



Arezzo, 16th December 2022

## POLICY ON RESPONSIBLY-SOURCED METALS

TCA S.p.A. was founded in 1977 in Arezzo and operates in the heart of Arezzo's goldsmith district, in the field of recovery and refinement of precious and prestigious metals.

The company's activity is carried out in three on-site units, located in the province of Arezzo, Alessandria and Vicenza, with the three plants having a total of around 130 employees.

TCA S.p.A. is a Member of the Responsible Jewellery Council (RJC) and is included in the Gold Good Delivery List and in the Silver Good Delivery List of the London Bullion Market Association - LBMA. Furthermore, TCA is included in the Platinum Good Delivery List and in the Palladium Good Delivery List of the London Platinum and Palladium Market – LPPM.

Recognising the risk that significant adverse effects may be associated with the extraction, trade, management and export of minerals from areas under development or conflict and at high risk, whilst also being aware of the responsibility of each person in respecting human rights and not contributing in any way to the emergence or development of conflict, we undertake to adopt the following policy regarding the responsible supply of gold, silver and precious metals from conflict-affected and high-risk areas.

### ETHICS, COMPLIANCE and HUMAN RIGHTS

- We do not tolerate, facilitate nor contribute to:
  - any form of torture nor cruel, inhuman or degrading treatment;
  - any form of forced or compulsory labour, being work or service extorted from a person under threat of punishment and for which that person has not voluntarily offered their services;
  - illegal and/or unacceptable forms of child labour;
  - other human rights violations or abuses;
  - war crimes or other serious violations of international law on human rights, crimes against humanity or genocide.
- We shall immediately suspend business relationships with customers and suppliers upon a reasonable risk being identified regarding their supply or connection to parties involved with the aforementioned serious violations.
- We do not tolerate any direct or indirect support of state or non-state armed groups nor public or private security forces that:
  - illegally control mining sites or communication routes, the points in which minerals are traded or the persons involved upstream of the supply chain;
  - extort money or minerals at the access points to mining sites, along the transport routes or points in which minerals are traded;
  - illegally request money from intermediaries, export companies or international traders.

Our commitment with suppliers shall be immediately suspended or terminated upon the detection of a reasonable risk of direct or indirect support to state and non-state armed groups.

- We recognise that the role of public or private security forces in mining sites or communication routes should be exclusively in order to ensure the protection of human rights, the safety and security of workers, equipment and infrastructure, along with protecting mining sites and communication/transport routes from interference. We shall contribute to the prevention of such forces from being responsible for serious violations of human rights.

We do not directly or indirectly support public or private security forces that illegally control mining sites, transport routes or other players upstream of the supply.

Where we or any of our counterparties enter into contracts with public or private security forces, we undertake to require that such security forces are duly committed to the Voluntary Principles on Security and Human Rights. In particular, we will see to it or take measures to ensure that individuals or security units known to have been responsible for serious human rights violations are not employed.

- Together with central or local authorities, international and civil society organisations, we are committed to improving the transparency of funding for public and private security forces and minimising the exposure of vulnerable groups.
- We ensure that all taxes and dues associated with the extraction, trade, management and export of minerals from zones of conflict and high-risk are duly paid to governments and, in accordance with our company's position within the supply chain, we are committed to declaring such payments as established by the principles of the Extractive Industries Transparency Initiative (EITI).
- We shall engage suppliers, central or local authorities, international organisations and third parties to improve and monitor services in order to prevent and mitigate risks. We shall suspend or terminate business rapports with suppliers in the event that no corrective action is adopted regarding the risk of corruption, fraudulent declarations of origin regarding minerals, money laundering, the payment of taxes, dues and royalties to governments, along with direct or indirect support to armed groups.
- We will not offer, promise, give or demand any form of bribe to conceal or falsify the origin of the minerals or to evade payments due for the extraction, trade, transport and export of minerals.
- We shall support efforts to counter and contribute to preventing money laundering and terrorist financing whereby a reasonable risk associated with the supply and distribution chain of precious metals is identified. Active measures are taken to shine light on money laundering and terrorist financing.

## MANAGEMENT SYSTEMS

- We shall implement an integrated environmental management system with the LBMA Responsible Gold Guidance, the LBMA Responsible Silver Guidance, with the LPPM Responsible Platinum and palladium Guidance, the Responsible Jewellery Council and the Know Your Customer procedures, which serve to demonstrate that no source of raw materials for the production of pure gold ,silver platinum or palladium is involved in conflict, money laundering, human rights violations or terrorist financing. We operate in compliance with the procedures for RJC certifications that set out the requirements for creating a supply chain for precious metals produced, processed and marketed responsibly through the jewellery chains.
- We apply appropriate due diligence that takes into account the risk associated with the counterparty before entering into any business relationship whilst continuously monitoring transactions in order to assess the risk of contributing to conflict, money laundering, terrorist financing or serious human rights violations, with the implementation of a strategy to respond to any identified risks.
- We maintain documentation regarding the counterparties and gold ,silver , platinum and palladium transactions to demonstrate adequate due diligence and that the Know Your Customer and Risk Assessment procedures have been applied.
- We define a continuous training and information programme for all personnel involved in the supply chain, contractors and visitors to the production units regarding policies, systems and procedures adopted by TCA S.p.A.

In expressing the concepts declared in this Corporate Policy, TCA S.p.A. is inspired by the principles and standards contained in the LBMA Responsible Gold Guidance, the LBMA Responsible Silver Guidance with the LPPM Responsible Platinum and palladium Guidance, the Standards proposed by the Responsible Jewellery Council valid for the Code of Practice and Chain of Custody certifications, along with Annex II of the OECD Due Diligence Guidance in the supply chain of minerals from zones of conflict and high-risk.

The President of the board of directors

**TCA S.p.A.**  
Avv. Marco Manneschi  
PRESIDENTE DEL CDA

