



Giusto Manetti Battiloro S.p.A.

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RESPONSIBLE GOLD POLICY STATEMENT

Giusto Manetti Battiloro S.p.A., always sensitive to the ethics of enterprise, operate in business in accordance with the principles and ethical values such as fairness, transparency, respect for workers' rights, health and safety.

Given the peculiarities of its products and raw materials used, Giusto Manetti Battiloro S.p.A. has also established a policy for the procurement of "Responsible Gold" or "No Conflict Gold".

Recognizing that risks of significant adverse impact may be associated with the extracting, trading, handling and exporting of minerals from conflict-affected zones and high-risk areas and recognizing that we have the responsibility to respect human rights and to avoid contributing to conflict, Giusto Manetti Battiloro S.p.A. undertakes to adopt the following policy on responsible gold sourcing from conflict-affected and high-risk areas at a time:

- Do not tolerate, contribute to, assist or facilitate:
 - Any form of torture, cruel, inhuman and degrading treatment.
 - Any form of forced or compulsory labour, being any work or service that people are forced to do against their will under threat or punishment.
 - Illegal and / or unacceptable child labour.
 - Other human rights violations or abuses such as widespread sexual violence.
 - War crimes or other serious violations of international human rights, crimes against humanity or genocide.
- Immediately suspend commercial relations with customers and suppliers for which a reasonable risk has been identified that they will obtain supplies or they are connected to parties involved with the serious violations involved above;
- Do not tolerate any direct or indirect support to non-state armed groups which:
 - Illegally control mining sites or related communication routes, places where minerals are negotiated and the upstream subjects of the supply chain;
 - Extort money or minerals from access points to mining sites, along transport routes or where minerals are traded;
 - Illegally request money from intermediaries, export companies or international traders;
- Immediately suspend commercial relations with customers and suppliers for which a reasonable risk has been identified that they will obtain supplies or are connected to parties that directly or indirectly support non-state armed groups as defined above;
- Do not offer, promise, give or demand any form of bribe to hide or falsify the origin of minerals or to evade the contributions due for the extraction, trade, transport or export of minerals;
- Support efforts, help to avoid and discover money laundering and terrorist financing where we identify a reasonable risk associated with the supply and distribution chain of precious metals;
- Implement procedures to demonstrate that no source of pure gold supply is involved in conflict, money laundering, human rights violations and terrorist financing;
- Apply behaviour to take into account the risk associated with the counterparty before starting any commercial relationship and continuously monitor transactions in order to assess the risk of contributing to conflicts, money laundering, terrorist financing and serious violations of rights humans and implement a strategy to respond to identified risks;
- Maintaining the documentation relating to counterparties and gold transactions to demonstrate the application of adequate and constant application and monitoring of procedures.

Campi Bisenzio, 16 of October 2019

Giusto Manetti Battiloro S.p.A.