



Policy for the Supply Chain and Knowledge of Counterparty (KYC)

- 1 G and S srl is an Italian company producing silver jewellery and chains in gold, brass, bronze, silver filled and steel based in Arezzo.

We have 40 years of experience in jewelry manufacturing and produce:

- Silver chains
- Silver jewellery
- Semi-finished silver products
- Chains in brass and bronze
- Silver filled chains
- Steel chains
- Gold chains

Our chains are available both finished or on spool. All our products are nickel, cadmium and lead free. We serve wholesalers, chain stores, department stores but WE DO NOT SUPPLY single stores.

This policy confirms the commitment made by G and S srl in order to respect human rights, avoid contributing to the financing of conflicts and comply with all relevant United Nations sanctions, resolutions and laws.

- 2 G and S srl is a certified member of the Responsible Jewellery Council (RJC). As such, we are committed to providing evidence, through independent external verification, that:

- a. we respect human rights in accordance with the Universal Declaration of Human Rights and the Declaration of the International Labor Organization on principles and fundamental rights in the work;
- b. we do not engage in or tolerate bribery, corruption, money laundering or terrorist financing;
- c. we support the transparency of state payments and security forces compatible with the protection of rights in the extractive industry;
- d. we do not provide direct or indirect support to illegal armed groups;
- e. we set up processes through which stakeholders can raise concerns relative to the jewellery chain;



f. we implement the OECD regulatory framework in five steps as a management system (and, where applicable, also the supplement for the gold sector) for the due diligence activities based on the risk, relating to the supply chains responsible for minerals from conflict-affected and high-risk areas.

- 3 3. Furthermore, we are committed to using our ability to influence to avoid abuse by others. Thanks to its Supply Chain Policy and the monitoring developed by the risk analysis, G and S srl intends to address the risks of non-compliance by suppliers.

In the face of evidence of criticality or discrepancies from the COP of the RJC, a Complaints Management procedure will be activated which in the most serious cases provides for direct communication with all the interested parties and for less serious occurrences, the commitment and dialogue at level with complaints that can be resolved through the policy officer.

- 4 Regarding serious abuses associated with the extraction, transport and trade of gold We do not intend to tolerate or profit from, help to, assist or favor:

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

- 5 We will immediately cease all commitments with suppliers upstream of the supply chain if we find a reasonable risk that they commit the abuses referred to in paragraph 4 or procure from or are connected to a counterparty that commits the aforementioned abuse.

- 6 Regarding direct or indirect support to non-governmental armed groups We do not intend to tolerate direct or indirect support to non-governmental armed groups, including, the procurement of gold from, the making of payments to or the assistance or supply of equipment to non-governmental armed groups or to them affiliates who, illegally:

- a. control mining sites, transport routes, gold trading points and upstream operators in the supply chain;
- b. tax or extort money or gold at mining sites, along transport routes or at gold trading points, or from intermediaries, export companies or international traders.

- 7 We will immediately cease all engagements with upstream suppliers if we find a reasonable risk that they are sourced from, or are linked to, a counterparty providing direct or indirect support to non-governmental armed groups.

- 8 Regarding public or private security forces

We confirm that the role of public or private security forces is to ensure the safety of workers, plants, equipment and property, in accordance with the law, including the law that protects human rights. We do not intend to provide direct or indirect support to public or private security forces.



9 Regarding corruption or false declarations of the origin of gold

We do not intend to offer, promise or seek bribes and we intend to oppose the solicitation of bribes, the request to conceal or disguise the origin of the gold, or to misrepresent taxes, duties, fees and royalties paid to governments for the purpose. of extraction, trade, handling, transport and export of gold.

10 Regarding money laundering

We intend to support the efforts and contribute to the elimination of money laundering where we identify the reasonable risk of money laundering arising from or related to the extraction, trade, handling, transport or export of gold.

11 With regard to the knowledge of the procedures of the money laundering counterpart G and S srl intends:

- a. Determine the identity of the counterpart by checking the identification data issued by the government. Based on the risk assessment or applicable law, establish the beneficial owner and the owners / shareholders of the counterpart.
- b. Verify that the counterpart and, where applicable, beneficial owners do not appear on government lists of individuals or organizations involved in money laundering, fraud or involvement with banned and / or conflict-sponsored organizations.
- c. Ensure up-to-date knowledge about the nature and legitimacy of their business.
- d. Monitor transactions for unusual or suspicious activity and report any suspected cases of money laundering or terrorist financing to relevant authorities.
- is. Keep the data adequately for a minimum of five years or for the period required by national legislation, if longer.

Signed / approved: Marco Casprini

Effective Date:

5.11.2020