



# COMPANY POLICY

**TAV Metalli  
Import & Export S.r.l.**

**VERS. 2/2023**



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# 1 THE COMPANY VISION

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## *Letter from the Sole Director to stakeholders*

TAV Metalli Import & Export S.r.l. was founded in the end of 2021 as a commercial company for the import and export of precious metals, especially gold.

The vision of the undersigned is to increase the company in the precious sector in a conscious way, respecting the Company's Code of Ethics in all its aspects.

This vision includes, among other things, the ethical principles of loyalty, honesty, trust, legality, fairness, transparency, reciprocity and confidentiality, paying particular attention to the involvement of its stakeholders, employees and collaborators, customers and suppliers, as well as national and foreign public institutions.

We work with diligence and commitment in the selection of business partners who operate with the same philosophy as TAV Metalli, as well as having a policy that respects human rights and the environment, to combat money laundering, terrorism, observing the rules issued by the country where they are based.

It is of fundamental importance the involvement of the stakeholders of TAV Metalli Import & Export S.r.l., a company of which I have the honor to be the Sole Director, in order to carry out a policy of "Ethical Gold", so that mining activities are carried out with non-invasive techniques and methodologies, or without the use of chemical agents or explosives, as well as in harmony and cooperation with the environment and the local communities involved.

This excludes the possibility of collaborations with partners who do not accept our Code of Ethics, who do not safeguard and respect people and the environment, or who are in any way involved in money laundering, terrorism, or other illegal activities.



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In my corporate vision, the growth of TAV Metalli in compliance with ethical principles and sustainability will contribute to leaving a better world to future generations, and to do this we need the collaboration of all.

Maurizio Tavini

*Sole Director*



## 2 ORGANIZATION PROFILE

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### 2.1 IDENTITY

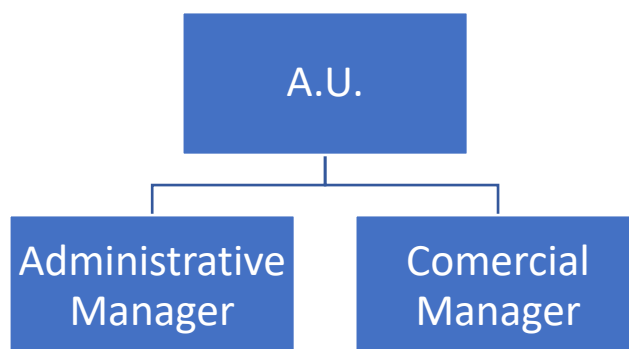
Name	TAV Metalli Import & Export S.r.l.
Address	Via Aretina Nord, 43/E – Fraz. Pieve al Toppo
Zip / City / Province	50141 Civitella in Val di Chiana (AR) - Italy
P.IVA and C.Fisc.:	02419430513
Registration of the CCIAA Arezzo Business Register	REA 211272
Email	<a href="mailto:tavmetalli@gmail.com">tavmetalli@gmail.com</a>
Pec	<a href="mailto:tavmetalli@pec.it">tavmetalli@pec.it</a>
Telephone	333-866.2979

### 2.2 OWNERSHIP STRUCTURE

Sole Shareholder: Maurizio Tavini

Share Capital: Euro 50.000,00 i.v.

### 2.3 COMPANY ORGANIZATION CHART



## 3 POLITICS

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TAV Metalli Import & Export S.r.l. aims to ensure that precious metals come from legitimate and ethical sources, that we have no relationship with crime, nor finance terrorism or armed conflicts or operate in violation of human rights.



Our policy is to cooperate exclusively with customers and suppliers who are law-abiding and legitimate, and who accept the principles of our Code of Ethics.

Our company is based on principles of honesty, respect and loyalty, and acts in compliance with national and foreign regulations in order to maintain high standards of ethical and moral conduct in relations with business partners, employees and collaborators.

Therefore, our company adopts the following company policies:

- 1- No contribution to conflicts between government, militias, organized crime, or terrorist groups. We only accept valuable material if it comes from "conflict-free" areas.
- 2- No contribution to armed aggression between two or more parties leading to human rights violations.
- 3- We refuse to receive gold from areas and operations that contribute to the financing of conflict or the degradation of the environment. We will never tolerate, help, assist or facilitate any form of torture, cruel, inhuman, and degrading; any form of forced or compulsory labor; illegal or unacceptable child labor; other human rights violations, such as torture and sexual abuse; and crimes against humanity.
- 4- No contribution to money laundering or terrorist financing, terrorist acts or terrorist organizations and wars.
- 5- We undertake to immediately suspend business relations with partners for whom a reasonable risk has been identified that they are related to the supply or to the subjects involved in violations of the above.
- 6- We collect information on the sources of mined gold, recycled gold, or any other raw material, in order to ensure that they have not financed conflicts, have not participated in human rights abuses or money laundering, not financed terrorism.



The general scheme of best practice for such a structure is as follows:

- a) assign authority and responsibility to Senior Management with the skills, knowledge and experience necessary to oversee the supply chain due diligence process;
- (b) ensure the availability of the resources necessary to support the operation and monitoring of those processes;
- (c) increase internal responsibility for the implementation of the supply chain due diligence process;
- (d) establish a continuing training program for all personnel involved in the gold chain.

7- Establish an internal system of due diligence, controls, and transparency on gold supply chains, including traceability and identification of other actors in the supply chain.

8- Strengthen the involvement of companies with gold supply counterparties and, where possible, assist gold supply counterparties in building due diligence capacities;

9- Establish a company-wide communication mechanism to promote broad employee participation and risk identification in management;

10- We are committed to receiving only gold mined from operations that comply with internationally accepted environmental practices.

11- We refuse to deal with counterparties that do not comply with local and international laws and do not accept refining or smelting activities from such suppliers.



## 4 LIST OF STAKEHOLDERS

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### 4.1 STAKEHOLDER OBLIGATIONS

They are summarized in:

- Preserve the credibility and reputation of the company to ensure a development in the market;
- Respect for ethical and safety principles at work;
- Not to incur penalties that may put at risk business continuity, profitability and employment maintenance;
- Maintenance of economic/financial solidity;
- Work with low stress level, positive business thinking and good relationship between colleagues and management;
- Improve collaboration by demonstrating mindful attitudes towards employees;



- Create synergies with the outside world to pursue the improvement of the organization and of customers / suppliers / partners;
- Monitor suppliers periodically through updates of their documentation.

## 5 CONTEXT OF THE ORGANIZATION AND RISK

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TAV Metalli does not supply goods from conflict-affected or high-risk areas as defined in the OECD guidelines.

Each customer and supplier will undergo a DUE DILIGENCE process to verify the documentation and detect possible risk situations. The levels of risk are assessed by way of example in relation to: the legal nature; the conduct held at the time of completion of the transaction or the establishment of the continuous relationship or professional performance; the geographical area of residence or the registered office of the customer or contractor; the frequency and volume of transactions as well as the duration of the ongoing relationship or professional performance.

