

ARMANDO LUCCHETTA S.r.l. complies with applicable laws and relevant technical standards in its sector, ensuring constant information on updates and timely implementation of the same.

We are committed to complying with the RJC Principles and Standards of Procedure (COP) and the requirements of the CoC (Chain of Custody) Procedure, also in compliance with OECD guidelines, informing our Stakeholders (employees, collaborators, suppliers and Customers) about the various principles and disclosing them.

We are careful in assessing our risks, including risks to our business arising from our business associates, analyzing the most sensitive situations and implementing appropriate procedures and controls with respect to human rights, social principles and the environment.

Suppliers and external collaborators play a key role in improving the Company's overall competitiveness. The Company's relations with suppliers and external collaborators, in the pursuit of maximum competitive advantage, are marked by fairness, impartiality and respect for equal opportunities towards all those involved. ARMANDO LUCCHETTA S.r.l. requires its suppliers and external collaborators to comply with the principles and requirements set forth in this RJC Policy.

The policy will be displayed at the operational, commercial and administrative headquarters at Via Pio La Torre 26, 36061 Bassano del Grappa (VI) and published on the website www.lucchetta.it accessible to all Stakeholders.

We do not tolerate any kind of bribery of public officials, or any other party, in any form or manner, in any jurisdiction, even where such activities were in practice permitted, tolerated or not judicially prosecuted.

The payment of bribes or acceptance of any goods is prohibited.

We will not tolerate money laundering and/or the financing of terrorist activities.

We engage in Know Your Customer and Supplier activity and exercise utmost vigilance in our responsible supply chain from conflict and high-risk areas, specifically for the supply of gold, silver, diamonds and precious gems. For COC chain activation we purchase only CdC Material declared eligible from a CdC certified entity supported by appropriate CdC documentation. For COC certification, we commit to comply with the requirements and ensure internal traceability as defined in appropriate operating procedure by issuing the RJC- COC Material Transfer Form to the Customer.

We commit to purchase diamonds from supply chains that comply with WDC (World Diamond Council) guidelines and LBMA certified gold.

We are committed to ensuring measures for product security within the facility and during shipments to prevent theft, damage or substitution.

We are committed to maintaining the safety and well-being of employees, visitors and other relevant stakeholders who visit our company.

We pledge to fully and thoroughly disclose the characteristics of the products we sell.

We are committed to the principles of confidentiality and protection of confidential data.

We are committed to maintaining the safety and well-being of Employees, Visitors and other relevant Business Partners.

We believe in and are committed to respecting fundamental human rights and the dignity of the individual, in accordance with the Universal Declaration of Human Rights enshrined in the United Nations.

We do not tolerate the use of child labor.

We pledge not to use any form of forced, bonded, indentured, or prison labor, and not to restrict the freedom of movement of employees and subordinate workers.

We are committed to ensuring high health and safety standards in our headquarters and operations, including through the cooperation of the Occupational Safety Officer and the Workers' Safety Representative.

We pledge not to discriminate on the basis of race, ethnicity, caste, country of origin, religion, disability, gender, sexual orientation, union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restriction not permitted in the workplace, so that all "Fit to Work" persons are accorded equal opportunity without discrimination on the basis of factors unrelated to their ability to perform the intended task.

We pledge not to practice corporal punishment under any circumstances and to prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.

We undertake to establish a procedure for handling disciplinary disputes with respect to conduct that is inappropriate with respect to COP standards.

We undertake to comply with current legislation, regarding working hours and wages, in the absence of such legal requirements, to adopt the standards prevailing in the industry.

We are committed to safeguarding the surrounding environment:

- eliminating and where not possible reducing the use of toxic substances in production operations;
- minimizing the negative impact of our activities on the environment.
- by responsibly disposing of waste.
- By reducing the consumption of paper, water and energy.

Regarding serious abuses associated with the mining, transportation and trade of gold

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

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labor;
- the worst forms of child labor;
- human rights violations and abuses;
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately cease any engagement with upstream suppliers in the supply chain if we find a reasonable risk that they are engaged in or sourcing from or linked to a counterparty committing the abuses above (OECD- guidelines).

Regarding direct or indirect support for non-government armed groups, we do not intend to tolerate direct or indirect support for non-government armed groups, including but not limited to procuring gold, making

- payments or assisting or providing equipment to non-government armed groups or their affiliates who illegally control mining sites, transportation routes, gold marketing points, and upstream actors in the supply chain;

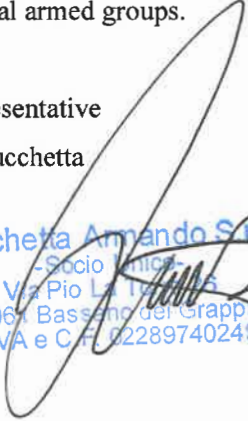
and/or

- tax or extort money or gold at mining sites, along transportation routes, or at gold marketing points, or from brokers, export companies, or international traders.

We will immediately cease all engagement with upstream suppliers in the supply chain if we find a reasonable risk that they are sourcing from, or connected to, a counterparty that provides direct or indirect support to non-governmental armed groups.

Legal Representative

Massimo Lucchetta


Lucchetta Armando Srl
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