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ETHICAL PRINCIPLES AND BUSINESS POLICY AND PROGRAMMING

Since 1953 our company has been producing a vast and complete assortment of components for goldsmiths and jewelers in Valenza.

By tradition, **BOTECCHI IVO Srl** continues to seek the affirmation of its industrial and commercial activities pursuing objectives of transparency and reliability both of its products and of its social and industrial relations, basing its values not only with the maximum guarantee of quality and functionality of its products, but also engaging in the constant search for improvement to offer products that are in no way harmful and dangerous for end consumers, to be carried out through processes

productive and commercial practices that respect the rules and regulations, the environment, the health and integrity of its employees and collaborators.

In particular BOTECCHI IVO Srl actively pursues:

- The preparation of company mechanisms and systems that allow the highest levels of efficiency and transparency towards suppliers and customers.
- The creation of working conditions that guarantee to employees and collaborators the performance of the activity in a satisfactory and equitably paid manner, without ethnic, political or religious discrimination, in healthy and non-hazardous environments.
- The pursuit of profitability in compliance with customer requirements and the rules that regulate its
 production sector, observing the principles of free and fair commercial competition without resorting to
 behaviors that generate corruption of any nature in the economic or institutional system.
- Attention to the environment in which it operates with the use of adequate resources for the protection
 of the territory and the improvement of the environmental impact of its production processes through
 technological and system investments.
- Communication and contacts with the social fabric in which it operates, with the authorities of the
 territory for the better understanding and application of the regulatory systems, the particular needs of the
 community and the realization of a contribution to development and to economic and social improvement.
- The establishment of collaborative relationships with qualified suppliers that operate with industrial principles and policies in line with the principles of legality and transparency of BOTECCHI IVO Srl, helping to improve the achievement of corporate objectives effectively and efficiently.
- Care, defense and enhancement of company assets, consisting of material values and human knowledge.

These principles are concretely pursued by the company through:

- The choice of internal procedural systems that guarantee the observance of national and international
 rules governing employment contracts and respect for human rights and political, religious and trade union
 freedom, tax and customs compliance, prevention provisions the laundering of capital and assets deriving
 from illegal activities, as well as any activity aimed at capturing advantages through corruption of
 institutional or commercial partners.
- The constant internal communication and with its external partners to prevent non-conformities, improve
 internal control processes, stimulate the adoption of business principles consistent with the principles of
 BOTECCHI IVO Srl and disclose sector information
- The voluntary adherence to procedures for the verification of one's own internal organization, of its own
 production chain and of its supply chain of precious metals certified by external institutions according to
 the guidelines issued by OECD (Organization for Economic Co-operation and Development) and by other
 qualified associations for the responsible sourcing of gold and for the affirmation of ethical, social and
 environmental practices responsible in the precious metals production chain. In practice, BOTECCHI IVO SrI
 procures gold only from certified LBMA and / or RJC suppliers.
- The effective commitment to promulgate the culture of legitimacy and ethical behavior with customers and suppliers, also with regard to the gold supply chain, committing to promote adherence to the principles and methods that its partners:
- They allow to transform and produce with materials that do not come from areas of conflict, or from proceeds of illegal activity or from sources that do not respect human rights.
- They allow to produce in respect of the environment and of the communities interested in the industrial processes of the entire processing chain.
- They promote the rights and dignity of workers and those who make contact with the company.

As part of this corporate policy, **BOTECCHI IVO Srl** is committed to respecting transparency, reliability and legality, and is also committed to selecting commercial and industrial partners that can ensure respect for human rights and the rights of the child according to United Nations resolutions and that can guarantee the acquisition of precious metals from legitimate sources, not involved in the financing of conflicts, terrorist actions or the result of money laundering unlawful.

Furthermore, always in compliance with the aforementioned policy, **BOTECCHI IVO Srl**, is a Member of the Responsible Jewelery Council (RJC).

The Responsible Jewelery Council (RJC) is an organization set up to promote responsible ethical, human rights, social and environmental practices throughout the jewelery supply chain.

As an RJC Member, we are committed to conducting our business in accordance with the RJC Code of Practice. We are committed to integrating and disseminating ethical considerations relating to human, social and environmental rights in our daily activities, in corporate planning and in decision-making processes.