### 5.1 SUPPLIER MONITORING

The monitoring of suppliers is continuous and supervised, based on monitoring criteria and risk analysis methods on the basis of factors that can impact on ethical sustainability (safety, human rights) and on the basis of factors related to the aspects of corruption and origin of the metal. The procedure differs for providers of services, materials, equipment and customers; for RJC certified suppliers and customers, the qualification procedure can be simplified in relation to the degree of knowledge and historicity of the relationship. Critical issues are evaluated through a path of assessment of the risks of the supply chain (based on the type of processing, company



size, reference sector and work area) determining whether there may be high social risks.

The sole administrator is responsible for the management and processing of data (EU Reg. 2016/679 ("European Regulation on the protection of personal data")).

## 6 HUMAN RESOURCES MANAGEMENT

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The relationship with people who work and collaborate with TAV Metalli Import & Export S.r.l. is of fundamental importance for the growth of the company. It must be based on mutual trust, communication, teamwork and with full respect for human rights.

Human rights are all the fundamental rights and freedom of a person; they are part of general international law and must be satisfied, so that people can realize themselves with dignity in the entirety of their material and spiritual components.

They include:

- Workers' rights (e.g., freedom of association; excluding physical labor, child labor, discrimination, etc.);
- Social, cultural and economic rights (e.g. the right to drink water, hygiene, education, etc.);
- Civil and political rights (such as the right to life and liberty, as well as freedom of expression and equality before the law);

To respect these rights, TAV Metalli does not use or offer support for the use of forced labor, nor does it require it to withhold original documents or deposit money to its staff, or to threaten or intimidate them. Staff have the right to leave the workplace at



the end of the working day, as well as are free to terminate the employment relationship, within the terms expressed by the rules and the Collective Agreement. The company is open to dialogue with its employees, respecting civil and working coexistence.

## 6.1 PROTECTIONS

The recruitment process takes place impartially, based on the required skills considering the needs of the company, without any discrimination. All information collected during recruitment or during the recruitment period is managed according to the Privacy Regulations.

The CCNL of category is applied, according to which family rights, pregnancies, periodic medical checks, risk assessments are protected, among other things, in order to protect the right to a safe and healthy working environment.

Staff are trained and equipped with PPE in order to mitigate the risk of accidents at work and uncomfortable situations.

The working time is that established by the CCNL.

Remuneration and career development shall consider skills acquired internally or externally without any discrimination.

## 6.2 CHILD LABOR AND COMPANY INTERNSHIPS

No use is made of child labor which may deprive minors of their childhood, of their potential and dignity, detrimental to their social, physical and mental development.



The company, however, may involve minors in training internships organized by secondary schools, both public and private, in compliance with the relevant regulations, the Company Code of Ethics and this document. The training internships can also concern the Universities, Higher Education (ITS) or similar.

### 6.3 PRIVACY AND VIDEO SURVEILLANCE

Privacy is the set of rules aimed on guaranteeing the processing of personal data carried out in compliance with the fundamental rights and freedom of each person. Personal data is information that identifies or makes identifiable, directly, or indirectly, a natural person and that can provide information on his characteristics, habits, lifestyle, personal relationships, state of health, economic situation, etc.

Particularly important are:

- a) Data that allow direct identification (e.g., personal data) or indirect identification (e.g., tax code, IP address, license plate number).
- b) The so-called "sensitive" data, i.e. those falling into particular categories and revealing race, ethnicity, religious or philosophical beliefs, political opinions, trade union membership, sexual life or orientation, health, genetic and biometric data.
- c) The so-called "judicial" data, i.e. those relating to criminal convictions and offences (also related to security measures), which may reveal the existence of certain judicial measures subject to registration in the criminal record (e.g. final criminal convictions, parole, prohibition or obligation to stay, alternative measures to detention) or the status of accused or suspected.



As new technologies evolve, particular attention should be paid to personal data transmitted via electronic communications and to data that enable geolocation, providing information on places frequented and travel.

For EU Regulation 2016/679, personal data concern:

- The interested party, i.e. the natural person to whom the personal data refer;
- The Data Controller, i.e. the natural person, the public authority, the company, the public or private body, the association, etc., which adopts decisions on the purposes and methods of processing
- The Data Processor, therefore the natural or legal person to whom the Data Controller requests to perform on his behalf specific and defined management and control tasks on his behalf of the Data Processing.

Data Processing includes any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data. It includes, for example: collection, recording, organization, structuring, storage, adaptation or alteration, extraction, consultation, use, communication by transmission, dissemination, or any other form of making available, comparison or interconnection, limitation, erasure or destruction. Therefore, the subjects who proceed with the Processing of Personal Data must take special measures to ensure the correct and safe use of the data.

As for the installation of video surveillance, it will not be used for control purposes (even indirect) on the professional activity of employees, but to protect company assets and safety at work (to prevent and repress robbery / theft / damage attempts), according to Legislative Decree 196/2003 and the General Provision 08/04/2010 of the Privacy Guarantor.



## 6.4 USE OF COMPANY ASSETS AND IMAGE PROTECTION

Every employee has the duty to work with the diligence of the good father of the family to protect the company's assets, operating responsibly, in compliance with the rules on safety at work and the environment required by law.

Employees, as far as possible and without ever jeopardizing their safety, must act in such a way as to reduce the risk of theft, damage or threats to company assets and resources.

It is forbidden for employees to publish online or to provide material or information that may damage the image and seriousness of the company and / or compromise its competitiveness on the market.

## 6.5 DISCIPLINARY PROCEDURES - REPORTS

Please refer to the provisions of the National Collective Labor Agreement (CCNL).

## 6.6 WORKING HOURS

The working hours, scheduled from Monday to Friday, are as follows:

8:30 – 12:30 / 13:00 – 17:00

Holidays and leave are paid according to the CCNL, with the aim of encouraging the use of holidays and leave by staff.

## 6.7 PAY

The company complies with the provisions of the CCNL.



## 7 HEALTH AND SAFETY

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The governance structure of the management system for safety in the company is composed of:

Employer and RSPP
Territorial RLS (external)
Competent Doctor
First Aid Officer
Fire Fighting Officer

The staff is trained in accordance with the provisions of Legislative Decree 81/08, and subsequently, and in particular in accordance with the provisions of Articles 36 (information to workers) and Article 37 (training of workers and their representatives).

Below is the list of the main documents:

- DVR (Risk Assessment Document);
- Video terminal risk assessment;

There have been no injuries within the company, from its establishment to the present.

## 8 WORK ACTIVITY AND SERVICES

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TAV Metalli deals with the marketing of precious materials containing gold, for which it imports and exports.

