:

- Importance to Stakeholders
- Significance of the social, environmental and economic impact of PAMP's business operations

The matrix depicts the process that supports both the analysis of Stakeholders and the identification of the *strategic areas* where the social impact of our actions is greatest. We ensure the matrix remains up to date through a process of constant reviews during which changes to the requirements and priorities of Stakeholders or throughout the surrounding social and economic fabric are noted.



Stakeholder involvement

1. Transparency towards stakeholder
2. Proactive approach to corporate social responsibility

Supervision of production and supply chain

3. Ethical conduct and transparency of the production chain
4. Compliance with laws and regulations
5. Analysis of commercial partners and suppliers

Social responsibility

6. Employment conditions and work environment
7. Occupational health and safety
8. Teaching and training

9. Partnerships with local actors and relationships with the local community
10. Dialogue with institutions

Environmental responsibility

11. Protecting the environment
12. Careful management of resources

Economic responsibility

13. Lasting company competitiveness
14. Creation and distribution of economic value
15. Creation of value through innovative, high quality products and services
16. Purchase from local suppliers

An occasion to meet at a UNICEF fundraising event

For the third consecutive year PAMP offered its support to the Swiss Committee for UNICEF by sponsoring a charity event in collaboration with Ticino's Commitment to Children. That special evening, held at the beginning of May at the Hotel The View Lugano, saw various Ticino-based companies come together to raise funds for a project to improve access to pre-school education for Ethiopian children. The event itself and a number of related initiatives raised over CHF 65,000 for the cause. According to UNICEF, education is the most important requirement for overcoming poverty: that is why it is so important to take concrete steps to ensure every child is provided the same opportunities.

The evening provided a chance to meet many important Stakeholders, who gladly accepted our invitation and were welcomed at our table. Among them was Deputy Mayor Paolo Prada, who attended on behalf of the municipal authorities (in the photo, with our CEO Nadia Haroun).



Supervision of the production and supply chain

An additional reason for working diligently every day to provide a responsible and transparent precious metals production chain is the satisfaction of setting an example for the sector. We carry out a range of activities to achieve that aim. Indeed, our internal activities are guided by various policies and procedures that are implemented through specific tools and guidelines. We regularly screen our suppliers of raw materials and our providers of products and services. We are active members of international organisations, and as such we contribute to the drafting of rules and regulations that we then apply throughout our own operations.



One of only three Good Delivery Referees worldwide accredited both by LBMA and LPPM

+16%
active suppliers
assessed according
to the SA8000
procedure

Evaluation of suppliers to be contracted for the refinery restructuring based on a range of criteria such as value for money, certifications and CSR.

Strategic alliance
with IT company



Representative of the Social Performance Team continuously enforces correct application of the SA8000 certification

Implementation
of the Responsible
Precious Metals
Group and Know
Your Customer
Policies

INDEX

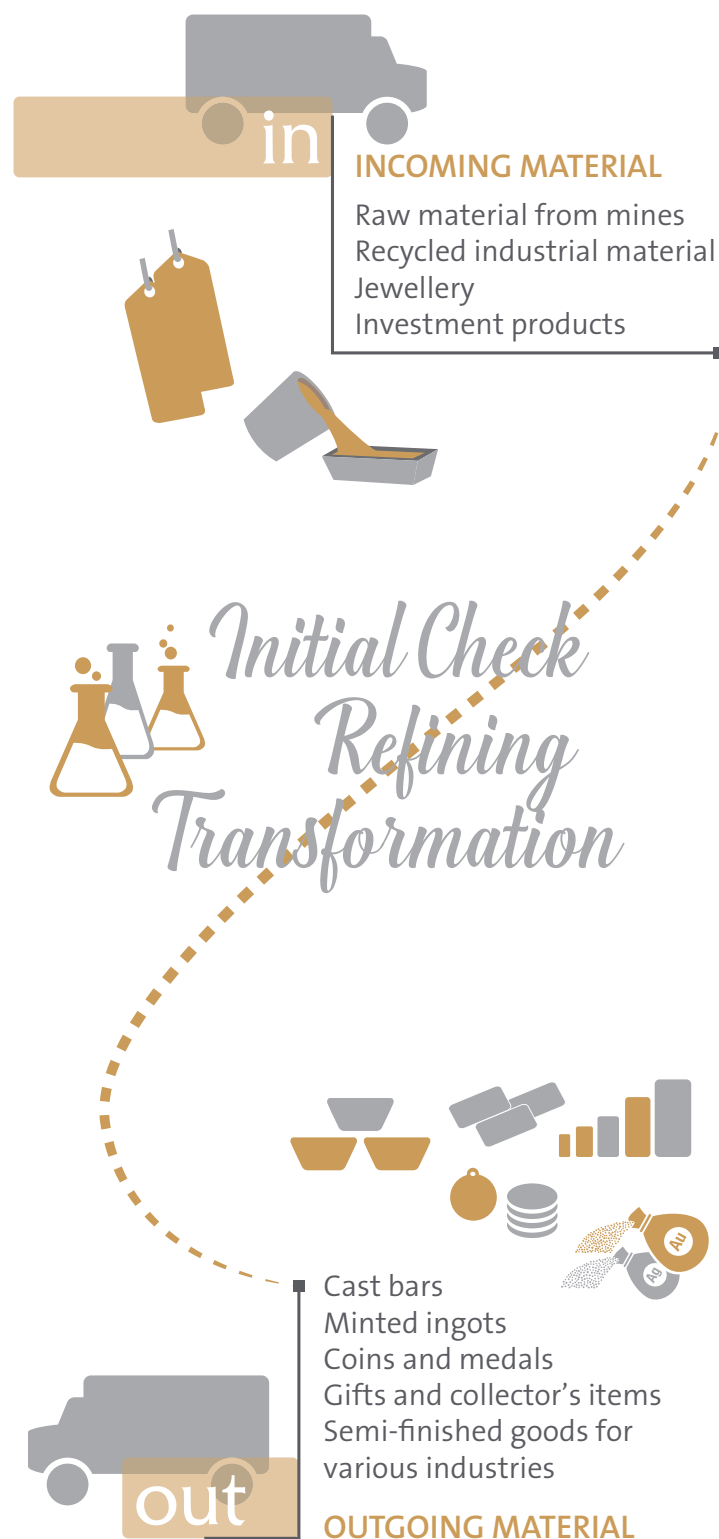
Production and supply chain	p.24
Internal procedures	p.25
Accreditations and collaborations	p.26-27
Suppliers	p.28
Focus: Blockchain technology for enhanced traceability	p.29

Production and supply chain

Our company, and precious metals refineries in general, play a key role in the precious metals production chain. That is because we have opportunities to interact with the various sources that supply our raw materials, which are processed for distribution to a global clientele. That allows PAMP to **monitor all stages** of the transport of materials, from extraction to distribution, enabling us to guarantee traceability. The image below illustrates our production chain: the provenance of the materials, the phases of processing and finally the types of products fabricated and delivered to our clients.

In the past year, technological advances have allowed us to take another step forward in guaranteeing the traceability of metals: thanks to a strategic alliance with an IT company, PAMP has implemented blockchain technology to reconstruct the route taken by precious metals from the moment of extraction, throughout all production processes to final delivery and custody of the end product(s) (see page 29).

In addition, as part of the reconstruction of the gold refinery, described on page 51, specific workbenches will be installed that ensure singular client-based gold refining, which can also be used for orders of small quantities, thus guaranteeing that all customers, large or small, will have their metals processed separately.



Internal procedures

Careful control of the production chain actively involves the whole MKS PAMP GROUP, to ensure all activities are conducted with full respect for human rights while also preventing the financing of conflicts or terrorism, as well as corruption and money laundering. At the same time, rigorous inspections are also regularly undertaken to ensure that environment and sustainability responsibilities are complied with by suppliers, including for surrounding communities affected by operations.

Our actions are guided by a number of internal regulations, including the **Responsible Precious Metals Group Policy**. That regulation involves us directly as part of MKS PAMP GROUP and is based on the OECD guidelines: we adopt a management system that involves the completion of due diligence based on risk analysis at the beginning of any commercial relationship, as well as constant monitoring of all transactions. That process is also supported by the **Know Your Customer** procedure, through which we verify the following for all current and potential customers:

- The provenance of the raw materials received for processing
- The legality of financial resources
- Respect for human rights and standards of working conditions
- The compliance with responsibilities for environment and sustainability by mining and production operations

Finally, we also fully comply with FINMA (Swiss Financial Market Supervisory Authority) regulations in relation to combating money laundering and the financing of terrorism (ORD-FINMA).

Developing a commercial collaboration involves rigorous risk-based due diligence through documentary screening, external verifications and direct visits: those protocols must be completed before establishing any sort of relationship with any entity providing us with precious metals for processing. These checks and oversight are carried out regularly and produce a continuous flow of data, allowing us to ascertain the compliance of the entire working relationship.

