



LBMA  
GOOD DELIVERY  
REFINER



LONDON  
PLATINUM &  
PALLADIUM  
MARKET

## RESPONSIBLE METALS SOURCING POLICY

Arezzo; February 20, 2023

TCA S.p.A. was founded in 1977 in Arezzo, and operates in the heart of Arezzo's gold jewelry manufacturing district in the recovery and refining of precious metals.

Its business is carried out at three locations in the Arezzo, Alessandria and Vicenza provinces, with a total number of approximately 130 employees at the three plants.

TCA S.p.A. is a Member of the Responsible Jewellery Council (RJC) and is on the Gold Good Delivery List and Silver Good Delivery List of the London Bullion Market Association (LBMA). TCA is also on the Platinum Good Delivery List and Palladium Good Delivery List of the London Platinum and Palladium Market (LPPM).

Recognizing that risks of significant adverse impacts may be associated with extracting, trading, handling and exporting minerals from developing, conflict-affected and high-risk areas, and recognizing everyone's responsibility to respect human rights and not contribute in any way to the initiation or development of conflict, we undertake to adopt the following policy on the responsible sourcing of gold, silver and precious metals from conflict-affected and high-risk areas.

### ETHICS, COMPLIANCE and HUMAN RIGHTS

- We will not tolerate, facilitate or contribute to:
  - any form of torture or cruel, inhuman and degrading treatment;
  - any form of forced or compulsory labor, meaning work or service that is exacted from any person under the menace of penalty and for which said person has not offered himself or herself voluntarily;
  - illegal and/or unacceptable child labor practices;
  - other human rights violations and abuses including but not limited to sexual violence;
  - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- We will immediately suspend business engagements with customers and suppliers where a reasonable risk is identified that they are sourcing from, or linked to, any party committing the serious abuses referred to above.
- We will not tolerate any direct or indirect support to state or non-state armed groups and public or private security forces that:
  - illegally control mine sites, communication routes, points where minerals are traded and upstream actors in the supply chain;
  - extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;
  - illegally demand money from intermediaries, export companies or international traders.
- We will immediately suspend or interrupt engagements with counterparties where a reasonable risk is identified of direct or indirect support to state or non-state armed groups.
- We recognize that the role of public or private security forces at mine sites or along communication routes should be solely to ensure the safeguarding of human rights and security of workers, equipment and facilities, and to protect the mine sites and communication/transportation routes from interference. We will take steps to prevent such forces from being responsible for gross human rights violations.

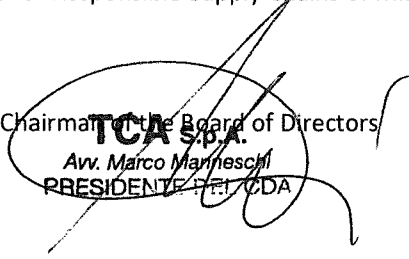
- We will not assist, either directly or indirectly, public or private security forces that illegally control mine sites, transportation routes or other upstream actors in the supply chain.  
If we, or any counterparty of ours, should stipulate contracts with public or private security forces, we will require such security forces to act in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or adopt measures to ensure that individuals or security units known for being responsible for gross human rights abuses are not employed.
- We will improve, together with central or local authorities, international organizations and civil society organizations, the transparency of the financing of public and private security forces, and we will minimize the exposure of vulnerable groups, focusing particularly on conflict-affected and high-risk areas (CAHRAs).
- We will ensure that all taxes and duties related to mineral extraction, trade, handling and export from conflict-affected and high-risk areas are duly paid to governments and, in conformity with our company's position within the supply chain, we will disclose such payments as established by the Extractive Industry Transparency Initiative (EITI) principles.
- We will involve counterparties, central or local authorities, international organizations and third parties in improving and monitoring services to prevent and mitigate the risks. We will suspend or interrupt business relationships with the counterparties if corrective measures are not adopted against the risk of corruption, fraudulent misrepresentation of mineral origin, money laundering, payment of taxes, duties and royalties to governments, or direct or indirect support to armed groups.
- We will not offer, promise, give or demand any form of bribery to conceal or disguise the origin of minerals or to evade the taxes due on the mining, trade, transportation and export of minerals.
- We will support efforts and take steps to avoid money laundering, any contribution to conflict, and terrorism financing where a reasonable risk connected to precious metal supply and distribution chains is identified. We will contribute to the discovery of money laundering and terrorism financing.

## MANAGEMENT SYSTEMS

- We will implement a management system integrated with the LMBA Responsible Gold Guidance, LBMA Responsible Silver Guidance, LPPM Responsible Platinum and Palladium Guidance, Responsible Jewellery Council (RJC) and Know Your Customer (KYC) policies, which serve to demonstrate that no source of raw materials for pure gold, silver, and platinum group metal production is involved in conflicts, money laundering, human rights abuses or terrorism financing. We will implement a control and traceability system that identifies the origin of the gold, silver and platinum group metals, the partners involved in the supply chain, and a mechanism for tracing the incoming material by each refined batch. We will comply with the policies for RJC certification that set out the requirements for the realization of a supply chain for precious metals produced, refined and marketed responsibly through jewelry supply chains.
- We will perform adequate due diligence that takes into account counterparty risk before entering into any business relationship, we will monitor transactions continuously in order to assess the risk of contributing to conflicts, money laundering, terrorism financing and serious human rights violations, and we will implement a strategy to respond to the risks identified, including ESG risks.
- We will retain the documentation regarding counterparties and transactions in gold, silver, platinum and palladium to demonstrate that adequate due diligence has been performed and Know Your Customer and Risk Assessment policies have been applied. As necessary, we will assist the entities in charge of and authorized to perform supervisory and control activities, and we will provide them with all the documentation needed, with the utmost transparency.
- In order to mitigate any money laundering and fraud risks, we will make and receive payments only through official bank channels, except in the case of negligible amounts.
- We will define a continuous training and information program for all personnel involved in the supply chain, contractors and plant visitors regarding the policies, systems and procedures adopted by TCA S.p.A.
- We implement a confidential complaint procedure ([LINK](#)) that enables any employee or external stakeholder to express their concerns about the gold supply chain or any other identified risk.
- We will maintain long-term relationships with counterparties based on mutual trust and mutual recognition.

TCA S.p.A. has expressed the concepts stated herein based on the principles and standards contained in the LMBA Responsible Gold Guidance and LBMA Responsible Silver Guidance integrated with the LPPM Responsible Platinum and

Palladium Guidance, the standards proposed by the Responsible Jewellery Council for Code of Practice and Chain of Custody certification, and Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

  
Chairman of the Board of Directors  
**TCA S.p.A.**  
Avv. Marco Manneschi  
PRESIDENTE DEL CDA