The services it offers are as follows:





- Purchase and sale of material containing gold from and abroad and / or in the national territory;
- Sending the aforementioned material for analysis, refinement and recovery at third-party companies;
- Assistance in recovery work on behalf of the supplier / customer;
- Assistance in transformations into semi-finished or finished products on behalf of the supplier / customer;
- Management of the import and export of the material (pure, raw, semi-finished and / or finished).

## 9 WASTE MANAGEMENT

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For office work, the company collects and separates the following waste, which it produces in minimal quantities:

- Mixed packaging / paper and cardboard / plastic

## 10 PRODUCT INFORMATION

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The company is authorized as a "professional gold trader"; It is in possession of licenses for wholesale and processing of precious metals; It has the precious metals identification mark.

For its activity it buys gold doré and resells, or even sends on account processing on behalf of third parties, fine gold (with a title equal to or greater than 995 thousand) so transformed by companies that own the precious metals punch according to Legislative Decree 251/1999 "discipline of securities and identification marks of precious metals, in implementation of art. 42 of Law 128/1998".



## 11 CERTIFICATION "RJC – COP"

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In the corporate vision there is the obtaining of the RJC COP certification, therefore the company is preparing the documentation that will be necessary for the verification by an external auditor, adhering to and applying the RJC Code of Procedure.

The Responsible Jewelry Council is a standardization organization set up to improve responsible environmental, social, ethical, and human rights practices across the entire jewelry supply chain regarding gold, silver, platinum, diamonds, and colored gems. RJC has developed a reference standard for the jewelry supply chain and credible mechanisms to verify, through third parties, that the companies in the supply chain operate according to responsible commercial practices.

TAV Metalli undertakes to carry out the activities in accordance with the RJC Code of Procedure and to integrate ethical, social, environmental, and human rights considerations into our daily activities, business planning and decision-making processes.

Obtaining the COP certification is a valid system to demonstrate to stakeholders that TAV Metalli carries out its activities responsibly, as well as to add value to its services and products, but above all to reduce risks and vulnerabilities, improving the operating procedures, present in the company supply chain. The COP is divided into six general sections, comprising 42 provisions, summarized on the table below:

					
General requirements	Responsible supply chains, human rights and due diligence	Labour rights and working conditions	Health, safety and environment	Gold, silver, PGM, diamond and coloured gemstone products	Responsible mining
1. Legal compliance 2. Policy and implementation 3. Reporting 4. Financial accounts	5. Business partners 6. Human rights 7. Due diligence for responsible sourcing from conflict-affected and high-risk areas 8. Sourcing directly from artisanal and small-scale mining 9. Sourcing post-consumer industrial precious metals directly from informal recyclers 10. Community development 11. Bribery and facilitation payments 12. Know Your Counterparty: money laundering and finance of terrorism 13. Security 14. Provenance claims	15. General employment terms 16. Working hours 17. Remuneration 18. Harassment, discipline, grievance procedures and non-retaliation 19. Child labour 20. Forced labour 21. Freedom of association and collective bargaining 22. Non-discrimination	23. Health and safety 24. Environmental management 25. Hazardous substances 26. Wastes and emissions 27. Use of natural resources	28. Product disclosure 29. Kimberley Process Certification Scheme and World Diamond Council System of Warranties 30. Grading, analysis and appraisal	31. Extractive Industries Transparency Initiative 32. Stakeholder engagement 33. Indigenous peoples and free, prior and informed consent 34. Impact assessment 35. Artisanal and small-scale mining and large-scale mining 36. Resettlement 37. Emergency response 38. Biodiversity 39. Tailings and waste rock 40. Cyanide 41. Mercury 42. Mine rehabilitation and closure

taken from: <https://www.responsiblejewellery.com/wp-content/uploads/RJC-COP-Guidance-April-2019-IT.pdf>

The company will implement the COP effectively according to the 8 common elements identified by RJC:



1. **Management responsibility:** the company will point its own Internal RJC Coordinator, who will collaborate in agreement with the Sole Director;
2. **Written policy:** TAV Metalli has adopted this written policy;
3. **Risk assessment:** the company, in adopting its policies, has carried out the risk assessment, in the areas of its interest, including, for example, the risks in the field of human rights, health and safety of people, etc.
4. **Procedures adopted:** specific procedures have been identified and adopted that allow us to understand how to concretely apply company policies.
5. **Compilation of registers:** in addition, and in accordance with the accounting and administrative management, special registers have been adopted to allow the company to manage the data over time and to measure the progress made; these registers are a source of information for checking made by external parties.
6. **Reporting:** taking into account the company's corporate size, the Company Policy, the Code of Ethics, the RJC membership status, and anything else necessary to communicate to strengthen the credibility and reputation of the company, will be published online and / or sent by e-mail (or another digital format).
7. **Training:** the company considers this aspect valuable to increase the understanding of company policies and practices, develop new skills, clarify expectations, and facilitate the monitoring of the responsibilities of individuals (e.g. employees, partners, etc.).
8. **Complaint and grievance mechanism:** the company is available to acknowledge, evaluate, monitor, and take action on any concern it may receive



from anyone and report it, in timely, informed, open, protected and respectful of human rights.

### 11.1 LEGAL COMPLIANCE (COP 1)

Tav Metalli complies with national (and international) regulations in various areas, including gold and precious metals, social and environmental rights, labor, safety at work, privacy, etc., as well as permits, licenses and other forms of authorizations, local statutes, indications, judgments, or interpretations pronounced by the competent Judicial Authorities; etc.

The company has obtained the Authorization from the Bank of Italy as a "professional operator in gold"; it has the licenses issued by the Police Headquarters of Arezzo for "trade and processing of precious metals"; in the field of safety at work, it has carried out the risk assessment; it complies with the provisions of its Code of Ethics and Company Policy.

To comply with legal compliance, the company also uses external consultants, as well as strives to obtain information from external sources (e.g. online).

### 11.2 POLICY AND IMPLEMENTATION (COP 2)

This corporate policy defines the expected responsibility and conduct in relation to its activities and operations, demonstrating the commitment of corporate governance to corporate responsibility to assess and eliminate or reduce risks and issues, transmitting the principles, intent and corporate values in order to determine uniform and consistent behavior within the company.

Among other things, TAV Metalli provides, within the limits of its size and capabilities, to adopt the Sustainable Development Goals (SDGs):



Any employee and business partner concerned who intends to collaborate with TAV Metalli undertakes to comply with the policies of the RJC Code of Procedure, as well as this Company Policy and the Company's Code of Ethics.

### 11.3 REPORTING (COP 3)

The reporting (or "information") serves to publicly disclose the company's business practices to the parties involved (e.g. business partners, employees, etc.), including: the Company Policy, the Code of Ethics, etc.

TAV Metalli provides direct and/or public information to interested parties on the practices adopted with respect to the RJC Code of Procedure.

