

SUPPLY CHAIN DUE DILIGENCE POLICY

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt the following policy on responsible sourcing of precious metals from conflict-affected and high-risk areas.

- Neither tolerate, contribute to, assist with or facilitate the commission by any party of:
 - any forms of torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - illegal and/or unacceptable forms of child labour;
 - other human rights violations and abuses such as widespread sexual violence;
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Immediately suspend or discontinue engagement with customers and suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.
- Not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals who:
 - illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
 - illegally tax 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 tax or extort intermediaries, export companies or international traders.
- Immediately suspend or discontinue engagement with customers and suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined above.
- Immediate suspend or discontinue engagement with upstream suppliers where we identify a probable occurrence that they are sourcing from, or linked to, any party providing direct or indirect support to public or private security forces with illegal practices or committing human rights abuses.
- Not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.
- Support efforts and contribute to avoid and disclose money laundering and financing of terrorism where we identify a reasonable risk of money-laundering and financing of terrorism resulting from, or connected to the supply and distribution chain of precious metals.
- Establish strong management systems integrated with LBMA Responsible Gold and Responsible Silver Guidance and LPMM Responsible Platinum and Palladium Guidance and Code of Practice and Chain of Custody of Responsible Jewellery Council including Know Your Customer process, useful for demonstrating that no source of raw materials for the production of pure precious metals is involved in conflicts, money laundering, human rights abuses and terrorist financing.
- Perform appropriate due diligence on a risk based approach over our counterparties before doing any business and ongoing monitoring of the relationship in order to assess the risk of contribution to conflict, money laundering, terrorist financing and serious human rights abuse and implement a strategy to respond to identified risk.
- Maintain adequate records of the supply chain documentation to demonstrate that appropriate and ongoing due diligence have been followed.
- Develop an ongoing precious metals supply chain training programme for all staff involved in the precious metals supply chain.

Chimet S.p.A. put in place the following e-mail address quality@chimet.com allowing any employee, supply chain actor, or stakeholder to voice concerns over precious metals supply chain or any newly identified risk.

Badia al Pino, 13th May 2019

The President of the Board
