

## INTEGRATED POLICY

Asolo Gold is a goldsmith business specializing in the production of solid chains made of yellow, white and rose gold and of platinum.

Asolo Gold S.p.A. has set itself several priority objectives, for the near future, to satisfy all the stakeholders who interact with the developed activity company (Customers - Employees - Suppliers).

Asolo Gold S.p.A., aware of the growing importance of the various issues: quality, environment, work safety, ethics in relationships, considers it appropriate to take these into account also in the conduct of its business, making itself responsible for its actions and engaging in the search for solutions to fully comply with the various applicable requirements, both voluntary (ISO 9001, ISO 14001, RJC COP, RJC COC) and mandatory (see workplace safety laws) as far as possible.

The commitments that the company undertakes in this context are the compliance with the legislative limitations and applicable regulations, and the continuous improvement of its performance in all the fields mentioned above.

### ETHICS

#### Human rights

Asolo Gold S.p.A. undertakes to identify, mitigate and where possible to prevent the potential violation of human rights related to its activities.

For this purpose, Asolo Gold S.p.A. commits to:

- Support the protection and defence of human rights, fundamental freedoms according to the principles stated by the Universal Declaration of Human Rights of 1948 and the successive international conventions on human rights.
- Recognise and respect the principles established by the Fundamental Conventions of ILO "International Labour Organization" and in particular the right of association through the free registration of workers in the trade unions; prohibition of forced and child labour through employment relationships exclusively regulated by National Collective Labour Agreements, and the ban on discrimination of gender, age, ethnicity, religion, political affiliation, trade union membership, sexual orientation, gender and language identity or functional diversity and the existing labour law and worker's rights.
- Not practice corporal punishment and prohibit degrading treatments, abuses, coercion and any form of intimidation.
- Not to procure material in areas where there are armed conflicts, widespread violence or other risks of human rights violations.

Asolo Gold S.p.A. undertakes to support the development of the communities where it operates with the aim of contributing to the economic and social well-being of the territory. The Company promotes charitable and solidarity initiatives and provides its contribution and support for projects that have an impact on the territory.

## ANTI-CORRUPTION, ANTI-BRIBERY AND ANTI-MONEY LAUNDERING TRADE POLICY

Asolo Gold S.p.A. undertakes to carry out and conduct its activities in full respect of ethical laws, guaranteeing the integrity, transparency and compliance with applicable laws.

For this purpose, the Company declares its commitment:

- Not to practice subordination, corruption and bribery and contribute to the fight against such crimes and unfair practices.
- Not to accept payments, gifts, discounts, advantages or promises and / or other utilities that can be also interpreted as exceeding normal commercial practices or practices of courtesy, and that may influence the independence of judgment or be intended to ensure any advantage or favourable treatment.
- Not to engage in transactions and/or operations that could compromise the principles of fair competition and competition or that could constitute an attempt to influence business or decision-making processes.
  
- To avoid conflicts of interest.
- Not to tolerate money laundering and the funding of terrorist activities.
- To apply adequate due diligence taking into account the risk associated with the counterparty before entering into any business relationship and closely monitor our supply chain and exercise 'Know Your Counterpart' activities.
- To disclose integrally and precisely the characteristics of the precious metals sold and to ensure the conformity of weight, functionality, finishing and title of its products, guaranteeing the compliance and the quality by means of systematic inspections using effective and advanced precision instruments.
- To adopt appropriate systems and measures to ensure the integrity and security of product shipments and to prevent theft, damage and replacement.
- To respect consumer rights, in particular by applying business and advertising practices and fair marketing, and by adopting the necessary steps to guarantee the safety and the quality of its products.
- To respect the principle of confidentiality and protection of personal data according to current legislation.

Regarding serious abuses associated with the extraction, transport and trade of gold.

We do not intend to tolerate or profit from, contribute to, assist or favour:

- Torture, cruel, inhuman and degrading treatment;
- Forced or compulsory labour;
- The worst forms of child labour;
- Violations and abuses of human rights;
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately cease any engagement with upstream suppliers if we find a reasonable risk that they are engaged in, procure from, or are connected to a counterparty committing the above abuses.

With regard to direct or indirect support to non-governmental armed groups, we do not intend to tolerate direct or indirect support to non-governmental armed groups, including but not limited to the procurement of gold, the making of payments or the assistance or supply of equipment to non-governmental armed groups or their affiliates who, illegally:

- Control mining sites, transport routes, gold marketing points and upstream stakeholders and / or.
- Tax or extort money or gold at mining sites, along transport routes or at gold trading points, or from



intermediaries, export companies or international traders.

We will immediately terminate any engagement with upstream suppliers if we find a reasonable risk that they are sourcing from, or are connected to, a counterpart that provides direct or indirect support to non-governmental armed groups.

## QUALITY

- Direct, continuous and permanent commitment by Management in the management of the QMS.
- Relationship with the customer based on maximum collaboration, always and in any case trying to adequately evaluate all requests, with particular attention to delivery times, in order to give timely answers and adequate solutions to the issues presented.
- Compliance with applicable legal, regulatory and regulatory requirements, in particular customer specifications.
- Continuous improvement of the effectiveness of the Quality Management System with maximum attention also to its efficiency.

## ENVIRONMENT

The company is committed to:

- Minimizing environmental impacts related to its activities through the optimization of the use of energy resources, implementing a proper management of the waste for each activity present in the company, carefully monitoring its environmental aspects with a particular attention to emissions into the atmosphere.
- Orienting the acquisition of plants, materials and products towards those that, with more advanced technologies, guarantee a lower environmental impact.
- Training and teaching its personnel to respect the principles of environmental protection and health and safety in the workplace, of environmental law and the internal procedures.
- Cooperating with the competent authorities for the identification of the optimal conditions between production activities and the surrounding environment.
- Maintaining periodic assessment and review of risks and opportunities for process improvement in view of the identified context and the requirements of the various stakeholders identified.

Asolo Gold S.p.A. promotes the appropriate actions required for the protection of the health and safety of their workers and of the people who come in contact with the company, and for that purpose, it undertakes to:

- Comply with the current legislation on health, security and hygiene at the workplace.
- Train and inform its workers.
- Set up and maintain a system for identifying and controlling risks to workers' health and safety.
- Define and implement technical, organisational and managerial measures to prevent - where possible - and/or reduce risks to the health and safety of workers in the workplace.
- Ensure and maintain the safety and well-being of workers, guests, customers and suppliers.

## SECURITY POLICY

Asolo Gold S.p.A. undertakes to protect industrial property (such as trademarks, patents, hallmarks, designs, industrial models, intellectual work, etc.) both its own and of others. For this purpose, Asolo Gold S.p.A. has established appropriate procedures for the protection against theft, damage or replacement of products within their own premises and during shipments.

Asolo Gold S.p.A. has also informed its employees of the importance and duty to respect the confidentiality and industrial property of both the company and its business partners.

## REPORTING 2022

During 2023, no purchases of precious metals were made from countries in a state of conflict in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas. Women increased from 42% to 43% of the total employees, a figure that remained substantially unchanged from the previous year.

There were no complaints or reports of human rights violations.

Donations were made to an association that deals with assistance to the disabled.

We have had no warnings, fines or rulings for non-compliance with legal environmental requirements.

ISO 9001:2015, ISO 14001:2015, RJC COP and RJC COC recertification audits were passed without non-conformities.

San Zenone degli Ezzelini 19.10.2024

La Direzione  