Reporting (or disclosure) to stakeholders about business practices is a set of actions divided into three phases:



Taken from p. 24: <https://www.responsiblejewellery.com/wp-content/uploads/RJC-COP-Guidance-April-2019-IT.pdf>

#### 11.4 FINANCIAL ACCOUNTS (COP 4)

In accordance with national accounting rules, and on the basis of current turnover, the company has instructed an external accounting consultant to keep the financial accounts of all transactions, who examines the information received from the internal administrative office. During the verification or control process, the company management shall identify and address the risks that could cause significant anomalies in the financial statements, including fraud.

Since TAV Metalli is in its first year of activity, the control body or the external auditor is not envisaged if at least one of the legal limits (assets of Euro 4 million; revenues of Euro 4 million; employees 20 units) is not exceeded for two consecutive years. The obligation starts from the third year.



## 11.5 BUSINESS PARTNERS (COP 5)

A company's ability to influence business partners (i.e. an entity with which an RJC member has direct business relationships) varies according to the socio-economic context in which it operates, as well as the scope and type of its relations with the partner in question.

TAV Metalli does its utmost to act honestly, reasonably and with positive actions, according to its power of influence, aimed at fulfilling the obligations envisaged, for example, to adopt responsible commercial and operational practices with its business partners.

Through the Due Diligence procedure, respect for human rights and risks related to manpower are included in the risk assessment, to comply with the provisions of COP 6 (Human Rights), COP 7 (Due Diligence for responsible sourcing from conflict and high-risk areas), COP 8 (Direct procurement from artisanal and small-scale mining activities), COP 13 (Safety), COP 19 (child labor), COP 20 (forced labor), COP 23 (Health and Safety).

All employees and visitors present in the company will also have to comply with the company's policies, systems, and procedures relevant to the COP.

Significant business partners are required to provide the company with copies of their policies as evidence of commitment to comply with COP provisions.

The compliance of business partners will be checked regularly through monitoring activities.

## 11.6 HUMAN RIGHTS (COP 6)

The term human rights refers to the universal rights and freedoms enjoyed by every single person, without any discrimination, as defined in the International Charter of





Human Rights, in the Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work, as well as in applicable laws.

Human rights affect all companies, regardless of size, industry, or country in which they operate. They include social, cultural and economic rights, workers' rights, as well as political and civil rights, and include: freedom of association and effective recognition of the right to collective bargaining; the abolition of forced or compulsory labor; the abolition of child labor; the abolition of discrimination in employment and occupation.

They have been dealt with in Chapter 6 of this Company Policy.

Our Human Rights Due Diligence includes a reasonable investigation to identify, assess, prevent, and mitigate the effects on human rights in the supply chain.

#### 11.7 GUIDING PRINCIPLES OF THE UNITED NATIONS (COP 6.1)

TAV Metalli respects human rights by considering all potential and actual impacts in their activities and business relationships. It also undertakes to respect and implement the UN Guiding Principles on Business and Human Rights applicable according to company size and circumstances:

UN Guiding Principles		OECD Guidance	
6.1A	Commitment to respecting human rights	<b>Policy</b> A written policy on your own operations and your supply chain that outlines your commitment, and is reflected in operational processes and procedures.	Commitment to responsible supply chains <b>S1</b>
6.1B	Focus on your own operations and supply chains	<b>Due diligence</b> An effective due diligence process that is overseen and coordinated through effective management systems. That includes a review to identify and assess human rights impacts, a strategy and action plan to respond to identified impacts, and ongoing monitoring and evaluation of efforts.	Focus on your supply chains <b>S2</b> <b>S4</b>
6.1C	Remedy as per your involvement (cause, contribute or link to)	<b>Remedy</b> Appropriate remedy for any identified actual impact, and action to stop it happening again.	Focus on your supply chains <b>S3</b>
6.1D	Report to internal and external stakeholders	<b>Communication</b> Reporting on your efforts to prevent and address human rights impacts, at least once a year.	Information needed varies with business type <b>S5</b>

Taken from p. 41: <https://www.responsiblejewellery.com/wp-content/uploads/RJC-COP-Guidance-April-2019-IT.pdf>

The UN Guiding Principles (and the OECD Guidelines) set out what needs to be done in relation to human rights (to avoid causing negative effects on human rights or contributing to them and then having to be remedied) and suggest how it should be done, defining the human rights due diligence process to be put in place to identify, prevent and mitigate negative effects on human rights and to respond to the way they are addressed.

TAV Metalli undertakes not to be involved in the negative effects on human rights in the three ways envisaged (cause, contribution, link):

Type of involvement		Examples
<b>Cause</b>	A company is a necessary and sufficient factor for the harm to occur.	<ul style="list-style-type: none"> <li>• Failing to pay wages to employees.</li> <li>• Discriminating in treatment of workers.</li> <li>• Exposing factory workers to hazardous working conditions without adequate safety equipment.</li> <li>• Dumping chemical effluents from production processes into waterways, directly polluting local communities' drinking water.</li> </ul>
<b>Contribution</b>	A company exacerbates the harm, but is not a sufficient factor for it to occur.	<ul style="list-style-type: none"> <li>• Changing production requirements for suppliers at the last minute without adjusting production deadlines and prices, thereby pushing suppliers to breach labour standards to deliver.</li> <li>• Working with a subcontractor that uses prison/voluntary prison labour to work in factories.</li> <li>• Relying on on-site labour agents using deceptive tactics to recruit migrant workers, who are then forced into debt to pay recruitment-related fees.</li> </ul>
<b>Linkage</b>	A company is linked to harm, but the harm would have been just as severe without it.	<ul style="list-style-type: none"> <li>• Migrant labour abuse at a supplier's manufacturing site, despite explicit policies against such activities and confirmation from suppliers that such policies are implemented.</li> <li>• A supplier subcontracting parts of production to child workers in homes, in contradiction to contractual obligations and without any specific procurement pressures from the company.</li> <li>• Suppliers using raw stones sourced through an agent originating from mines that allow child workers to perform hazardous work endangering their health.</li> </ul>

Taken from p. 43: <https://www.responsiblejewellery.com/wp-content/uploads/RJC-COP-Guidance-April-2019-IT.pdf>

The company's human rights due diligence procedure is divided into four phases:

1. Assessment of potential and actual impacts on human rights.
2. Integration and action on the basis of what has emerged.
3. Tracking of the answers.
4. Communication of how impacts are addressed.

Given that risks may change with the passage of time, TAV Metalli will carry out a review of the due diligence procedure, with a frequency based on risk and dictated by changes within the company, for example: • every time you start a significant new business or a business relationship; • in case of complaint or accusation against the company; • if you start sourcing new products or from a new country; • if the country in which the company operates, or from which it sources, undergoes changes that affect the human rights risk (e.g. political changes).



## 11.8 RESPONSIBLE SOURCING FROM CONFLICT AND OTHER AREAS (COP 7)

The term "conflict and high-risk areas" (CAHRA) refers to areas characterized by armed conflict, widespread violence (including violence generated by criminal networks) or other risks of serious and widespread harm to individuals. Armed conflict can take many forms, such as an international or national conflict, wars of liberation, revolts, civil wars, etc. Such areas may include territories with political instability or repression, weak institutions, insecurity, declining civilian infrastructure, and widespread violence, and are often characterized by widespread violations of human rights and national and international law.

