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General Policy (RJC)

Caurum S.r.l., a chemical company with a long history of expertise and specializing in the production, processing, and recovery of precious metals, declares its commitment to managing and developing its business responsibly and is committed to ensuring that its entire supply chain aligns with these principles.

The implementation and management of its Organizational System is based on the principles of the Responsible Jewellery Council and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Caurum. Caurum is committed to applying and promoting ethics, respect for human rights, and social practices in a transparent and responsible manner, in accordance with the following:

- **Business ethics.**

The company is committed to:

- Conduct its activities in full compliance with ethical standards, ensuring integrity, transparency and compliance with applicable laws;
- Not tolerate any type of corruption or money laundering and monitor so that any suspicious practices are disclosed and countered;
- Make the characteristics of its products and services fully and in detail clear;
- Ensure the traceability of precious metals used in our manufacturing processes to guarantee that they are used exclusively and not from illicit sources or from areas of armed conflict fuelled by the proceeds of the sale of precious metals;
- Spread awareness of the importance of a responsible and carefully managed supply chain;
- Spread among all stakeholders the principles of social equity, mutual respect, territorial development, social responsibility and the importance of respecting health and safety in the workplace.

- **Human Rights**

The company is committed to:

- Support the Universal Declaration of Human Rights established by the United Nations;
- Not to resort to child labour and any form of forced or coercive labour;
- Ensure high safety standards in the workplace in accordance with national and international regulations;
- Not to discriminate in any way and not to apply degrading treatment, harassment, abuse, coercion or intimidation of any kind;
- Promote the importance of transparent communication at all levels of the organization by encouraging the reporting of any improper behavior caused by anyone working in the name and on behalf of the Organization;
- Comply with current legislation on employment and monitor its compliance;

- **Inclusivity, diversity and equal opportunities**

Our company promotes a work environment based on respect, inclusion, and the valorization of diversity. We are committed to ensuring equal opportunities for all people, regardless of gender, age, culture, orientation, origin, or creed. We promote fair practices at every stage of the employment relationship and encourage a corporate climate open to dialogue and collaboration. Gender equality is a core principle of our organizational, recruitment, and professional development decisions. Any discriminatory behavior is prohibited and actively opposed.

We also promote internal awareness through training and dedicated initiatives, to build a truly fair and inclusive environment.

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Complaint mechanism

The company provides a transparent grievance mechanism accessible to all workers, collaborators, and stakeholders, so they can safely report any improper behaviour, ethical violations, or suspected non-compliance. We guarantee the utmost confidentiality in analysing reports and are committed to handling them in a timely, impartial, and documented manner. Any form of retaliation against those who report in good faith is strictly prohibited. We foster a corporate culture of trust, where everyone can express doubts or concerns without fear of negative consequences. The company encourages the responsible use of the grievance channel as a fundamental tool for continuous improvement and the integrity of the management system.


<1> Any report can be forwarded through the web platform <https://www.caurum.com/whistleblowing/> or by writing to the email odv231@caurum.it.

Responsible supply chain

The company is committed to:

- Conduct its activities in full compliance with ethical standards, ensuring integrity, transparency and compliance with applicable laws;
- Disclose the characteristics of the products and services in full and in detail;
- Support efforts and help prevent and detect money laundering and terrorist financing where we identify a reasonable risk associated with the precious metals supply and distribution chain;
- Do not tolerate any direct or indirect support for non-state armed groups that illegally control mining sites or communication routes, points where minerals are traded and upstream actors in the supply chain, or that extort money or minerals at access points to mining sites, along transport routes or at points where minerals are traded, or that illegally solicit money from intermediaries, export companies or international traders;
- Prevent any type of abuse for the purposes of money laundering and terrorist financing;
- Fulfill all due diligence obligations required towards counterparties by strictly applying KYC requirements, verifying each counterparty and ascertaining the legality of the origin of the materials to be recovered;
- Ensure that such Due Diligence takes into account the risk associated with the counterparty before entering into any business relationship and continuously monitor transactions in order to assess the risk of contributing to conflict, money laundering, terrorist financing and serious human rights violations and implement, in the event of a risk being identified, a strategy to respond to the identified risks;
- Stop any business transactions deemed suspicious and promptly report them to the competent authorities;
- Do not enter into any business relationship with organizations whose beneficiaries are not identifiable;
- 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 in the serious violations outlined above, and report this to the Competent Authorities;
- We do not offer, promise, provide or demand any form of bribe to conceal or falsify the origin of minerals or to evade contributions due for the extraction, trade, transport or export of minerals and we require that our sources declare their provenance without omissions to ensure that they do not come from conflict-affected or high-risk areas;
- Maintain documentation relating to counterparties and precious metals transactions to demonstrate that adequate, ongoing and complete due diligence has been applied;
- Define a continuous training program for all personnel involved in the precious metals supply chain.

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Caurum srl provides <1> the following link to the web platform <https://www.caurum.com/whistleblowing/> and the following e-mail address odv231@caurum.it to enable any employee, supply chain actor and interested party to express any concerns relating to the precious metals supply chain or any other identified risk.

Caurum S.r.l. will act in such a way as to protect whistleblowers 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 accused wrongly and/or in bad faith.

Reporting on the overall performance of the system, during the period of application of the RJC Code of Practices, no deviations from the Code of Practices were detected, nor were any risks identified in the supply chain based on the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Chahra."

Due to the nature of the company's operations, sourcing from conflict-affected or high-risk areas is not contemplated. Based on the risk assessment conducted, all our sources have an acceptable level of risk. Furthermore, no direct or indirect human rights violations have been identified.

The Company Policy is communicated to all staff, customers, and suppliers and is made available to anyone who requests it for understanding and sharing. <1>This policy is reviewed in the event of changes to procurement practices.

San Zeno, 16/03/2026

CEO

