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## RESPONSIBLE SOURCING POLICY

Caurum S.r.l., a chemical company with a long-standing expertise and specializing in the production, processing, and recovery of precious metals, declares its commitment to responsibly managing and developing its business 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 dictates of the Responsible Jewellery Council and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Cahra and 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.

Therefore,

### **Regarding serious abuses associated with the extraction, transportation or trade of minerals:**

We will not tolerate, nor in any way profit from, contribute to, assist, or facilitate the commission by any person of:

- any form of torture, cruel, inhuman or degrading treatment;
- any form of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which the person in question has not offered himself voluntarily;
- the worst forms of child labor;
- other serious human rights violations and abuses such as sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

### **Regarding the management of the risk of serious abuse:**

We will immediately suspend or terminate engagement with upstream suppliers if we identify a reasonable risk that they are sourcing from, or are connected to, a party that commits serious abuses.

### **Regarding direct or indirect support to non-state armed groups:**

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transportation, trade, handling or export of minerals.

Direct or indirect support to non-state armed groups through the extraction, transportation, trade, handling or export of minerals includes, but is not limited to, the procurement of minerals, the making of payments or the provision of logistical assistance or equipment or logistical assistance or equipment to non-state armed groups or their affiliates that:

- illegally control mining sites or otherwise control transportation routes;
- illegally control mining sites or otherwise control transportation routes, mineral trading points, and upstream actors in the supply chain;

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- illegally tax or extort money or minerals at access points to mine sites, along transportation routes, or at points where minerals are traded;
- illegally tax or extort money or minerals from middlemen, export companies, or international traders.

**Regarding the management of the risk of direct or indirect support to non-state armed groups:**

We will immediately suspend or terminate engagement with upstream suppliers if we identify a reasonable risk that they are sourcing from, or are linked to, a party that provides direct or indirect support to non-state armed groups.

**As regards public or private security forces:**

We agree to eliminate, directly or indirectly, support for public or private security forces that:

- illegally control mining sites, transport routes and upstream actors in the supply chain;
- illegally tax or extort money or minerals at access points to mine sites, along transportation routes, or at points where minerals are traded;
- illegally tax or extort money or minerals at access points to mine sites, along transportation routes, or at points where minerals are traded;
- illegally tax or extort middlemen, export companies, or international traders.

We recognize that the role of public or private security forces at mine sites and/or surrounding areas and/or along transport routes should be exclusively to maintain the rule of law, including the protection of human rights, ensure the safety of mine workers, equipment and facilities, and protect the mine site or transport routes from interference with legitimate mining and trade.

When we or any company in our supply chain contracts with public or private security forces, we will commit or require that such security forces be employed in accordance with the Voluntary Principles on Security and Human Rights. Specifically, we will support or adopt screening measures to ensure that individuals or security force units who have been responsible for serious human rights violations are not employed. We will support efforts, or take steps, to engage with central and local authorities, international organizations, and civil society organizations to contribute to workable solutions regarding transparency, proportionality, and accountability in payments made to public security forces for the provision of security. We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, particularly artisanal miners where minerals in the supply chain are mined on an artisanal or small-scale basis, to adverse impacts associated with the presence of security forces, whether public or private, at mine sites.

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**Regarding the risk management of public or private security forces:**

In accordance with the company's specific position in the supply chain, we will immediately develop, adopt, and implement a risk management plan with upstream suppliers and other relevant stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as previously identified, where such a risk is deemed to exist. In such cases, we will suspend or terminate engagement with upstream suppliers after unsuccessful mitigation efforts within six months of adopting the risk management plan.

**Regarding corruption and fraudulent misrepresentation of the origin of minerals:**

We will not offer, promise, give or demand bribes and will oppose the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, duties and royalties paid to governments for the purposes of mining, trading, handling, transportation and export of minerals.

**Regarding money laundering:**

We will support efforts, or take measures, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising from, or in connection with, the extraction, trading, handling, transportation or export of minerals resulting from the illegal taxation or extortion of minerals at access points to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.


**Regarding the payment of taxes, duties and royalties due to governments:**

We will ensure that all taxes, duties and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are consistent with the company's position in the supply chain. We are committed to disclosing taxes and royalties along the supply chain. We are committed to disclosing such payments in accordance with the principles established by the Extractive Industries Transparency Initiative (EITI).

**Regarding the management of the risk of corruption and fraud, fraudulent declaration of the origin of minerals, money laundering and the payment of taxes, tariffs and royalties to governments:**

Depending on the company's specific position in the supply chain, we are committed to supply chain engagement and collaboration with suppliers, central or local government authorities, international organizations, civil society, and governments, as appropriate, to improve and monitor performance in order to prevent or mitigate the risks of negative impacts through measurable measures and within a reasonable timeframe. We will suspend or terminate engagement with upstream suppliers if mitigation efforts fail.

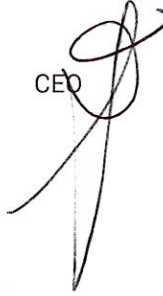
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Any report of violation of this Policy can be submitted through the web platform <https://www.caurum.com/whistleblowing/> or by writing to the email to [odv231@caurum.it](mailto:odv231@caurum.it).

This policy is reviewed annually.

San Zeno, 29/04/2026

CEO 

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Public – CAURUM S.r.l. Fraz. San Zeno, Strada A 36, 52100 Arezzo – Italy, Tel. +39 0575 99494

Web: [www.caurum.com](http://www.caurum.com)