Accreditations and collaborations

Our desire to play an active role and contribute to defining guidelines and standards for the whole sector leads us to collaborate with a range of national and international organisations and participate in a number of working groups:

- **Responsible Jewellery Council (RJC):** we follow their Code of Practice and in 2015 we obtained the Chain-of-Custody certification (CoC): CoC-certified metal comes from a fully traceable production chain that complies with the RJC's ethical requirements
- **Organisation for Economic Co-Operation and Development (OECD):** we are an active member of the Multi-Stakeholder Steering Group, a working group involved in implementation of the OECD Due Diligence Guidance
- **London Bullion Market Association (LBMA):** PAMP contributed to drafting its Responsible Gold Guidance and its Responsible Silver Guidance
- **London Platinum and Palladium Market (LPPM):** PAMP participated in defining guidelines for the extraction of platinum and palladium (respectively the Responsible Platinum Guidance and Responsible Palladium Guidance) inspired by the LBMA regulations
- **Public-Private Alliance for Responsible Mineral Trade (PPA):** PAMP belongs to the PPA, established to promote programmes aimed at developing responsible supply procedures for small mine operators
- **World Gold Council (WGC):** PAMP contributed to the publication of the Conflict-Free Gold Standard to promote gold that does not cause or support armed conflicts
- **Swiss Better Gold Association (SBGA):** we are founding members, sitting on the Board of the association and we actively participate through meetings and working groups
- **Alliance for Responsible Mining:** at the start of 2018 PAMP became authorised reseller of Fairmined gold, a certificate created by the organisation to support responsible gold mining practices by artisanal and small-scale mines
- **Responsible Mining Initiative (RMI):** PAMP joined this initiative in June 2019.

Accreditations:

- London Bullion Market Association: Ordinary Member
- London Platinum and Palladium Market, Tokyo Stock Exchange: Associate Member
- New York Commodity Exchange and the Chicago Mercantile Exchange, non-clearing member

Good Delivery recognition of our products by the following bodies:

- London Bullion Market Association (LBMA)
- London Platinum and Palladium Market (LPPM)
- Swiss National Bank (SNB)
- Tokyo Stock Exchange (TOCOM)
- New York Commodity Exchange (COMEX)
- Dubai Gold and Commodities Exchange (DGCE)
- Chicago Mercantile Exchange (CME)
- Shanghai Gold Exchange (SGE)



New York
Mercantile Exchange

Assay laboratory: global excellence

Our assay laboratory is one of only three Good Delivery Referees worldwide accredited both by LBMA and LPPM, authorised by both organisations to conduct technical analysis to evaluate bars sent by candidates for Good Delivery certification. In addition, it proactively and anonymously monitors the list of companies recognised as Good Delivery and provides LBMA and LPPM with technical consultancy on a series of topics as required.

Suppliers

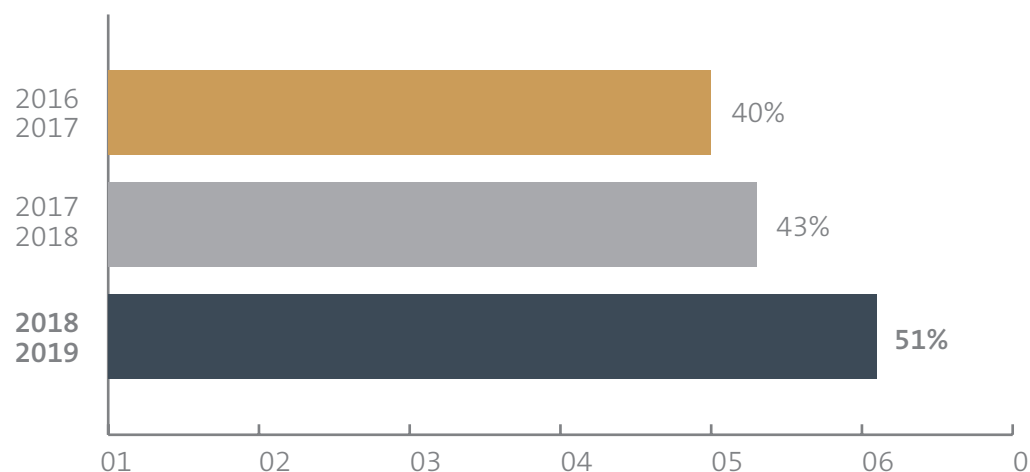
Every year we carefully check suppliers of services and materials (in the categories of machinery and facilities, packaging, chemical products, energy, security, technology, associations, bodies and consultants and general suppliers), based on the requirements of the SA8000 certification.

As shown in the **Active suppliers assessed according to the SA8000 procedure** graph, to date we have evaluated 51% of all active suppliers: 250 suppliers were assessed out of a total of 489. That represents over 90% of our expenditure. There was no need to take corrective measures as we did not uncover any social or environmental problems.

Suppliers are inspected through an in-depth assessment which starts with a questionnaire to check compliance with certain environmental and social criteria, rather than by signing a declaration of commitment to follow our ethical standards. We then begin targeted campaigns to verify the declarations made. The cataloguing process that began in the previous period has allowed us to reach the suppliers for inspection more effectively.

In parallel we are implementing procedures for supplier selection based on a set of criteria that includes not only quality, service and price aspects but also an assessment of social and environmental policies. For example, the suppliers that worked on the restructuring of the refinery were chosen according to those principles.

Active suppliers assessed according to the SA8000 procedure*



* that have issued at least one invoice during the period.

For transparent and responsible traceability

PAMP has established several strategic alliances with adjacent industry leaders – some of them long-standing, as with AlpVision, while others were formed more recently, as with Peer Ledger in 2018.

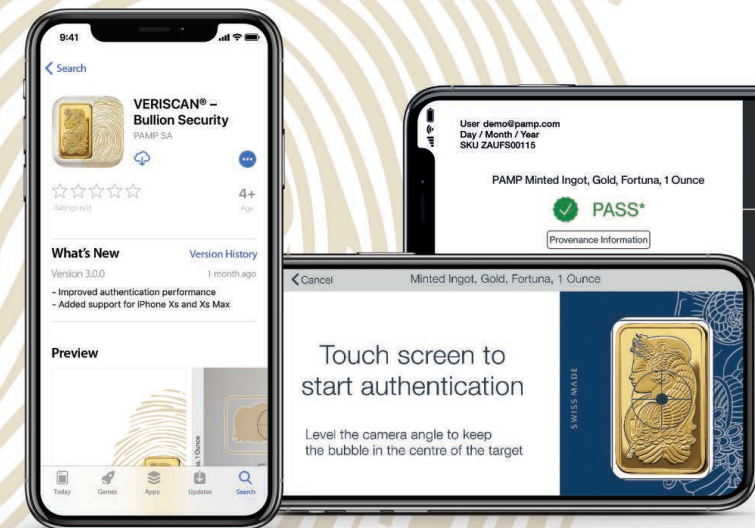
Those collaborations are driven by the desire to improve recognition and traceability of all precious metals sourced and utilized by PAMP. By combining AlpVision’s cryptographic technology for the authentication of precious metals with Peer Ledger’s Blockchain model for responsible sourcing, we aim to provide the best risk-management tools along the entire supply and production chain.

In detail, AlpVision’s technology authenticates precious metals by recognising the unique surface profiles of PAMP products. At the same time, Peer Ledger’s integrated MIMOSI Blockchain System ensures a responsible supply chain and sustainable traceability of precious metals. The technology allows end-customers, as well as auditors and regulators, to verify compliance of sourcing practices. The origins of precious metals are verified efficiently, both in terms of cost and convenience, while maintaining data integrity.

In that way, by simply scanning a compatible product via the innovative VERISCAN™ iPhone application, our customers can obtain both authentication and sourcing information with maximum security.

Those combined technologies ensure the precious metals supply chain does not contain counterfeit materials. At the same time, individual stakeholders will know with certainty the origin of a precious metal at each step of the production process.

VERISCAN™
BULLION IDENTIFICATION SECURITY SYSTEM



Social responsibility

Our commitment to carefully evaluating our actions has a number of ethical implications. Those evaluations define our openness to dialogue, attention to people, commitment to workplace safety and the development of shared procedures. Together, those elements are the foundation upon which our corporate social responsibility activities are built. Our ultimate goal is also to ensure good health and job satisfaction for all of our staff; to achieve this we organise training courses and social events and make certain all tasks will be carried out safely. At the same time, we believe it is important to build valuable relationships with the region. To this end we take active steps to build relationships both with institutions and the local population.