The term "CAHRA" (ref. EU Regulation 2017/821) may refer to a region, a country, an area within a country or crossing one or more national borders. Activities based in these areas are not necessarily complicit in ongoing conflicts.

The term "origin of a material from mining activity" means the mining site, the holding, the region, or the geographical location where the mining site is located, regardless of whether it is a small-scale artisanal mining activity, medium or large-scale mining activity. The origin of the recycled material is the point at which it enters the jewelry supply chain again. For recycled gold and silver, it is the point at which that material is returned to the refining company or other intermediate operators downstream of the supply chain or to the recycling company.

TAV Metalli carries out the Due Diligence procedure, to identify the risks and therefore be able to prevent or limit the negative effects related to their procurement, whose program is:



- Continuous: perfectly integrated into the company's management systems and daily procedures;
- Proactive: designed and implemented in order to identify and mitigate risks and prevent negative effects;
- Reactive: able to respond promptly to risks (both actual and potential);
- Risk-based: with a level of accuracy and commitment suitable to manage the potential risks typical of company supply chains;
- Such as to allow continuous improvement: companies can start from a lack of knowledge of the risks of their supply chains and strive to improve systems and knowledge over time.

TAV Metalli, based on its capacity and operation, carries out Due Diligence on customers and suppliers, in order to prevent and assess the risk, based on the indications of Appendix II of the OECD guidelines.

Recognizing that the extraction, trade, handling and export of conflict-affected and high-risk minerals may entail risks of significant adverse effects and that we have a responsibility to respect human rights and not to contribute to conflicts, we are committed to adopting, disseminating on a large scale and incorporating into contracts and/or agreements concluded with suppliers the following strategy for the responsible sourcing of minerals from conflict-affected and high-risk areas, which is a common reference for procurement practices that specifically take into account conflicts and to raise suppliers' awareness of risks from the extraction point to the end user. We undertake to refrain from any action that contributes to financing



conflicts, and we undertake to comply with the relevant United Nations sanctions resolutions or, where applicable, the national laws that apply such resolutions.

### **Regarding serious abuses associated with the extraction, transport, or trade of minerals**

1. When sourcing or operating in conflict-affected and high-risk areas, we do not intend to tolerate or in any way profit, contribute to or facilitate the perpetration by any person of:

*(i)* any form of torture or cruel, inhuman and degrading treatment;

*(ii)* any form of forced or compulsory labor, meaning any work or service demanded by a person under threat of punishment and for which that person has not offered himself spontaneously;

*(iii)* the worst forms of child labor;

*(iv)* other abuses and serious human rights violations such as widespread sexual violence;

*(v)* war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

### **Regarding risk management of serious abuse**

2. We intend to immediately suspend or terminate all engagements with upstream suppliers if we identify a reasonable risk that they will source from or are related to a serious abuser as defined in paragraph 1.



### **Regarding direct or indirect support to non-state armed groups**

3. We do not intend to tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. "Direct or indirect support" to non-State armed groups through the extraction, transport, trade, handling, or export of minerals means, but not exclusively, the making of payments or logistical assistance or the supply of equipment to non-state armed groups or their affiliates which:

*(i)* illegally control mining sites or otherwise control transport routes, mineral marketing points and upstream actors in the supply chain;

and/or

*(ii)* illegally tax or extort money or minerals at access points to mining sites, along transport routes or at points of marketing of minerals; and/or

*(iii)* illegally tax intermediaries, exporting undertakings or international traders or engage in extortion against them.

### **Regarding the risk management of direct or indirect support to non-state armed groups**

4. We intend to immediately terminate the relationship with upstream suppliers for whom we identify a reasonable risk that they will source from or are linked to third parties providing direct or indirect support to non-state armed groups as defined in paragraph 3.

### **Regarding public or private security forces**

5. We undertake to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces illegally controlling mining sites, transport



routes and upstream actors in the supply chain; illegally tax or extort money or minerals at access points to mining sites, along transport routes or at points of marketing of minerals; or illegally tax intermediaries, exporting companies or international traders or practice extortion against them.

6. We recognize that public or private security forces at mining sites and/or surrounding areas and/or along transport routes should have only the role of maintaining legality, safeguarding human rights, ensuring the safety of workers, equipment, and installations of mines, and protecting mining sites or transport routes from any interference with legitimate mining and trade.

7. When we or any company in our supply chain enter a contract with public or private security forces, we undertake or demand that such security forces be engaged in accordance with voluntary principles of security and human rights. In particular, we intend to support or take steps to ensure that selection policies are adopted to ensure that no persons or units of the security forces known to be responsible for serious human rights violations are recruited.

8. We intend to support efforts or take steps to work with central or local authorities, international organizations, and civil society organizations in order to contribute to the search for viable solutions to improve transparency, proportionality and accountability in relation to payments made to public security forces to ensure security.

9. We intend to support efforts or take measures to cooperate with local authorities, international organizations, and civil society organizations in order to avoid or minimize the exposure of vulnerable groups, in particular artisanal mining operators when the extraction of minerals in the supply chain is carried out in an artisanal or





small-scale manner, the negative effects associated with the presence of security forces, public or private, in mining sites.

### **Regarding the management of risk related to public or private security forces**

10. Based on the specific position of the undertaking in the supply chain, we intend to define, adopt, and immediately implement a risk management plan with upstream suppliers and other actors in order to prevent or mitigate the risk of direct or indirect support being offered to public or private security forces as identified in paragraph 5, when we identify the existence of such a reasonable risk. In such cases, we intend to suspend or terminate, once risk mitigation attempts have failed, business relationships with upstream suppliers within six months of the adoption of the risk management plan. If we identify a reasonable risk of activities incompatible with paragraphs 8 and 9, we intend to do the same.

### **Regarding corruption and misrepresentation of the origin of minerals**

11. We do not intend to offer, promise, give or demand bribes and we will resist soliciting bribes, requesting to conceal or conceal the origin of minerals, or falsely declaring taxes, charges and fees paid to governments for the extraction, trade, handling, transport, and export of minerals.

### **About money laundering**

12. We intend to support efforts or implement measures to contribute to the effective elimination of money laundering where we identify the reasonable risk of money laundering originating from or related to the extraction, trade, handling, transport, or export of minerals resulting from the illegal taxation or extortion of minerals at access



points to mining sites, along transport routes or at points of marketing of minerals by upstream suppliers.

### **Regarding the payment of taxes, charges, and fees due to government**

13. We intend to ensure that all charges, taxes, and charges related to the extraction, trade and export of minerals from conflict-affected and high-risk areas are paid to government and depending on the position of the company in the supply chain, we undertake to disclose such payments in accordance with the principles set out in the Extractive Industries Transparency Initiative (EITI).

