

AREZZO REFINERY Co.,Ltd.

Supply Chain Policy

1. This policy to confirm Arezzo Refinery's commitment to respect human rights, avoid contributing to the finance of conflict and comply with all relevant UN sanctions, resolutions and laws, and comes into effect as of March 5, 2016.
2. Arezzo Refinery Co., Ltd. is a certified member of the Responsible Jewelry Council (RJC). As such, we commit to proving, through independent third-party verification, that we:
 - a. respect human rights according to the Universal Declaration of Human Rights and International Labor Organization Declaration on Fundamental Principles and Rights at Work;
 - b. do not engage in or tolerate bribery, corruption, money laundering or finance of terrorism;
 - c. support transparency of government payments and rights-compatible security forces in the extractives industry;
 - d. do not provide direct or indirect support to illegal armed groups;
 - e. enable stakeholders to voice concerns about the jewelry supply chain;
 - f. are implementing the OECD five-step framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas although we have chosen not to deal with any company in whatsoever form involved or engaged in the areas
 - g. are not buying or purchase or even processing any fresh mined fine precious metals, nor raw in whatsoever purity and concentration but only and exclusively industrial remains containing precious metals having exhausted its life cycle or compromised by quality or any other factors, or for whatever reason impossible to be used in their actual form or composition as typical in the industrial process and for the purpose they were originally manufactured**
 - h. will allow ourselves to purchase fine metals only when needed from certified entities such as LBMA GLD ; RJC CoC / Cop , (or RMI following practices) or any similar guidelines but only if certified by renown third party bodies (SGS ; Knight Frank , Bureau Veritas etc.etc.) and by that reasonably preventing Arezzo to deal unwillingly with unclear sources and doubtful traceability.
3. We also commit to use our influence to prevent abuses by others.
4. Regarding serious abuses associated with the extraction, collection, manufacture and transport or trade of precious metals:

We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of

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

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing abuses described in paragraph 4 or are sourcing from, or linked to, any party committing these abuses in whatsoever form

5. Regarding direct or indirect support to non-state armed groups:

We will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring diamonds (gems) or precious metals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- a. control mine sites, transportation routes, points where gold and precious metals are collected and traded and upstream actors in the supply chain;
- b. tax or extort money, or gold and precious metals at mine sites, along transportation routes or at points where gold and precious metals are collected, traded, or from intermediaries, export companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 6.

7. **Regarding public or private security forces:**

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4, or that act illegally as described in paragraph 6.

8. **Regarding bribery and fraudulent misrepresentation of the origin of minerals and gold:**

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of precious metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, collection, trade, handling, transport and export of precious metals.

9. **Regarding money laundering:**

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of minerals and gold.

Andrea Malfanti
C&SR Director

We, _____

a clientsupplier of AREZZO REFINERY CO.,Ltd , understand and acknowledge the provisions stated in this Supply Chain Policy and agree to comply with such provisions.

Representative's name _____

Date _____

Supplier's Signature and Stamp

Arezzo's Supply Chain Policy.docx