-69%
fall in the accident
frequency index

Close cooperation
with institutions



Supporting the local
nursing home



174
Employees

79%
of our employees
have worked with
us for at least 5
years

Free sight and
hearing tests for all
staff

INDEX

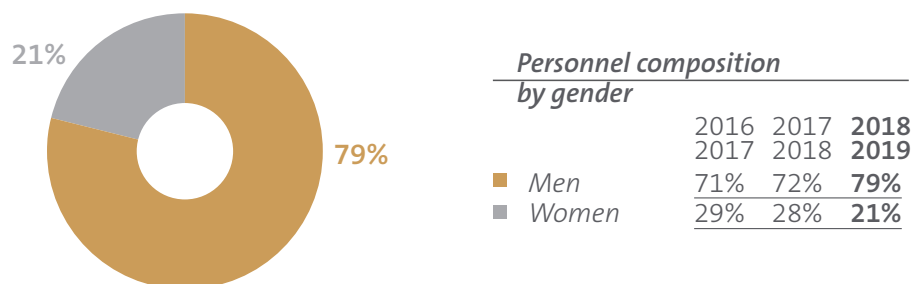
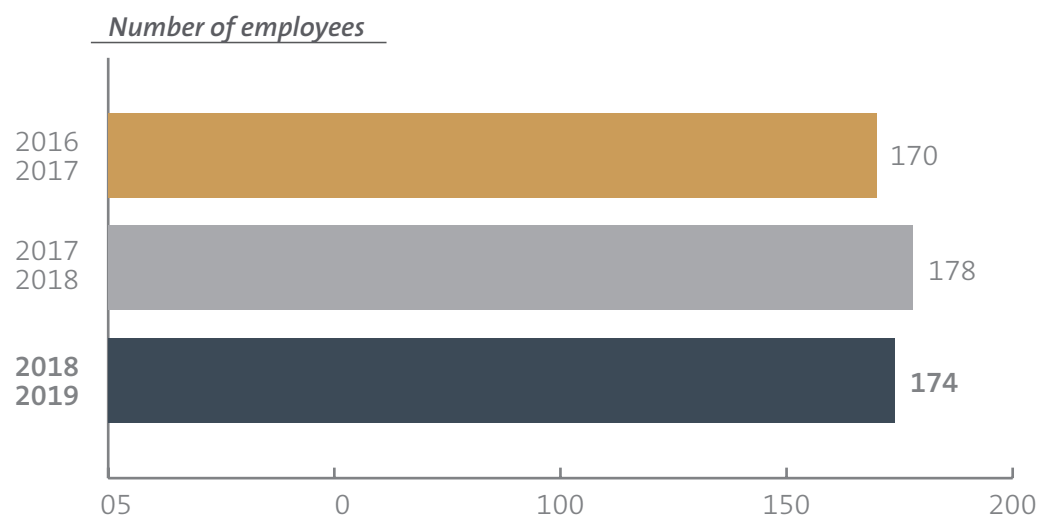
Personnel	p.32-33
Occupational health and safety	p.34
Training	p.35
Local community	p.36
Focus: Istituto Sant'Angelo: inauguration of a new workshop	p.37

Personnel

PAMP has a total of 174-employees at the Castel San Pietro site, all hired on permanent contracts (except for the occasional presence of agency workers), of which fewer than 10% work part-time. During the 2018-2019 period, as shown in the graph, the **number of employees** remained largely in line with previous years, and the reduction in employee numbers by four was due to natural staff turnover. The negative turnover rate for the financial year in question was 9%.

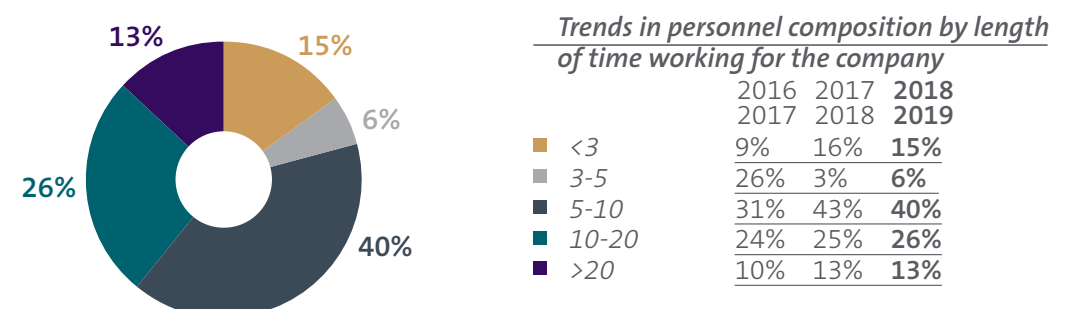
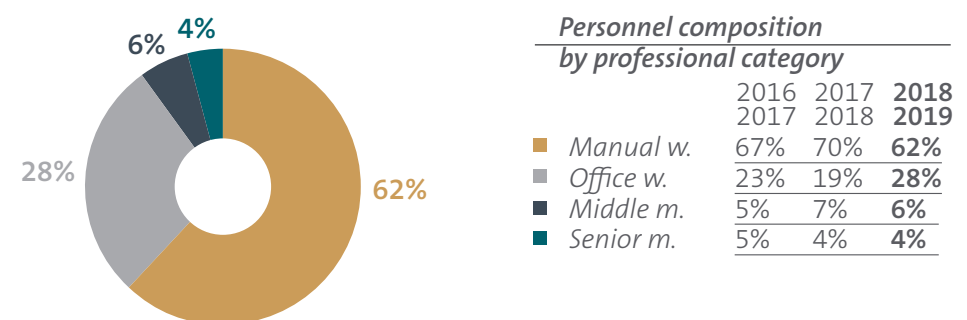
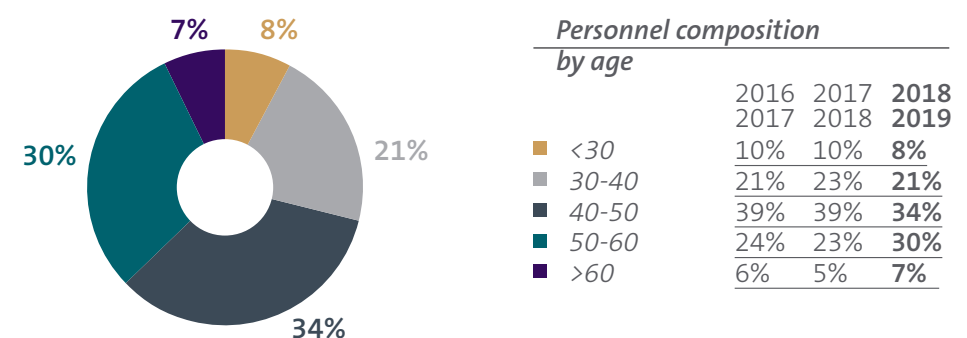
We periodically calculate a minimum living wage by means of the agreements signed through the company contract, drawn up together with Workers' Representatives. That is recalculated periodically to take various continuously evolving factors into account and incorporate the needs of employees. The process allows us to compensate for the lack of a collective bargaining agreement for the sector while also ensuring our employees receive adequate remuneration.

The nature of our activities also has a direct influence on **Personnel composition by gender**. There is a clear majority of male employees due to the fact that our activities mainly involve a physically intense production environment. That majority became even more pronounced during the 2018-2019 period owing to the construction of the new gold refinery, a project which mainly involved male workers and which led to the hiring of a number of maintenance workers. Otherwise, we have a high proportion of female employees in administrative and management positions. In particular, half of our managerial staff are women, and three out of our seven managers were hired from the local community.



Once again that period saw slight variations in **Personnel composition by age**, which were mainly caused by cyclical changes in the structure of the workforce. **Personnel composition by professional category** showed a decrease in the percentage of manual workers and middle managers while the number of office workers increased. That variation is due to the corporate restructuring process that has been underway for a number of years, which has led to a more extensive definition of tasks than in the past.

Considering **Personnel composition by length of time working for the company**, we are proud to note the loyalty of our Staff: 79% have been with PAMP for at least 5 years. That result is also due to various initiatives that reinforced a sense of belonging among Staff while also improving the working environment, such as regular meetings with Workers' Representatives (every six weeks), the company notice board where employees can post their own proposals and the company's volunteer activities.

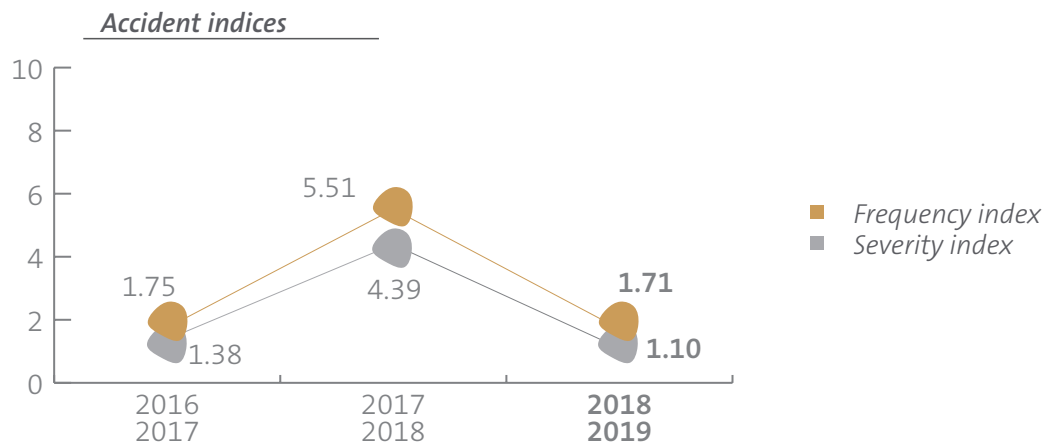


Occupational health and safety

PAMP takes active steps to provide all employees with the safest and healthiest working environment possible. We have the voluntary OHSAS 18001 certification, the British standard requiring the application of a structured system to manage workers' health and safety. As well as complying with laws in force and conducting regular checks, we apply internal procedures that take account of processes and we promote regular training and awareness-raising courses on this issue. We are also supported in those actions by our occupational doctor who works to ensure employees receive the best possible protection.

Unlike the previous period, which saw an increase in **accident indices**, the 2018-2019 period saw a net reduction. The frequency index (number of accidents per 100,000 hours worked) was 69% lower, while the severity index (number of working hours lost due to occupational accidents per 1,000 hours worked) fell by 75%, returning to levels seen in previous years. That is due to a small number of occupational accidents, which fortunately were not serious, and which led to the loss of fewer than 300 working hours.

Although the indices can be significantly affected by individual accidents, our goal remains to bring them as close as possible to zero.



