



Policy for Sustainable Procurement

FIOR SPA, recognising that the activities for the extraction, trade in, handling, and export of precious metals originating from conflict and high-risk zones may entail risks of significant negative effects, and endorsing respect for human rights and the desire not to contribute in any way to the conflicts, undertakes to adopt this policy, disseminate it to its suppliers, and raise their awareness thereof. The company undertakes to refrain from any action that may contribute to financing conflicts and to comply with the relevant sanctioning resolutions of the United Nations, or, where applicable, the national laws that apply said resolutions.

The company, as member of the RJC, by means of an independent external audit, provides proof that:

- it respects human rights in conformity with the Universal Declaration of Human Rights and with the Declaration of the International Labour Organisation on fundamental principles and rights at work
- it does not carry out or tolerate malfeasance in office, corruption, money laundering, or the financing of terrorism;
- it supports the transparency of payments
- it does not provide direct or indirect support to armed groups
- it has drafted a procedure that describes the means by which the stakeholders can express worries
- it implements a management system for due diligence activities based on risk, with regard to the chains of responsible procurement of minerals from conflict and high-risk areas

In the procurement process, the company undertakes to comply with the following principles:

1. it does not tolerate:

- any form of torture or cruel, inhuman, or degrading treatment
- any form of forced or compulsory labour, the term applying to all labour or service requested from a person under the threat of punishment and for which said person has not voluntarily offered himself or herself
- child labour
- other abuses and grave violations of human rights
- war crimes or other grave violations of international human rights law, crimes against humanity, or genocide

2. it does not allow trade relationships with suppliers and customers for which there is a suspicion of reasonable risk with regard to abuses or who may be involved in or related to the aforementioned crimes

3. it does not tolerate any direct or indirect support through the purchase of precious metals to armed groups or their associates which:

- control mining sites, transport routes, points where the precious metals are negotiated, and actors upstream of the procurement chain
- illegally tax or extort money or precious metals from mining sites, during transport, or at the points of trade
- illegally tax or extort money or precious metals from intermediaries, export undertakings, and international traders

4. it does not allow or will immediately interrupt business relationships with suppliers should it identify a reasonable risk that such suppliers may procure from or be in any way related to non-state armed groups through direct or indirect support

POLICY FOR SUSTAINABLE PROCUREMENT

5. **declares** a commitment not to provide direct or indirect support to the public or private security forces that control, illegally tax, or extort money from mining sites, along transport routes, at the points where the precious metals are negotiated, towards intermediaries, export undertakings, and international traders
6. **it states that** the role of public or private security forces is to guarantee the safety of workers, plants, equipment, and goods in line with the rule of law, including the Standards that guarantee human rights
7. **offering, promising, or requesting bribes is forbidden** and we are firmly opposed to seeking bribes, to the request to occult or hide the origin of the gold/silver or to make false declarations on taxes, duties, tariffs, and royalties paid to governments for the extraction, trade in, handling, transport, and export of the precious metal.
8. **it does not allow** any form of money laundering and supports the efforts for the effective elimination of the laundering of money deriving from, or related to, the extraction, trade in, transport, or export of precious metals.

The company asks that its employees, agents, consultants, and trade partners comply with this policy, and, in order to apply it, we will implement suitable disciplinary actions, which may go as far as dismissal or the interruption of contracts.

This policy has been drafted with reference to the principles of the OECD Due Diligence Guidance for Responsible Supply Chains.

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THE MANAGEMENT