

RESPONSIBLE SOURCING POLICY

Caurum S.r.l. is a chemical company founded in 1987 that specializes in the production, processing and recovery of precious metals.

Recognizing the risk that significant adverse effects may be associated with the extraction, trade, handling and export of minerals from conflict affected and high-risk areas and further recognizing that we have a responsibility to respect human rights and not contribute to conflicts, we commit to the following policy of responsible sourcing of precious metals from conflict-affected and high-risk areas.

- We do not tolerate, contribute to or facilitate:
 - any form of torture, cruel, inhuman and degrading treatment ;
 - any form of forced or compulsory labor, i.e., labor or services extorted from a person under threat of punishment and for which that person has not volunteered;
 - illegal and/or unacceptable forms of child labor ;
 - other human rights violations and abuses such as widespread sexual violence;
 - war crimes or other serious violations of international human rights law, crimes against humanity or genocide.

- We immediately suspend business relationships with customers and suppliers for whom a reasonable risk has been identified that they are sourcing from or are connected to parties involved with the serious violations set forth above.

- We do not tolerate any direct or indirect support for non-state armed groups that illegally control mine sites or transportation routes, spots where minerals are traded, and upstream portion of the supply chain, or extort money or minerals at access points to mine sites, along transportation routes, or spots where minerals are traded, or illegally solicit money from brokers, export companies or international traders.

- We immediately suspend business relationships with customers and suppliers for whom a reasonable risk has been identified that they are sourcing from or are connected to parties that directly or indirectly support non-state armed groups as defined above.

- We terminate any direct or indirect support for public or private security forces that illegally control mine sites, transportation routes and upstream portion of the supply chain; illegally tax or extort money or minerals at access points to mine sites, along transportation routes, or at spots where minerals are traded; or illegally tax or extort money from brokers, export companies or international traders.

- We recognize that the role of public or private security forces at mine sites, surrounding areas and along transportation routes shall be solely to maintain the rule of law, including the protection of human rights, providing security for mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate mining and trade.

- We require that the security forces used by the counterparties adhere to the Voluntary Principles on Security and Human Rights; in particular, we require the counterparties to support measures to adopt policies to ensure that security forces that have been held accountable for serious human rights violations are not employed.

- We take measures to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how to improve transparency, proportionality and accountability in payments made to public safety forces for security services.
- We immediately develop a risk management plan with suppliers and other interested parties to prevent or mitigate the risk of direct or indirect support to public or private security forces that commit abuses or act illegally or against the activities of central and local authorities or international or civil society organizations as described above. To suspend or terminate engagement with upstream suppliers after unsuccessful mitigation attempts within six months of adoption of the risk management plan.
- We do not offer, promise, give or demand any form of bribe to conceal or falsify the origin of the minerals or to evade contributions due for the extraction, trade, transportation or export of the minerals.
- We support efforts to help prevent and detect money laundering and terrorist financing where we identify a reasonable risk related to the precious metals supply and distribution chain.
- We apply appropriate due diligence that takes into account the risk associated with the counterparty prior to entering into any business relationship and continuously monitor transactions in order to assess the risk of contributing to conflicts, money laundering, terrorist financing and serious human rights violations and implement a strategy to respond to the risks identified.
- We maintain documentation of counterparties and precious metals transactions to demonstrate that proper and ongoing due diligence has been carried out.
- We define an ongoing training program for all personnel involved in the precious metals supply chain.

Caurum srl provides the following email address odv231@caurum.it to allow any employee, supply chain player and interested parties to express any concerns regarding the precious metals supply chain or any other identified risks.

Caurum Srl will act in such a way as to protect the notifying parties against any form of retaliation, discrimination or penalization, also ensuring the confidentiality of their identity, without prejudice to any legal obligations and the protection of the rights of persons wrongly accused and/or in bad faith.