Let's see things clearly

During the period covered by this report, PAMP offered employees sight and hearing tests free of charge. That successful initiative was carried out in collaboration with an external company that brought specialised opticians to PAMP over a number of days: more than half of the company's employees participated in the testing on the premises during office hours.

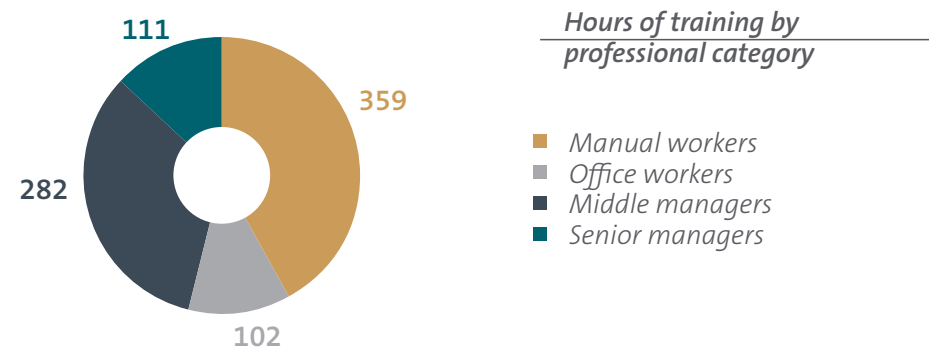
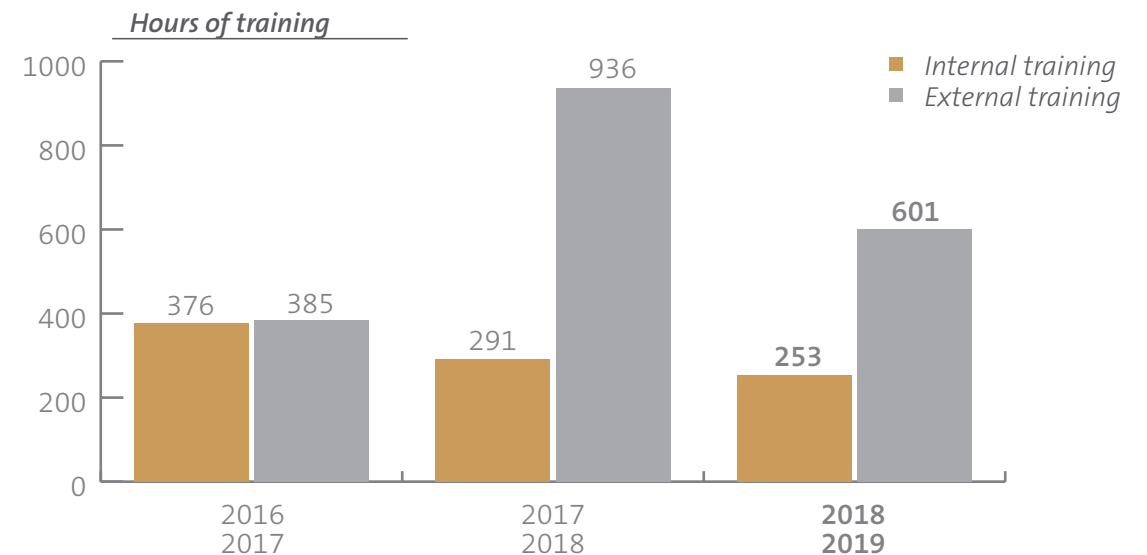
Training

PAMP devotes constant attention to hours of training, as we are aware that such activities are essential to keeping our Staff motivated. Overall, a total of 854-hours of training were provided, both internally and externally. More targeted training sessions were held during the period in question thanks to the introduction of a specific human resources platform that shows an overview of employees' performance, identifying any gaps or chances for improvement. That strategy led to a 30% reduction compared to the previous year.

The graph with the breakdown of **hours of training by professional category** shows that manual workers received the bulk of the training provided. That is due to the provision of specific safety training (for example, the use of chemical substances), both of a general and targeted nature, relating to possible risks arising from the refinery work site.

All Staff, with possible exceptions for those newly hired, took part in at least one training course on standard SA8000. That also includes our Safety Staff (8 out of 9 workers), who are employed by a specialised external provider, and who received training during the period in question.

Once again in this period we organised annual training for all governance bodies on the rules and guidelines followed by the company for managing issues relating to human rights and combating corruption and money laundering. Those sessions are also regularly held for all employees.



Local community

We are acutely aware of our impact on the local community. Canton Ticino has around 350,000 inhabitants while the town of Castel San Pietro has just over 2,200. For that reason PAMP has constantly worked over the course of years to ensure our local impact is as positive as possible.

We aim to achieve this by promoting dialogue, transparency and cooperation with institutions, actively supporting various local organisations, both by taking part in meetings and offering to collaborate on various topics.

We are committed to keeping the local community informed of our activities, and over time we have established a relationship of trust with the canton authorities, the municipal authority of Castel San Pietro and with the various local associations and organisations, as well as with local residents.

Our objective for the future is to maintain those relationships and respond as much as possible to the needs of our community.

A look at our collaborations

- Department of the Environment: working closely together to protect the environment
- Municipal Authority of Castel San Pietro: periodic meetings; informal gatherings and collaborations at various levels; voluntary initiatives in collaboration with the Municipal Technical Office
- Vivigorla e Dintorni local association: regular meetings and contact
- Inhabitants of Castel San Pietro: direct communication channel available to local inhabitants
- Istituto Sant'Angelo di Loverciano school: annual support for special projects; support through collaboration to make use of their canteen
- Don Guanella nursing home: support for activities to entertain residents; voluntary work at the facility
- Alleanza Patriziale Ticinese meeting: support for the edition held in Castel San Pietro

A valuable tradition

In May 2019 the Patricians of Canton Ticino held their meeting at the Castel San Pietro School Centre, before visiting a number of little-known cultural jewels of our region: the Ethnographic Museum in Cabbio, the Bruzella Windmill and the Cantonal Forest Nursery in Lattecaldo. PAMP made a contribution towards the event in view of the role the Citizens' Communities continues to play.

Indeed, Ticino's 200 Citizens' Communities carry out a wide range of activities that benefit the entire area, such as managing the territory, looking after woodlands, creating and maintaining leisure areas, promoting cultural events, building affordable housing and managing mountain pastures and grazing lands.

Istituto Sant'Angelo: inauguration of a new workshop

After the cycle that saw the students of the Istituto Sant'Angelo di Loverciano school involved with the free pasta factory, the start of the 2018-2019 school year marked the beginning of the new clay workshop. In line with the aim of promoting activities that can expose young people to the world of work, PAMP continued the collaboration, established over ten years ago, with the school in Castel San Pietro, which offers education and vocational training to disabled or socially disadvantaged young people.

The clay workshop in particular is aimed at all students in the 3rd and 4th practical cycle (15-16 years old) and focuses on developing vocational training in order to give those students contact with methods and processes similar to those in the world of work. That environment helps to provide young people practical experiences of the working environment, particularly because they are supervised by trained facilitators who are responsible for bringing the students' experience to life. That initiative helps with learning both in terms of cognitive and practical-professional skills.



Environmental responsibility

PAMP gives great attention to the environment around us so we can best protect our ecosystem. One of the main requirements to achieve that goal is to comply with all regulations and to introduce exacting practices and systems. That means we use resources sparingly, we dispose of waste sustainably and we carefully control emissions into the air and water. That is what environmental responsibility means to us – a shared commitment at all levels and throughout all activities.

95%
of waste is recycled

Increased use of energy and water for construction activities at the gold refinery site



100%
of the water discharged externally is analysed by our laboratory

-9%
average value of nitrogen oxides present in the atmosphere recorded by detectors positioned around our facility (OIA limit 30 µg/m³)



-64%
Reduction in consumption of sulphuric acid

INDEX

Materials	p.40
Energy	p.41
Water	p.42
Waste	p.43
Atmospheric emissions	p.44
Focus: Better air quality thanks to new scrubbers	p.45

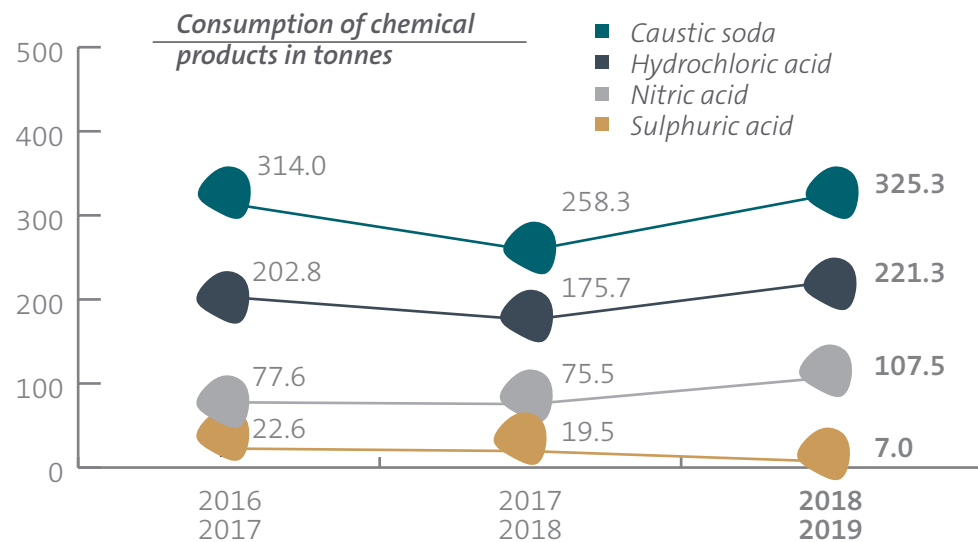
Materials

Chemical products are indispensable for the processes carried out at the refinery as they make it possible to obtain precious metals with high levels of purity.

