

SUPPLY CHAIN POLICY

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ITALPREZIOSI[®]

Italpreziosi SpA participates and collaborates with the relevant authorities and intensifies global efforts to ensure that precious metals come from legitimate, ethical sources and that they have no relation to crime, armed conflicts or human rights violations. Our policy is to do business only with lawful and law-abiding customers and suppliers, and to deny our products and services to those who do not comply with these principles. This policy, the program and the due diligence procedures that implement it are based on our general rules of business conduct, which see us committed to: - Carrying out our business based on principles of honesty and firm opposition to any form of fraud and corruption; - Maintain high standards of ethical and moral conduct both in business and in the engagement of social and territorial activities; and - Maintain appropriate business relationships at all levels with natural persons including government officials and employees. We will implement this policy through a comprehensive management system. This system will not only implement the above general rules of business conduct, but also verify our compliance with international laws and guidance regarding the acquisition of precious metals. In this sense, we are committed to the following:

1. We do not tolerate, nor will we take advantage of, contribute to, assist or facilitate the commission of the following crimes: Torture, cruelty and inhuman and degrading treatment;

i. Forced or compulsory labour;

ii. Child labour;

iii. Abuses and human rights violations;

iv. War crimes, violations of international humanitarian law, crimes against humanity or genocide;

2. We will not have commercial relationships and will immediately terminate the same with suppliers or customers, who identify a reasonable risk of abuse or who may be involved in or linked to the aforementioned crimes.

3. We will not tolerate any direct or indirect support to non-State armed groups, through the acquisition of precious metals, or by making payments or providing assistance or equipment to non-governmental armed groups or their affiliates that illegally unwillingness.

They control mining sites, transport routes, points where precious metals are traded and actors upstream in the supply chain; and/or

unwillingness. Tax or extort money or precious metals from mining sites, along communication routes or at points where they are traded, by intermediaries, by exporting companies or by international companies;

4. We will not negotiate, and the business relationship with suppliers will be immediately terminated if a reasonable risk is identified they may obtain supplies or be in some way connected to non-State armed groups as described above connected or that such groups may receive direct or indirect support from said suppliers.

5. We affirm that the role of public or private security forces is to ensure the safety of workers, plant, equipment and property in a manner consistent with the rule of law, including the Norms that guarantee human rights.

We will not provide direct or indirect support to public or private security forces who commit abuses or who act illegally as described above.

6. We will not seek to influence others in an improper manner or offer, promise, give or demand bribes, in any form, and resist their solicitation, and we will not permit business funds, assets or property to be used for the benefit of any natural person, including government officials, our customers, contractors and suppliers who are illegal or in other ways that may violate this policy.

7. We will not hide the origin of precious metals, or misrepresent taxes, duties and royalties paid to governments, for the purposes of mining, trading, transporting and exporting gold.

8. We will support efforts and contribute to the effective elimination of money laundering which identifies a reasonable risk of money laundering arising from, or related to, the extraction, trade, transport or export of precious metals.

9. We will support efforts or take steps to engage with local authorities, international organizations and civil society organizations to avoid or minimize exposure to vulnerable groups in particular, artisanal miners.

10. In accordance with the company's specific position in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other interested parties to prevent or reduce the risk of direct or indirect support to security forces public or private, as identified in paragraph 5, in which we identify the existence of such a reasonable risk. In these cases, we will suspend or terminate engagement with upstream suppliers' failed attempts after mitigation within six months of adopting the risk management plan (8). Where we identify a reasonable risk of activity incompatible with paragraph (8) and (9), we will respond in the same way.

11. Not to offer, promise to give or ask for bribes and to resist the solicitation of bribes to hide or disguise the origin of minerals, to misrepresent taxes, duties and royalties paid to governments for the purpose of mineral extraction, trade, handling, transport and export (9).

12. We will support efforts or take steps to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising out of or related to mining, trading, manipulation

the transport or export of minerals derived from illegal taxation or the extraction of minerals at access points to mining sites along transport routes or at points where minerals are traded by upstream suppliers.

13. We will ensure that all taxes, costs and royalties related to mineral extraction, trade and export from conflict affected and high-risk areas are paid to governments and in accordance with the company's position in the supply chain, undertake to communicate payments in accordance with the principles set out by Extractive Industries Transparency Initiative (EITI).

14. In accordance with the company's specific position in the supply chain, we are committed to connecting with suppliers, central or local government authorities, international organizations, civil society and interested third parties as appropriate to improve and track performance, in order to prevent or mitigate the risks of adverse effects through measurable steps taken within a reasonable time. We will suspend or terminate engagement with upstream vendors, after failed mitigation attempts. (10)

We ask all our stakeholders, employees, agents, consultants and business partners, to comply with this policy, and in order to apply it, we will implement appropriate disciplinary actions, which may go as far as dismissal or interruption of contracts.