



Giusto Manetti Battiloro S.p.A.

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Capitale Sociale € 2.400.000 i.v.

RESPONSIBLE GOLD POLICY STATEMENT

Giusto Manetti Battiloro, always sensitive to the ethics of enterprise, has long adopted a commitment by maintaining a Management System for Social Responsibility.

The CSR allows us to intervene and operate on the market in accordance with the principles and ethical values such as fairness, transparency, respect for workers' rights, health and safety.

Given the peculiarities of its products and raw materials used Giusto Manetti Battiloro has also established a policy for the procurement of "Responsible Gold" or "No Conflict Gold".

Recognizing that risks of significant adverse impact may be associated with the extracting, trading, handling and exporting of minerals from conflict-affected zones and high-risk areas and recognizing that we have the responsibility to respect human rights and to avoid contributing to conflict, Giusto Manetti Battiloro undertakes to adopt the following policy on responsible gold sourcing from conflict-affected and high-risk areas at a time:

- Do not tolerate, contribute to, assist or facilitate :
 - Any form of torture, cruel, inhuman and degrading treatment;
 - Any form of forced or compulsory labor, being any work or service that people are forced to do against their will under threat or punishment;
 - Illegal and / or unacceptable child labor;
 - Other human rights violations and abuses such as widespread sexual violence;
 - War crimes and other serious violations of international human rights, crimes against humanity or genocide;
- Immediately suspend commercial relations with customers and suppliers for which has been identified a reasonable risk that they only source or are connected to the parties involved with the serious violations involved above;
- Do not tolerate any direct or indirect support to non-state armed groups such as:
 - Illegally control extracting sites or routes, points where minerals are traded and actors up the supply chain and / or
 - Extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded and / or
 - Illegally require money to intermediaries, export companies or international traders;
- Immediately suspend commercial relations with customers and suppliers for which has been identified a reasonable risk that they only source or are connected to parties that support directly or indirectly non-state armed groups as defined above;
- Do not offer, promise, give or require any form of bribe to hide or disguise the origin of the minerals or to evade the contributions due for the extraction, trade, transport or export of minerals;
- Support efforts and help prevent and detect money laundering and terrorist financing, where we identify a reasonable risk related to the supply chain and distribution of precious metals;
- Implement procedures to demonstrate that no source of supply of pure gold is involved in conflicts, recycling, human rights violations and terrorism financing;
- Apply a course of action to take account of 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 the serious human rights Human and implement a strategy to respond to the risks identified;



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- Keep records of counterparties and transactions in gold to demonstrate the application of an appropriate and consistent implementation and monitoring procedures.

Campi Bisenzio, 01 of September 2016

Giusto Manetti Battiloro S.p.A.