### **Regarding the management of the risks of corruption and misrepresentation of the origin of minerals, money laundering and the payment of taxes, charges, and fees to government.**

14. Based on the specific position of the company in the supply chain, we undertake to work with suppliers, central or local public authorities, international organizations, civil society and interested third parties, as appropriate, to improve and verify compliance in order to prevent or mitigate the risks of adverse effects through measurable actions implemented within a reasonable timeframe. If attempts to mitigate risks fail, we intend to suspend or terminate engagement with upstream suppliers.

## **11.9 BUSINESS MANAGEMENT SYSTEMS AND RISK MANAGEMENT**

As explained in Chapter 5 of this Company Policy, the company will subject each customer and each supplier to a Due Diligence process.



In order to identify and evaluate the risks, it is first necessary to know the supply chain and identify the suppliers through the collection of information and documents of different types, based on the position occupied along the supply chain (mining company, refining company, downstream company of the cycle).

Each partner must be informed and accept the Company Policy and the Code of Ethics of TAV Metalli. These documents, together with the Due Diligence process, will be subject to a programmatic review.

To briefly summarize the negative impacts and adequate response in risk management by the company, based on the recommendations set out in Appendix II of the OECD Guidelines:

Identified risk of adverse impact	Appropriate response
Serious abuses associated with the extraction, trade and transport of minerals	Immediately suspend or disengage from suppliers. Mitigate where possible.
Direct or indirect support to non-state armed groups	Immediately suspend or disengage from suppliers. Mitigate where possible.
Direct or indirect support to public or private security forces who illegally control mine sites, transport routes and upstream actors (including illegal taxation)	Continue, or temporarily suspend, trade with suppliers, but implement measurable mitigative actions. Suspend or disengage if mitigation measures are ineffective.
Bribery and fraudulent misrepresentation of the origin of gold / silver / platinum	Continue, or temporarily suspend, trade with suppliers, but implement measurable mitigative actions. Suspend or disengage if mitigation measures are ineffective.

The company will be audited as part of the normal COP certification procedure.

To this end, being a member of RJC, TAV Metalli undertakes to provide evidence, through independent external verification, of the fact that:

- a. we respect human rights in accordance with the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
- b. we do not exercise or tolerate bribery, corruption, money laundering or terrorist financing;



- c. we support the transparency of state payments and security forces compatible with the protection of rights in the extractive industry;
- d. we do not provide direct or indirect support to illegal armed groups;
- e. we establish processes through which the parties involved can express problems related to the jewelry supply chain;
- f. we refer to the five-step OECD regulatory framework as a management system (and, where applicable, also the gold supplement) for risk-based due diligence activities, in relation to responsible supply chains of minerals from conflict-affected and high-risk areas. In addition, we are committed to leveraging our ability to influence to prevent abuse by others.

With regard to serious abuses associated with the mining, transport and trading of gold: we do not intend to tolerate or profit, contribute, assist or favor:

- a. torture, cruel, inhuman and degrading treatment;
- b. forced or compulsory labor;
- c. any form of child labor;
- d. human rights violations and abuses;
- e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately cease all engagements with suppliers upstream of the supply chain if we find there a reasonable risk that they will commit the abuses or procure from or are connected to a counterparty who and commit the aforementioned abuses associated with the extraction, transport and trade of gold.

We do not intend to tolerate direct or indirect support to non-governmental armed groups, including inter alia the procurement of gold, the making of payments or the



assistance or supply of equipment to non-governmental armed groups or their affiliates which, in an illegal manner:

- (a). control mining sites, transport routes, gold marketing points and upstream operators in the supply chain;
- (b). tax or extort money or gold at mining sites, along transport routes or at gold marketing points, or by intermediaries, export companies or international traders.

We will immediately cease all engagements with suppliers upstream of the supply chain if we find a reasonable risk that they will procure or be linked to a counterparty providing direct or indirect support to non-governmental armed groups.

With regard to public or private security forces: we confirm that the role of public or private security forces is to ensure the safety of workers, facilities, equipment and property, in accordance with the law, including the law protecting human rights. We do not intend to provide direct or indirect support to public or private security forces that commit the above abuses, or that act contrary to the law.

Regarding bribery or misrepresentation of the origin of gold: we do not intend to offer, promise, or request bribes and we intend to oppose the solicitation of bribes, the request to conceal or conceal the origin of gold, or to declare the false regarding taxes, duties, tariffs, and royalties paid to governments for the purpose of extracting, trading, handling, transporting, and exporting gold.

Regarding money laundering: We intend to support efforts and contribute to the elimination of money laundering where we identify the reasonable risk of money laundering arising from or related to the extraction, trade, handling, transport, or export of gold.

#### **11.10 DIRECT PROCUREMENT FROM ARTISANAL AND SMALL-SCALE MINING (COP 8)**



Although the company does not currently source directly from small-scale artisanal mining activities (EEA), it considers it appropriate to include this case in its Company Policy, considering the rapid evolution of the market in which it operates.

In this case, TAV Metalli will carry out a periodic assessment of the risks indicated in cop 7 (Due Diligence for responsible sourcing from conflict-affected and high-risk areas) as well as the risks regarding dangerous working conditions, the uncontrolled use of mercury and significant environmental impacts (including those on biodiversity – COP 38 – and environmental – COP 24) in order to try to foster a development of the EEA community in line with the EEA community COP 10 (Social Development) and COP 6 (Human Rights) arrangement.

Periodic on-site visits to EEA mining sites will also be planned to look for clues to potential risks, including, for example, the exclusive use of cash transactions and immediate proximity to World Heritage sites, areas protected or important biodiversity areas.

Finally, TAV Metalli undertakes to provide fair trading conditions for any EEA suppliers.

#### **11.11 DIRECT PROCUREMENT OF PRECIOUS METALS FROM INFORMAL RECYCLING COMPANIES (COP 9)**

Although at present the company does not source directly from informal recycling companies outside its control, it considers it appropriate to include this case in its Company Policy, considering the speed of development of the market where it operates.



The term "informal recycling" refers to the process of collecting, grouping and manual processing of waste that has reached the end of its life to obtain recycled material. Unlike the formal recycling sector, informal recycling is conducted mostly without mechanized means and is mainly based on manual techniques with high use of laborers, and includes a large number of activities, such as the collection, grouping and scrapping of waste, and the recovery of particular precious materials such as gold, silver, platinum and palladium. The practice of this form of recycling is closely linked to the enormous growth of waste electrical and electronic equipment (WEEE), which can contain a large number of hazardous waste (e.g. lead, mercury, etc.).

