

1. COMMITMENT AND PURPOSE

Italpreziosi recognizes its responsibility to respect human rights in all its operational activities and in relationships with its stakeholders.

Italpreziosi is formally committed to implementing the United Nations Guiding Principles on Business and Human Rights and ensuring that the entire supply chain does not cause, contribute to, or be linked to human rights abuses.

This commitment extends to all internationally recognized rights, including those contained in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the ILO fundamental conventions, and specific protocols for the precious metals sector.

Italpreziosi undertakes to use its influence to prevent abuses by third parties, integrating the protection of Human Rights into daily operations, business planning, and decision-making processes.

2. REFERENCE STANDARDS

Italpreziosi adheres, among others, to the following international standards:

- Universal Declaration of Human Rights (UDHR);
- UN Guiding Principles on Business and Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work;
- Declaration on the Protection of All Persons from Being Subjected to Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
- EU Corporate Sustainability Due Diligence Directive (CSDDD);
- UN Women's Empowerment Principles (WEPs);
- B Lab Standards;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).

3.SCOPE OF APPLICATION AND FUNDAMENTAL RIGHTS

This policy applies to all Italtreziosi counterparties. Italtreziosi specifically commits to:

- **Prohibition of Child Labor:** Zero tolerance for labor under the age of 15 or any form of hazardous work for those under 18;
- **Elimination of Forced Labor:** Working towards the elimination of all forms of forced labor, modern slavery, or human trafficking, based on the ILO framework. This includes Convention C029 (1930) defining forced labor, Convention C105 (1957) prohibiting its use as a political or economic sanction, and Protocol P029 (2014) which imposes binding obligations for prevention and victim protection;
- **Combating Human Trafficking:** Firmly condemning all forms of human trafficking and ensuring no stage of its activities or supply chain is involved in the recruitment, transport, or transfer of persons through threat, force, or deception for exploitation purposes;
- **Freedom of Association:** In accordance with Articles 20 and 23.4 of the UDHR, Italtreziosi recognizes:
 - The right of every individual to freedom of peaceful assembly and association,
 - The right not to be compelled to belong to an association,
 - The fundamental right to form or join trade unions, as established by ILO conventions C087 (1948) and C098 (1949).

To ensure the practical application of these principles, the company ensures:

- 1.Right to form or join labor organizations without interference from the employer or the authorities;
 - 2.Freedom for members to elect their representatives and for the latter to carry out their duties according to current laws;
 - 3.Prohibition of management interference in internal affairs, meetings, or the recording of minutes for union activities;
 - 4.Protection of the role of trade unions from any interference by non-union bodies present in the company;
 - 5.Freedom for grassroots organizations to form or join broader federations and confederations;
 - 6.Right of workers to collectively negotiate their employment conditions in a free and transparent manner.
- **Non-Discrimination:** Guaranteeing an inclusive work environment free from discrimination based on race, gender, religion, sexual orientation, or any other personal characteristic. This includes the right to equal pay for equal work (Art. 23 UDHR) and alignment with ILO conventions C111 (1958) and C100 (1951) regarding equality of opportunity and pay;
 - **Equity and Inclusion (JEDI):** Promoting a culture of Justice, Equity, Diversity, and Inclusion (JEDI). The company values individual differences and implements merit-based selection and promotion processes (refer to the 'Equality & Inclusion Policy');
 - **Health and Safety:** The right to safe and healthy working conditions for all employees and visitors;

- **Civil and Political Rights:** Respect for human dignity, privacy, and freedom of expression;
- **Remuneration and Working Hours:** Ensuring a decent wage, paid legally and regularly, while promoting pay transparency to reduce the gender pay gap. Ensuring compliance with legal limits on working hours and the right to rest periods (refer to the '*Human Resources Management Policy*');
- **Disciplinary Practices and Dignity:** Severely prohibiting corporal punishment, mental or physical coercion, and any form of verbal abuse. Disciplinary procedures must be transparent, fair, and respectful of human dignity.

Furthermore, Italtrepreziosi ensures that security services, even when outsourced, operate with full respect for the law and human dignity.

Environmental protection is also considered fundamental to the enjoyment of human rights.

4. DUE DILIGENCE AND RISK MANAGEMENT

In compliance with the OECD Due Diligence Guidance and the EU CSDDD, Italtrepreziosi adopts the following operational standards:

- *Analysis and Assessment:* Identifying "salient" risks (those with the most serious potential impact on people) in both internal operations and the supply chain;
- *Fundamental Rights at Work:* Zero tolerance toward child labor, forced labor, modern slavery, and discrimination;
- *High-Risk Areas (CAHRAs):* Applying enhanced controls for sourcing from conflict zones or artisanal mines (ASM) to ensure no profit is derived from torture, war crimes, or human rights violations.

5. RESPONSIBLE SUPPLY CHAIN

Italtrepreziosi requires its counterparties to adhere to equivalent standards. In accordance with the OECD Guidance, it commits to not tolerating, profiting from, or contributing to torture, inhuman treatment, or war crimes during the extraction, transport, or trade of precious metals.

Rigorous Know Your Counterpart (KYC) processes are applied. Italtrepreziosi also actively supports the legal integration of Artisanal and Small-scale Mining (ASM) into international markets.

6. GRIEVANCE MECHANISM

Italpreziosi provides a reporting mechanism accessible to all stakeholders:

- Reports can be submitted anonymously and confidentially;
- We guarantee no retaliation for those reporting concerns in good faith;
- If an adverse impact is identified, Italpreziosi commits to providing or supporting legitimate remedy processes.

Grievance mechanisms are managed under the *Whistleblowing and Grievance Policy*

7. RESPONSIBILITY

Management is responsible for sharing this policy with all employees and relevant counterparties. It ensures that the policy is understood and that specific training is provided. This document is reviewed at least annually to ensure constant alignment with corporate objectives.

8. COMMUNICATION AND TRANSPARENCY

This policy is approved by Management, communicated to all collaborators, and made public on the Italpreziosi website.