At PAMP we mainly use three types of substances: hydrochloric acid, used in gold refining, nitric acid, used in silver refining, and caustic soda, used to neutralise acids. Given the properties of the chemical reagents used with gold and silver, their consumption varies according to demand for the type of material to be refined.

In the 2018-2019 period there was an increase in **consumption of chemical products** such as hydrochloric acid (+26%), nitric acid (+42%) and caustic soda (+26%), while consumption of sulphuric acid declined by 64%. The changes were caused by an increase in the amount of gold and silver refining and the composition of the material we received for processing. The reduction in consumption of sulphuric acid was made possible by use of the Acidless Separation System (ALS) for the initial refining process, which takes place without using acids.

Over the years, as well as introducing the equipment mentioned above, we have limited the use of chemicals by upgrading our equipment to enable more precise dosing, and increased the level of specialisation in our internal laboratory which works closely with the refinery.

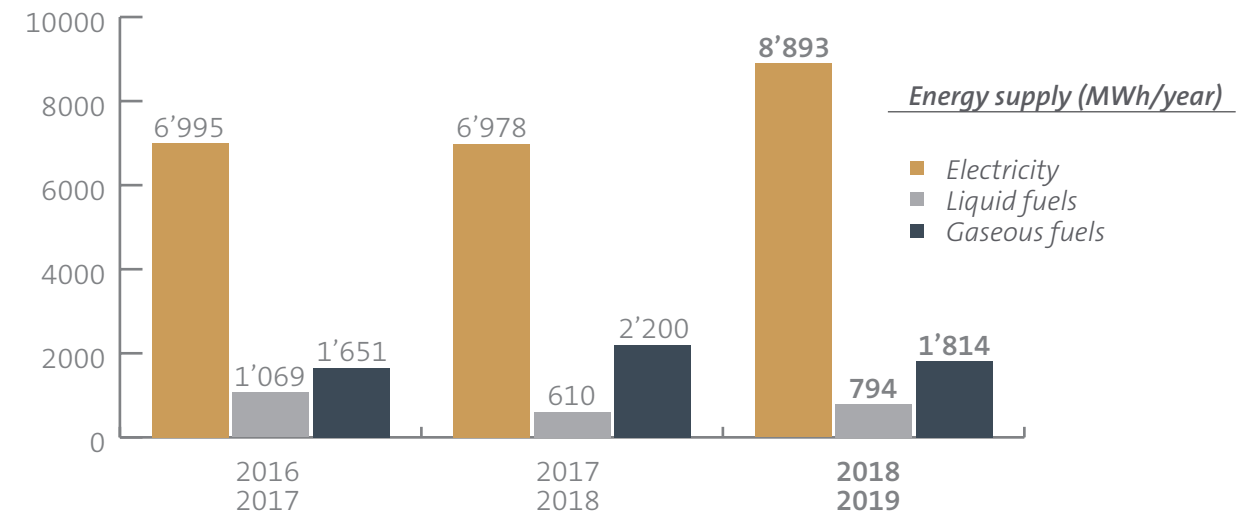


Chemical	2016	2017	2018
Hydrochloric acid 33%	202.8	175.7	221.3
Nitric acid 65%	77.6	75.5	107.5
Sulphuric acid 94%	22.6	19.5	7.0
Hydrogen peroxide 35%	22.0	18.8	23.1
Ammonia 25%	16.9	15.3	3.6
Dextrose monohydrate	7.5	3.0	5.2
Caustic soda 30%	314.0	258.3	325.3
Sodium metabisulphite	18.2	12.6	26.6

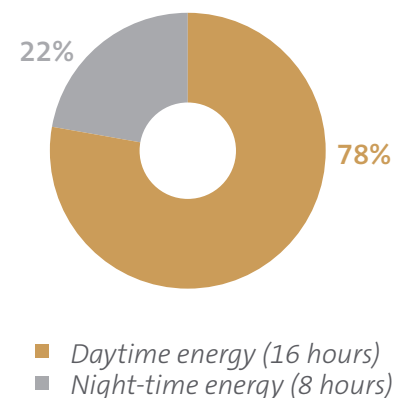
Energy

The **energy supply** graph shows that in the 2018-2019 financial year there was an increase in overall energy consumption, at 11,501 MWh, up 17.5% compared to the previous year (9,788 MWh). That increase is mainly due to construction activities at the gold refinery site, combined with a greater workload. That is also why electricity was the type of energy that showed the greatest increase. Since 2016 we have been supplied exclusively with Swiss hydroelectric energy, as part of a broader commitment to ensure that our energy mix mostly comes from renewable sources of clean energy with low impact in terms of carbon dioxide (CO₂). Regarding fuels, the installation of methane and propane boilers during the previous period has enabled us to keep consumption of liquid fuels at much lower levels than gaseous fuels. That allows us to reduce not only emissions of waste such as nitrogen oxides (NOx) but also to reduce the impact caused by the transportation of liquid fuel.

Day-to-day distribution of electricity consumption has shifted to greater energy use during daytime hours. That is also caused by the restructuring work at the gold refinery site, which is obviously conducted by daylight. In our production activities, by normalising input energy we are able to avoid peaks during the day by exploiting night-time surpluses.



Day-to-day distribution of electricity consumption



Energy consumption per hour worked

Consumption of energy per hour worked decreased by 15% during this period, from 35.9 KWh to 30.5 KWh. The change was chiefly due to the fact that while construction activities utilize a lot of energy, they consume less than foundry/refinery processes. PAMP is also continuing its efforts to make our processes even more efficient.

Water

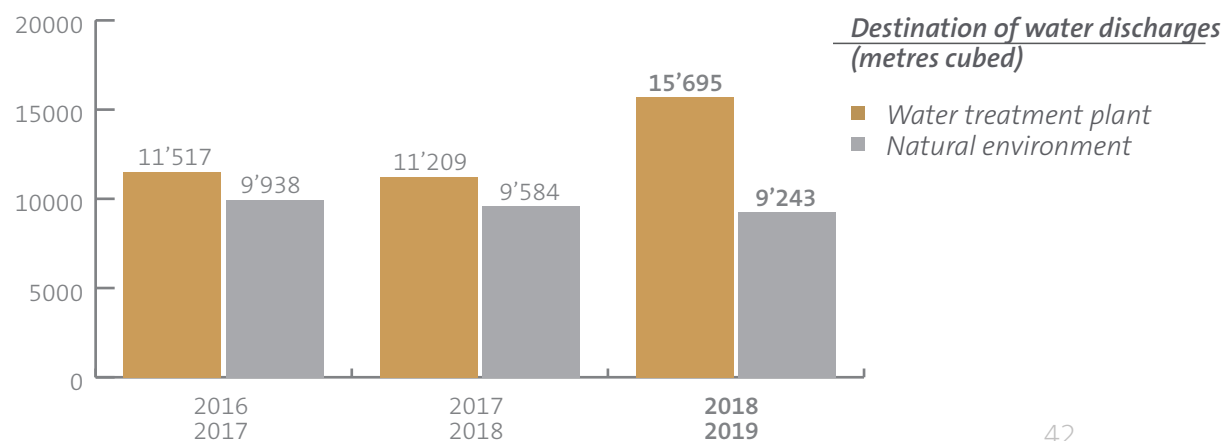
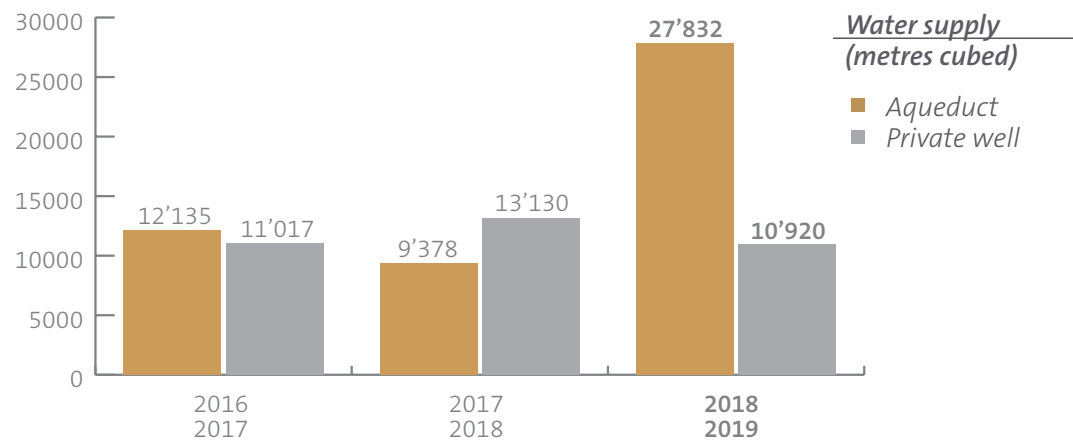
Ongoing construction activities have also had a significant impact on data for water use and discharge. Regarding **water supply**, there were changes in both total water consumption and in the water supply mix. Of a total of 38,752 m³ of water (+ 18% compared with 2017-2018), 72% was drawn from the aqueduct.