In case of procurement from informal recycling companies outside its control, the company will strive to:

a. Periodically assess the risks indicated in COP 7 (Due Diligence for Responsible Sourcing from Conflict and High-Risk Areas) as well as risks regarding hazardous working conditions, exposure to toxic chemicals and metals, and other significant environmental impacts; and seek ways to promote the development of informal recycling communities in line with the COP 10 (Social Development) provision.

b. Use all means to positively influence practices in order to:

i. Reduce or avoid risks and provide, or cooperate, to remedy adverse effects on human rights and the environment. Measurable risk mitigation actions should aim to foster significant improvement within the defined time frame from the time of adoption of the risk management plan.

ii. Support development possibilities for informal recycling communities.

If TAV Metalli identifies a risk of harmful practices, it will have to monitor and limit them, in line with COP 6 (Human Rights) and COP 7 (Due Diligence for Responsible



Sourcing from Conflict and High-Risk Areas) provisions. In this case, it will terminate the relationship with the supplier of informal recycled material in the event that it has detected particularly harmful practices, such as the use of forced labor or the worst forms of child labor.

#### 11.12 SOCIAL DEVELOPMENT (COP 10)

Social development is a way of working, supported by a commitment to equity, social justice, participation, and empowerment, which enables people to identify common issues and provides them with support in adopting related measures.

The social development strategy is based on community consultation actions, regional cooperation initiatives and partnership creation, taking care to frame everything in the context of local community priorities, national development goals and existing work programs. You can, for example, work with government agencies, non-governmental organizations (NGOs) or local groups to consolidate existing long-term programs that target education, health, gender equality, the environment, health and safety, economic development, and cultural activities. In practice, this may include:

- create job opportunities at local level through training, recruitment and the ability to maintain staff over time;
- support local sourcing by investing in local financial institutions and business development programs;
- promote education opportunities by collaborating with local and regional education centers;
- launch training activities on environmental monitoring and management of natural resources, aimed at members of the local community.





TAV Metalli, according to its needs as professional figures and labor, strives to hire staff in the area where it is based.

### 11.13 CORRUPTION AND FACILITATING PAYMENTS (COP 11)

TAV Metalli rejects any act addressed to bribery, corruption, or facilitator payments to obtain preferential treatment regarding something that the beneficiary of the sum must still do.

To this end:

- a. It prohibits corruption in all business practices and transactions conducted by the company's staff or agents acting on their behalf.
- b. It protects employees from penalties or negative consequences for identifying in good faith aspects related to suspected corruption, for refusing to participate in corruption or for making a facilitator payment in cases where such payments are prohibited, even if this behavior could cause losses to the company.
- c. It defines the criteria and approval procedures that employees must follow when offering gifts to third parties and / or receiving them from them, in compliance with the company's Code of Ethics. In particular, after adequate training regarding policies and procedures, employees are required not to accept gifts of any kind that involve high risks of participation in forms of corruption. In case of suspected corruption, an internal investigation will be carried out, with the elevation of sanctions (which will be established according to the circumstances and gravity) in case of overt corruption or attempted corruption.



#### 11.14 KNOW YOUR CLIENT – KYC (COP 12)

As already stated in chapter 3 of this Company Policy and in its Code of Ethics, TAV Metalli:

1. Refuses to contribute to conflicts between governments, militias, organized crime or terrorist groups, or to parties that violate human rights or contribute to conflict or environmental degradation;
2. Refuses to contribute to money laundering or terrorist financing activities, terrorist acts or terrorist organizations and wars;
3. undertakes to immediately suspend business relations with partners for whom a reasonable risk of violation of the above points has been identified.
4. undertakes to document and apply the "Know Your Client (KYC)" policy and the related customer and supplier procedures in order to:
  - a. Determine the identity of the counterparty by checking the identification data issued by the government. Based on the risk assessment or applicable law, determine the beneficial owner and owners/shareholders of the counterparty.
  - b. Verify that the counterparty and, where applicable, beneficial owners do not appear on government lists of persons or organizations involved in money laundering, fraud, or involvement with prohibited organizations and/or conflict financiers.
  - c. Ensure up-to-date knowledge about the nature and legitimacy of their business.
  - d. Monitor transactions to detect unusual or suspicious activity and report to the competent authorities any suspected cases of money laundering or terrorist financing.

and. Keep the data appropriately for a minimum of five years or for the period provided for in national law, whichever is longer.

To this end, it adopts the following RJC procedures:



*Taken from p. 113 RJC COP Guide 2019*

The KYC policy and procedures will be reviewed periodically, at least once a year. Staff will be adequately trained on KYC principles and related compliance procedures, including risk indicators.

TAV Metalli only carries out tracked transactions (e.g. bank transfers, etc.). In the case of cash transactions of an amount equal to or greater than Euro 10,000, whether it takes place in a single operation or in several operations that are connected, the data of the individual transactions and the related receipts will be stored.



### 11.15 SECURITY (COP 13)

TAV Metalli adopts security measures in order to protect employees, contractors, visitors and personnel employed by business partners against theft of products, damage or replacement of products at its headquarters and during events, exhibitions and shipments.

In compliance with this policy, society puts the protection of people first.

In this regard, see chapter 6 of this Company Policy, in particular as provided for in point 6.4.

### 11.16 DECLARATIONS OF PROVENANCE (COP 14)

The term "origin of a material from mining activity" means the mining site, the holding, the region, or the geographical location where the mining site is located, regardless of whether it is a small-scale artisanal mining activity or a medium or large-scale mining activity. The origin of the recycled material is the point at which it enters the jewelry supply chain again. For recycled gold, silver, or platinum, it is the point at which that material is returned to the refining company or other intermediate operators downstream of the supply chain or to the recycling company.

The term "declaration of provenance" means a documented statement, drawn up with the aid of descriptions or symbols, relating to gold, silver, platinoids, diamonds or colored gems intended for sale (as separate materials or mounted in jewelry). Declarations of source typically relate to the origin of a product, verification of the source, traceability of the material, certification of the material or suppliers, or other mechanism to ensure the use of responsible sourcing practices not covered in the COP.



Statements of source are a form of corporate presentation and may be governed by consumer protection laws that prohibit the use of false and misleading advertising (see COP 28 "Product Policy").

To this end, procurement shall be carried out in accordance with the OECD Guidelines (in accordance with COP 7 provision "Due diligence for responsible sourcing from conflict-affected and high-risk areas".)

TAV Metalli will adequately keep the appropriate documentation, provide on request information on declarations of origin and basic systems, based on formal procedures to manage each supply of materials covered by the declaration.

#### 11.17 GENERAL CONDITIONS OF USE (COP 15)

As provided for in chapter 6 of this Company Policy, TAV Metalli will recruit personnel impartially, without discrimination. Employment conditions relating to wages, working time and other aspects shall be communicated to employees in writing, in a comprehensible manner, prior to the employment relationship.

The company keeps the employment contract of each worker, in addition to the appropriate records of employee data, including payments of wages as well as working hours, for all full-time employees, part-time employees, etc.

#### 11.18 WORKING HOURS (COP 16)

Please refer to the provisions of point 6.6 of this Company Policy.

