

# RESPONSIBLE SOURCING POLICY



1. Faggi Enrico S.p.A. is a company specialized in the production of fine chemicals and catalysts, in the recovery, refining and marketing of precious metals. With this policy, the Organization confirms its commitment to respect human rights, to refrain from actions that contribute to the financing of conflicts, and to comply with the relevant United Nations sanctions resolutions and the laws implementing these resolutions.
  
2. We have defined the procedures for exercising risk-based due diligence in the precious metals supply chain, in accordance with the relevant OECD guidelines, through the following five steps:
  - a. Preparation of an effective business management system
  - b. Risk identification and assessment in the supply chain
  - c. Design and implementation of a response strategy to identified risks.
  - d. Conducting an independent third-party audit of supply chain due diligence at identified points in that chain.
  - e. Publication of a report on the exercise of due diligence in the supply chain.
  
3. Faggi Enrico S.p.A. is a certified member of the Responsible Jewellery Council (RJC) and it is an entity with chain of custody certified by the RJC itself. As such, we are committed to providing evidence, through independent external verification, that:
  - a. we respect human rights in accordance with the Universal Declaration of Human Rights and the Fundamental Rights at Work of the International Labor Organization.
  - b. we do not engage in or condone active or passive bribery, money laundering or terrorist financing.
  - c. we do not provide direct or indirect support to illegal armed groups.
  - d. we set up processes through which the parties involved can express problems relating to the supply chain of our products.
  - e. We do not source precious metals from conflict-affected or high-risk areas.
  
4. We are also committed to using our influence to prevent abuse by others. The company has implemented an Integrated Management System for the environment, quality and occupational health and safety certified respectively according to the UNI EN ISO 14001, UNI EN ISO 9001 and UNI ISO 45001 standards. In this context, the Organization has established and taken appropriate actions to address the risks of non-compliance with the supply chain policy by its suppliers, and how it could intervene to avoid or contain the risk.
  
5. Serious abuses associated with the extraction, transport, or trade of minerals, we will not tolerate or profit from, contribute to, assist, or abet:
  - a. torture, cruel, inhuman, and degrading treatment.
  - b. forced or compulsory labour;
  - c. the worst forms of child labour;
  - d. human rights violations and abuses;
  - e. war crimes, violations of international humanitarian law, crimes against humanity or genocide.
  
6. Serious abuse risk management  

We intend to immediately suspend or terminate all engagement with upstream suppliers if we identify a reasonable likelihood that they are sourcing from or connected with a seriously abusive counterparty.

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## 7. Direct or indirect support to non-state armed groups

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transportation, trade, handling, or export of minerals.

We intend to immediately terminate any upstream suppliers for whom we identify a reasonable risk that they are sourcing from or related to third parties providing direct or indirect support to non-state armed groups.

## 8. 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 who commit the abuses described in paragraph 5, or who act contrary to the law, according to paragraph 7.

## 9. Corruption and misrepresentation of the origin of minerals

We do not intend to offer, promise, give or solicit bribes and will resist the solicitation of bribes, requests to conceal or disguise the origin of minerals, or to misrepresent taxes, duties and fees paid to governments for the extraction, trade, handling, transport and export of minerals.

## 10. Money laundering

We intend to support efforts or implement measures to help effectively eliminate money laundering where we identify reasonable money laundering risk originating in or related to the mining, trading, handling, transportation or export of minerals from illegal taxation or extortion of minerals at access points to mining sites, along transport routes or at points of commercialization of minerals by upstream suppliers.

Date: 28.08.2023

CEO Cav. Lav. Gianni Faggi

A handwritten signature in blue ink, appearing to read "Gianni Faggi".