The influence of the construction work on water supply data is further reflected in the **destination of water discharges**: while in previous years around 90% of incoming water was discharged externally, in the 2018-2019 period just 64% was externally discharged. The increase in the quantity of water drawn, as well as this difference, was due to the use of water to build the foundation slab for the gold refinery.

Discharges into the natural environment remained in line with the previous period, while there was a 40% increase in discharges to the water treatment plant: those results were due to changes in water use. Regarding the former, by optimising capacity for water recovery from the well through the device that conducts the reverse osmosis process, we are able to recover a greater quantity of water for use in cooling machinery, which can later be discharged into the stream.

As for discharges to the water treatment plant, it should be noted that a long-standing partnership exists with the Water Treatment Consortium for Chiasso and Surrounding Areas, with which we agree the quantities of water to be sent at pre-established intervals, as well as the chemical properties.

All water is analysed by our laboratory before being discharged externally in order to ensure it meets the required standards.



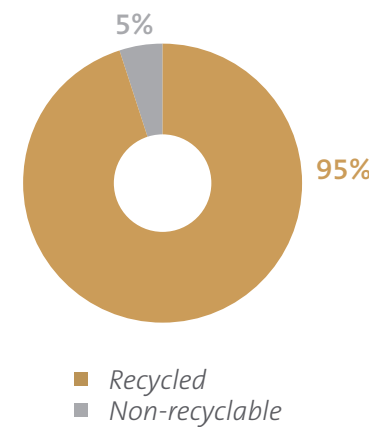
Waste

As shown in the **composition of the ordinary waste** graph, during the period the total quantity increased by 14%. That increase came as a direct result of construction work for the new refinery: the demolition of the previous area produced 35-tonnes of bulk waste. That figure was not calculated in the past since any bulk waste from small demolition processes was included in the respective categories.

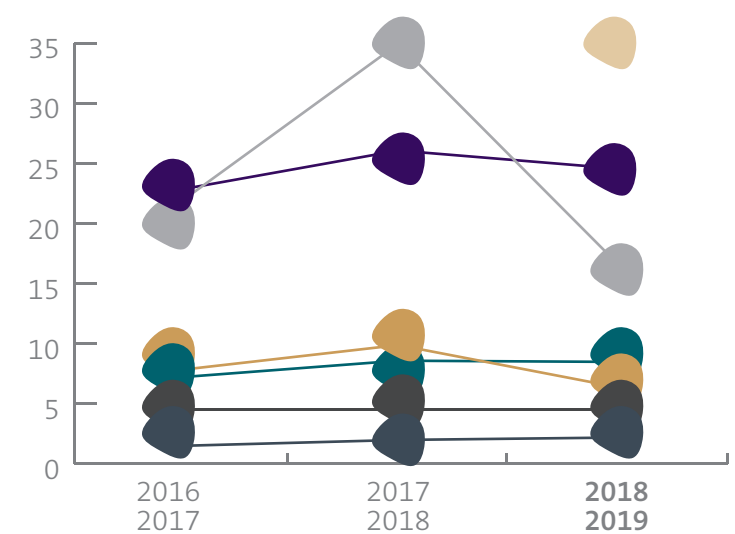
Overall, careful separate waste collection by the company allowed us to recycle 95% of waste (see the **recycling of ordinary waste** graph).

As regards the **composition of special waste**, there was a significant reduction (-39%). The type of material we receive for processing determines the quantity of special waste for disposal, particularly in relation to copper content. The significant variation noted is principally due to the time required to send this waste to specialised companies and therefore for registration and accounting during the period in question. We work with authorised companies that carry out the necessary treatment for the recovery and recycling of this material.

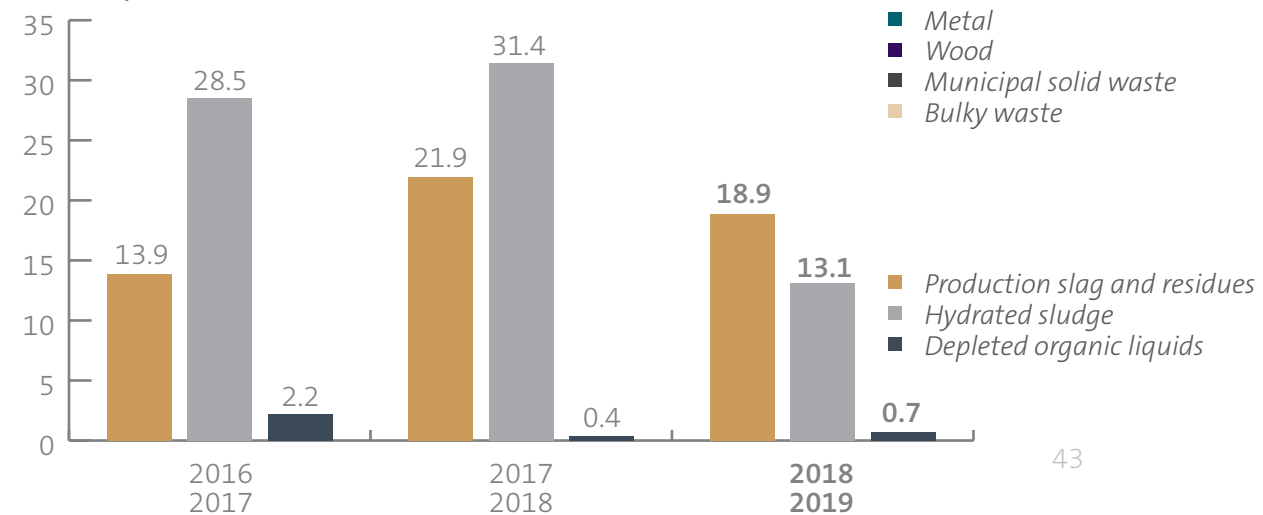
Recycling of ordinary waste



Composition of ordinary waste (tonnes)



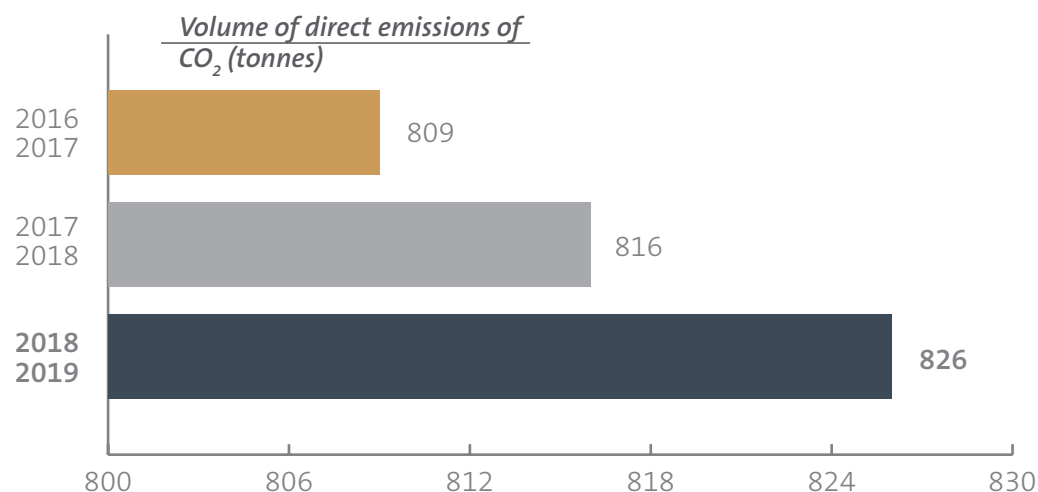
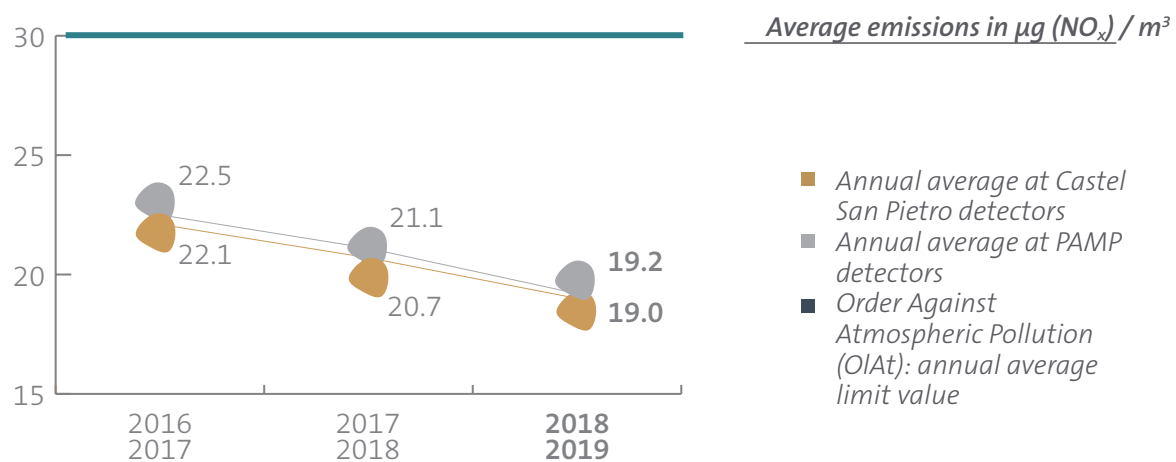
Composition of special waste (tonnes)



Atmospheric emissions

The data on *atmospheric emissions* once again continued a positive trend during the period in question. Indeed, there was a drop in both the average value for the concentration of nitrogen oxides per metre cubed ($\mu\text{g}(\text{NO}_x) / \text{m}^3$), recorded by detectors in Castel San Pietro and the value recorded by the detectors installed at PAMP, falling by 8% and 9% respectively. Those quantities are consistently well below the upper limit of $30 \mu\text{g}/\text{m}^3$ (micrograms per metre cubed) established by the Ordinance on Air Pollution Control (OIAt). That data shows that our production activities have a very marginal impact on the concentration of nitrogen oxides in the air, with very little discrepancy between the value registered by the PAMP detectors and those installed in the town centre. The presence of those substances is due to factors such as traffic and the heating of the facility: our newly installed methane boilers also made a contribution. In spite of the encouraging data, PAMP aims to make continuous improvements in that area. In addition, thanks to continuous monitoring of air emitted by the plant via detectors installed on our towers, we are able to detect any anomalies in real time.