Working hours may not exceed 48 hours per week, usually from Monday to Friday.

If overtime is necessary for business needs, it will be required voluntarily and in the terms of the Collective Labor Agreement, without constraints, abuses, threats of dismissal, etc...



### 11.19 REMUNERATION (COP 17)

Employees' salaries will be paid without delay or on deferred dates; by bank transfer or by other preferably traceable means, in the manner and in the location convenient for employees; accompanied by the pay slip as required by law.

Deductions from wages are provided for only if such deductions:

- a. Comply with the law and, where applicable, are governed by collective labor agreements;
- b. They are established and calculated on the basis of a documented process clearly communicated to employees;
- c. Do not result in a salary for the employee below the minimum wage.

There are no deductions for disciplinary reasons.

The company does not force employees to purchase supplies or services from their company.

For any further cases, the CCNL is applied as expressed in chapter 6.7 of the Company Policy.

### 11.20 HARASSMENT, DISCIPLINARY PROCEDURES, CORPORATE DISPUTES AND ANTI-RETALIATION MEASURES (COP 18)

All forms of violence and harassment are prohibited in the workplace, including, but not limited to, corporal punishment, rude or degrading treatment, sexual or physical harassment, mental, physical, verbal, or sexual abuse, retaliation, coercion and intimidation. Any form of direct or indirect harassment is unacceptable in the workplace. TAV Metalli guarantees that employees are treated with dignity and respect and that they are not subject to harassment or violence or threatened with such acts against themselves or those of their family members or colleagues.



In case of violations, employees are free to file a complaint, alone or together with other workers, without being subject to sanctions or retaliation. Each complaint must be addressed to the manager and the Human Resources Manager, in a timely manner. The data and documentation relating to the complaints submitted by the workers, as well as the consequent investigative procedures and their results, are kept within the company.

#### 11.21 CHILD LABOR (COP 19)

As provided for in Chapter 6.2, the company does not employ child labor. Before hiring, the age is verified through the examination of the identity document.

#### 11.22 FORCED LABOR (COP 20)

Society does not practice or favor any form of forced labor, including forced labor, ransom labor and involuntary labor in detention, as defined by Convention 29 of the International Labor Organization (OIL).

TAV Metalli makes sure that all employees work voluntarily, namely:

- a. without undue restrictions on the freedom of movement of employees within the workplace or in any on-site accommodation.
- b. without retaining the worker's original personal documents, including identity documents.
- c. without misleading recruitment practices and/or requiring employees to pay (in whole or in part) deposits, advances for equipment or recruitment fees as part of the recruitment procedure. If the existence of such payments is discovered, the sums in question must be reimbursed to the employees.
- d. without restricting any percentage or part of an employee's salary, allowance, or property in order to compel him to continue the employment relationship.



- e. without preventing employees from terminating the employment relationship after reasonable notice or under applicable law.
- f. without practicing or favoring trafficking in human beings, as well as any type of deceptive hiring practice and / or forced labor.

### 11.23 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (COP 21)

TAV Metalli respects the right of employees to freely associate with organizations of their choice, without suffering interference or negative consequences, and ensures that employees who intend to create an organization or join an organization of their choice are not subject to any form of harassment, as indicated in the PROVISION COP 18.1 (Harassment, disciplinary procedures, company disputes and measures against retaliation).

The company respects the right of employees to collective bargaining and adheres to collective employment contracts, acting in good faith to the relevant provisions.

### 11.24 NON-DISCRIMINATION (COP 22)

TAV Metalli does not practice or tolerate any form of discrimination in the workplace in terms of recruitment, continuation of the employment relationship, remuneration, overtime, access to vocational training, promotion, termination of the employment relationship or retirement. Any such discrimination is based, for example, on race, skin color, ethnicity, caste, nationality of origin, religion, disability or genetic information, sex, sexual orientation, trade union membership, political affiliation, marital status, parenthood or pregnancy, physical appearance, AIDS, age, or any other personal characteristic not related to the specific requirements of the tasks in question. The company ensures that all "fit for work" individuals are offered equal



opportunities without discrimination based on factors unrelated to their ability to do the job.

### 11.25 HEALTH AND SAFETY (COP 23)

As already provided for in chapter 7 of this Company Policy, the company complies with the legislation on safety at work, guaranteeing all employees safe and healthy working conditions, according to applicable law and other sector-specific rules, and implementing a program that includes the following 9 points:



*Taken from p. 186 COP 201Guide 9*

TAV Metalli prepares and maintains workplaces having the following characteristics:

- a. Availability of drinking water with safe access;
- b. Clean toilets and washing facilities adapted to the number and gender of the staff employed;



- c. Adequate firefighting and fire prevention equipment;
- d. Visible, accessible and unblocked emergency and escape exits; and adequate electricity supply and emergency lighting;
- f. Working conditions suitable for pregnant or lactating women or alternative accommodations to avoid their stay in unsuitable workplaces.

TAV Metalli carried out the risk assessment related to the low danger of the workplace and provided controls to minimize the risk of accidents and injuries for employees.

The figure of the Workers' Representative for Territorial Security (RLST) has been provided for and the Competent Doctor has been appointed.

The workers have been adequately trained and informed in compliance with Legislative Decree 81/2008 and following.

#### 11.26 ENVIRONMENTAL MANAGEMENT (COP 24)

TAV Metalli strives to regulate and manage the problems and risks related to the environment due to its activity. The environment is understood as the space that includes air, water, soil, natural resources, flora, fauna, habitats, biodiversity, ecosystems, human beings, and their mutual relationships.

#### 11.27 DANGEROUS SUBSTANCES (COP 25)

TAV Metalli does not use hazardous substances for its activity, except those necessary for cleaning the premises and the toners of the printers that disposes of them according to local regulations.



### 11.28 WASTE AND EMISSIONS (COP 26)

The company disposes of waste according to the regulations and indications of local authorities, selecting the various types of waste, in order to allocate it for recycling. For the type of activity, the company does not produce emissions harmful to the atmosphere.

### 11.29 USE OF NATURAL RESOURCES (COP 27)

In line with the COP 22 (environmental management) provision, TAV Metalli monitors the use of energy and water in its activity, adopting initiatives to improve efficiency in the use of these resources.

Where possible, it shall convert to the use of renewable energy in accordance with national frameworks, targets and/or regulations.

### 11.30 PRODUCT INFORMATION (COP 28)

TAV Metalli does not make untrue, misleading, or deceptive statements, nor does it omit relevant information in selling, advertising or marketing gold, silver and platinum or jewelry products, in compliance with international standards on the subject.

The company provides precise communication of the finesse of gold, silver, and platinum; The description of the finesse or title must be as evident as the term "gold", "silver" or platinum or abbreviation.



## 12 ENTRY INTO FORCE

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This Code of Ethics is approved today and adopted by TAV Metalli Import & Export S.r.l. with effect from 01 September 2023.

Maurizio Tavini

*Legal Manager*