

**Orchidea Preziosi S.p.A**, recognizing that the activities of extraction, trade, handling and export of precious metals from conflict-affected and high-risk areas may entail risks of significant negative effects and making its own respect for human rights and the will not to contribute in any way to conflict, undertakes to adopt, disseminate and make its suppliers aware of this policy. The company undertakes to refrain from any action that contributes to the financing of conflicts and to comply with the relevant sanctioning resolutions of the United Nations or, where applicable, the national laws that apply such resolutions.

Our company, as an RJC member, through independent external verification, provides evidence that:

- respects human rights in accordance with the Universal Declaration of Human Rights and the Declaration of the International Labor Organization on fundamental principles and rights at work does
- not engage in or tolerate extortion, corruption, money laundering or the financing of terrorism;
- supports the transparency of payments
- it does not provide direct or indirect support to armed groups
- has prepared a procedure that describes the ways in which the parties involved can express problems
- implements a management system for risk-based due diligence activities, relating to responsible supply chains of minerals from conflict-affected and high-risk areas

In the procurement process, our company is committed to the following principles:

1. is not tolerated:
  - any form of torture or cruel, inhuman and degrading treatment
  - any form of forced or compulsory labor, meaning any work or service demanded by a person under the threat of punishment and for which that person has not volunteered
  - child labor
  - other abuses and serious violations of human rights
  - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
2. commercial relationships are not allowed with suppliers and customers for whom a reasonable risk of abuse is identified or who may be involved or connected to the aforementioned crimes
3. no direct or indirect support is tolerated through the purchase of precious metals to armed groups or their affiliates, which:
  - monitor mining sites, transport routes, points where precious metals are traded during the entire supply chain
  - illegally tax or extort money or precious metals from mining sites, during transportation or at points of sale illegally
  - tax or extort money or precious metals from intermediaries, exporting companies and international traders
4. relationships are not allowed, or will be immediately interrupted, with suppliers if a reasonable risk is identified that they may obtain supplies or be in some way connected to non-state armed groups through direct or indirect support
5. It is our commitment not to provide direct or indirect support to public or private security forces who illegally control, tax or extort money at mines, along transport routes, at points where precious metals are traded, against intermediaries, exporting companies and international traders
6. we affirm that the role of public or private security forces is to ensure the safety of workers, plants, equipment and assets in accordance with the rule of law, including the Standards that guarantee human rights
7. it is not allowed to offer, promise or ask for bribes and we strongly oppose soliciting bribes, asking to conceal or disguise the origin of gold, or to misrepresent taxes, duties, fees and royalties paid to governments for the purpose of mining, trading, handling, transporting and exporting gold
8. No form of money laundering is permitted and we support efforts to effectively eliminate money laundering arising from, or related to, the extraction, trade, transport or export of precious metals.

## RESPONSABLE PROCUREMENT POLICY

We ask our 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 termination of contracts.

Date 13.01.2022

The Chief Executive Officer

**Enzo Scartoni**