Following the agreement signed with the Confederation for reducing carbon dioxide emissions, we continue to implement a range of technical interventions (including the installation of a new ventilation system, which is mentioned on the next page). This year the *volume of direct emissions of CO₂* registered a slight increase, which was essentially caused by increased energy consumption.



Better air quality thanks to new scrubbers

As part of the restructuring of the gold refinery (described in detail on page 51), a cutting-edge extractor system was installed, with capacity to filter external air emissions thanks to four high-performance extraction and scrubber systems. That equipment makes it possible to reduce the concentration of substances such as dust and pollutants recovered from refining workbenches through a complex system that washes the air by passing it through atomised water. These new extraction systems improve both the air inside the refinery to protect employees, and also the capacity to filter external air emissions – which in any case is continuously checked using detectors and monitoring of the competent authority. In addition, the four systems can function individually or simultaneously, ensuring improved energy efficiency, especially when only some of the workbenches are active.

The choice of supplier was based both on the ability to supply a customised system that met our needs and also by evaluation of aspects relating to corporate social responsibility. After having compiled a list of important criteria that included quality of the after-sales service, geographical distance and possession of environmental certifications, PAMP carried out a systematic evaluation of other potential suppliers before making our final decision. We aim to apply this approach meticulously when selecting important partners.



Economic responsibility

The concept of economic responsibility is based on ensuring stability for all of our employees and to instill confidence about the future. Those aims are achieved by developing a long-term strategy that supports company growth. To this end we invest a great deal of time in strengthening our relationships with our commercial partners and providing continuous support to local organisations. That responsibility motivates us to generate 'value' for society and for the cantonal and national economic fabric.

+ 12%
increase in turnover

+ 4%
increase in capitalisation

INDEX

Operating results	p.48
Tax, investments and sponsorships	p.49
Provenance of suppliers	p.50
Focus: The new gold refinery: an investment in the future	p.51

33%
of all our suppliers of consumables, machinery and services are from Ticino



Investment in restructuring the gold refinery

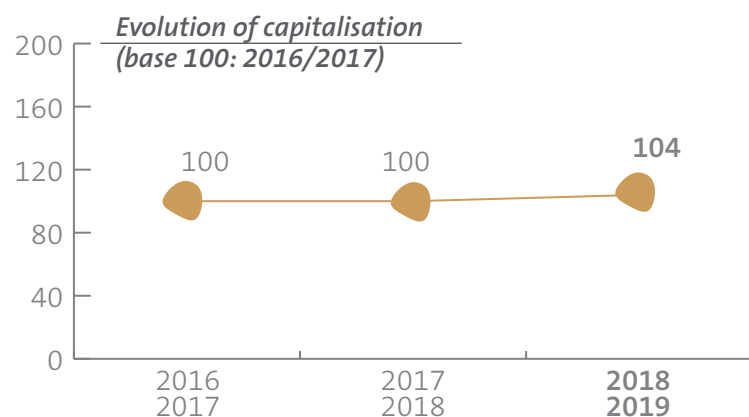
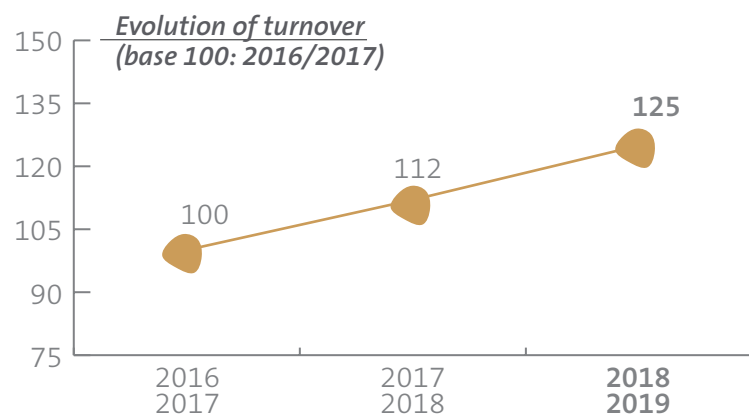
+ 80%
increase of our investments

Operating results

The table presenting the **evolution of turnover** provides a snapshot of economic performance in recent years. In particular it shows that there was an increase in turnover once again, with the result 12% higher than the previous period. That increase builds upon the positive trend seen in the previous two financial years. The primary reason for such strong performance was the implementation of a number of long-term strategies in previous years that are now contributing to favourable results. In addition, the increase in turnover is due to an increase in demand across all business lines in the last period.

It should also be noted that the **evolution of capitalisation** registered an increase of 4% after having remained unchanged in previous years. Those positive results helped form the decision to allocate part of the profits from the period to company capital.

A comparison of that data with previous periods shows that PAMP is a solid company, and its long-term management strategy makes it well placed to ride out market fluctuations.



Associations to which we belong

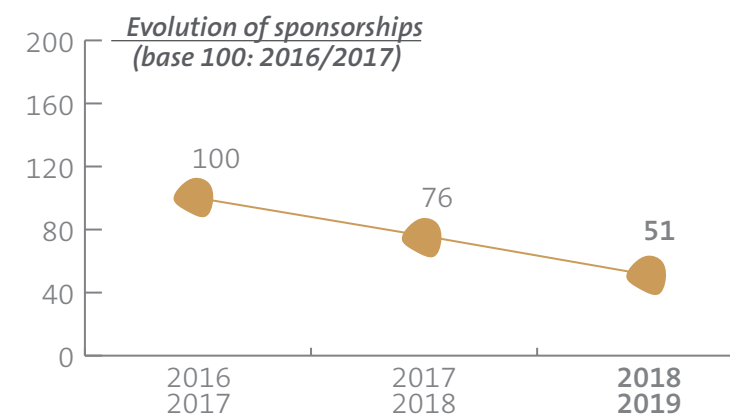
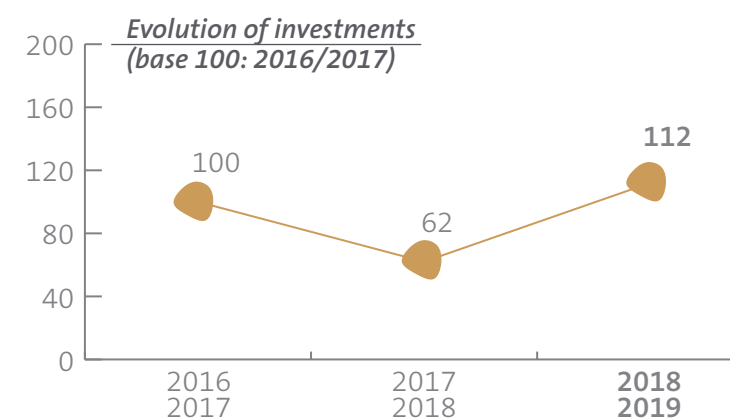
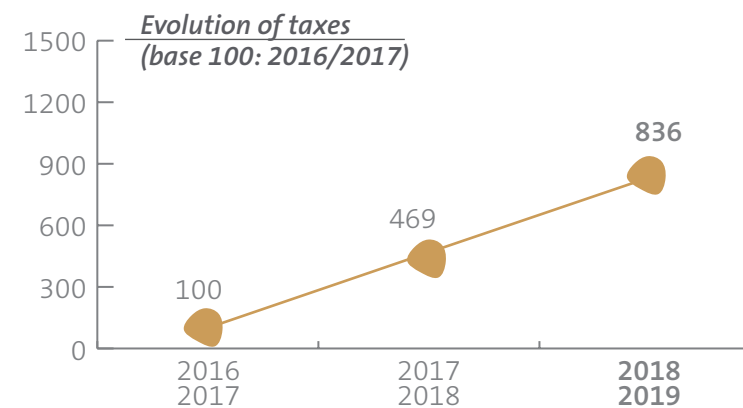
- Swiss Association of Manufacturers and Traders in Precious Metals (ASFCMP)
- The Canton Ticino Chamber of Commerce (Cc-Ti)
- Association of Ticino's Industries (AITI)
- Ticino Watchmaking Industry Association (ATIO)

Tax, investments and sponsorships

The profit posted by the company during the relevant period led to a significant increase in the **evolution of taxes** (+78%).

Evolution of investments was 80% higher than in the 2017-2018 period. That result is also due to the significant investment made to rebuild the gold refinery.

As regards the **evolution of sponsorships**, the table shows a negative trend. Firstly it should be noted that the base year 2016-2017 was unusual in that it included extraordinary events connected with the company's 40-year anniversary celebrations, and therefore sponsorships later decreased until returning to usual levels. Meanwhile, the 33% reduction this financial year compared with the previous period is due to the end of the long-standing collaboration with Associazione Sportiva Castello, the local football team. Thus far, only part of the amount previously allocated to the team has been diverted to other causes.



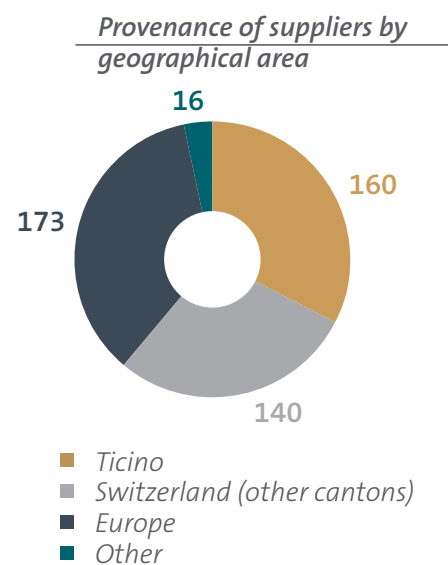
Provenance of suppliers

This section does not include precious metals suppliers, but rather suppliers that issued an invoice during the financial year and that provide consumables, equipment or services.

According to these criteria, during the last financial year PAMP had dealings with 489 suppliers, slightly fewer than in the previous period, yet in line with our drive to increase the efficiency of our procurement system by reducing the number of suppliers with which we transact.

The table presenting *provenance of suppliers by geographical area* shows that fully 33% of suppliers are based in Ticino (a total of 161 companies). That result reflects our desire to reward geographical proximity, which allows us to generate added value to the local economic fabric while protecting the environment by limiting the need for transportation. When it is not possible to use local companies, we give preference to suppliers from other Swiss cantons (29%).

In general, PAMP always look to establish long-term relationships with our partners in order to promote the development of synergies and increase efficiency, for which we believe a longer-term perspective is essential.



The new gold refinery: an investment in the future

The facility in Castel San Pietro was built at the start of the 1980s and the floor of the gold refining area needed to be replaced in order to comply with safety requirements and procedures. In planning that work, PAMP management decided to seize the opportunity not only to reinforce the flooring but also to completely rebuild the refinery. That initiative demonstrates the company's faith in its current premises and in the local area, with benefits on many fronts:

- Increased worker safety with the introduction of a cutting-edge extraction system (see the focus on page 45), an additional safety exit and structures made from more durable synthetic materials rather than the traditional choice of steel
- Additional environmental protection provided by the extraction system with increased capacity to filter external air emissions, with continuous monitoring supervised by the competent authorities
- The simplification of procedures to ensure the traceability of metal on a large scale thanks to special 'baths,' including small sized units, that make it possible to segregate and work separately on smaller quantities of precious metals

The refining process is a key stage in gold processing for the purpose of traceability. Being able to ensure that the material we receive is processed individually, in segregated conditions, makes it possible to uniquely connect the finished product with its source. Today our effort to improve traceability through Blockchain and Provenance (see the foci on page 6 and 29), together with the redevelopment of the facility, will enable us to meet growing demand from markets and institutions for transparency of the provenance of precious metals.



Sustainability report

Topics contained in the report

The information contained in the “Who we are” section refers to the whole of PAMP and its Castel San Pietro operation.

Reference period and reporting cycle

This sustainability report relates to the period from 1 July 2018 to 30 June 2019. The sustainability report is published annually. The previous report relates to the period from 1 July 2017 to 30 June 2018.

Format

This sustainability report was drawn up in accordance with the Global Reporting Initiative (GRI) guidelines, ‘Core’ option (option adopted: GRI Standards).

External verification

Most of the information contained in this sustainability report was reviewed via internal and external audits. All of the data was rigorously checked and analysed. As a result, the report was not submitted for additional external verifications.

Global Reporting Initiatives

Standards Index

Number	Disclosure	Page Number	Comments/Omissions
GENERAL STANDARD DISCLOSURES			
ORGANIZATIONAL PROFILE			
102-1	Name of the organization	4	
102-2	Activities, brands, products, and services	6,7	
102-3	Location of headquarters	4	
102-4	Location of operations	4,10,11	
102-5	Ownership and legal form	4	Private corporation
102-6	Markets served	7	
102-7	Scale of the organization	4, 32, 33, 48	
102-8	Information on employees and other workers	32,33	
102-9	Supply chain	24,25	
102-10	Significant changes to the organization and its supply chain		None
102-11	Precautionary Principle or approach	38,39	
102-12	External initiatives	26,27	
102-13	Membership of associations	26,27	
STRATEGY			
102-14	Statement from senior decision-maker	1	
102-15	Key impacts, risks, and opportunities	1,12,13	
ETHICS AND INTEGRITY			
102-16	Values, principles, standards, and norms of behavior	5,9,26,27	
GOVERNANCE			
102-18	Governance structure	8	
STAKEHOLDER ENGAGEMENT			
102-40	List of stakeholder groups	16,17	
102-41	Collective bargaining agreements	32	
102-42	Identifying and selecting stakeholders	16,17	
102-43	Approach to stakeholder engagement	15,16,17	
102-44	Key topics and concerns raised	18,19,20	
REPORTING PRACTICE			
102-45	Entities included in the consolidated financial statements	53	PAMP SA
102-46	Defining report content and topic boundaries	53	
102-47	List of material topics	20	
102-48	Restatements of information	53	
102-49	Changes in reporting	53	
102-50	Reporting period	53	
102-51	Date of most recent report	53	
102-52	Reporting cycle	53	

102-53	Contact point for questions regarding the report	59	
102-54	Claims of reporting in accordance with the GRI Standards	53	
102-55	GRI content index	55,56,57,58	
102-56	External assurance	53	

ECONOMIC PERFORMANCE

ECONOMIC PERFORMANCE

103	Management approach	46,47,48,49	
201-1	Direct economic value generated and distributed	48,49	For privacy reasons, we do not report economic results

MARKET PRESENCE

103	Management approach	30,31,33	
202-2	Proportion of senior management hired from local community	33	

INDIRECT ECONOMIC IMPACTS

103	Management approach	46,47,49	
203-1	Infrastructure investments and services supported	49	

PROCUREMENT PRACTICES

103	Management approach	46,47,50	
204-1	Proportion of spending on local suppliers	50	

ANTI-CORRUPTION

103	Management approach	22,23	
205-1	Operations assessed for risks related to corruption		None
205-2	Communication and training about anti-corruption policies and procedures	35	

ENVIRONMENTAL PERFORMANCE

MATERIALS

103	Management approach	38,39,40,45	
301-1	Materials used by weight or volume	40,45	

ENERGY

103	Management approach	38,39,41	
302-1	Energy consumption within the organization	41	
302-3	Energy intensity	41	
302-4	Reduction of energy consumption	41	

WATER

103	Management approach	38,39,42	
303-1	Water withdrawal by source	42	
303-3	Water recycled and reused	42	

EMISSIONS

103	Management approach	38,39,44	
305-1	Direct (Scope 1) GHG emissions	44	
305-5	Reduction of GHG emissions	44	
305-7	Nitrogen oxides (No _x) sulfur oxides (Sox), and other significant air emissions	44	

EFFLUENTS AND WASTE

103	Management approach	38,39,43	
306-1	Water discharge by quality and destination	43	
306-2	Waste by type and disposal method	43	
306-3	Significant spills		None

ENVIRONMENTAL COMPLIANCE

103	Management approach	38,39	
307-1	Non-compliance with environmental laws and environmental criteria		None

SUPPLIER ENVIRONMENTAL ASSESSMENT

103	Management approach	22,23,28	
308-1	New suppliers that were screened using environmental criteria	28	

SOCIAL TOPICS

EMPLOYMENT

103	Management approach	30,31,32,33	
401-1	New employee hires and employee turnover	32,33	

OCCUPATIONAL HEALTH AND SAFETY

103	Management approach	30,31,34	
403-2	Types of injury and rates of injury, occupational diseases, lost days, absenteeism, and number of work-related fatalities	34	

TRAINING AND EDUCATION

103	Management approach	30,31,35	
404-1	Average hours of training per year per employee	35	
404-2	Programs for updating employee skills and transition assistance programs	35	

DIVERSITY AND EQUAL OPPORTUNITY

103	Management approach	30,31,32,33	
405-1	Diversity of governance bodies and employees	32,33	

CHILD LABOR

103	Management approach	22,23
408-1	Operations and suppliers at significant risk for incidents of child labor	26,27,28,29

SECURITY PRACTICES

103	Management approach	30,31,35
410-1	Security personnel trained in human rights policies or procedures	35

FORCED OR COMPULSORY LABOR

103	Management approach	22,23
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	26,27,28,29

HUMAN RIGHTS

103	Management approach	30,31,35
412-2	Employee training on human rights policies or procedures	35

LOCAL COMMUNITIES

103	Management approach	36,37
413-1	Operations with local community engagement, impact assessments and development programs	16,17,36,37

SUPPLIER SOCIAL ASSESSMENT

103	Management approach	22,23,28
414-1	New suppliers that were screened using social criteria	28
414-2	Negative social impacts within the supply chain and actions taken	28

SOCIOECONOMIC COMPLIANCE

103	Management approach	22,23
419-1	Non-compliance with laws and regulations in the social and economic area	None

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